

August 29, 1990

MEMORANDUM FOR: Jean Lee, Allegation Coordinator
Office of Nuclear Reactor Regulation

FROM: Ben B. Hayes, Director
Office of Investigations *ISI B Hayes*

SUBJECT: LETTER FROM STEPHEN B. COMLEY REGARDING SEABROOK
STATION NUCLEAR PLANT

This letter is forwarded to you for appropriate action.

Attachment:
As Stated

Distribution:
Seabrook
Reading

lee/joyce

OI: *[Signature]*
DMurphy:Jw
8/29/90

OI: *[Signature]*
RFortuna
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We The People, Inc.
of the United States

Stop Chernobyl Here

U.S. NRC

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OFFICE OF INVESTIGATIONS
HEADQUARTERS

June 20, 1990

- DD: RF
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DATE: _____
TIME: _____

Mr. Ben Hayes
Office of Investigations
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Handwritten notes:
D, head cc to: IG,
Tom Mundy, NRR; Thompson
& OI RI, + FBI
BA
6-29-90

Dear Mr. Hayes,

Enclosed for your review please find a copy of our letter of June 14, 1990 to Mr. David Williams of the Office of Inspector General, Nuclear Regulatory Commission along with a copy of a chronology prepared by Ernest Hadley, attorney for We The People. This chronology documents the quality assurance problems pertaining to welding encountered during the construction phase of Seabrook Station in Seabrook, New Hampshire throughout the decade of 1980.

As stated in the chronology, backup documentation is available upon request; please do not hesitate to contact us regarding this matter.

Sincerely,

Signature: Stephen B. Comley
Stephen B. Comley
Executive Director

SBC/de
Enclosures

Handwritten number: 9868130713

We The People, Inc.
of the United States
Stop Chernobyl Here

June 14, 1990

Mr. David Williams
Office of the Inspector General
Nuclear Regulatory Commission
Washington DC 20555

Dear Mr. Williams,

During our meeting March 8, 1990 with Mr. Leo Norton and Mr. Robert Watkins of your staff, we agreed that we would prepare and provide your office with a chronology of quality assurance problems pertaining to the welding at Seabrook Station. Enclosed you will find that report which has been prepared by Ernest Hadley, attorney for We The People, Inc. It shows that the 20% rejection rate for welds found by Mr. Joseph Wampler during his 1983 Level III inspections was part of an on-going problem with welds and related materials. These problems date from 1980 to the present and include high weld rejection rates, falsified quality assurance documents, inspection lapses, unqualified welders and inspectors and the use of counterfeit substandard parts in the construction of this plant.

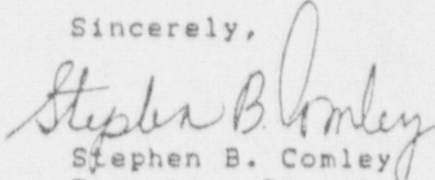
The observations of an independent nuclear plant expert noted at the end of this chronology find an "apparent lack of objectivity" of NRC inspectors at Seabrook Station.

We believe that both the history of weld safety problems and the NRC's treatment of them warrant a serious investigation. We suggest that such an investigation should also include gathering information from the Employees Legal Project (their contact person would be Mr. Renny Cushing, telephone 603-926-6718), a non-profit research organization which has confidentially interviewed many former Seabrook Station workers over the last 4 years.

page 2.

Since the NRC has chosen to license Seabrook, which is now at 50% capacity, without thoroughly investigation these safety concerns. Hopefully by working together we will be able to stop a Chernobyl instead of reacting to one. The Russian people and our own people at Three Mile Island will testify that once you have experienced a nuclear disaster, hindsight administration is not acceptable.

Sincerely,


Stephen B. Comley
Executive Director

cc: Rep. Peter Kostmayer, Chairman of the House Energy Comm.
on Oversight and Investigation
House Interior and Insular Affairs Chairman Morris Udall
Mr. Ben Hayes, Director of the NRC's Office of
Investigation
Sen. Edward Kennedy
Sen. John Kerry
Congressman Edward Markey
Congressman Nicholas Mavroules

We The People, Inc.
of the United States

Stop Chernobyl Here

SEABROOK STATION CHRONOLOGY OF EVENTS

The following chronology, compiled by We The People, Inc., documents the history of major problems encountered during the construction phase of Seabrook Station in Seabrook, New Hampshire throughout the decade of 1980. Backup documentation is available upon request.

