

I suspect the structural integrity of all dry cask storage containers designed by Holtec International and fabricated by U.S. Tool and Die (UST&D) for utilities such as Exelon/ComEd, Southern Nuclear Operating Company, New York Power Authority, etc. All the nonconformance condition disposition of Use-As-Is, Rework, and Repair by UST&D is in violation of 10CFR 71 & 72 Quality Assurance Program for design Control. UST&D is not an approved design organization and its QA Program clearly reflects that they do not have a design capability. Use-As-Is and Repair dispositions are considered as the Design Change and should be evaluated and documented by engineering analysis in the same manner as the original design. UST&D had disposition many nonconformance conditions under UST&D's QA Program without the Holtec International consent who was the designer.

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In addition, Holtec International QA Manager, Mr. Mark Soler, had a misunderstanding and inadequate knowledge of the differences between Repair and Rework and the applicable codes. He challenged Oscar Shirani's finding against Holtec's QA Program in this regard, but later agreed with him. He was misinterpreting the definitions in ASME NCA-3800 and ASME NCA-4000. Hence, he had implemented inadequate/incomprehensive quality assurance oversight activities for all the nonconforming conditions, which were disposition as Use-As-Is, Repair, and Rework. Mr. Soler fixed his procedures and the applicable forms to close the audit finding toward the end of the dry cask projects. I suspect whether Mr. Soler of Holtec performed any design reconciliation and documentation for all the dry cask storage containers and associated parts impacted by disposition of use-as-is, repair, and rework at UST&D that were already built and delivered to nuclear plants.

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Oscar Shirani's Potential Part 21 issue to Zion Station (Ref: ATTACHMENT 15) was not considered and investigated by ComEd. The issue may also be applicable to other ComEd's older vintage plants such as Dresden and Quad Cities. (This is definitely a significant public safety concern). The details were maintained in my personal files which, were taken out by ComEd after exiting me with humiliation and disgrace. This issue was an area of my expertise in valve seismic analysis and I was the manager of Motor Operated Valves (MOV) Seismic and Weak Link Analysis per USNRC GL 89-10 Program for over three years at ComEd.

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I suspect some of the ComEd design valve qualification and seismic analysis except the MOVs covered under NRC GL-89-10 Program in which I managed up until November 1994 and their impact on piping analysis and structural supports at the older plants. The valve manufacturers assume that the valves are rigid, but this assumption should be validated by the licensee to calculate the natural frequencies of the valves in connection to piping analysis. At some of my audits of engineering organization who were working for Exelon/ComEd, this area was found to be very ambiguous for engineering companies and they were stating that this was not part of their scope of work under their contract with ComEd.

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