

50-352

LEWIS
2004 BRADFORD TERR.
PHILA, PA. 19149

Darrell Eisenhut
Division of Licensing
USNRC

Dear Mr Eisenhut;

A letter from Mr Kemper of PECO arrived today. It was a copy of a letter sent to you on Dec. 27, 1983. The letter said that PECO hoped to begin fuel loading on or before Aug. 1, 1983.

I have several letters in front of me that make such a schedule totally inappropriate and even dangerous. The first letter is from Mr Starostecki to Mr Kemper of PECO. The Subject of the letter is NRC IE Bulletin 83-06 (Non Identical Replacement Parts) Request for Extension of Response Time, dated 22 Dec. 1983.

In Mr Starostecki's letter from the NRC granting extension of time to make sure that replacement parts will do the job to which they are originally designed, The NRC grants Peco a 90 day extension.

These replacement parts will be used in many of the systems directly and indirectly involved in fuel loading. There will not be sufficient time for the NRC to qualify PECO's response as adequate and safe if the fuel loading is scheduled or allowed by Aug. 1 or sooner. Many of the problems with replacement parts have been subtle and hard to find until they smack a reactor system out of functioning.

I shall use the examples in the IE Notice 83-06 to demonstrate my wariness of PECO's accelerated fuel loading schedule.

Check valves: Check valves are used extensively all over the nuclear industry as part of leakage correction maintenance. Even the newest reactors have minor leaks. Limerick would be a very improbable reactor if it did not have check valves installed as part of the leakage maintenance system. Also this leakage maintenance system would have to be qualified and in operation to keep the fuel loading from being a very wet and messy operation. Although the fuel itself might be loaded safely, surely subsequent leakage maintenance without check valves would be both messy and dangerous to workers. Starting fuel loading without qualifying check valve replacement parts is just asking for increased difficulty handling spills and leakage maintenance with attendant increased and unnecessary exposure to workers and possibly the public.

At least two types of control switches are mentioned in the IE Notice 83-06. Control switches are used in all control functions in a reactor and the loading system. In fact, a problem about control switches in the polar crane at TMI#2 may have caused a Bechtel employee to be transferred to the SW. I do not understand how the transfer of an employee of a subcontractor fixed a control switch problem, but apparently the NRC feels that was sufficient fixing needed on the control switches. I hope more direct solutions will be used to guarantee that there will be no fuel drops during loading at Limerick. One such solution might be to qualify all replacement parts for all switches before fuel loading at Limerick. In the haste of fuel loading an unqualified replacement part might just accidentally find its way into a control switch. This cannot happen if all replacement parts are qualified before fuel loading. An unqualified replacement part for any control switch should not be allowed on site.

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Another part that is mentioned in the IE Notice 83-06 is air operated pilot valves. There are many air operated valves in the various systems of the Limerick reactor. There is not telling at this time the effect of the failure of one or more of these valves. Many of these valves will have had replacement parts already installed due to the testing required to qualify them. Until and unless all of these valves are qualified including their respective replacement parts, there is a lack of safety ~~in~~ inherent in their use.

Battery power is essential for loss of offsite power. During fuel loading battery power will be especially essential since there will be no reactor generated power. ~~Also~~ Also diesel generator power will also be dependent upon the very control switches previously mentioned in this letter. This leaves a reactor during fuel loading very and usually more than usually dependent upon battery power during fuel loading. This means the batteries must be up to full charge. The batteries cannot be up to full charge with defective circuit boards. Defective circuit boards that kept the batteries from getting up to full charge were one of the problems cited in the IE Notice.

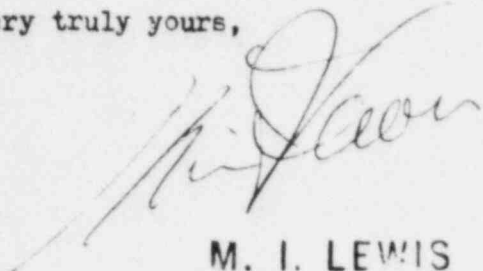
The above concerns are not comprehensive, definitive or complete. They do show a pattern that is most disturbing and indicative of a lack of concern for ~~safety~~ safety.

I sincerely hope that the NRC will not allow fuel loading in a Limerick reactor that has not even met substantial concerns voiced in IE Notice 83-06 over a year ago.

Another concern that has arisen recently is that pipes on the Limerick site were allowed to freeze. The weather was especially cold. This freezing of pipes is an old problem at nuclear power plants. It was supposedly settled years ago by the addition of heaters where needed. I hope that the NRC will check this problem out at Limerick. If the fuel loading date is really August, the necessary heaters should have already been in place and operable.

Further, I am very concerned that the external water sources for Limerick can also freeze. Both the Perkiomenk and the Schuylkill Rivers freeze solid on occasion. I have seen them so frozen. I am apprehensive that a company that cannot keep on site piping from freezing have done sufficient work to make sure their off site supply or supply piping will not also freeze. One thing for sure is that there won't be a hard freeze in August.

Very truly yours,

 12/30/83
M. I. LEWIS
6504 BRADFORD TERR.
PHILA, PA. 19149

ENVIRONMENTAL COALITION ON NUCLEAR POWER

Headquarters: 433 Orlando Avenue, State College, Pa. 16801

M. I. LEWIS
6504 BRADFORD TERR.
PHILA, PA. 19149

Darrell Eisenhut
USNRC
Washington, D.C. 20555

