

# AIR and WATER Pollution Patrol

BROAD AXE, PA.  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Aug. 13, 1984

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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In The Matter Of  
PHILADELPHIA ELECTRIC COMPANY  
(LIMERICK GENERATING STATION  
UNITS 1 AND 2)

Docket Nos. 50-352  
and 50-353

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AWPP PROVIDES FURTHER SUPPORT FOR REOPENING CONTENTION VI-I re  
WELDING AND WELDING INSPECTION INFRACTIONS AT LIMERICK

No doubt the Board is aware of the Aug. 3, 1984 letter from the office of Thomas T. Martin, Director, Division of Engineering and Technical programs of the NRC, to John S. Kemper, Vice-President Engineering and Research of Philadelphia Electric Company. The subject of the letter was Inspection No. 50-352/84-29, dealing with the Pre-service Non-destructive Examination that found "lack of fusion" in safety related pipe welds at the Limerick Unit No. 1 nuclear reactor.

No doubt the Board is also aware that these welds on safety-related piping had, through the Applicant's Quality Control and Quality Assurance program been recorded as properly performed throughout, including final inspection. The fact that the Applicant can claim they were found, does not at all indicate efficiency of the Q.A. program, as the Applicant will allege.

In reality, as AWPP (Romano) has repeatedly contended before the Atomic Safety and Licensing Board, the Applicant's Quality Assurance program has, since construction began, resorted to a program which instead of assuring that welding was properly performed, degenerated into a program that even permitted welders and inspectors to use their own judgement as per p.54, line 6, and p.96, line 3, of V. Boyer, March 15, 1984 Deposition by AWPP. Such a program could assure only that when a faulty weld was found, it would be dispositioned one way or another as no problem.



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(2)

AWPP Provides Support For Reopening Contention VI-I continued:

We now see that same easy method of disposition, namely, the rationalization by the Applicant, even at this late stage with fuel rods already in the reactor building. In the Kemper letter, Applicant requests that it not be required to concern itself about pre-service tests that were done on twelve pipe welds, some of which showed definite indications of "lack of fusion". As a former laboratory apparatus glass blower for the U.S. Navy Laboratory in Philadelphia, I know that lack of fusion means careless technique, improper torch and heat application and ultimately failure due to stress in glass...and the same in metal.

In the June 6, 1984 letter, Applicant, via J. Kemper to A. Schwencer of the NRC, asked the NRC to forget the "lack of fusion" finding via the ASME Code XI, on the basis that if the Applicant had not used Code XI (ultrasonic inspection) but used the ASME Code III using radiographic analysis, the lack of fusion would not have been found...and, therefore, would not require dispositional correction for weld metal which had not fused properly.

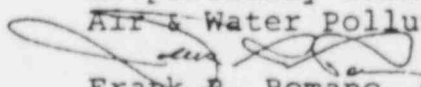
Even if only one of the twelve welds given the pre-service examination showed lack of fusion, on the basis of just one of the two million welds at Limerick, it would calcualte to involve 85,000 questionable welds.

Therefore, it is not a matter to just be discussed and an agreement made between the Applicant the the NRC by a paper arrangement of the shift from Code III and Code XI. This is a matter of indications of welds previously recoreded as O.K. to now being questioned as to proper fusion, which the Code III method used at Limerick could not always show, if at all.

In an atomic reactor plant, unresloved questionable items could result in a cloud of radioactive dust over an entire state...with death and destruction along every highway.

AWPP (Roman0) calls for a full scale re-inspection, not just because of the "lack of fusion" affair, but because it corroborates everything AWPP (Romano) questioned in the unbelievable "Broomstick Affair" revelations.

Respectfully submitted,  
Air & Water Pollution Patrol

  
Frank R. Romano, Chairman