1980

* Letter from PSNH Site Manager to UE&C Resident Construction Manager: "The quality of pipe welding...is cause for serious concern. The rejection rate for radiographed safety class welds performed by Pullman-Higgins was 38% as of 6/10/80. The rejection rate for weld repairs was 50%...From 5/1/80 to 6/10/80 the rejection rate for both new welds and repairs was 60%...The above examples show an unacceptable situation wherein the quality of welding is poor and seems to be worsening." 1

1981

* Some welds in the main steam feed restraints were never QC inspected; two Pullman-Higgins welds (4001 and 4002) performed in 1981 were still cracked and unrepaired when the work was completed (2 301-89-004). 2

* YAEC Site Audit: "Deficiencies identified...weaknesses in the QA program. Weld monitoring was...a repetitive deficiency..." 3

1982

* YAEC Site Audit: "Twenty deficiencies were identified; two primary areas of concern [are] material identification and weld monitoring. . . . P-H management less than effective in taking corrective action. . . ." 4

* A Stop Work Order was issued by P-H in part because of

1 / 1989 Employees Legal Project (ELP) Report, Exhibit G, Testimony for the State of Vermont Department of Public Service, 12/86, VII, Pullman-Higgins Problems, Exhibits, at p. 1. Employees Legal Project, Box 633, Hampton, New Hampshire 03842

2 / 1989 ELP Report, Appendix H: Statements of Concerned Individuals, 301-89-004.

3 / 1989 ELP Report, Exhibit G, at p. 2.

4 / Id. at p. 3.

unqualified welding procedures. ⁵

* A concerned individual told the NRC in 1984 that in 1982 he has seen Dravo Co. piping with faulty shop welds in turbine building 1, in the radioactive pipe tunnel and in reactor coolant pipe in the main steam feed area. P-H QC told him Dravo welds were not their concern. Dravo Co. was reported by the NRC in 1988 to have supplied counterfeit, possibly defective, piping to Seabrook Station. ⁶

1983

* YAEC Audit "The lack of timely response to open items, the new items revealed during this audit ... indicate a need for P-H ... to display a proper sense of urgency relative to identified program deficiencies." ⁷

* Counterfeit unistrut bolts installed throughout the plant in 1982 and 1983 were partially replaced in late 1983 because the bolts were of the wrong material and were not strong enough. However, the only bolts replaced were those which were easily accessible. The reporting individual was a member of the team changing the bolts. There is apparently no record of which bolts were replaced and which were not. The bolts hold up electrical raceways, cables, conduits, etc. ⁸

* Twenty people in a 30 person cadwelding crew were fired for falsifying test cadweld splices. The cheating violated several QA requirements. The NRC did not issue a violation to the utility, or require the utility to investigate the cause of the problem. ⁹

* An NRC report "identifies the lack of requisite QA coverage on certain safety-related systems." ¹⁰

JAMES PADOVANO

-- James Padovano, a Pullman-Higgins quality control inspector, conducted between 2,399 and 2,408 non-destructive examination at

5 / Id. at p. 5.

6 / 1989 ELP Report, Appendix H, 112-84-012; Appendix E, Exhibit B; "Counterfeit and Substandard Materials in US Nuclear Power Plants, Parts I and II, and Seabrook Station Involvement," We The People, 1988.

7 / 1989 ELP Report, Exhibit G at p. 13.

8 / 1989 ELP Report, Exhibit G, 149-89-002.

9 / 1989 ELP Report, Appendix H, 195-89-001.

10 / USNRC Systematic Assessment of Licensee Performance, August, 1983.

Seabrook Station between July 1982 and March 1983.¹¹

-- He was indicted by a Federal grand jury in June 1985 for filing inspection reports on welds in the piping system for which he had performed no inspections. He entered a plea agreement with the US attorney, pled guilty to two counts of falsifying documents (each count carries a maximum sentence of five years, with a possible fine not to exceed \$250,000), and was sentenced to six months incarceration and three years probation.¹²

-- The NRC allowed Pullman-Higgins to hire and supervise a company which performed the reinspections of Padovano's work; apparently 1,000 of the welds were never actually reinspected.¹³

-- An NRC investigator told We The People during an interview at the Department of Justice that the NRC has inspected less than 10% of Padovano's work. The NRC was told that during the Padovano investigation, records had been burned.¹⁴

-- Padovano told a member of We The People that he felt he was encouraged to falsify weld reports and that others were doing the same.

-- According to a concerned individual who was QC weld inspector in 1983, Padovano had worked at three nuclear plants previously; at two he had falsified weld inspections, using the same x-ray on many welds. A Seabrook Station employee who had worked with Padovano at a plant in Oswego had caught Padovano falsifying inspections there. Oswego management did not tell the NRC and gave Padovano a good recommendation to Seabrook. P-H did not check Padovano's background. One of his fellow inspectors at Seabrook checked on Padovano's LP exams, found bad welds and informed the NRC. The company gave Padovano a good recommendation and he went back to work at another nuclear power plant.¹⁵

11 / PSNH Letters to NRC Region I, 6/3/83, 7/5/83, 8/4/83, 8/16/83, 9/9/83, 10/12/83, 12/2/83, 12/21/83.

