

September 13, 1986

Rec'd from

PSM on 9/15/86
during entire mtg
88 SEP 17 1986
VISIT.

IN THE MATTER OF CAROLINA POWER & LIGHT
NOT KNOWING IF IT HAS GIVEN THE SAFETY
RELATED WELDS IN THE SHEARON HARRIS NUCLEAR
PLANT A PRESERVICE INSPECTION

AFFIDAVIT OF PATTY S. MIRIELLO

Patty S. Miriello, being duly sworn according to law ^{OFFICE} ~~DOCK~~ and says
as follows:

1. My name is Patty S. Miriello. I live in Charleston County, S.C. I am both a nuclear engineer and a materials engineer, presently. I was employed by Carolina Power & Light (CP&L) from February 1985 through August 1985 as a health physics technician. I was employed by Nuclear Energy Services, a nondestructive testing contractor, at the Shearon Harris nuclear plant in the preservice inspection as an engineer from April 1984 through February 1985. As an engineer for Nuclear Energy Services (NES), Carolina Power & Light (CP&L) was billed approximately \$50.00 per hour for my services; whereas, technicians and clerks were billed to CP&L for much less. At a cost of about \$50.00 per hour, CP&L paid NES about the same amount of money for Archie Doud (B.S. Nuclear Engineer) as they did for me (B.A. B.S. Engineer/M.S. in completion). I designed, implemented, and supervised the preservice data control system at the Shearon Harris nuclear plant. I wrote almost 100 nonconformance reports on the Shearon Harris safety related piping. I was responsible for interfacing as an engineer with Daniel engineering to see that the repairs dictated by the nonconformance were completed and I verified that they were and informed NES personnel when they could reinspect welds. I interfaced with the construction crews doing the repairs, CP&L quality assurance, and I answered to plant management and interfaced with plant management in this matter at meetings. Any statement by Tom Brombach, my former CP&L supervisor (no degree) in inservice inspection, that I was not an engineer; but a technician is an attempt to cover up. (See the CP&L Brombach affidavit of August 6, 1986 to the Director of the United States Nuclear Regulatory Commission) Moreover, Thomas Brombach was pleased with my work as an engineer as plainly shown in Attachment 1. Does Thomas Brombach and CP&L lie to the USNRC?

2. The purpose of this affidavit is to once again point out the following: That there are many safety related welds at the Shearon Harris nuclear plant that require a preservice inspection according to U.S. Code nuclear regulations; that were never given a preservice inspection. I informed former CP&L supervision of this matter while I was employed as an engineer by NES in the inservice inspection program.

3. In July or August of 1984, I told both Tom Brombach and Stanely Pruitt that I found between 10 and 20 safety related piping welds that had never had an a preservice inspection. Both NES and CP&L thought the welds had been given a preservice inspection; but in actuality the welds had been cut out or reworked and had never been given a second preservice inspection. The documentation at that time in the CP&L quality assurance construction vault such as the complete weld data report (WDR) plainly showed the rework and dates of rework. However, the interface between the CP&L construction people and the CP&L operations

personnel was so poor that one didn't always know what the other was doing. Thomas Brombach (the inservice inspection 'engineer' for CP&L) and Stanely Pruitt (No degree, formerly from TMI, and the inservice inspection specialist for CP&L) did not know the extent of the problem.

Therefore, I was told to spend a week in the construction vault reviewing weld documentation (WDR's) to either confirm or deny what the NES technicians were reporting to CP&L: that construction crews (Daniel) were going behind the NES inspection crews and cutting out and reworking welds. In addition, the NES crews were stating that they were not being told to reinspect these welds by Stanely Pruitt or Thomas Brombach. I was being given no indication by Stanely Pruitt or Thomas Brombach that any welds needed to be reinspected or to adjust the data control or nonconformance systems to reflect that. It was the responsibility of CP&L to inform NES what the construction status of the welds requiring inspection was. In plain terms, the system wasn't working at Harris.

