

GOVERNMENT ACCOUNTABILITY PROJECT

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November 26, 1983

Mr. Richard C. DeYoung
Director, Office of Inspection
and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. James G. Keppler
Administrator, Region III
Inspection and Enforcement
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Gentlemen:

Some weeks ago I received a copy of a Memorandum for Region III files regarding a closed meeting held October 25, 1983, in Bethesda, with Mr. J. Selby, President and Chief Executive Officer, and Mr. S. Howell, Executive Vice-President of Consumer Power Company (CPC).

The brief memo raises a number of significant questions which I have listed below. Some of these questions I have already expressed to members of the Region III Office of Special Cases, Midland Team. I would appreciate a response from you as soon as possible to these concerns.


Concerns Regarding October 25, 1983, Meeting

1. The independent management audit discussed at the meeting has, presumably, been left in the hands of CPC. GAP is concerned that, like the Stone and Webster nomination for the Q.A. soils work, the CPC nomination and the scope of the audit will be a fait accompli. The independence criteria (SECY 82-1003) adopted by the NRC at Diablo Canyon for situations such as this, requires public comment be included after the nomination of several companies. Further, since the suggestion was generated by the GAP petition filed June 14, 1983, pursuant to 10 C.F.R. 2.206, it seems minimally reasonable that public comment be permitted about the scope of the management audit.

It is appropriate to note that the NRC position on the case of Midland's problems remains one of bewilderment; see Wall Street Journal article of October 28, 1983, regarding Midland. This has been Region III's response to the cause of Midland's problems since May, 1982.

In light of the NRC's lack of insight and the obvious criticality of pin-pointing the cause of a decade of quality assurance breakdowns and unprecedented construction foul-ups, we renew the request for the NRC approval-phase of CPC's management audit to be conducted with regard for the requirements of SECY 82-1003.

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PDR FOIA
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*Bob,
for your information!
--- just misguided! 
Belto*

NOV 1 1983

Mr. Richard C. DeYoung
Mr. James G. Keppler

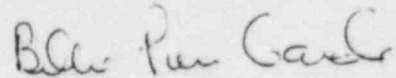
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2. The memorandum also makes reference to a "plan of action" which was being prepared for submittal to the NRC. Please explain what this "plan of action" is, and the purpose which it is to serve.

I look forward to your earliest possible response.

Sincerely,



Billie Pirner Garde
Citizens Clinic Director

BPG:me

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