

AIR and WATER Pollution Patrol

BROAD AXE, PA.

March 19, 1986

DOCKETED
USNRC

86 MAR 24 10:46

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

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

BEFORE ADMINISTRATIVE JUDGES:

Ivan W. Smith, Chairman
Richard F. Cole
Gustave A. Linenberger, Jr.

In The Matter Of
PHILADELPHIA ELECTRIC COMPANY
(Limerick Generating Station
Unit 1)

Docket No. 50-352-OLA-1
[ASLBP No. 86-522-02-LA]
(Check valves)
Docket No. 50-352-OLA-2
[ASLBP No. 86-526-04-LA]
(Containment Isolation)

SUPPLEMENT OF AIR & WATER POLLUTION PATROL (AWPP) OF
FEB. 24, 1986 RESPONSE TO DOCUMENT DATED 1/27/86) TO
MR. E. C. BAUER, PHILADELPHIA ELECTRIC COMPANY, FROM
THE NRC WHICH RELATES TO LIMERICK GENERATING STATION,
UNIT 1. THIS DOCUMENT, IDENTIFIED AS "MONTHLY NOTICE;
APPLICATIONS AND AMENDMENTS TO OPERATING LICENSES IN-
VOLVING NO SIGNIFICANT HAZZARD CONSIDERATIONS, DATED
DEC. 26 and 30, 1985 AND JANUARY 9, 1986".

Air and Water Pollution Patrol /Romano (AWPP) seeks to show
that Philadelphia Electric (P.E.) Company's long standing con-
tempt for NRC regulations and specified procedures can signifi-
cantly increase the potential for accident that will endanger me
my family, members of AWPP and the public.

On the other side, the NRC, via partiality to P.E., has di-
rectly or indirectly allowed a pattern of carelessness that now
AWPP contends disqualifies P.E. from seeking exemptions from any
inspections what-so-ever. The Associated Press reports stated
the shuttle disaster may have resulted from 80% of spec. waived on
key shuttle parts...how many already waived for Limerick?

Contempt by P.E. for NRC regulations, if occurring at any
activity, other than governmental, would be labeled as fraud. It
is this already-experienced potential of P.E. to even falsify
statements to the NRC that the danger in allowing exemptions lies.
I refer to IE 76-06-01 when in 1976, it came to light via other
welders, that difficult welds at certain elevations were being
done by unqualified welders. These welds, however, were being re-
corded as O.K. by an inspector who skipped inspections.

8603250237 860319
PDR ADOCK 05000352
G PDR

Supplement of AWPP of Feb. 24, 1986 response continued:

Philadelphia Electric disagreed that the welds were improper, but after a forced re-inspection proved they were improper, P.E. agreed to re-inspect other welds supposedly inspected by that errant inspector. In as much as this incident involved safety, I asked the NRC, during the past three years, to require P.E. to prove such welds were reinspected. Because of conflicting information supplied by P.E. both to me and the NRC, in July, I influenced the NRC to require legal affidavits from P.E. representatives, as they repeatedly stated, that all welds were reinspected.

On August 10, 1983, John S. Kemper, Vice-President for P.E.'s Limerick reactor admitted that questioned welds previously stated to be reinspected and found to be properly performed, were actually not reinspected. (J. S. Kemper, Affidavit of 8/10/83)

Report 86-02 now details (again softly) Pipe rupture on the first week of Jan., 1986, attesting to danger to the public from improperly performed welding with release of radioactive water outside the reactor building (as in 76-01 report).

Further as it relates to softness on the part of the NRC, I.E. report #76-09-02 described "six major areas of defects" found on removal of concrete forms. The report describes a "honeycombed" wall with holes as deep as five feet into a six foot wall enclosing the reactor vessel, one hole being large enough to drive a Volkswagen through as stated by one former employee.

Mr. Boyer, Senior Vice President for the Limerick reactor received the above report which stated 3600 tons of grout cement was used to patch defects in that wall. Regarding the defective concrete the report further states that P.E. personnel (1) did not check that something was wrong until many loads of concrete were placed, (2) that when found out did not report it properly, (3) nor make required follow up procedures to insure correction. Again AWPP contends that radioactive steam that condensed and seeped through the concrete wall (I.E. 86-02) was capable of seeping through because of poor concrete placement.

That was in 1976 the pattern of carelessness continues: Approximately 120 LER's of inexcusable careless, contemptuous acts, like missed inspections, missed fire watches, etc. One could have devastated Pennsylvania. A detector was installed to detect lethal phosgene gas which could contaminate the fresh air line to the Limerick reactor control room...the very heart and brain of the reactor safety. Almost one year after installation, it was accidentally found that the phosgene gas detector, which would sound an

Supplement of AWPP of Feb. 24, 1986 response continued:

alarm when phosgene reached the danger limit of 3.5 parts per million (ppm), would not be activated because the detector was carelessly left at 50 ppm when installed. Think of it...for almost one year, if there had been a quick build-up of phosgene gas, no alarm would sound until the gas reacted 50 ppm, with all control room operators dead at the controls. Such a situation could mean a runaway meltdown accident bringing death and devastation to the State of Pennsylvania.

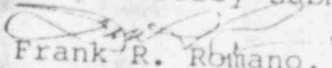
"Dangerous Properties of Industrial Materials", the chemists Bible, conforms that in a quick build-up, "there may be no immediate warning that dangerous concentrations of the gas are being breathed", and that phosgene gas [at] "50 ppm is rapidly fatal after even short exposure".

Exemptions and improper follow up of this type of situation and its potential for accident demands there be no exemptions since there is already too many safety questions, as above, to allow other leeways.

The mishap at the Kerr-McGee Sequoyah plant which killed one worker and radiated others exemplifies the contempt at nuclear plants which spawns unbelievable errors. (read Sequoyah)

AWPP feels Limerick is an accident waiting to happen, Admitted inadequate evacuation plans beg that there be no exemptions ...beg that increased care be taken...not less.

Respectfully submitted,


Frank R. Rothano, Chairman
AIR & WATER POLLUTION PATROL
61 Forest Ave.
Ambler, Pa. 19002