



UNITED STATES
ATOMIC ENERGY COMMISSION

WASHINGTON, D.C. 20545

MAY 25 1971

Mr. Robert J. Rowen, Jr.
2504 O Street
Eureka, California 95504

Dear Mr. Rowen:

Thank you for your letter dated April 30, 1971.
We appreciate the cooperation you afforded Messrs.
Ward and Book of this Division during their recent
meeting with you. Our investigation of the matters
you brought to our attention is now in progress.

As you were informed by Mr. Ward, we will not identify
you, during the course of our investigation or there-
after, as the source of the information you have
furnished. This fact is confidential and it will be
furnished only to appropriate Government authorities.
This does not preclude you, however, from making any
disclosures you may consider appropriate.

Thank you for your cooperation.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lawrence D. Low", is written over the typed name.

Lawrence D. Low, Director
Division of Compliance

8305180618 710915
PDR ADOCK 05000133
Q PDR

On May 11, and on May 19, 1971, I met with an AEC investigation team at their request. Three members of this AEC investigation team are shown below.



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U. S. ATOMIC ENERGY COMMISSION
DIVISION OF COMPLIANCE
REGION IV

JOHN J. WARD
INVESTIGATION SPECIALIST

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UNITED STATES
ATOMIC ENERGY COMMISSION
REGION V, DIVISION OF COMPLIANCE

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UNITED STATES
ATOMIC ENERGY COMMISSION
Region V Division of Compliance

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The following items represent a rough outline of some of my complaints to the AEC. These items were transcribed from a seven and one-half hour tape recording.

1. Violations of "Routine Work Permits" and "Special Work Permits" in radiation controlled areas.
2. Shipping cask incident of Aug. 6, 1969. Also this shipping cask is a continuous problem.
3. Safety lines for employees who are working over the open core of the reactor.
4. Refusal of permission to talk with AEC compliance inspectors about radiation protection safety problems and violations.
5. Reactor incore problem during refueling outages.
6. Certain members of management instructing control technicians on "proper" use of control technician log, which was contrary to Company directive dated 8/29/66.
7. Mr. E.D. Weeks, plant technical engineer in charge of technical department including radiation protection, informed me that it was ill-advisable for me to go to the AEC on my own.
8. False police report concerning four of seven nuclear Control Technicians, who were all critical of the Company's radiation protection safety program.

9. Alarm settings on Hand and Foot Monitor set above release limits allowing workmen to leave plant with radioactive contamination on their persons.
10. Access Control had high background during Apr/May, 1970, refueling outage making personnel monitoring impossible for all practical purposes.
11. High Level Storage Vaults inadequate allowing extremely "hot" particulants to be blown-out under windy conditions when lids are off.
12. Off-scale environmental dosimeters readings at the South Bay Elementary School during August, 1969.
13. G.C. painting crew radioactively contaminated on their persons and clothing for several days before discovery. Company refused to send monitoring personnel to their homes and public places they had gone.
14. AEC Compliance Inspector, Mr. Dodds, does not talk with radiation protection personnel on routine basis during inspections of plant.
15. All of the Company's safety records are not valid.
16. I was ordered not to log radiation protection violations.
17. 55 gal. drum of reactor water leak at low level radiation waste storage.
18. PG&E sold radioactive contaminated scrap metal to G & R Metals of Eureka.
19. Employees ordered not to bring up radiation safety problems at Company safety meetings.
20. Discrepancies between employees estimated exposures and reported exposures by Radiation Detection Company of Mt. View, Calif., during January, 1970.
21. Untrained out-side-plant personnel brought into plant to work in radiation areas.
22. Having employees to perform jobs in ignorance - that others more knowledgeable will not do.
23. PG&E employee from Redding, Calif., with recent history of skin cancer, brought into plant to perform temporary work. After Company discovered the employee's problem, he was immediately returned to his own headquarters. Improper screening of trans. workers.
24. Employees required to receive high exposure in very short periods of time.

