

M. I. LEWIS
6504 BRADFORD TERR.
PHILA, PA. 19149
2/15/85

HAROLD R DENTON

USNRC

WASHINGTON, D.C. 20555

DEAR DIRECTOR,

YOUR LETTER OF FEB 13 TO ROB ANTHONY
CAME TODAY. I WOULD VERY MUCH LIKE TO
JOIN WITH MR ANTHONY IN THIS
(10 CFR 2.206) PETITION OR PROVIDE
YOU WITH MY COMMENTS OR BOTH.
MR ANTHONY IS CORRECT IN HIS
FACTS. HOWEVER, THE FACTS ADD UP
TO A MUCH DANGEROUS SCENARIO THAN
CHARACTERIZED IN YOUR LETTER AND
NOTICE (7590-01.) IN FACT, THE FACTS
ADD UP TO A MUCH MORE DANGEROUS
SITUATION THAN EVEN THAT CHARACTERIZED
BY MR ANTHONY.

MR ANTHONY LIMITS THE BASIS FOR
HIS PETITION TO CERTAIN EXEMPTIONS,
LICENSEE EVENT REPORTS, AND VARIOUS
INSPECTION REPORTS. AS APPROPRIATE AND IMPORTANT
AS MR ANTHONY'S CITATIONS ARE, THESE
CITATIONS ONLY DESCRIBE SOME OF THE
CONTINUING SYMPTOMS OF LONG STANDING &
WIDE RANGING SAFETY DEFICIENCIES AND
CONSTRUCTION DIFFICULTIES.

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LIMERICK'S CONSTRUCTION DIFFICULTIES STRETCH BACK OVER A DECADE. LIMERICK STANDS ON CONCRETE THAT WAS SO POROUS THAT A MAN COULD SIT IN SOME OF THE VOIDS. GOING FROM BELOW THE PLANT TO ABOVE THE PLANT, A ERROR IN THE COOLING TOWERS CAUSED A 13" JOG IN THE CONCRETE ABOVE THE PLANT. SINCE THE COOLING TOWERS ARE NOT SAFETY-RELATED, REPAIRS TO THE COOLING TOWERS DID NOT HAVE TO MEET NRC INSPECTION OR REQUIREMENTS.

DURING THE ASLB HEARINGS, THE LICENSEE DISINGENUOUSLY DEFENDED WELDS THAT WERE INACCESSABLE AS HAVING BEEN INSPECTED + APPROVED. SUBSEQUENTLY, THE INTERVENOR, FRANK ROMANO FOR AWPP, DEMONSTRATED THE IMPOSSIBILITY OF THE LICENSEE'S STAND.

CURRENTLY, LABOR UNREST, ON ^{SITE} ~~SIGHT~~, HAS LEAD TO ALLEGATIONS BY SUBCONTRACTORS OF ALCOHOL CONSUMPTION ON SITE, POOR WELDING, SECURITY VIOLATIONS, AND MANY OTHER SAFETY RELATED DEFICIENCIES. VIOLATIONS AND 'OPEN ITEM' EVALUATIONS HAVE FOLLOWED SOME, BUT NOT ALL, OF THESE ALLEGATIONS.

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THE STAFF HAS SHOWN A BIAS AND LOYALTY TO THE LIMERICK LICENSEE THAT IS UNREASONABLE AND ADVERSE TO THE NRC CHARTER AND THE HEALTH & SAFETY OF THE PUBLIC. THE LICENSEE - IN THE PERSON OF MR BOYER - HAS STATED THAT NRC INDULGES IN 'NIT PICKING'. THE STAFF HAS APPARENTLY ~~AGREED~~ ^{AGREED} TO THAT EVALUATION EVEN COMMISSIONER ZECH HAS CHARACTERIZED THE PROBLEMS ENCOUNTERED BY PEC₀ AS "SURPRISING." CONSIDERING THE LONG HISTORY OF DEFICIENCIES AT LIMERICK, THE PROBLEMS ^{WHICH} PEC₀ IS ENCOUNTERING IN LOW POWER TESTING ARE 'EXPECTED', NOT SURPRISING.

IN SUM, PEC₀ HAS A HISTORY OF DEFICIENCIES AT LIMERICK. THE NRC STAFF HAS DEMONSTRATED A BIAS TOWARD PEC₀. THE PROBLEMS HAVE ENLARGED INTO "SURPRISING" DIMENSIONS. THE CONSTRUCTION AND OPERATION HISTORY OF LIMERICK MIMICS THE HISTORY OF TMI #2.

- A. THE RUSH TO GET INTO COMMERCIAL OPERATION TO MEET "RATEBASE" REQUIREMENTS OF THE PA PUBLIC UTILITY COMMISSION.
- B. "SPURIOUS" SIGNALS + ALARMS PLAGUING OPERATORS.
- C. INCORRECT VALVE SEQUENCING.
- D. WATER PROBLEMS BUT THE CHARACTER OF THE WATER PROBLEMS DIFFERS BETWEEN TMI #2 + LIMERICK

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I RESPECTFULLY REQUEST THAT MR ANTHONY'S
PETITION BE GRANTED; NOT ONLY FOR THE BASIS USED
BY MR ANTHONY; BUT ALSO, ON THE BASIS THAT
THE PRESENT PROBLEMS ARE THE CULMINATION
OF A TREND WHICH MIMICS THE TREND
LEADING TO THE TMI #2 ACCIDENT.

RESPECTFULLY SUBMITTED,

Martin I. Lewis, R.P.E.