12 / United States of America v. James Padovano, Docket No. 85-000016-01-L (D. NH, Sept. 30, 1985).

13 / See Note 10.

14 / During interview of Stephen B. Comley at Department of Justice, Washington DC on 1/15/87.

15 / 1989 ELP Report, Appendix H, 108-86-007.

-- The NRC concluded that Padovano's was an isolated case of document falsification. However a weld inspector on the job at the same time as Padovano said that he thought Padovano was only 1 of 100 people who had falsified weld inspections. He said Padovano was a scapegoat. Another weld inspector provided documentation of a weld inspection falsification, and a further instance of a forged signature was reported by the NRC itself (NCR 7433), which, by chance, the NRC discovered during a spot review.¹⁶

-- Updates to the NRC from the utility regarding the status of reinspections of Padovano's weld falsifications reveal inconsistencies. For example, the categories into which welds were placed varied throughout the utility's reports. It is never clear in the PSNH reports to the NRC how many safety-related welds fell into each category, therefore it is unknown how many un-reinspected welds labelled "inaccessible" and "accept-as-is" were safety related welds.¹⁷

-- The NRC report said "about one third" of the 2399 Padovano welds were safety related, but a Dept. of Justice press release stated that "More than half of these welds were classified as safety related, i.e., they were on critical systems within the plant."¹⁸

JOSEPH WAMPLER

-- Joseph D. Wampler was hired by Pullman Higgins in August, 1983. He was the company's only Site Level III inspector at the time. He oversaw non-destructive examination inspections performed by P-H, and inspected weld x-ray packages dating back to 1981, though most were from early 1983. He found a rejection rate of 20% and considered 5% to be high. The company gave him less than a month to inspect 970 packages of backlogged weld x-rays; there were numerous paperwork errors, lack of fusion and porosity rejects, and illegible film.

-- Wampler was terminated by P-H on January 3, 1984.

-- Wampler filed a Dept. of Labor suit stating he was terminated in retaliation for exposing safety problems. In a March 1984 agreement with the utility, Wampler withdrew his complaint and agreed not to report safety violations in exchange for a money payment.¹⁹

¹⁶ / 1989 ELP Report, Appendix B; NRC Combined Report 50-443/84-12 and 84-06, pp. 60-61.

¹⁷ / 1989 ELP Report, Appendix B at p. 5.

¹⁸ / NRC Inspection Report 50-443/85-25 at p. 6; Press Release of Sept. 20, 1985, Department of Justice, District of New Hampshire.

¹⁹ / U.S. Department of Labor, In the matter of Joseph D. Wampler vs. Pullman-Higgins Co., Case No. 84-ERA-13 (March 30, 1984).

1984

- * A welder used a graphite pencil in a weld in the equipment vault to hide the welds porosity; a QC inspector accepted the weld. ²⁰
- * An INPO evaluation stated control of pipe installation and welding processes need improvement. Improvement is needed in training craftsmen and QC inspectors. ²¹
- * A woman in the document section of P-H destroyed many documents the week before UE&C took over for P-H. ²²
- * UE&C changed procedures on Feb. 20, 1984, to lower welding inspection criteria. This reporting individual was a weld inspector. ²³
- * The company began using cheaper piping as money got tight. ²⁴
- * Faulty welds were performed in the pipe tunnel; 100 suspect welds were not inspected. A QC inspector was ordered not to inspect welds. ²⁵
- * Ebasco Schedule Review: "A backlog of P-H documentation packages to support 18 safety related BIPS has accumulated. A backlog of 1,268 P-H radiographic film packages was recently discovered by YAEC QA." ²⁶
- * P-H records Management Program: The review showed documents with dates and signatures missing, NRC numbers transposed, ISO revision numbers missing, conflicting data entries on related inspections..." ²⁷
- * Non-conformance report NCR-73-011687 R/A identifies falsified QC signatures on a weld process sheet. It appears Pullman Higgins was using welders to QC their own welds prior to this 8/85 NCR. ²⁸

20 / 1989

21 / 1989 ELP Report, Appendix G at pp. 15, 20.

22 / ELP Report, Appendix H, 111-86-003.

23 / Id., 110-87-002.

24 / Id., 112-84-003.

25 / Id., 112-84-006, 007.

26 / 1989 ELP Report, Exhibit G at p. 16.

27 / Id.

28 / Id., 090-86-002.

