

GOVERNMENT ACCOUNTABILITY PROJECT

1555 Connecticut Avenue, N.W., Suite 202
Washington, D.C. 20036

(202) 232-8550

October 26, 1984

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Mr. Harold R. Denton
Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. Darrell Eisenhut
Director
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Comanche Peak Steam Electric Station,
Units 1 and 2 (Nos. 50-445 and 50-446)
Texas Utilities Generating Company
Program Plan, October 8, 1984

Dear Mr. Denton and Mr. Eisenhut:

This letter serves as preliminary comments, analysis and recommendations of the Government Accountability Project (GAP) and the Citizens Association for Sound Energy (CASE) regarding the adequacy of design, construction and operation of the Comanche Peak Steam Electric Station (CPSES) and the compliance of CPSES with federal regulations and industry standards.

It is clear to us, and we believe should be to the NRC and the public, that the Comanche Peak plant is the victim of a comprehensive quality assurance/quality control (QA/QC) breakdown.

Since the scope of the Technical Review Team (TRT) is limited, it is understandable why Texas Utilities Generating Company's (TUGCo) response is equally narrow. Such an approach is extremely imprudent by both the agency and applicant, at this juncture.

Based on our review of the October 1984 proposal by TUGCo or applicant, we make the following recommendations:

1. Reject the October 8, 1984, proposal (Revision 0) as submitted.
2. Require TUGCo to hire an independent contractor to develop and implement any subsequently approved re-inspection or corrective action proposal.

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3. Require TUGCo's response to include a "vertical slice" re-inspection program of at least three safety systems.^{1/}
4. Expand the NRC's TRT's efforts to include those expanded items in Section II of this letter, including a total inspection and documentation review of either one major safety system or one separate area of the plant (similar to the major Diesel Generator Building inspection at the Midland nuclear power plant in October, 1982).
5. Expand the official agency review of the adequacy of TUGCo's response effort to include a review by a panel of former employees.

At this time, we remain skeptical of the plan being provided by TUGCo to allay legitimate NRC and public concerns about the safety of the CPSES project.

I. BACKGROUND

Comanche Peak Steam Electric Station is a two-unit power reactor under construction near Glen Rose, Texas. It is owned by a consortium of six utility companies. Texas Utilities Electric Company (TUEC), through its subsidiary TUGCo, retains responsibility for design, construction and operation.

The plant has been plagued by a lengthy history of allegations of inadequate design, improper construction, and a flawed QC program. These allegations have come to the attention of the NRC primarily through the citizens intervenor organization; however, throughout the seven to eight years of construction, employees have independently contacted the NRC to report design and construction deficiencies.

The project has undergone a number of special NRC inspection efforts, as well as the regulatory program.

The plant has not yet received an operating license. There are currently two ongoing licensing dockets, both actively involved in hearings.

In March, 1984, GAP announced an independent investigation of CPSES. GAP filed an emergency request pursuant to 10 C.F.R. 2.206 requesting an immediate stop work order, an independent audit of the project, and a major investigation by the Office of Investigations (OI). That request was subsequently granted in part and denied in part.

^{1/}A similar request is pending in front of the Licensing Board (ASLB or Board) both in the technical contentions docket (Docket 1) and the harassment and intimidation docket (Docket 2).

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On March 12, 1984, William J. Dircks, Executive Director for Operations (EDO) announced the reorganization of NRC resources for the Waterford III and CPSES projects. This reorganization was to coordinate all agency actions on these projects under one office--the Office of the Director of the Division of Licensing. The stated purpose of this unusual organization was to resolve the remaining issues before the staff could make the licensing decision.

The initial focus of this coordinated "task force" approach, used previously at Diablo Canyon, was to "expeditiously" resolve all existing and new issues "so as not to delay the licensing decisions." (March 12, 1984, Memorandum to John T. Collins, et al., from William J. Dircks, EDO, re: Completion of Outstanding Regulatory Actions on Comanche Peak and Waterford.)

In early April, a coordinated team of NRC management officials, inspectors and investigators arrived on the CPSES site to conduct a preliminary review of the adequacy of construction at the project. The report of this effort was issued July 13, 1984.

On September 18, 1984, a second report was issued which highlighted some of the issues which had been identified by the TRT in its inspection and review effort conducted during July and August, 1984.

On October 8, 1984, TUGCo responded to the findings of the TRT by announcing the establishment of a Comanche Peak Response Team (CPRT) and a complimentary response effort to the NRC's findings.

