

TRIAL LAWYERS FOR PUBLIC JUSTICE, P.C.

COUNSELLORS AT LAW

SUITE 611

2000 P STREET, NORTHWEST

WASHINGTON, D.C. 20036

(202) 463-8600

ANTHONY Z. ROISMAN
EXECUTIVE DIRECTOR

ARTHUR BRYANT
STAFF ATTORNEY

BILLIE GARDE
DIRECTOR, ENVIRONMENTAL
WHISTLEBLOWER PROJECT

BARBARA PRATT
OFFICE MANAGER

KATHLEEN CUMBERBATCH
SECRETARY

March 10, 1986

50-445/446

Mr. Vince Noonan
Director
Technical Review Team
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. Lawrence J. Chandler
Special Litigation Counsel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Sir:

We are in receipt of your March 5, 1986 letter to the Board regarding the expected issuance of the Staff's Supplemental Safety Evaluation Report (SSER) evaluating the CPRT Program Plan by the end of March 1986.

As you know CASE has not provided comments to Revision Three of the CPRT, and do not believe we can competently do so without access to other information which has been available to the staff. Specifically we have not received any of the attribute inspection checklists, nor virtually any information on the Region IV audits of the implementation of the CPRT.

Our concern, as has been expressed to the staff on numerous occasions, is that the staff's approval of the plan will have the effect of grandfathering in all of the work done according to Revisions 0, 1, and 2 without regard to critical deficiencies in the earlier phases, or the inadequacies of the current program.

CASE was informed sometime ago that the CPRT approval will be of "scope" only, not implementation. It seems to us that this is a distinction without a practical difference because the approval of the plan will validate the procedures which have allegedly been followed, and by default all of the inspection and rework done to those procedures.

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We renew our request to the staff to immediately provide us with all of the information necessary to complete an adequate review of the CPRT. Until that review is finished we object to the issuance of the CPRT SSER.

Sincerely,

Billie Garde

Billie Garde
Representative of CASE

BG:kc
cc: Service List