* An NRC report stated "the site was experiencing difficulty in the ultrasonic examination of 6-inch diameter stainless steel welds. Also, the valve sides of the 6-inch piping welds were not being examined. It was not clear to the inspector as to what type of examination the licensee plans for these welds." ²⁹

* UE&C again lowered weld inspection criteria. ³⁰

1986

* A non-conformance report was changed to make the problem appear to be with Unit 2. ³¹

* An individual witnessed a welder welding stainless steel although he was not qualified to do so; the welder then etched another welder's initial into the completed weld. A QC inspector signed off on rejected welds without inspection, based on who the welder was. ³²

* Lumbermens Mutual Casualty Company provided Authorized Nuclear Inspector (ANI) inspection services to Seabrook Station. In May, 1985, unable to provide a qualified inspector, Lumbermens hired an inspection trainee, and sent Seabrook Station a letter of instruction stating this individual could perform only limited inspections under the supervision of a qualified ANI. In March this individual failed every section of the test to qualify as an ANI. In April 1986 this individual was found in possession of marijuana while driving a company car and was fired.

* An investigator for Lumbermens found that the qualified ANI had performed independent inspections of pipe welds, in violation of the American Society of Mechanical Engineers Code and of the letter of instruction from Lumbermens to Seabrook Station. Lumbermens investigator recommended a full investigation, but Lumbermens dropped the matter because an investigation would have interfered with Seabrook Station's process of compiling data certification reports. The ANI inspector's work is suspect and there appears to have been a deliberate coverup of the fact these inspections were performed by an unqualified inspector. ³³ The attitude in most NRC documentation available is one of unwillingness to believe anything could be wrong at Seabrook.

* An individual wrote an NCR on a violation of weld inspection procedures; the NCR was canceled by his QA supervisor. This was one of 20 or 30 violations of weld procedures this person encountered. ³⁴

²⁹ / USNRC Inspection Report 50-443/85-25 at p. 8.

³⁰ / See note 22.

³¹ / 1989 ELP Report, Appendix H, 119-86-001.

³² / Id., 077-86-12, 13, 16.

³³ / We The People Letter to U. S. Department of Justice, 1/11/88.

³⁴ / 1989 ELP Report, Appendix H, 84-86-001.

* An individual who worked for General Electric was concerned with vendor practices. The source inspector for GE passed products on inspection before they had ever been poured. X-rays for completed welds were incorrect; all parts of the welds could not be seen. Upper tie plates which pick up the rods were tested with a sample program: 5 x-rays for a batch of 100. If the x-rays revealed cracks in the tie plates, GE would continue x-raying the plates until they had 5 good x-rays. Using the 5 x-rays to prove the batch was good, GE would ship them out. 35

* An individual saw a Mass. Gas official falsify certifications for materials supplied to UE&C. 36

1987

* The ANI signed off illegible documentation and signed off on work which was never looked at. This concerned individual was a weld inspector. 37

* There are indications that anaerobic bacteria is causing corrosion (MIC or microbiologically induced corrosion) in piping and other equipment. MIC is a recently-discovered safety hazard at nuclear power plants, and current treatment methods don't work. The corrosion can be a particular problem when the bacteria sets in improperly welded areas of pipe. 38

COUNTERFEIT MATERIALS AT SEABROOK STATION

1988

* During an NRC-ordered inspection in August 1988, PSNH discovered 369 "suspect" piping fixtures built into Seabrook Station, but said those fixtures met safety requirements. However a chemical analysis by an independent laboratory in October 1988 revealed some flanges in the service water system were defective. The NRC had told utilities to test bolts because counterfeit bolts have been installed in the plants. They can shear off or melt under normal stress. However, PSNH was only required to test ten safety and ten non-safety bolts found in the warehouse. This was two years after plant construction was completed; no bolts in the actual plant itself were tested.

* The NRC announced that tens of thousands of counterfeit, possibly defective, materials had been built into half of US nuclear power plants. The agency called off all further investigations after an industry-sponsored computer study convinced the NRC to lower safety standards

35 / Id., 100-86-001, 002, 003, 004.

36 / Id., 111-86-007.

37 / Id., 110-87-005.

38 / 1989 ELP Report, Appendices A & F.

rather than require nuclear utilities to find and replace materials which did not meet the safety requirements. Counterfeit materials include circuit breakers, valves, piping materials, pumps and fasteners. Companies which supplied materials to Seabrook Station fall into two categories: those whose labels were illegally affixed to used or below-grade parts; and those known to have manufactured or distributed cheaper, weaker or less accurate materials falsely labelled as meeting safety requirements. Those companies include General Electric, Westinghouse, Underwriters Laboratories, Dravo Piping Co., Pullman Power Co., Planned Maintenance Systems, West Jersey Manufacturing Co., and Piping Supplies, Inc. 39

1989

* During a public hearing held September 6, 1989 to discuss the NRC Region I inspection team report, Seabrook operators were sited as reacting in an unacceptable way to equipment failure that brought about an abrupt halt to low power testing June 22, 1989. Beyond the criticism of Seabrook staff reaction to proper shut down procedures, Mr. Eselgroth, Mr. Dudley and Mr. Martin of the NRC, gave little indication that either their agency or the licensee regarded falsification of a maintenance inspection sign-off on an unrepaired valve as a serious matter, even though the valve in question, No. 3011, led to the actual emergency shut down. There is no evidence at present to show that the person who falsified this report was ever reprimanded. 40

* Quality Technology Company, an independent company of nuclear plant experts, examined Seabrook Station documentation and information from plant workers. QTC found that NRC reports dealing with various safety concerns show an "apparent lack of objectivity" by NRC in these matters. The attitude in most NRC documentation available is one of unwillingness to believe anything could be wrong at Seabrook. 41

39 / "Counterfeit and Substandard Materials in US Nuclear Power Plants, Parts I and II, and Seabrook Station Involvement," We The People, 1988.