After one week of review in the vault, I cited between 10 to 20 welds which CP&L and NES thought had a valid preservice inspection which in fact were not preservice inspected. No one in inservice inspection knew that the welds had been reworked or that in some cases the original weld was completely gone and a new weld was present. I copied the WDR's as evidence, attached the invalid preservice inspections, and attached any related documentation which I had such as nonconformance reports and gave all of this to Thomas Brombach. He said that he would take care of the problem. He did take up the matter with Stanely Pruitt.

At this point in time about 1000 safety related welds had a preservice inspection completed and neither CP&L or NES were sure which inspections were valid. As I analyzed the situation and the WDR's it became clear that in some cases, construction crews due to the amount of work were simply slow in making weld repairs. Often the paper work took time. Therefore, it was not unusual for construction work to continue on the piping after CP&L operations thought it had ceased. At this point in time there was no written statement or documentation from CP&L construction to CP&L operations - inservice inspection that a piping weld could be turned over to be inspected. This was poor engineering and management of the inservice inspection program. A critical point was overlooked in the rush for construction completion.

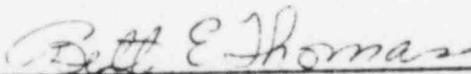
The 1000 welds (approximate) included the following systems: reactor coolant, main steam, safety injection, and other systems. I was told not to concern myself anymore with this matter and that it would be taken care of. From this point in time to February 25, 1985 I never saw any effort to go back and review the documentation on the welds previously given the preservice inspection which now were suspect of having false reports as official plant documentation. In my opinion the whole matter should have been written up in a nonconformance report as a reportable matter to the USNRC. It never was. Because a number of NES personnel knew of the problem; the system was changed so that there was a documented turn over of piping systems between CP&L plant construction and the inservice inspection personnel. However, Thomas Brombach and Stanely Pruitt did not go back and check the supposedly completed welds. They probably hoped the matter would never become exposed.

Consequently, what safety related welds in the Shearon Harris nuclear plant have really been inspected? What other communication problems between CP&L organizations resulted in similiar problems? The inservice inspection and preservice inspection is required by the USNRC to help insure that the plant is safe. Moreover, the integrity and the engineering ability to operate the Shearon Harris nuclear plant is in question in this matter.

In order for Thomas Brombach and Stanely Pruitt to change the system and the interface between CP&L construction and operations personnel in this matter; plant management had to become invdved. This included Ed Steudel, the manager of Technical Support of plant operations and Jim Willis the plant manager. Also the construction management of both CP&L and Daniel construction would be aware of the problem so that a new system of documented turn over of welds could work effectively. Quality assurance mangement would in a similiar manner be aware of the problem and changes. Are all of these people aware that there are approximately 1000 welds out there that slid by?


 Patty S. Miriello

Sworn and subscribed to before me
 this 13th day of Sept, 1986.


 Notary Public

My Commission expires 6/7/89.

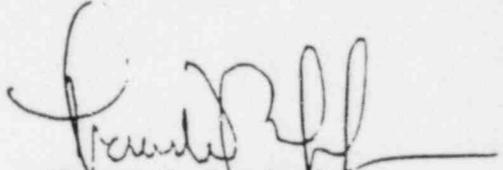
CP&L

Carolina Power & Light Company

May 8, 1985

To whom it may concern:

During the period of April 9, 1985 through February 25, 1985; I had the opportunity to supervise and direct the activities of Patty S. Miriello. I can candidly state that Patty was the type of employee most supervisors enjoy to have on their staff. She was self motivated needing little direction nor supervision. Assigned tasks were performed diligently and reporting requirements satisfied in a manner beneficial to the company. She showed interest in all phases of her work continuing to pursue and become knowledgeable in all areas not restricting herself to her own specific function. At no time did I have any reason to question her stability, reliability, or trustworthiness. Patty comes highly recommended to fill any position for which she is qualified.



Thomas W. Brambach
Project Engineer

Sharon Harris Sabatage

1. Diesel generator building fire was set as alleged.
2. Reactor coolant piping was cut as alleged.