25. Radioactive airborne conditions in control room.
26. Radioactive contamination on employees' automobiles in parking lot.
27. Inadequate procedure to determine personnel contamination due to airborne conditions.
28. Employees not willing to jeopardize themselves to notify AEC or other agencies about radiation protection safety problems.
29. Usually adequate notice is given to nuclear plant by AEC when AEC inspectors are going to inspect the plant.
30. Reactor Feed Pump Room incident. Citable situation, yet Company covered the facts completely.
31. Radiation Waste Boxes incident.
32. Present radiation process monitors inadequately trained.
33. Improperly handling of neutron source by employees due to poor equipment and procedure.
34. Co⁶⁰ source incident of Spring '70.
35. Tailboard briefings in extremely high radiation areas.
36. Inadequate C.P. Cal. data situation.
37. Film badge readings of employees are not always representative of actual exposure.
38. Outside yard contamination incidents.
39. Company's Environmental testing of grazing animals is not totally adequate. The rabbit testing program is falsely representing the facts. (They may not be running this program presently but they use the data from previous programs.)
40. Radioactivity found in ground surface water in #3 dip sample well.

There were many more items, but this ought to give you some idea of what I presented to the AEC. Ofcourse, each of these needs to be discussed at length for a thorough understanding.

August 4, 1971

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Director
Department of Transportation
Washington D.C.

Dear Sir:

On May 28, 1971, I signed a statement for the U.S. Atomic Energy Commission which stated in part the following:

"On August 8, 1969, a spent fuel shipping cask was cleared for shipment from the PG&E Humboldt Reactor when it was known by PG&E management to be still contaminated over the limits permitted by the Department of Transportation Regulation 49 CFR 173.397."

It is the details of this incident along with supportive materials that I desire to bring to your attention for your consideration and appropriate action.

For the sake of brevity please allow me to quote from the following:

Decision of the Referee
California Unemployment Insurance Appeals Board
Case Number SF-1319
Robert J. Rowen, Jr. vs Pacific Gas and Electric Company

STATEMENT OF FACTS

2. A supervisor ordered a technician to take smears of material to be shipped from the nuclear plant at the top and bottom of the container but not in the center. This would have the effect of minimizing the radiation count. After the supervisor had been informed the count exceeded the level permitted for such shipments, he asked the claimant (Rowen) to sign a previously prepared shipping document which indicated the radiation level was within tolerable limits. When the claimant refused, he (the supervisor) corrected the shipping document to show the correct figure and then ordered the shipment processed, contrary to the governmental regulation involved. The claimant accurately reported the entire incident in the daily log he was required to keep as part of his duty. He was severely reprimanded by Mr. Weeks for having done so on the ground this was not a "proper" use of the log, pointing out that the Atomic Energy Commission inspectors had access to the log.

I have included for your reference copies of the following documents:

- (1) PG&E directive concerning use of Control Technician log book.
- (2) Copy of log entry dated August 6, 1969 in PG&E log book #62598 Pg.#65.

Con't.../2

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- (3) Copy of cask release write-up dated August 7, 1969, by Mr. Gail E. Allen, PG&E Radiation Protection Engineer.

As a nuclear Control Technician, I was working as a radiation monitor during the time of this incident. I was ordered by the Radiation Protection Engineer to take smears of the surface areas of the cask he had already predetermined as being relatively "clean" thus avoiding the areas on the cask that were highly contaminated. I strongly protested his decision but complied with his orders. After an evaluation of the smears, the Radiation Protection Engineer then asked me to sign a false shipping document which stated the contamination levels were within proper limits. I refused to do so and eventually he agreed they should be changed to read the actual results of his surveying methods. When the change was made, which was still in violation of the D.O.T. Regulation involved, I signed the shipping document. And this in itself was totally improper. However, I wish to point out that the stated contamination levels on the shipping document is totally false. This is due to the improper survey methods the Radiation Protection Engineer ordered to be employed.

After the incident I took the initiative to log the matter in the appropriate PG&E log book which has become an official record. Mr. Edgar D. Weeks, Power Plant Manager, said the following concerning my usage of the log book, and I quote:

"The Control Technician Log of 8/6/69 was, in my opinion, deliberately made out by Mr. Rowen in a manner intended to convey the impression that his supervisor, Mr. Gail Allen, was attempting to falsify radiation protection records.

Now I would like to bring to your attention the following testimony given under oath by Mr. Edgar D. Weeks, Power Plant Manager of the Humboldt Bay Power Plant, at a hearing dated December 9, 1970, before the Referee of the California Unemployment Insurance Appeal Board. (Page 50, lines 20-28 and pg. 51, lines 1 & 2.)

"I checked with the Department of Transportation because I wasn't 100 percent sure myself whether this was okay and they assured me it was okay, that if we didn't make a habit of doing this type of thing that they didn't have any qualms about it. So, this judgment decision of Mr Allen's turned out to be the right decision, but I was concerned enough about it that I talked to Mr Alfred Guerilla(phonetic) back in New York, who was the man in charge of this type of thing for the Department of Transportation. And, I telephoned just to make sure that, whether Mr. Allen's judgment decision was a valid one and he assured me it was."