40 / September 6, 1989 Public Hearing at University of New Hampshire to Discuss the Results of NRC Region I on Seabrook Unit I at Durham, New Hampshire pp. 107-117

41 / 1989 ELP report: Quality Technology Company's Investigation, NRC Lack of Professionalism

* The NRC did not do everything possible, in a professional manner, to investigate concerns.⁴² OTC has discovered a continuing failure by the NRC to address quality problems as such.⁴³

* "NRC actions in the area of document falsification do not appear to address the full spectrum of the QA breakdown that occurred. These "isolated incidents" as the NRC calls them make up a programmatic problem. The NRC cannot or will not see problems at Seabrook Station as other than "isolated incidents...".⁴⁴

42 / Id., at p. 19.

43 / Id., at p. 40.

44 / Id., at p. 41.

Inside N.R.C.



INSIDE N.R.C. — June 18, 1990

An exclusive report on the U.S. Nuclear Regulatory Commission

NO SIGNIFICANT EVENTS EARNS PGE TOP RATING FOR OPERATIONS

NRC awarded Portland General Electric Co. (PGE) a top Category 1 rating in the area of plant operations in the agency's latest SALP review of performance at Trojan. Region V Administrator John Martin said the absence of any significant operational events during the 15-month review period was a primary reason for the high rating.

The utility, however, was given a low Category 3 rating in the area of maintenance/surveillance. Martin said the SALP board "considered the planning, scheduling, and oversight of maintenance/surveillance work activities to be weak, and the quality of associated procedures and work instructions to be in need of improvement." Some improvement was noted at the end of the period, but Martin said, "this area clearly warrants close future scrutiny by PGE management."

According to Nucleonics Week, Trojan, a 1,178-MW, Westinghouse PWR, had a gross capacity factor in 1989 of 56.61%. Through April 1990, the unit's capacity factor was 61.83%.

In the area of radiological controls, the SALP report noted that total collective dose has been increasing since 1987, with the 1989 total at 420 person-rem. The report said that the development of a "healthy ALARA program was hindered by plantwide problems with inefficient outage coordination, inconsistent job scope evaluation, and ineffective planning."

The report noted that PGE has taken steps to "enhance its Trojan management team and to implement broad scope improvements through the nuclear division improvement plan." The report said, however, that many of the changes have yet to occur and several key management positions were vacant, being temporarily filled, or were in transition as the SALP period ended, and therefore, the results of PGE's efforts are only recently beginning to be observed.

NRC INVESTIGATION PROBES ALLEGATIONS OF FAULTY SEABROOK WELDING

A two-month NRC investigation aimed at resolving questions about the integrity of certain Seabrook pipe welds and related quality assurance matters is coming to a close, with a report expected to be drafted by the end of the month.

Lee Spessard, the NRC senior manager leading the investigation, declined to discuss details of the report. Spessard said the group was chartered "to do an after-the-fact independent evaluation" of pipe welding and nondestructive examination activities at Seabrook.

NRC launched the independent team investigation about one month after the commission authorized full-power operation of the controversial plant (ENR, 12 March, 5). Despite the commission's March 1 vote okaying full-power operation, NRC and congressional staffers and consultants have been poring over years of inspection reports, radiographs, and other records to determine if welds for safety-related piping at Seabrook meet regulatory requirements and if a paper trail, supporting that conclusion, exists.

Questions about the integrity of the welds—or at least the integrity of the quality assurance program for the welds—came to light six years ago during a Department of Labor grievance hearing involving a former Seabrook contract worker. The worker, Joseph Wampler, was employed by Pullman-Higgins Co., a piping contractor for Seabrook from August 1983 to January 1984. He was fired on the grounds that he was uncooperative and caused dissension at work.

In his brief tenure at Seabrook, Wampler was assigned to examine hundreds of backlogged weld radiographs. Of those he reviewed, Wampler rejected about 20%, either because the radiograph could not be read because it had not been shot properly or had faded, or because the radiograph showed a weld that did not meet code. Wampler alleged that one of the reasons he was fired was because he rejected too many of the weld radiographs.