On October 19, 1984, a meeting was held in Bethesda to discuss the TUGCo response to the TRT findings. (That meeting was completed at a second meeting on October 23.)

Additionally, on October 19, 1984, the NRC staff submitted to the ASLB its projected schedule for completion of outstanding ASLB issues. Although the ASLB schedule outlines the schedule for the items necessary for resolution before the ASLB, it does not incorporate all items requiring NRC review, inspection and resolution prior to licensing. (Those additional items, or a timetable for resolution, are not addressed in the staff submittal.)

Following the release of the latest schedule, the original instructions from Mr. Dircks, EDO, to his staff, that is, the expeditious resolution of open issues to meet the utilities' timetable, seems inappropriate.

Outlined below are what GAP and intervenor CASE believe to be a more prudent and regulatory-efficient approach.

II. PROPOSED NRC ACTIONS

The following outline is submitted as a proposed modification to the ongoing TRT efforts: (see Attachment A)

1. Expanded field inspection effort
 - a. "Whole system" or "vertical slice" approach;
 - b. As-built inspection with final design paper;
 - c. Audit of documentation to field to vault for in-process construction.
2. Incorporation of source review
 - a. Appointment of allegations source response coordinator;
 - b. Field visits by allegation sources;
 - c. Review panel for former employees.
3. Allegations recruiting program
 - a. Establishment and promotion of information "hot line;"
 - b. Publication of a summary of unanswered questions to the workforce;
 - c. Establishment of an NRC interview program;
 - d. Structured "debriefing" program.

III. MODIFICATION IN THE CPSES RESPONSE TO THE TRT

The current proposed Revision O of the Program Plan and Issue-Specific Action Plan ("Program Plan") has several fundamental flaws in its structure, scope and methodology. Essentially, we believe that TUGCo needs to completely revamp the programmatic basis and philosophical approach upon which the Program Plan is based.

These flaws are summarized below:

- No organization independence.
- Inherent conflict of interest of personnel involved in the Senior Review Team, review team members, issue leaders, etc.

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- Fundamentally inadequate program objectives and principles.
- Inadequate and unacceptable program processes and QA (methodology).
- Insufficient program record plans and tracking systems.
- Overly-narrow and restricted scope.

Because of the overall inadequacy and fundamental flaws of the TUGCO proposal, we do not think it is a prudent expansion of our efforts to provide a line-by-line analysis of this revision. We will, however, delineate our principle objections and recommendations below.

1. Any analysis or re-inspections which are responsive to the TRT's findings should be done by an independent contractor.

This contractor should be chosen according to all of the criteria for independence. Those criteria are outlined in a February 1, 1982, letter from Chairman Palladino to Congressmen Dingell and Ottinger. The three elements necessary are:

- a. Competence: "Competence must be based on knowledge of and experience with the matters under review."
- b. Independence: "Independence means that the individuals or companies selected must be able to provide an objective, dispassionate technical judgment provided solely on the basis of technical merit. Independence also means that the design verification program must be conducted by companies or individuals not previously involved with the activities they will now be reviewing."
- c. Integrity: "Their integrity must be such that they are regarded as respectable companies or individuals."

We have reviewed the independence criteria as it has been applied by the NRC to the independent contractors at the Diablo Canyon, Midland and Zimmer nuclear power plants in preparation for this response. There is no question, given that criteria, that Ebasco, Inc.--evidently selected by TUGCO to perform the independent review--does not qualify to perform an independent audit or analysis of Comanche Peak problems under any of the three criteria.

First, we do not find that Ebasco is competent. We draw the attention of the NRC to its own recent findings about the significant

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QA breakdown at the Waterford nuclear power plant. In the September, 1984, Supplement to the Safety Evaluation Report (SSER No. 7), on page 15, the NRC made the following conclusion in the summary of a review of 350 allegations:

2. Quality Assurance activities during most of construction were principally delegated to the major contractor, EBASCO, by the utility. The lack of a fully staffed and effective utility QA program, along with EBASCO's failure to fully carry out the QA responsibilities delegated to them, led to quality problems during construction.

Documentation available to both GAP investigators and the NRC clearly indicates that Ebasco was willing--and in fact did--shortcut compliance of its work to federal regulations.

We also understand that Ebasco is currently under investigation by OI for its activities at Waterford nuclear power plant.