This incident on August 6, 1969, was not the only occurrence of this kind, but it is my only documentation of the problem. On several occasions during the past few years and as recently as last spring, this 80-ton spent fuel shipping cask has traveled across the Country with smearable radioactive contamination levels far exceeding the maximum levels permitted by the D.O.T. Regulations.

I have asked the Pacific Gas and Electric Company to reveal the name and address of the firm who owns the shipping cask, and as of yet, they have refused to give me this information - claiming that this is not available to the public. However, I am reasonably certain that the shipping cask belongs to a spent fuel reprocessing firm located in New York.

I trust that this information is sufficient for your further inquiry into the matter, and if I can be of any further assistance to you in correcting this problem please feel free to call on me.

Thank you for your consideration in this matter.

Sincerely,

Robert J. Rowen, Jr.

Robert J. Rowen Jr.

My mailing address is:

Robert J. Rowen, Jr.
2504 "O" Street
Eureka, California 95501
phone (707) 443-3689

cc: Environmental Defense Fund

HUMBOLDT BAY POWER PLANT
UNIT NO. 3

MEMORANDUM

8/29/66

SUBJECT: Control Technician Log Book

Effective January 3, 1966 the C.T. Log Book will be kept as a record of all important events* that occur during the day in Rad. Protection and Chemistry. It will be the duty of the R₂ man to maintain this log and sign the completed sheet each day.

Paul E. Allen
J. V. Boots

CEA:cr

"All important events" is defined as:

1. Unusual happenings such as Control Room contaminated, large spill, etc.
2. Unusual air sample data or chemistry data.
3. Brief rundown of day's activity.
4. Personnel contaminated.
5. Personnel clothing retained because of contamination.
- ✓ 6. Any violation of established standards.
- ✓ 7. Any other thing felt important by the C.T. in this area.

READ, DATE, AND INITIAL

J. K. *[initials]*
R. S. *[initials]*
H.J.D. *[initials]*
M.S. *[initials]*
D.W. *[initials]* 8-30-66

PACIFIC GAS AND ELECTRIC COMPANY

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NO. 62558-55 B

HBPP UNIT #3 STATION Aug 6 1969

C. V. R. ROWEN & R. SKIDMORE

D. Allen asked Rowen to sign the release papers for the special fuel shipping crane stating the construction level of the crane to be \$22000 / hr, when in fact, they were \$2600 / hr. Further, D. Allen gave Rowen directions to the final square for determination of release conditions on the top and bottom covering the middle areas on all sides of the crane when just previously R. Skidmore took care of the middle areas to find out of limit conditions.

R. Rowen

Stack Gas Readings

Aug 1.5 (10%) 7/8 lbs.

As an aid in reading the rather blurred copy of the log entry dated August 6, 1969, I have typed it out for you.

"G. Allen asked Rowen to sign the release papers for the spent fuel shipping cask stating the contamination level of the cask to be <2200 d/m (per 100 cm^2), when in fact, they were >2600 d/m (per 100 cm^2). Further, G. Allen gave Rowen directions to take final smears for determination of release conditions on the top and bottom avoiding the middle areas on all sides of the cask, when just previously, R. Skidmore took smears of the middle areas to find out of limit conditions."

R. Rowen

Cask Release - Wednesday 8/7/69 12

At 0800 Wednesday morning Mr. Rowen was asked to take some smears on the cask that had been washed during the night. The smears that he took were wet and required drying. The activity on the smears varied from 3000 to 30,000 cpm/100 cm² so I decided to wash the cask with alcohol. Mechanical Maintenance furnished three men and Radiation Protection furnished one (Rowen). At the men's request, the refueling building doors were opened to give additional ventilation. Before lunch, additional smears were taken. These were dry and when counted showed some reduction in activity (I cannot be sure they were taken in the same spots as the morning, however).

A second alcohol scrub was ordered for right after lunch. The refueling building doors were opened for ventilation again. The smears this time indicated no improvement and possibly an increase in activity so I decided to wash the cask with a strong solution of DCL3 (half H₂O half DCL3). Rowen asked about the doors at this time. I told him that we couldn't open them and that the DCL3 wasn't toxic and the additional ventilation wasn't necessary. He stated that he had read somewhere on Tuesday that it was but he also said that it was not stated as toxic on the can. He generally dismissed the ventilation system and I told him that it was being worked on.