Not until earlier this year did NRC make a concerted effort to investigate Wampler's information. Wampler's allegations, which were surfaced by anti-Seabrook activist Stephen Comley, led to the now-broadened inquiry.

At first, NRC senior officials said the 20% reject rate cited by Wampler was "not unusual" in the industry. The agency staffers, citing "some confusion over the exact nature of Mr. Wampler's function" at Pullman-Higgins, have since pulled back from that statement, but are holding to the posi-

WE THE PEOPLE HAS SETUP A DEFENSE FUND FOR WAMPLER AND OTHERS. MR. WAMPLER IS REPRESENTED BY WE THE PEOPLE'S ATTORNEY ERNEST HADLEY, WHO CAN BE REACHED AT 508-291-1354

unnlike the 20% reject rate, by itself, is of very limited relevance in assessing overall plant safety.

NRC's confidence in the integrity of the welds and the welding program appears to be based largely on two things: a "100% check of the radiographs" conducted by Yankee Atomic Electric Co. and a recent NRC review of 100 weld radiographs.

Responding to questions from Sen. Edward Kennedy (D-Mass.), NRC said the company, "deemed it prudent to do an independent 100% review" of Pullman-Higgins radiograph work. In the beginning, the 100% review was "an ongoing, informal process," NRC said, but in 1984 Yankee formalized the review by adopting a written procedure "which contained provisions to review all safety-related vendor and site generated radiographs."

There appears, however, to be some disagreement between the licensee and NRC over whether the 1984 written procedure, in fact, controlled the 100% weld radiograph review.

New Hampshire Yankee spokesman Ron Sher told Inside N.R.C. that procedures for the 100% review "had always been the same." Contrary to NRC's understanding, the 1984 written procedure applied to another Yankee review program—not the 100% review.

According to Sher, in 1984, Yankee adopted a program whereby they duplicated a variety of non-destructive examinations that had already been conducted. Those included radiography, liquid penetrant, and magnetic particle examinations, done on a number of randomly selected welds. That effort aimed to check the adequacy of Yankee contractors' nondestructive examination operations, but did not constitute a 100% review.

The informality of the process early on, and the concomitant lack of records on the effort, troubles congressional critics who argue that relying on such an informal, scantily documented review indicates noncompliance with NRC's quality assurance criteria. These critics acknowledge that there is no evidence of specific defective welds, but they argue there is questionable basis for NRC certification that the welding was done in accord with NRC regulations.

Spokesman Sher noted that the Yankee 100% review was not a regulatory requirement. Rather, it was a step beyond what NRC regulations called for and therefore, not beholden to NRC documentation requirements. "It's not a requirement...but its the type of conservative approach we've always taken at Seabrook," Sher said.

Asked to further explore the apparent contradiction in Yankee and NRC understanding of the role the 1984 written procedures played in the 100% review, Sher said it would be "inappropriate" to respond to additional inquiries that "parallel" the NRC investigation. "Given this is part of the regulatory review, the appropriate forum for us to answer these (questions) is NRC," Sher said.

Sher added that the company believes it has "demonstrated to NRC that the welds and weld records meet NRC and code requirements." He said he was aware Inside N.R.C. was talking to Seabrook's critics and contended that the Seabrook's "dedicated opponents will probably never be satisfied with what we do at Seabrook." But he added, "we want to assure the general public" that the safe operation of the plant is foremost in the company's mind.

In an April 24 interview with the NRC review group, Wampler said the radiographs he reviewed between August 1983 and January 1984 "had been approved and sitting around since early 1982" and that Yankee Atomic's own review "was turning up almost 19% to 20% reject rate over and above what I was bringing to them."

According to Wampler, prior to November 22, 1983, he and Yankee Atomic's radiographic reviewers informally passed questionable radiographs back and forth.

Yankee Atomic quality assurance engineer Dick Julian would call Wampler and ask him to review radiograph film packages that he, Julian, thought were questionable. The packages had been approved by Pullman-Higgins before Julian reviewed them.

If Wampler agreed with Julian's interpretation that a weld or weld package was rejectable, Wampler would hand carry the package back to Pullman-Higgins and have the weld re-radiographed. If a repair was warranted, a weld repair order would be generated.

But, according to Wampler, the entire procedure was accomplished without preparation of Yankee Atomic deficiency reports or other paperwork that would be maintained as a quality record.

At a November 22, 1983 meeting, it was agreed that Yankee Atomic's rejection of a weld or weld package would thereafter be documented on all radiographic packages containing rejectable indications, Wampler said.

It is unclear at this time whether the informal nature of the review and apparent gap in the paper trail would be a violation of NRC regulations, but those in Congress eyeing the issue are concerned.