However, it is not necessary to leave Comanche Peak to make general assessments about Ebasco's lack of competence. Both TUGCo and the NRC are well aware of the lengthy trail of misjudgments made by Ebasco's lead employee on the Comanche Peak site. Perhaps the most notable incident currently in front of all parties is the liner plate mishap. (This incident is described in detail in a CASE pleading, September 27, 1984, CASE's Evidence of a Quality Assurance Breakdown.) Mr. Thomas Brandt, senior Ebasco employee, has attempted since the issue came to the attention of the ASLB, to explain the basis for his personal conclusion that the stainless steel liner plates are installed in an indeterminate condition. This position by the senior Ebasco employee is evidence under both the integrity and competence section. It is indicative of the same type of sloppy attitude that has led the Waterford NRC team to reach its conclusions about Ebasco.

Second, Ebasco simply does not meet the independence standard. Ebasco personnel have been involved in every aspect of the construction, inspection, litigation and re-evaluation of the Comanche Peak project.

Even if Ebasco brought in personnel who have had no previous involvement with the project, the company would not have any corporate independence.

We hope that TUGCo has recognized that organizational independence is impossible for Ebasco to achieve.

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Finally, the history of Comanche Peak's Department of Labor record and its Waterford evaluation are full of Ebasco's demonstrated lack of integrity. We draw the attention of the NRC once again to the Secretary of Labor's finding that Thomas Brandt was not credible in his testimony about the termination of Charles Atchison. (See the Secretary of Labor's Decision, Atchison v. Brown & Root, June 10, 1983, pg. .)

We hope that TUGCo has the foresight to voluntarily withdraw Ebasco as its nominee and resubmit a set of three nominees to the agency for their selection.^{2/}

In choosing the companies to nominate for this independent review, we request that the utility be required to adhere to both the independence criteria (discussed above) and the following process recommendations:

1. Do not "hire" any contractor until the NRC has the opportunity to review the nomination for competence, integrity and independence.
2. Arrange for the public (intervenors, former employees, lay persons) to comment on the selection prior to entering into any contract.
3. Be prepared to have the contract for the independent contractor publicly available.

Our specific recommendations regarding the contract of the independent auditor are noted below:

1. The independent contractor should be responsible directly to the NRC, submitting all interim and final product simultaneously with TUGCo and the NRC.
2. The independent contractor should do a historical assessment of TUGCo's prior work.
3. The contract should ensure that, once hired, TUGCo cannot dismiss the independent contractor from the project without prior notice to the NRC

^{2/}This process of nomination, selection and a public meeting on the selection was used at Midland, Zimmer, Diablo Canyon and LaSalle (partial HVAC audit).

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- and an NRC-sponsored public meeting to justify the decision.
4. The contract should require that each auditor subcontract any services for which its direct personnel are not qualified.
 5. The contract should require that the proposed methodology be disclosed: specifically selection criteria and size of the samples for inspections and testing.
 6. The contract should require the auditors to provide calculations demonstrating that it is possible to adequately complete its work during the proposed timeframe.
 7. The contract should require the auditor to support its proposed methodology through references to established professional codes (i.e., ASIM, ASME, ANSI, AWS, etc.).
 8. The contract should require all auditors to report all safety-related information directly to the NRC.
 9. The employees and auditors should demonstrate that the personnel assigned to the project are free from conflicts of interest.
 10. The auditors must recommend corrective action, and then control its implementation.

We are extremely alarmed that TUGCo has provided such sketchy details about the persons or organizations that will be performing the detailed review of the Comanche Peak deficiencies.

We request that first the NRC delineate in writing to TUGCo what it expects in a nomination of a third-party/independent re-review to respond to the findings of the TRT (including instructions to TUGCo to not hire a contractor without NRC approval).

2. Inherent conflict of interest of personnel involved in the Senior Review Team, review team members, issue leaders, etc.

This item is, in actuality, dealt with through the independence section above. However, any analysis of the TUGCo Program Plan would be incomplete without pointing out that the Plan, as submitted,

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contains as the Senior Review Team, issue leaders, and team members, the very people charged by the allegers with causing the problems in the first place.

This flaw is incredulous.

In reality, the situation without modification, results in the following typical scenario:

Inspector "A" identifies problems on the Comanche Peak site with System X to Supervisor "B." Supervisor "B" and Manager "C" prevent Inspector "A" from pursuing his concerns. Inspector "A," believing he has been harassed and intimidated, either quits or is fired and reports his concerns to the NRC TRT.

The TRT substantiates Inspector "A's" concerns and requires TUGCo to respond to those concerns. TUGCo assigns Supervisor "B" and Manager "C" to resolve the concerns initially raised to them by the allegger.

