

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

February 21, 1991

Mr. David Williams  
Office of the Inspector General  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. Williams:

Today in my meeting with Mr. Walker of your office, I gave him three allegations about instances of falsified documentation, two of which relate directly to Seabrook Station.

The two allegations relating to Seabrook are addressed in more detail in the attached letters. One involves the application of x-rays of good welds to welds which actually required repairs. Quality Control did this to avoid the expense of repairing those welds. The second allegation is regarding Dravo Company and the falsification of inspection records for piping. That falsification took place at the Dravo manufacturing plant.

The other allegation involves Ray Miller, Inc., a company which issued false pedigrees for pipes, flanges, the whole 9 yards, in the late 1970s. This case was bandied about on the Hill at the time. This shows clearly that the NRC was well aware early on of the existence of the problem of counterfeit parts. There was also a similar case involving Tueblein Co., along with several others of the same nature. It is my understanding that the results of some of these cases ended in fines and prosecutions. I do not believe the NRC's Office of Investigation (O.I.) was established at that time, but I do know that the NRC was well aware of these particular cases. I think that O.I. will be the most appropriate place to inquire about all of this information. Obviously, if these matters had been taken care of responsibly early on, many of the parts that the GAO confirmed exist in 72 plants throughout the country may not be a threat to the American people today.

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As far as I know, this is new information about Dravo piping and is not the reason the NRC cited Dravo as having supplied below standard piping to various nuclear power plants. I believe it is important in light of allegations made in 1983 by David Day, a welder for Pullman-Higgins. At that time Day told Pullman-Higgins supervisors that he saw bad welds in Dravo piping but was told to disregard them. He reported his concerns to the NRC but they were dismissed after a cursory investigation.

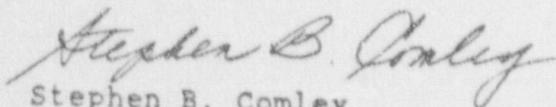
Public documents for Seabrook Station make no mention at all of this wholesale replacement of Dravo piping. Was the NRC ever informed about the falsification of x-rays at the Dravo facility? Was Dravo Piping Company ever investigated and prosecuted for this violation of federal law? Was it determined that there was only one inspector falsifying x-rays?

What were the procedures used to identify and replace the piping at Seabrook Station? Was similar action ever taken at other facilities which may have received Dravo piping with falsified x-rays?

I am concerned that it is possible the NRC never knew about this problem because the inspectors who investigated David Day's concerns never mentioned it in their report. Is it true they were unaware of the previous Dravo piping problem when they did their inspection in 1983? My understanding of NRC regulations would have required an official report from the utility to the NRC of both the falsification problem and the replacement of the piping. Was this ever done?

Please let me know as soon as possible what you intend to do with this allegation. Thank you for your attention to this matter.

Sincerely,



Stephen B. Comley  
Executive Director

SBC/ca