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RECIP. NAME RECIPIENT AFFILIATION
EISENHUT, D. Division of Licensing

SUBJECT: Forwards summary of allegations received from anonymous plant personnel re containment structure tilting & classification of platform on behalf of Joint Intervenors.

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March 28, 1983

Daryl Eisenhut
Director of Licensing
Nuclear Regulatory Commission
Washington, D.C.

Re: Diablo Canyon

Dear Daryl,

As we discussed earlier today, I have enclosed a summary of the allegations received over the course of the last seven (7) to ten (10) days. The caller apparently works for the Diablo Canyon Project but wants to remain anonymous.

The allegations, if true, are especially troublesome. They suggest not only that significant safety problems remain unresolved, but more important, that the PG&E/Bechtel group continue to play hide and seek with the Commission.

On behalf of the Joint Intervenors, I request that you give this matter your prompt attention.

Very truly yours,

David Fleischaker

David S. Fleischaker

DSF:jm
cc: Congressman Morris Udall
Congressman Leon Panetta

YE03

SUMMARY OF ALLEGATIONS RECEIVED BY ANONYMOUS TELEPHONE CALL

1) Containments structure tilting: Preliminary calculations on the stability of the containment structure utilizing the latest response spectra developed by PG&E/Bechtel disclosed some cases where the containment would topple. Since the masses of the structure are not symmetrically distributed, seismic motions in certain directions can result in overturning the containment. The preliminary calculations were conducted with a simplified methology but because of the potentially negative results, PG&E/Bechtel has decided not to conduct a more detailed analysis. Rather PG&E/Bechtel have assumed without a detailed analysis that there is not in reality a problem for two reasons. Cohesiveness between the foundation map of the structure and the underlying rock material and low probability of the event occurring with seismic excitation in the most critical direction. Finally, PG&E/Bechtel assume that the NRC will not conduct a detailed review of the underlying data concerning this matter. Hence the cursory description provided to the NRC did not highlight the potential tilting problem.

2) Classification of Platform: The platform between the crane wall and the shield wall is a Class II, (non-safety related) structure but the platform holds Class I (safety related) equipment and serves as a connection for Class I pipe support. This is improper since there are different design criteria for Class II as compared to Class I platforms. Further, the design and construction control program did not contain measures to insure that in the future that Class I equipment would not be supported by Class II platforms.

3) High Energy Line Break (HELB) Assessment: The HELB analysis was not conducted in accordance with the procedures described in Section 3.6 of the FFAR and Regulatory Guide 1.46. For example, the Reg Guide required an assessment if a temperature of greater than 200°F or a pressure of greater than 275 psia are exceeded in a line. But both conditions are required to be satisfied for PG&E/Bechtel to conduct an analysis. Further, potential breaks are not postulated at every sitting nor is a fatigue analysis conducted. Thus, there is a lack of assurance that PG&E/Bechtel has made correct estimate of break locations.

4) Systems Interaction: The Systems Interaction measures are not being implemented in accordance with PG&E/Bechtel commitments. PG&E committed that any Class II equipment which might fail during a seismic event and result in damage to Class I equipment will be modified to meet Class I requirements. Current plant modifications are not being designed and constructed in accordance with the preceding

commitment. In addition, the Design Criteria Memorandum, which the working level engineers utilized, fail to document the preceding PG&E commitment.

5) Analus Structural Steel: The loading analysis for the containment analus structural steel has not included all the potential loads. For example, pipe attachments to the analus steel radial beam will result in torsional loads due to thermal expansion and seismic excitation. Such torsional loads have not been analyzed to date.

6) Tornado Design Criteria: Masonry walls in the turbine building are not analyzed for the suction loads which might result from a tornado. Thus the tornado design criteria is incomplete.

7) High Energy Rupture Restraint Pads: The crush pads provided for high energy pipe rupture restraints have insufficient margins in some cases resulting from restrictions due to a lack of available clearances. In those cases design loads could require more than 100% of the pad crushing capacity.

8) Seismic Criteria for Westinghouse Items: The Nuclear Seam Supply System (NSSS) equipment and piping supplied by Westinghouse is designed for a Safe Shut-down Earthquake (SSE) as originally defined by PG&E for the Double Design Earthquake (DDE). Thus, the Westinghouse SSE analyses were not systematically updated based on the new Hosgri SSE load.