Obviously, the supervisor and management were neither capable nor willing to solve the problems in the first place. They are certainly even more incapable of now indicting their own previous decisions and lack of action.

Any credible response must be done by an independent team.
(See Item 1 above.)

3. Fundamentally inadequate program objectives and principles.

The three sections of the Program Plan describe TUGCo's objectives (§II) and principles (§III).

In §II, Program Plan Objectives, TUGCo states that it is "committed to the safe, reliable, and efficient design, construction and operation of CPSES...." We think this initial statement is illustrative. TUGCo is committed under the law to a code of federal regulations and industry standards. In the past, TUGCo has ignored the former commitment and embarked on an uncharted journey while paying lip service to the latter commitment.

No one questions the intent of TUGCo to ultimately safely operate the Comanche Peak project. That commitment, however, must be to the unique programs and processes which it agreed to through its FSAR commitments.

The five objectives outlined in §II are the correct broad goals. Unfortunately, the Program Plan Project is not capable of fulfilling those objectives.

Section III, Program Plan Principles, uses ten basic elements for each question raised by the NRC. These are listed below, with the primary flaw of each category beside it.

1. Specific Questions - Is limited to only those identified by the NRC TRT.
2. Expanded Reviews - Provides for expanded sample size which can erase the problem.
3. Generic Implications - Only a "forward look"/horizontal approach as opposed to assessment of systematic implications
4. Thorough Reviews - Potentially a "Rube Goldberg" search for an acceptable, instead of legitimate answer.
5. Root Cause - Does not concede that breakdowns in the implementation of the system inherently indicate a defective system.
6. Corrective Action - Lack of comprehensiveness. First, TUGCo should receive centralized and controlled NRC approval for corrective action.
7. Collective Significance- A totally useless category in its present form; only potential use is internal management tool
8. Future Occurrences - Must be controlled by independent auditing firm.
9. Personnel Training/
Qualifications - All personnel doing any work on this project must be independently qualified for tasks, since the qualifications of personnel involved, or the procedures they were qualified to originally may have been totally inadequate.

10. Records

- Narrative format too complicated. Any data submitted to the NRC must also be publicly available, not only "NRC auditable."

4. Inadequate and Unacceptable Program Processes and Quality Assurance (Methodology).

Section IV, Program Process (pages 11 through 15) and Attachments 1-4 of §V, are the extent of the detailed implementing procedures offered by TUGCo.

The abbreviated "bullets" of TUGCo's plan do not provide the level of detail necessary for the public (or the NRC) to have any confidence in the TUGCo Program Plan.

We suggest that Section V be completely rewritten, utilizing a subcontractor with experience in development and implementation of program processes. If TUGCo does bring in a consultant to redevelop this section, we would request permission to provide them comments on the reorganization prior to submission to the NRC.

As a guideline, we include the following list of inadequacies:

1. Program has no organizational independence. (See pages 4 through 9).
2. Program does not include any assumption or acceptance of error as a serious possibility; in other words, the approach is backwards.

For example, a concern substantiated by the TRT and submitted to TUGCo for evaluation and resolution, should be approached from the "ground up." The response team (or independent reviewer) must first gather the appropriate standards and procedures used, review and audit the processes followed by design and construction, identify deficiencies in the craft and QA accomplishment of their tasks from a historical documentation perspective and, finally, audit the as-built condition of the system or component against a final design document.

Then, once the cause of the as-built deficiency has been identified, evaluated and tracked for similar discrepancies, the safety significance of the item can be separately evaluated.

The reverse process--identification of the safety significance, has the very real potential of failing to diagnose a multitude of

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generic causes necessary to understanding the QA/QC breakdown.

Quality Assurance/Quality Control Program

The QA/QC program for this effort should be a completely separate function. Their program and procedures should be submitted to the NRC prior to the start of any program. Currently the QA effort for their response is to come from the existing QA program. If that were actually implemented Mr. Antonio Vega would not only wear the hat of the Senior Review Team in which he is going to audit and review his own work as both a team leader and an issue leader, he will also head up the QA effort to audit his own work while wearing the other three hats.

5. Insufficient Program Record Plans and Tracking Systems

All audit records should be disclosed simultaneously to the public, the ASLB and the utility company. These records should include any and all basis--including calculations and judgments which the TRT was given by TUGCO, as well as all data described in the "Project Working Files Section." (see pg. 13)

More specifically, the record format described in Attachment 2 and 3 should be revised from a narrative form to a one page (with continuations, if necessary) form. (We have found that the format used by the TERA Corporation for the Midland IDVCP project was particularly useful and flexible.)

