

November 17, 1988

AFFIDAVIT OF JOHN A. KIRKEBO

County of Knox)
) ss:
State of Tennessee)

JOHN A. KIRKEBO, being duly sworn, deposes and says:

1. My name is John A. Kirkebo. Presently, I am the Vice President, Nuclear Engineering for the Tennessee Valley Authority (TVA) within the Nuclear Power organization. I started working for TVA in January 1986, as a Stone & Webster Engineering Corporation employee assisting Steven White in his newly assumed responsibilities as the Manager of Nuclear Power. In February of 1986, still as a Stone & Webster employee, I accepted a position as a loaned manager within the Nuclear Engineering organization, reporting to W. C. Drotleff, who reported to Mr. White. In March 1987, I became a TVA employee. Prior to January 1986, I had no previous involvement in TVA activities. I have a B.S. degree in civil engineering (1964), and following graduation, I worked for over six years in the United States Navy nuclear submarine program. I began working at Stone & Webster in 1971. I have worked on a variety of commercial nuclear projects as a design engineer, as a lead engineer, as a project engineer, and in more senior engineering management positions. For example, I was responsible for the execution of all

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engineering work on the River Bend project during the entire construction period, from 1979 through 1985, including the responsibility for implementation of the 10 C.F.R. Part 50 Appendix B quality assurance program within the engineering organization.

2. The purpose of my affidavit is to affirm that in early 1986, I was a highly experienced non-TVA loaned manager within the TVA Nuclear Engineering organization, and I had responsibility for reviewing the engineering content of the responses to the so-called Nuclear Safety Review Staff (NSRS) perceptions which were attached to TVA's March 20, 1986 letter to the NRC.

3. One of my responsibilities when I first became a loaned manager at TVA was to ensure that appropriate engineering leadership was involved in the preparation and review of the attachments to TVA's March 20, 1986 response to NRC's January 3, 1986 letter concerning NSRS's perceptions. See OI Interview of J. Kirkebo, February 26, 1987 (OI/Kirkebo) at 7. I reported to William Drotleff, who was a Stone & Webster loaned manager that had been recently appointed as the Director of Engineering in TVA's Office of Nuclear Power.

4. In order to substantiate the accuracy and adequacy of the engineering content of the responses to NSRS's perceptions, I supervised TVA engineers assigned to work on the responses. I also spent a substantial amount of time personally reviewing and commenting on the technical content of the responses. As I told OI, I not only reviewed the engineering content of the responses, but I met with TVA engineers and licensing personnel who were

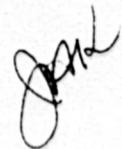


working on these drafts. OI/Kirkebo at 9-10. We discussed the technical elements and controls of the quality assurance programs that were involved, and whether the programs were being adequately implemented. OI/Kirkebo at 13. As a result of our technical review, many modifications were made to these responses to the NSRS perceptions. When finalized, these responses were attached to TVA's March 20, 1986 letter to the NRC. OI/Kirkebo at 7-9.

5. During the course of my review, I frequently discussed the responses to NSRS perceptions with Dick Kelly and Jim Huston, who were Stone & Webster experienced and respected Quality Assurance managers who had become loaned senior managers of the TVA Nuclear Quality Assurance Division. I worked together with Messrs. Kelly and Huston on a frequent basis, exchanging comments and questions about the responses.

6. I do not recall a specific meeting with Mr. White on the responses to NSRS perceptions. However, just before becoming the Manager of Engineering and Technical Services, I had worked as a member of Mr. White's staff in Chattanooga, interacting with him on a daily basis. After I became Manager of Engineering and Technical Services, I met with him frequently. It is very possible that I may have met with Mr. White on the responses to the NSRS perceptions and would not necessarily remember it.

7. I signed Mr. White's concurrence sheet on behalf of my supervisor, Mr. Drotleff. That concurrence indicated Mr. Drotleff's and my agreement with the March 20, 1986 letter and our satisfaction with the engineering content of the attached responses to the NSRS perceptions.



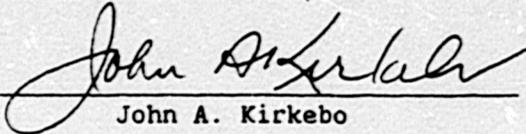
8. I do recall and told OI that a group of individuals under Craig Lundin's supervision did an independent assessment of the relevant practices at Watts Bar. OI/Kirkebo at 14, 21. I was not personally involved in that assessment. As I indicated to OI, I did not have a formal interview with Mr. Lundin or any of his people. However, I did informally talk to Mr. Lundin. In addition, one of the members of Mr. Lundin's group was an engineer, Dick Berry, who had worked closely with me for about five years on the River Bend project at Stone & Webster. I spoke with Mr. Berry about his work. Mr. Berry's independent observations were consistent with the information that I was receiving on Watts Bar, and confirmed the conclusions I had reached on the NSRS issues.

9. Because of Mr. Kelly's and my substantial involvement in the review of the responses that were attached to the March 20, 1986 letter, we both went to NRC's headquarters in Bethesda to hand-deliver the March 20 letter and to brief the NRC Staff on the technical content of the attached responses. We met with senior members of the NRC Staff, including Mr. Denton and Mr. Eisenhut, and walked through the attachments, explaining their content and responding to questions.

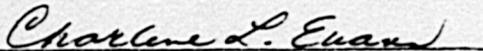
10. During a telephone interview by OI, I believe I was asked if I had reviewed "the Lundin findings." I was not familiar with this expression, and indicated that to OI. However, without question, as stated elsewhere in this affidavit, I reviewed the attachments to the March 20, 1986 letter in detail.



11. In summary, I was a highly experienced, non-TVA employee acting as a loaned manager who technically reviewed and approved the attachments to the March 20, 1986 letter, which were responses to eleven NSRS perceptions, for their engineering content.


John A. Kirkebo

Subscribed and sworn to before me
this 7th day of November, 1988


Notary Public

My Commission expires: 9-23-91.