The cask was washed with the DCL3 and dried with rags. I took a series of smears at top and mid cask as they were drying the cask. Several were 3000 - 4000 cpm while one was below 1,000 cpm.

I told Rowen to go down and get smears top and bottom on the four sides for final release. He did so with no complaint. In the meantime I checked the IPC in the counting room which read lower than the one in the control room. I had the new samples counted in the counting room IPC. I told Rowen that I would give an average number. He averaged out the numbers and came up with 2600 cpm/100 cm² (corrected for counter efficiency).

I had brought up the shipping papers for the cask. They had previously been typed out for <2200 cpm/100 cm². I asked Rowen to sign them. He ignored my request at first but did not say anything. When I asked again he said it was 2600 not 2200 so I said "Well change it to 2600 and then sign it." He did so. He did not refuse. I did not lose my temper but there could have been impatience in my voice and tone. In my judgment this average number was OK even though 400 cpm above the DOT regulation. This is only 15% error.

I also asked Rowen if he wanted to stay over past 1630 hours to finally check the cask and he said no because he wanted to go to the union meeting. The only person willing to stay over was Bill Evans.

The final survey of the cask showed less than 50 cpm on any smear pads by CM. The area smeared was greater than 100 cm². The place any activity was picked up was in the crack of the lid 20000 cpm. This area has never been checked before to my knowledge. Next time I'll tape this crack.

G. L. Allen/8/7/69 : rf

July 18, 1971

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Director
Regional Office
Environmental Protection Agency
760 Market Street
San Francisco, California

Dear Sir:

Please accept this letter as a matter of vital concern. The information contained herein has been related to me by certain nuclear power plant employees employed in the Pacific Gas and Electric Company's Humboldt Bay Nuclear Power Plant. These persons desire to remain anonymous due to sensitive job positions.

On June 26, 1971, the Pacific Gas and Electric Company discharged into the power plant's effluent canal an unknown amount of radioactive liquid. It is the details of this incident (as I understand them) that I would like to bring to your attention for your consideration and appropriate action.

At approximately 4:30pm on June 26, a Radiation Process Monitor (an individual) dumped approximately ten gallons of highly radioactive contaminated water into the nuclear unit's caisson sump which automatically discharges directly into the plant's effluent canal. This employee apparently was not aware of the design of the caisson sump system, and further, he feels that he is inadequately trained and experienced in his job classification. He assumed his job responsibilities on February 1, 1971, without having had prior experience or training in the nuclear industrial field. It is noteworthy that Mr. P. Matthew, Manager of Steam Generation for the Pacific Gas and Electric Company, informed the U.S. Atomic Energy Commission on September 11, 1970, that these persons "would be properly trained and carefully supervised."

This incident was logged by the employee involved on June 27, 1971, in PG&E log #67368 - pg. #66.

The situation involved the cleaning-up of reactor water and reactor crud at the -66ft. elevation location, which is an area located directly beneath the reactor. The actual activity level of the contaminated water is unknown; however, the employee involved obtained dose-rate readings of 400 mr/hr at the surface of the container he used to transfer the contaminated water to the caisson sump. Fortunately, he causally mentioned to a more experienced employee what he had done, and an attempt was made to transfer over the caisson sump system to the radiation waste liquid system, which is an out-of-the-ordinary valving arrangement. Apparently this occurred about an hour after the error. Meanwhile, unfortunately, the automatic level device on the caisson sump system activated and subsequently discharged either all or part of the contaminated water directly to the plant's effluent canal.

In any event, the caisson sump system does not have any radiation process monitoring devices of its own that are used under normal operating conditions. Further, the regular effluent canal sample station was not operating properly. This station is an automatic sample collection station only, and reportedly, only operates a fraction of the time. On most occasions the plant relies on a single one-gallon dip sample, which is made once a week, in order to analyze what is called a representative sample of the effluent canal. This has been the general practice for a number of years.

About two months ago Lawrence Radiation Laboratory installed a special sample station at the effluent canal. Apparently this is for some special experiment L.R.L. is conducting. This station is also only a collection station. It was at this sample station that PG&E obtained a dip sample which indicated abnormal radiation activity levels in the bay water. As to how high the levels were, I do not know. On June 27, 1971, PG&E management in the nuclear plant acquired a 14cc sample from the mop that was used during the clean-up job at the -66ft. elevation location. Supposedly this is how plant management determined the approximate radiation activity levels involved in the caisson sump incident.

