



AIR and WATER RELATED CORRESPONDENCE

Pollution Patrol

BROAD AXE, PA.

April 25, 1984

DOCKETED
USNRC

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

'84 APR 30 A11:16

BEFORE THE SAFETY AND LICENSING BOARD

OFFICE OF RECORDS
DOCKETING & SERVICE
BRANCH

In The Matter Of
PHILADELPHIA ELECTRIC COMPANY
(Limerick Generating Station,
Units 1 and 2)

Docket Nos. 50-352
and 50-353

AWPP RESPONSE TO "APPLICANT MOTION TO STRIKE TESTIMONY OF AIR AND WATER POLLUTION PATROL CONCERNING CONTENTION VI-I"

AWPP regards, as stated in its Testimony submitted April 16, 1984 that the Contention VI-I involves four aspects namely, (1) failure to properly control performance of certain welding, (2) failure to properly inspect certain welding in accordance with Quality Control and Quality Assurance procedure, (which AWPP considers partially results from improper sampling and auditing), (3) failure to take proper and effective corrective action when improper welding was discovered, because of inadequate concern for specified procedure, and (4) failure to take proper preventive actions when improper welding was discovered because of breakdown in Quality Assurance. In total AWPP interprets the wording of the Board as more than just improper welding not discovered by inspectors and not dispositioned properly.

While AWPP (Romano) was not able to obtain witnesses in welding itself, because of fear of reprisal or loss of jobs, Mr. Romano has experience in Quality Control and Quality Assurance, and indicated such in testimony relating to Contention V-4.

AWPP states the elements of Quality Control and Quality Assurance are essentially similar as it relates to adherence to specified, tested, and proven procedure, properly detailed in 10 CFR Appendix b to insure no deviation of workmanship, performance, inspection and corrective action...so that there is no deviation from results desired. Applicant has deviated from procedures (see page 99 line 11 to 14 of 3/15/85 and 100, line 6,23 deposition of Mr. Boyer and Mr. Clohecyc). Hundreds of NRC IE reports attest

8405020019 840425
PDR ADOCK 05000352
G PDR



AIR and WATER
Pollution Patrol
BROAD AXE, PA.
(2)

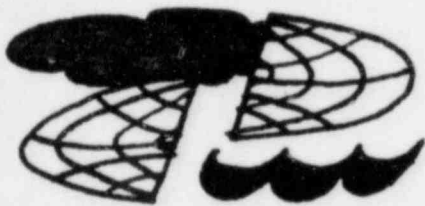
AWPP Response To "Applicant Motion To Strike" continued:

to the fact that the Applicant not only many times, improperly deviated from specified procedure, but even changed procedures arbitrarily, which Mr. Boyer states is use of "judgement". The use of judgement in the manner in which Mr. Boyer has inferred is contrary to Quality Control and Quality Assurance (see page 99-100 of March 15, 1984 AWPP Deposition.

Further, as an EPA approved laboratory director of an EPA approved laboratory, I am subject to Quality Control and Quality Control regulations. The essence of Quality Control and Quality Assurance, therefore, is inherent in the type of consideration in which I have 25 years experience. (See page 3 at *)

Further, Quality Assurance does involve the performance capability of welders, and the Board rightfully sought persual of a dangerous situation involving welding fraud known to have been practiced elsewhere. The Applicant should seek to include the scurity of the Board for the safety of the public and the elimination of such criminal practice. The Applicant should support this scrutiny.

The Applicant states AWPP (Romano) did not file Dr. Iverson's professional qualifications. However, AWPP did state Dr. Iverson was a Professor of Statistics at Swarthmore College. Dr. Iverson obtained his PhD in statistics from Harvard, was certified as an expert witness in Federal Court and is mainly qualified to testify on whether or not certain samples of welds) and audits met the scientific standards to assure highest probability of validity in making conclusions from sample observations made, as it assures or does not assure the highest degree of public safety. Only with scientific sampling and auditing of the weld population can the crucial aspects involved in assuring safe construction receive severe examination. The admitted use of "judgement" by inspectors and even as Mr. Boyer stated might be used by welders, is opposed to the principle of Quality Assurance (see page 54, line 6 of



AIR and WATER Pollution Patrol

BROAD AXE, PA.

(3)

stated might be used by welders, is opposed to the principle of Quality Assurance (see page 54, line 6 of March 15, 1984 AWPP-Applicant Deposition).

To permit an expert, Dr. Iverson, to testify on the validity of Applicant's audits upon which conclusion of proper workmanship and corrective action is based, which apparently has not been done at Limerick, is to be honest with the real world of reactor construction as it may affect the safety of millions. Bechtel Corporation's record at Midland, and recent disclosure of Bechtel Corporation's Korean scandal merits closer scrutiny of its work at Limerick. AWPP challenges the auditing process and the Applicant's auditors capability as to statistically proper methods, as it can impinge on public safety.

The final test of proper or improper welding performance and proper or improper correction of infractions fully involves sampling and auditing. The numerous NRC reports that raise questions of assurance of ultimate performance requires a severe challenge. Such a challenge can only come from an inspection of auditing practices used by Applicant and Staff. This can only be done via an independent scientific analysis of the Limerick weld sampling and auditing procedure by a qualified expert statistician, such as Dr. Iverson's scrutiny can provide.

Respectfully submitted,
AIR & WATER POLLUTION PATROL
Frank R. Romano, Chairman

FRR/jch

*While Applicant sought to limit my experience to studies of air and water which I submitted as pertinent qualifications in testimony for Carburetor Ice (V-4), my experience is broadly across chemical analysis, for example, analysis of brass and bronze and welding rod analyses for the United States Navy Department.

We certify the above has been served on the latest Service List.