The narrative approach is simply too subjective, very difficult to work with, and unreliable. As currently proposed, almost each line item of the Action Plan Format includes an interjection of opinion, conjecture and, ultimately, inaccuracies.

Program Process Steps

Attachment 4 to the implementing steps is in chronological order. Our own analysis of the Comanche Peak problems lead us to believe that change in the order of tasks is more sensible.

We propose that Step Eight, Identification of Root Cause and Potential Generic Implications, follow Step Four. Further, we propose that additional steps to review as-built verses final design be included after Step Eight.

We resist the Motion that any rework or corrective action can be taken by TUGCO or any of its contractors prior to any resolution of the concerns itself being approved by the NRC.

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Finally, we strongly object to the TUGCO plans to not forward the new information to the NRC until after it is a completed work project.

6. Overly Narrow and Restricted Scope

Due to schedule constraints on intervenors who were required to submit several motions last week, as well as attend NRC meetings with the new TRT management and the late receipt of the TUGCO Program Plan, this letter will have to be supplemented as it pertains to this section. We anticipate submitting this item within the next two days under separate cover.

VII. Conclusion

The evidence of noncompliances, improprieties, QA breakdowns, misrepresentations, false statements, waste, corporate imprudence and massive construction failures repeatedly meets the general NRC and Region IV criteria for suspension of a construction permit or the denial of an operating license.

In recent months, Comanche Peak has been the subject of repeated revelations and accusations of construction flaws, coverups, and negligence. The evidence already on the record is indicative of a significant failure on the part of TUGCO to demonstrate respect for the nuclear power it hopes to generate, or the agency which regulates its activities.

TUGCO has taken repeated risks with its stockholders' investments, its corporate credibility and its regulatory image. In each of these risks it has lost. It is too much to expect citizens to accept TUGCO's arrogant disregard for the public's health and safety.

GAP recognizes the steps forward by the NRC--establishing a special team to review Comanche Peak's problems and the request for an independent audit, however, this must only be the beginning.

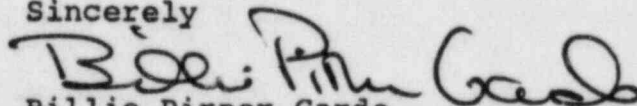
TUGCO has numerous problems to worry about, and it is clearly not in its own best interest to put the strictest possible construction on the regulations under which they have agreed to build this nuclear facility. It is for just this reason that the nuclear industry is regulated, but even regulation, fines, extensive public mistrust, and corporate embarrassment have not humbled Texas Utilities. If Comanche Peak is ever going to be a safe nuclear facility, someone else is going to have to put their professional credibility on the line. This independent auditor, paid by TUGCO, must be given strict guidelines for accountability and responsibility in order to justify its hard line recommendations.

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GAP hopes that both the Office of Nuclear Reactor Regulation and the Region IV office of the NRC will give serious consideration to GAP's concerns and recommendations set forth above, and implement a system whereby there is a truly independent system of auditing the extensive problems with the Comanche Peak plant.

copy to service list

Sincerely



Billie Pirner Garde
Director, Citizens Clinic for
Accountable Government

RECOMMENDATIONS FOR TRT REORGANIZATION

Our recommendations incorporate the best of the various Nuclear Regulatory Commission (NRC) inspection and review programs which the Government Accountability Project (GAP) has worked with since 1980. We believe that with successful implementation of the current Technical Review Team (TRT) plans along with the modifications described below, the NRC should be able to ascertain the actual condition of Comanche Peak, resolve all pending allegations, require the appropriate utility review or reinspection program, and provide assurance that all concerns of the workforce have been found by the NRC now instead of on the eve of licensing. 1/

1. Expanded Field Inspection Effort

We have previously explained this item in our September 26 letter to Darrell Eisenhut regarding the inadequacies of the TRT effort to date. In short, our concern is that the TRT effort will only pursue allegations. We know that the NRC's concept for these special inspection efforts is to follow an allegation until it is confirmed or substantiated and then turn it over to the utility for such things as "root cause evaluation," etc. Such an effort is incomplete when the objective of the special inspection effort is to determine "root cause."

Admittedly there is a large number of allegations and allegers at Comanche Peak. However, it is not acceptable for the agency to depend upon the willingness of plant workers to independently report all significant violations. Such an attitude would be dangerously optimistic.

