



**AIR and WATER
Pollution Patrol**
BROAD AXE, PA.

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U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

REG. DIVISION
LICENSING & SAFETY
BRANCH

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In The Matter Of
PHILADELPHIA ELECTRIC COMPANY
(Limerick Generating Station
Units 1 and 2

Docket Nos. 50-352
and 50-353

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MOTION TO REOPEN RE-CONSIDERATION ON AWPP VI-I

Following the oral argument re the AWPP Contention VI-I, on May 31, 1984 in Philadelphia, I feel, as in the Byron decision, that there exists a legitimate uncertainty regarding improperly dispositioned construction defects, in particular welding together with apparent falsified inspection records, as well as questionable quality assurance practices related to safety related hangers.

For example in the May 21, 1984 letter to PECO from NRC Richard Starostecki, writing on the combined Inspection Report 50-352/83-19: 50-358/83-07, see Response to Appendix A, Violation 2 where it states as follows:

10 CFR 50, Appendix B, Criterion X requires the establishment of a program that assures that examinations, measurements, or tests of materials or products processed be performed for each work operation where necessary to assure quality.

Section 17.2A.10 of the Final Safety Analysis Report and Volume I, Section 10 of the Limerick Generating Station Quality Assurance Plan establish this program.

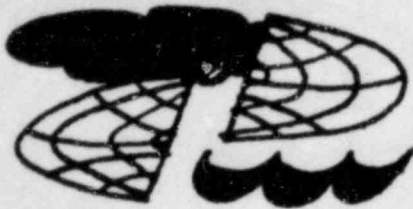
Contrary to the above, the program established for engineering and quality inspection of pipe support hangers failed to assure the quality of two safety-related hangers in that, as of November 7, 1983, hangers VRR-IRS-HHA-1, for the reactor circulation system suction piping were inadequately designed and installed and the inadequacies were not identified during the engineering and quality inspections which had been completed.

The Response by PECO is as follows:

The interferences identified by the Inspector did not

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develop until after Field Engineering and QC acceptance of HHB-1 and Field Engineering release for preops of HHA-1. These interferences developed as a result of the vibration caused by the recirc pump operation. However, subsequent to the interferences developing, Field Engineering performed rework on hanger HHB-1 which QC inspected. The rework was limited and did not involve the interfering members of the support. The interferences were not identified because of the apparently limited inspection of the reworked hanger.

The Inspector identified interferences have been resolved by implementing an option which was included in an FDDR prior to the interference being identified. The option was not used during initial installation because the Field Engineers did not foresee the development of the interferences.

To determine the extent of this condition QC completed inspections of the 24 GE designed recirculation and main steam hangers. These inspections identified several nonconformances, the majority of which result from the lack of installation tolerances. Investigation into the cause of these nonconformances is not complete. Therefore, a follow-up response to this violation will be made by 3/31/84.

That response is absolute proof of the statements AWPP (Romano) made during the VI-I hearings, namely, the Quality Assurance personnel and program is and has been abysmally incompetent. That pattern seriously threatens an accident at Limerick unless many rechecks are mandated.

The Applicant must know that there is only one absolute test as to whether a weld is 100% inspected as to its quality. That inspection is by destructive testing. While it is impracticable to do that kind of testing generally, I fault the Applicant's program for not doing destructive testing on those welds done in the test welds made by prospective employee welders. Also, thousands of welds were



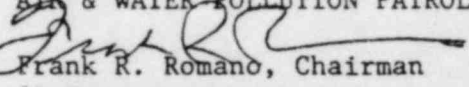
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dispositioned "use as is", "because it will support the weight", and thousands more on the basis of inbred "engineering analysis". Therefore, AWPP (Romano) moves the Board require a random sampling of the welds dispositioned as above, including inaccessible welds in 76-06-01 which Mr. Boyer could not fully reconcile.

Without such destructive corroboratory statistical analysis, the Board is depending on the "judgement" of Mr. Corcoran found wanting even as construction is completed.

Respectfully submitted,
AIR & WATER POLLUTION PATROL

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