

UNITED STATES OF AMERICA
ATOMIC ENERGY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
WISCONSIN PUBLIC SERVICE CORPORATION)	
WISCONSIN POWER AND LIGHT COMPANY)	Docket No. 50-305
AND)	
MADISON GAS AND ELECTRIC COMPANY)	
)	
(Kewaunee Nuclear Power Plant))	

AFFIDAVIT IN SUPPORT OF
MOTION FOR SUMMARY DISPOSITION

State of Maryland)
) ss
County of Montgomery)

The undersigned, E. W. Daniels, being first duly sworn, hereby deposes and says as follows:

1. A statement of by background and qualifications has been filed and is a part of the Docket in this matter .
2. Contentions 6.8.1; 6.8.2; 6.8.3-K; 6.8.4-K

The preoperational monitoring program now includes an extensive inventory of aquatic animals as well as plants, by genus and species .

(FES: pp. II-41-51; V-19 and 20; V-32; Appendix C, pp. 11-22.)

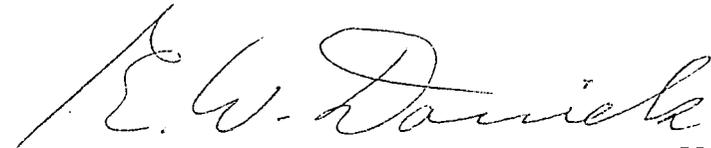
The matter of zooplankton is treated in the FES Pages II-44, 45; in the Appendix C, Table C-7, page 22, and Section V-14 and 15. Later information has been obtained by Bio-Test Laboratories during 1972 and is forthcoming from the Applicant. Also, a recent study done by the University of Wisconsin-Milwaukee for the Applicant has been published. (Report # KNR-3, May, 1972.)

The Wisconsin net is still a standard piece of equipment for qualitative sampling. It should not be used for quantitative sampling. The Juday trap is used less and less in this country, primarily because it is cumbersome. Any sampler can be criticised in some manner, particularly if it is used incorrectly, and for purposes unlike those for which it was designed. Qualitative sampling (for which the Wisconsin net was designed) usually comes first in any biological field study. Valid conclusions are not all based on quantitative work. Bio-Test (1971 Report to the Applicant) has used additional methods for collecting zooplankton. For example, the Birge closing net was used.

The results of the preoperational analysis of fish in the Kewaunee Plant area are presented in the FES, Section II, pages 48-51 including Table II-16 and Tables 16 and 17 p. 66 and 67 of Reference II-38 (1972); Section XII-7 through 9.

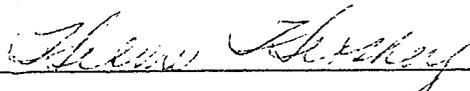
In addition, the 1972 Bio-Test data, obtained for the Applicant, is being analyzed, and furthermore, the fish monitoring program is being continued.

In my judgment, the preoperational monitoring program is adequate. The data are sufficient to provide a reasonable baseline.



E. W. Daniels

Subscribed to and sworn before
me this 1st day of February, 1973



My Commission expires 7/1/74