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October 6, 1972

Mr. Frank E. Kreusi, Director
Directorate of Regulatory Operations
U. S. Atomic Energy Commission
Washington, D. C. 20545

Re: Consolidated Edison Co.
of New York (Indian Point,
Unit No. 2)
Docket No. 50-247

Dear Mr. Kreusi:

On September 26, 1972, Mr. William Cahill of Consolidated Edison sent you a report on the defects discovered in 46 vent drain assemblies within the primary system pressure boundary of the Indian Point No. 2 reactor. There are several problems with this report which we want to emphasize and to urge you to require that corrective steps be taken.

First, the report is no report at all but merely a set of self-serving subjective conclusions unsupported by any objective data. For instance the "Corrective Action" section states that defective welds are being replaced and defective vent connection pipe nipples are being replaced" in accordance with specifications" but in neither case does the Applicant explain the precise corrective steps being taken or present facts from which it can be concluded that the system will be as safe as if it had never been defective. Similarly, the "Safety Implications" section asserts that "if any non-isolatable vent/drain assembly failed (emphasis added) there could be an orderly shutdown but no statistics or analysis are presented to justify this and in any event the issue is not failure of any of the 46 defective assemblies but rather failure of all of them at the same time as the result of the common defect.

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A second and even more disturbing deficiency in the report is the failure to explain how these 46 defective assemblies passed all previous quality assurance checks. The defective welds were apparently the result of the welders using a type of weld not authorized. This was not a mere accident but a systematic failure to follow instructions. The defective pipe nipples were delivered and accepted presumably after inspection by the manufacturer and the contractor and yet the defects were not discovered. The real issue is what corrective steps has Con Ed taken to eliminate any similar defects in the quality assurance program and how many other defects have escaped discovery.

As you know, this is not the first time that defects have been uncovered at Indian Point No. 2 after several quality assurance checks had been made and had failed to uncover the defect. Valve headers had to be rewelded because the stress analysis originally conducted had neglected to consider an important force vector. A defect in the building crane was only discovered after the crane was put into use. Sloppy maintenance resulted in crud and other debris jamming and permanently damaging several control rods. A defect in the plant security system was only discovered after someone apparently deliberately started a fire resulting in millions of dollars of damage. A defect in the design and operation of unpressurized fuel rods was not discovered until after another reactor experienced serious fuel rod distortions during operation. Questionable repair procedures to correct tolerance problems in the steam generators and reactor support ring were never fully analyzed until one of the subcontractors came forward and demanded a thorough investigation. Last minute ultrasonic inspection of a steam generator revealed a previously undiscovered defect (indication) in a steam generator.

We believe the time has come for your office to reject the Con Ed theory that each of these events is a totally separate random occurrence and to undertake a thorough re-analysis of the Con Ed quality assurance program. In addition, we believe that the dismal history of this plant (already nearly four years behind schedule as a result of the continuous discovery of safety defects) warrants a complete re-examination and retesting of every safety feature of the plant to verify that in all cases the proper tolerances and safety margins have been achieved. This re-examination must not be conducted by

Con Ed but must instead be undertaken by an independent testing company selected by the AEC.

I am sure that you realize that this power plant is the largest plant situated in such a densely populated area. Even a minor accident would have grave consequences for hundreds of thousands of people. That catastrophe must be avoided. The evidence is now overwhelming that something is and has been basically wrong with the construction of Indian Point No. 2. Those problems must be corrected before this plant is allowed to go critical.

Sincerely,



Anthony Z. Roisman
Counsel for Citizens Committee
for the Protection of the
Environment

AZR/pq

cc: All persons on the service list.

James P. O'Reilly

FROM
Anthony S. Reisman
Counsel for Citizens Committee for
the Protection of the Environment

CONTROL NUMBER
5013

FILE LOCATION
ACTION COMPLETION DEADLINE

TO
Frank E. Kruesi

DATE OF DOCUMENT
10/6/72

ACTION PROCESSING DATES
Acknowledged _____
Interim Report _____
Final 10/26/72

PREPARE FOR SIGNATURE OF:

Chairman

Director of Regulation

DESCRIPTION **Ltr** Original Copy Other

Ref report dtd 9/26/72 fm Con Ed on defects discovered at the Indian Point 2 reactor - points out problems with the report and urges corrective steps be taken

REMARKS



REFERRED TO	DATE	IS NOTIFICATION TO THE JCAE RECOMMENDED? _____
Kruesi	10/26/72	

Cys: **PDR (50-247)**