—Dave Airoso, Washington

CONNELLY FILES FOIA FOR RECORDS OF CIA INVESTIGATIONS OF HERSELF

Sharon Connelly, former director of the now-disbanded Office of Inspector & Auditor (OIA), has filed a request under the Freedom of Information Act for all NRC records dealing with, among other things, OIA investigations of Sharon Connelly.

Connelly was a central figure in the agency's controversial and fruitless investigation of Roger Fortuna, deputy director of the agency's Office of Investigations. In 1988, Connelly arranged to purchase surreptitiously made tape recordings of telephone conversations between Fortuna and an antinuclear activist. Connelly paid \$6,000 in cash for the tapes, with the money coming from a slush fund set up by former Executive Director for Operations (EDO) Victor Stello (INRC, 26 Feb., 1).

Several investigations have found that Stello and Connelly circumvented the advice of the agency's general counsel in setting up the slush fund and buying the tapes, and their action against Fortuna has repeatedly been characterized as vindictive.

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Inside N.R.C.



INSIDE N.R.C. — June 18, 1990

An exclusive report on the U.S. Nuclear Regulatory Commission

NO SIGNIFICANT EVENTS EARNS PGE TOP RATING FOR OPERATIONS

NRC awarded Portland General Electric Co. (PGE) a top Category 1 rating in the area of plant operations in the agency's latest SALP review of performance at Trojan. Region V Administrator John Martin said the absence of any significant operational events during the 15-month review period was a primary reason for the high rating.

The utility, however, was given a low Category 3 rating in the area of maintenance/surveillance. Martin said the SALP board "considered the planning, scheduling, and oversight of maintenance/surveillance work activities to be weak, and the quality of associated procedures and work instructions to be in need of improvement." Some improvement was noted at the end of the period, but, Martin said, "this area clearly warrants close future scrutiny by PGE management."

According to Nucleonics Week, Trojan, a 1,178-MW, Westinghouse PWR, had a gross capacity factor in 1989 of 56.61%. Through April 1990, the unit's capacity factor was 61.83%.

In the area of radiological controls, the SALP report noted that total collective dose has been increasing since 1987, with the 1989 total at 420 person-rem. The report said that the development of a "healthy ALARA program was hindered by plantwide problems with inefficient outage coordination, inconsistent job scope evaluation, and ineffective planning."

The report noted that PGE has taken steps to "enhance its Trojan management team and to implement broad scope improvements through the nuclear division improvement plan." The report said, however, that many of the changes have yet to occur and several key management positions were vacant, being temporarily filled, or were in transition as the SALP period ended, and therefore, the results of PGE's efforts are only recently beginning to be observed.

NRC INVESTIGATION PROBE ALLEGATIONS OF FAULTY SEABROOK WELDING

A two-month NRC investigation aimed at resolving questions about the integrity of certain Seabrook pipe welds and related quality assurance matters is coming to a close, with a report expected to be drafted by the end of the month.

Lee Spessard, the NRC senior manager leading the investigation, declined to discuss details of the report. Spessard said the group was chartered "to do an after-the-fact independent evaluation" of pipe welding and nondestructive examination activities at Seabrook.

NRC launched the independent team investigation about one month after the commission authorized full-power operation of the controversial plant (ENR, 12 March, 5). Despite the commission's March 1 vote okaying full-power operation, NRC and congressional staffers and consultants have been poring over years of inspection reports, radiographs, and other records to determine if welds for safety-related piping at Seabrook meet regulatory requirements and if a paper trail, supporting that conclusion, exists.

Questions about the integrity of the welds—or at least the integrity of the quality assurance program for the welds—came to light six years ago during a Department of Labor grievance hearing involving a former Seabrook contract worker. The worker, Joseph Wampler, was employed by Pullman-Higgins Co., a piping contractor for Seabrook from August 1983 to January 1984. He was fired on the grounds that he was uncooperative and caused dissension at work.

In his brief tenure at Seabrook, Wampler was assigned to examine hundreds of backlogged weld radiographs. Of those he reviewed, Wampler rejected about 20%, either because the radiograph could not be read because it had not been shot properly or had faded, or because the radiograph showed a weld that did not meet code. Wampler alleged that one of the reasons he was fired was because he rejected too many of the weld radiographs.

Not until earlier this year did NRC make a concerted effort to investigate Wampler's information. Wampler's allegations, which were surfaced by anti-Seabrook activist Stephen Comley, led to the now-broadened inquiry.

At first, NRC senior officials said the 20% reject rate cited by Wampler was "not unusual" in the industry. The agency staffers, citing "some confusion over the exact nature of Mr. Wampler's function" at Pullman-Higgins, have since pulled back from that statement, but are holding to the posi-

WE THE PEOPLE HAS SETUP A DEFENSE FUND FOR WAMPLER AND OTHERS. MR. WAMPLER IS REPRESENTED BY WE THE PEOPLE'S ATTORNEY ERNEST HADLEY, WHO CAN BE REACHED AT 508-291-1354

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and that the 20% reject rate, by itself, is of very limited relevance in assessing overall plant safety.