Relating to my six years' experience as a nuclear Control Technician in the nuclear power plant field, I recognize this situation as being absolutely deplorable. Therefore, I trust your office is in a position to assure the public that incidences such as these will not occur in the future. I realize the AEC has jurisdiction within the confines of the nuclear plant; however, this is a clear-cut case of procedural violations having ramifications beyond the confines of the plant - namely our bay.

I also have information concerning numerous other radiation safety violations, many of which I have presented to the AEC, and which has resulted in an AEC investigation. A portion of these radiation protection safety violations have environmental ramifications, and, if your office is interested these matters, I would be more than happy to supply you with further details.

If I could be of further assistance to you in the matter I have presented to you, please feel free to contact me. Thank you for your consideration in this matter.

Sincerely,

Robert J. Rowen, Jr.

2504 "C" Street

Eureka, California 95501

phone (707) 443-3689

cc: Environmental Defense Fund

June 20, 1971

Environmental Defense Fund
 Drawer 746
 Stony Brook, N.Y. 11790

Dear Gentlemen:

E.D.F. was referred to me by one of your members - Dr. J.R. Kneen of Humboldt State College, Arcata, California. Dr. Kneen has asked me to write to your organization about a problem of which I am intimately involved, for she feels that it would be of great interest to you.

By way of a brief introduction, I would like to state that I worked in the nuclear control technician field for six years (1965-1970). I was employed in the Pacific Gas and Electric Company's Humboldt Nuclear Power Plant located at Eureka, California. In a letter, dated April 30, 1971, to the Director of the U.S. Atomic Energy Commission, I stated that "I (had) worked in that plant for six years and during the period witnessed events which never became known to the AEC or the public." The AEC immediately launched an investigation, the results, of which, I have no knowledge.

Further, in my view, the AEC has a tendency to "whitewash" the kinds of problems I have presented to them. Nevertheless, I have signed a statement for the AEC investigation team, and I have enclosed a copy of that statement for your consideration.

I feel the AEC's statement is totally inadequate; therefore, I would like to present the following brief outline of this problem for your consideration, and, if your organization is interested in pursuing one or more of these items, I would be more than happy to supply you with further details.

- (1) While I was working as a nuclear Control Technician, PG&E management ordered me not to make official log entries concerning radiation protection safety violations. (documented)
- (2) PG&E violated Federal law (D.O.T. Regulation 49 CFR 173.207.) on August 3, 1969. PG&E shipped a spent fuel shipping cask with out-of-limit measurable radioactive contamination on its outside surfaces. (documented)
- (3) PG&E sold radioactive contaminated scrap metal to G. & H. Carey Metal Company. (documented)

- (4) "Reprisals" by Company management if AEC notified about radiation protection safety violations. (documented)
- (5) Off-scale dosimeter readings on environmental monitoring stations in line with radioactive gaseous waste discharge stack and South Bay Elementary School. (documented)
- (6) Nuclear plant employees, including nuclear Control Technicians who worked as radiation monitors, were not allowed to talk with AEC Compliance Inspectors while the Inspectors were in the nuclear facility on routine inspections. (verified by Mr. Herbert H. Locke, Senior Radiation Specialist of the A.E.C. I have this statement on a tape recording.)
- (7) The F.B.I. received a false police report involving four of the Company's seven nuclear Control Technicians, who, incidentally, were all critical of the Company's radiation protection safety program. This report was fabricated by EG&E management and Chief Examiner of the Eureka Police Department. (verified verbally by the Humboldt County District Attorney's office and the Humboldt County Grand Jury.)

Probably there is much more to this perplexing problem than I am able to present in a single communication; however, I have made an attempt to focus on several of the key issues, and hopefully, in a sufficient manner enabling your organization to determine whether or not this problem lies within your area of interest.

On account of my endeavors, thus far, in what I term as a "Nuclear Catastrophe" problem, my family has suffered a substantial loss of income, humiliation, and grief, but I only have done what I believed was right and I am still doing just that!

Any suggestions you may have would be graciously received, and any assistance you desire to offer, greatly appreciated.

Thank you for your consideration in this matter.

Sincerely,

Robert J. Rosen, Jr.

mailing address:

Robert J. Rosen, Jr.
2505 "C" Street
Eureka, California 95501

phone (202) 442-3680