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Mr. Herbert Grossman, Chairman
Atomic Safety and Licensing Board
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

OFFICE OF SECRETARY
DOCKETING & SERVICE
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FRONT NUMBER 50-395
FRONT FILE NO.

Dear Mr. Grossman:

As a private citizen residing in Columbia, South Carolina, this is to express my deep concern--and the concern of many other residents I have spoken to here--about the safety allegations raised in regard to the V. C. Summer nuclear reactor.

As you know, South Carolina Electric & Gas Co. is a relatively small utility with no experience in operating a nuclear plant. The Summer plant is located 20 miles due north of Columbia, a metropolitan area of 300,000 people.

The allegations of lax quality control standards are not new. What is new is that a second welder, one Harold Jennings, has come forward and alleged that numerous cadwelds have been falsified. Mr. Jennings has submitted an affidavit based on his work at the Summer plant, his observation of the work of others, and his comparison between quality control standards as enforced at the Summer plant and at a nuclear plant on which he worked in another state. When another former welder, Clarence Crider, made similar allegations several years ago regarding socket welds, a 100 percent reinspection of some 14,000 welds resulted in the reworking of several thousand, all of which had been previously passed by quality control.

Yet, the NRC staff that has looked into the recent allegations apparently seems to be saying not to worry because of the design conservatism. My understanding is that the design standards are set high in order to provide optimum protection against a nuclear accident and not for the purpose of accepting substandard performance. What is especially disturbing is that in 1974, South Carolina Electric & Gas Company's hired consulting firm stated in a letter to the company that compromising the quality control standards for cadwelds "is an extremely hazardous course of action which we cannot endorse."

At the least, any compromise should be subjected to the scrutiny of full public hearings. The burden on proving safety should fall on those who fail to meet the standards that are set. If the NRC staff now concludes that compromising the cadwelds is acceptable, they should explain why in a reopened public hearing. If the company has a convincing case, they should welcome the opportunity to instill public confidence.

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Another disturbing reference in the record is excerpted from the report of the consultants, Gilbert Associates, of March 18, 1981 (Reactor Containment Building Structural Acceptance Test) that notes: "Stress cracking in the cylinder wall and dome, away from the discontinuity regions of the shell, was not predicted to occur at 65.6 psig (pounds per square inch gauge). Any cracks which might appear were expected to be limited to discontinuity regions, and the cracks were expected to be small in nonprestressed reinforcement." The record includes a copy of a Figure 5 from the report that depicts a specific "crack pattern area."

NRC staff analysts dismissed the importance of this with a single sentence: "We have examined these discrepancies and determined they are not significant from a structural capability standpoint since the capacity of the containment /building/ to perform its pressure-containing function has been demonstrated."

Last week I asked a former executive with the nuclear division of Babcock & Wilcox, an engineer who is a proponent of nuclear energy, how he would react to information of unexpected cracking in the containment cylinder wall during pressure-testing of a nuclear plant about to go on-line. His response: "I would be concerned."

What concerns me is the apparent lack of concern by the NRC staff analysts. Their dismissal of this condition is almost as cryptic as the report by the consultants that "cracks . . . were not predicted to occur" and that "any cracks . . . were expected to be small."

It may be that the analysts have convincing reasons for their conclusion. If so, they are unstated in their report. How many cracks were there? What length? What width? The staff says they "are not significant from a structural capability standpoint." The question is whether they are significant from a safety standpoint. My understanding is that your report on seismic resistance of the containment building was based on criteria for a facility built to required standards in which quality control was not compromised. In fact, what exists is a facility in which unexpected cracks of unreported size and numbers appeared during pressure tests. Unstated by the staff analysts is whether a facility as weak as the one that actually exists, rather than the nonexistent one that meets design standards, could withstand external shocks from seismic disturbances that might reasonably occur in a fault area such as exists at the site of the V. C. Summer plant.

I would like to emphasize to each member of the Atomic Safety and Licensing Board that I find deep concern among many fellow citizens, a concern that gets little public expression. It

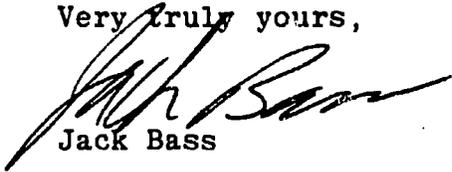
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is a concern based not on opposition to the concept of nuclear energy, but based instead on the seriousness of the allegations of compromised construction and quality control standards and the inadequacy of the response to those allegations. I urge you to reopen the hearings and to fully examine the allegations and to have them convincingly refuted before granting any further licenses to operate this plant. For your credibility as well as our safety, it is essential to demonstrate either that the plant has complied with the safety standards that exist or that operations proceedings be halted until such standards are met.

This is especially true for a plant in which it is acknowledged that existing deficiencies in the steam generators prevent them from safe operation at more than 50 percent capacity. If further modification is required, it would be far easier to achieve before the plant goes critical and the containment facility becomes contaminated by radioactivity.

Please accept this as a limited appearance statment in regard to the motion to reopen the record and conduct further proceedings.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Jack Bass", written in a cursive style.

Jack Bass