We also recognize that the NRC does not have unlimited resources. Therefore we suggest that the agency conduct either a "whole building" or "vertical slice" inspection as a means of determining the validity of the projects design and construction status.

We suggest that such an inspection be conducted of an area or system that is completed. This will enable the NRC to check the accuracy of the final design documents. Such an inspection must, of course, be unannounced if it is going to have any legitimacy.

¹As the NRC well knows it is an unfortunate, but predictable phenomena that members of a nuclear plant workforce wait until the last possible minute before making their concerns about plant safety known. This is a result of a combination of factors-including the belief that the problem will be resolved before start-up and fear of losing their job.

Further we propose that the QA TRT personnel conduct a documentation audit of a sample of construction work in progress. To assess the extent that documentation problems invalidate ongoing construction and inspection work.

2. Incorporation of Source Review

Our recommendations in this area stems from our disappointment about how the TRT effort has failed to utilize the knowledgeable members of the workforce who brought the problems to the attention of the NRC. (See also September 26, 1984 letter to Darrell Eisenhut from Billie Garde).

We suggest that the TRT appoint a coordinator to deal specifically with the allegers in order to both utilize their experience and expertise to the fullest extent. Further, the coordinator would insure that the NRC inspection is of the same deficiencies the alleger identified.

We have found in the past that taking the allegers on the site one of the best ways to take advantage of the level of detail and assistance which they can provide. That approach would be particularly helpful at Comanche Peak, especially among those personnel with experience in documentation.

Finally, we propose that the NRC establish a methodology which provides equal time (including preparation time) to the allegers to review the responses proposed by TUGCO to the TRT findings.

This could best be accomplished through the establishment of a review panel composed of members of the public, former CPSES employees, intervenors and any experts which were retained by the intervenors to review the adequacy of the resolutions proposed by TUGCO.

This process would institutionalize much of the time consuming effort of recontacting the various members of the public or allegers for their comments on a particular response. Further, it would provide a process in which the NRC staff - rather than a single representative - could direct questions at the intervenors or allegers who raised the concerns. These types of meetings have been going on informally at plants where there are allegations and disputes over resolutions, however these types of meetings have rarely been institutionalized. If such a procedure is considered GAP will provide the mechanism for setting up the meetings, contacting the appropriate group of allegers, and insuring that the personnel have the questions and materials necessary to adequately prepare for the meeting.

Obviously such meetings would, by financial necessity, have to be held in Texas. By efficiency we expect that the meeting, would be broken down by either discipline or by particular systems (i.e. problems in start-up, documentation deficiencies)

3. Allegation Recruitment Program

GAP has been inundated with requests for help by alle- gers and intervenors at nuclear power plants accross the country. The primary reason cited for contacting us for help in investigating prob- lems is a deep distrust in the Nuclear Regulatory Commission.

We have determined that this distrust among intervenors stems from a history of broken promises by the agency officials, un- professional and often rude treatment by the agency lawyers, _____ and blatant agency-industry "hob-nobbing" on technical issues and legal arguments. Intervenors soon learn that the agency is rarely on the side of the public.

Workers who contact us, however, usually have either little or no prior experience with the NRC or have only "heard" that the agency can not be trusted.

Most workers (except those in Region IV) have no pre- determined attitude against the NRC. They think that the agency wants to make sure a plant is safe and the rules are followed, they turn to GAP as a way to get their concerns to the agency.

Our program for flushing out allegations has been tre- mendously successful at almost every plant. We believe a similar pro- gram should be adopted by the agency as part of _____ final agency re- view at each plant to preclude last minute allegation crises. We sug- gest that Comanche Peak be the place to start.

Outlined below are the steps we think should be taken at this time at Comanche Peak plant to preclude a deluge of allegations throughout the remainder of the plant construction.

1. Establishment of an NRC "hotline" for Comanche Peak workers to report their concerns.
2. An on-site NRC information program in which the TRT, its purposes, and the conditions of confidentiality are explained
3. Publication and availability of the TRT's unanswered questions to those members of the workforce who can supply the answers.

4. Establishment of a separate NRC exit interview and information sheet for all departing employees, explaining their Department of Labor rights and their rights and obligations under the law to report problems.
(GAP will be glad to provide a copy of the form we use during our major investigations)
5. A structural "debriefing" program which is conducted by skilled interviewers as opposed to technical inspectors.

GAP representatives will be glad to meet with any or all members of the TRT to discuss in more detail any of our proposals described in this attachment.