

The enclosed is a copy of a letter I sent today to the local
San Luis Obispo County Telegram Tribune. You are free to use it
in any way you see fit.

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To the Editor:

With his letter of January 2, to the San Luis Obispo County Telegram - Tribune, Mr. Frederick W. Mielke, Jr. has made a compelling case against Diablo Canyon.

[Signed by him as Chairman of the Board of PG&E without a disclaimer of the letter's official character, it represents a consensus at the top of the corporate hierarchy, sets policy and gives guidance to all hands at PG&E.

The company's District Manager D.L. Kennedy's invitation (12.6.81) to phone him ^{FCA} for any information desired, and, more importantly, NRC Chairman Runcio J. Paladino's remark (12. 2.81) that "nuclear plants can be built safe and operated safely only if utilities assume the responsibility for proper procedure"-- these are silently dismissed by Mr. Mielke.

Instead, he resorts to two time-honored propaganda principles: (1) accuse your opponent of strategies you use yourself; and (2) stick unremittingly to deceptive semantics until they sound logical.

Ad (1): Mr Mielke accuses opponents of politicizing what he calls "technical issues" which, of course, include the recently discovered series of construction defects.

Ad (2) ~~Ad~~: he uses throughout his letter the word "audit" which dictionaries define as a "review of records and reports", a mere paper exercise. With this he is in conflict with the NRC's Table of Organization which makes a distinction between "audit" and "inspection", a word absent from Mr. Mielke's letter. He is in conflict also with Mr. Palladino's operative phrase of "inspection, verification and re-work", and ^{with} frequent similar demands made by others.

[A similar contrast marks his own, unique definition of what "independent" means, ~~which~~ ^{HS} departs from normal usage, from the sentiments expressed by Congressmen ~~and~~ demands forwarded to Washington and ^{PROF. R. G. PROPELLER} by the NRC itself. Needless to say, Mr. Mielke's attempt to draw a parallel between the work of seismic consultants and CPA's defies rational comment.

And when the PG&E Board Chairman complains that opponents question the professional and personal integrity of the engineers who designed and built Diablo, he discloses an abysmal inability or ~~willingness~~ to understand what the real issues are.

What Diablo opponents fear most is not lack of integrity ~~and~~ any kind of collusion, but incompetence, carelessness, irresponsibility, in sum the performance which Congressmen and NRC officials themselves labeled "questionable", "careless", irresponsible", "below quality assurance standards" and "disastrous".

Worst of all, Mr. Mielke doesn't even touch on the central Diablo issues: seismic safety and nuclear-operational safety, not to speak of the possibility that the plant might be exposed to both dangers at the same time. With 14 design and construction defects detected so far, Mr. Mielke even drops any personal assurance of the plant's safety--for years SOP at PG&E.

Nor is there any reference in his letter to the Three Mile Island accident ~~or~~ the 46 projects promised by PG&E for immunizing Diablo against a TMI type accident. That may be understandable: TMI clean-up efforts have so far only resulted in repeated radiation releases.

Not so understandable is Mr. Mielke's omission of any reference to Diablo's present state. In case of an earthquake, operational control would fail because of faulty in-plant wiring, inoperative emergency batteries, suspected weakness of the control room floor ~~is~~ possibly danger of buckling or collapsing.

A more substantial quake would deprive the plant of five cooling systems vital to safe operations and especially to a safe shut-down of reactors; and 225 tons of cooling fans together with ton upon ton of steel and concrete construction would drop 140 feet down on unstopped and uncooled reactors.

Mr. Mielke cannot possibly have overlooked all this. ~~The~~ reasonable assumption then ~~is~~ that he ordered silence on key issues ~~so as~~ not to undercut and prejudice the January 19 hearings on Diablo Canyon full power operating license.

And the reason for ~~keeping~~ a tight lid ^{is} is that he fears a Diablo Canyon full power license would have no chance ~~of being granted~~ if the full story of the plant's defects ~~becomes~~ widely known. It is this which makes his letter such a compelling ~~reason~~ for denying the plant ~~any~~ nuclear operating license.

Carl F. Mansfield
San Luis Obispo

Anti-Diablo charges: 'A new low'

Editor, News-Press: Opponents of the Diablo Canyon nuclear power plant have brought their campaign to a new low in attacking the integrity of PG&E engineers and the independent auditor it has retained to review the plant's design features. Their accusations rest on two false charges.

First, they charge that the auditor, Robert L. Cloud Associates, acted improperly by submitting preliminary drafts of its audit report for PG&E's review. Far from improper, such reviews are standard audit procedure, recommended by the "Standards for Audit" of the comptroller general of the United States and by the Nuclear Regulatory Commission's Office of Inspector and Auditor, to help eliminate factual and analytical errors in audit reports. Auditors retain complete editorial control and may reject any or all comments in the reviews.

Second, Diablo Canyon's opponents charge that Dr. Cloud cannot be truly independent because he was retained by PG&E once before. If this contention were true, no CPA firm could be hired by a company for more than one job without the firm's independence being compromised. The fact is that technical auditors are chosen for competence and experience from among qualified firms in their particular field. Because there are often few such firms, they frequently are hired more than once. The key point for independence is that Dr. Cloud was not retained to review any of his own previous work but work done by others.

Based on these false charges, PG&E and Robert L. Cloud Associates have, in effect, been accused of collusion. That accusation is shocking. It assumes that dozens of professional people involved — in both PG&E and the Cloud organization — have no professional or personal integrity. This unfounded assumption is fostered by many anti-nuclear groups, which often

insist that engineers, geologists, physicists, and other respected professionals hired as consultants by industry are untrustworthy.

It should be obvious to all that PG&E's own self-interest dictates that we be satisfied that the Diablo Canyon plant is correctly designed and constructed before we commence operation. The design error that triggered the recent investigation was found by PG&E and made public by PG&E. PG&E promptly and voluntarily began rechecking the plant's earthquake safety system and arranged for an independent audit of that system. We have offered the Nuclear Regulatory Commission unlimited opportunity to observe the audit and to consult with the auditors at any time.

No one has questioned the competence of Robert L. Cloud Associates. Instead, Gov. Brown and other opponents of nuclear power have misled the public about ethical audit procedures and have groundlessly accused PG&E and the Cloud firm of improprieties. They have chosen to politicize technical issues at Diablo Canyon to further their own purposes of preventing the plant from operating. This does not serve the public interest.

Frederick W. Mielke Jr.
Chairman and Chief Executive
Officer
PG&E

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