NRC's confidence in the integrity of the welds and the welding program appears to be based largely on two things: a "100% check of the radiographs" conducted by Yankee Atomic Electric Co. and a recent NRC review of 100 weld radiographs.

Responding to questions from Sen. Edward Kennedy (D-Mass.), NRC said the company, "deemed it prudent to do an independent 100% review" of Pullman-Higgins radiograph work. In the beginning, the 100% review was "an ongoing, informal process," NRC said, but in 1984 Yankee formalized the review by adopting a written procedure "which contained provisions to review all safety-related vendor and site generated radiographs."

There appears, however, to be some disagreement between the licensee and NRC over whether the 1984 written procedures, in fact, controlled the 100% weld radiograph review.

New Hampshire Yankee spokesman Ron Sher told Inside N.R.C. that procedures for the 100% review "had always been the same." Contrary to NRC's understanding, the 1984 written procedure applied to another Yankee review program—not the 100% review.

According to Sher, in 1984, Yankee adopted a program whereby they duplicated a variety of non-destructive examinations that had already been conducted. Those included radiography, liquid penetrant, and magnetic particle examinations, done on a number of randomly selected welds. That effort aimed to check the adequacy of Yankee contractors' nondestructive examination operations, but did not constitute a 100% review.

The informality of the process early on, and the concomitant lack of records on the effort, troubles congressional critics who argue that relying on such an informal, scantily documented review indicates noncompliance with NRC's quality assurance criteria. These critics acknowledge that there is no evidence of specific defective welds, but they argue there is questionable basis for NRC certification that the welding was done in accord with NRC regulations.

Spokesman Sher noted that the Yankee 100% review was not a regulatory requirement. Rather, it was a step beyond what NRC regulations called for and therefore, not beholden to NRC documentation requirements. "It's not a requirement...but its the type of conservative approach we've always taken at Seabrook," Sher said.

Asked to further explore the apparent contradiction in Yankee and NRC understanding of the role the 1984 written procedures played in the 100% review, Sher said it would be "inappropriate" to respond to additional inquiries that "parallel" the NRC investigation. "Given this is part of the regulatory review, the appropriate forum for us to answer these (questions) is NRC," Sher said.

Sher added that the company believes it has "demonstrated to NRC that the welds and weld records meet NRC and code requirements." He said he was aware Inside N.R.C. was talking to Seabrook's critics and contended that the Seabrook's "dedicated opponents will probably never be satisfied with what we do at Seabrook." But he added, "we want to assure the general public" that the safe operation of the plant is foremost in the company's mind.

In an April 24 interview with the NRC review group, Wampler said the radiographs he reviewed between August 1983 and January 1984 "had been approved and sitting around since early 1982" and that Yankee Atomic's own review "was turning up almost 19% to 20% reject rate over and above what I was bringing to them."

According to Wampler, prior to November 22, 1983, he and Yankee Atomic's radiographic reviewers informally passed questionable radiographs back and forth.

Yankee Atomic quality assurance engineer Dick Julian would call Wampler and ask him to review radiograph film packages that he, Julian, thought were questionable. The packages had been approved by Pullman-Higgins before Julian reviewed them.

If Wampler agreed with Julian's interpretation that a weld or weld package was rejectable, Wampler would hand carry the package back to Pullman-Higgins and have the weld re-radiographed. If a repair was warranted, a weld repair order would be generated.

But, according to Wampler, the entire procedure was accomplished without preparation of Yankee Atomic deficiency reports or other paperwork that would be maintained as a quality record.

At a November 22, 1983 meeting, it was agreed that Yankee Atomic's rejection of a weld or weld package would thereafter be documented on all radiographic packages containing rejectable indications, Wampler said.

It is unclear at this time whether the informal nature of the review and apparent gap in the paper trail would be a violation of NRC regulations, but those in Congress eyeing the issue are concerned.

—Dave Airoso, Washington

CONNELLY FILES FOIA FOR RECORDS OF CIA INVESTIGATIONS OF HERSELF

Sharon Connelly, former director of the now-disbanded Office of Inspector & Auditor (OIA), has filed a request under the Freedom of Information Act for all NRC records dealing with, among other things, OIA investigations of Sharon Connelly.

Connelly was a central figure in the agency's controversial and fruitless investigation of Roger Fortuna, deputy director of the agency's Office of Investigations. In 1988, Connelly arranged to purchase surreptitiously made tape recordings of telephone conversations between Fortuna and an antinuclear activist. Connelly paid \$6,000 in cash for the tapes, with the money coming from a slush fund set up by former Executive Director for Operations (EDO) Victor Stello (ENRC, 26 Feb., 1).

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