

DAVID R. PIGOTT
SAMUEL B. CASEY
CHICKERING & GREGORY
Three Embarcadero Center
Twenty-Third Floor
San Francisco, CA 94111
Telephone: (415) 393-9000

CHARLES R. KOCHER
JAMES A. BEOLETTO
SOUTHERN CALIFORNIA EDISON COMPANY
P. O. Box 800
2244 Walnut Grove Avenue
Rosemead, CA 91770
Telephone: (213) 572-1900

Attorneys for Applicants
SOUTHERN CALIFORNIA EDISON COMPANY
and SAN DIEGO GAS & ELECTRIC COMPANY

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	Docket Nos. 50-361 OL
)	50-362 OL
SOUTHERN CALIFORNIA EDISON)	
COMPANY, <u>et al.</u> , (San Onofre)	AFFIDAVIT OF KENNETH P. BASKIN IN
Nuclear Generating Station,)	SUPPORT OF MOTION FOR SUMMARY DIS-
Units 2 and 3).)	POSITION OF INTERVENOR, FRIENDS OF
)	THE EARTH, ET AL.'s CONTENTION 1a
)	(DEWATERING WELLS)

STATE OF CALIFORNIA,)	
)	ss.
COUNTY OF LOS ANGELES.)	

KENNETH P. BASKIN, being first duly sworn, deposes and says
that if called as a witness herein he can competently testify, as
follows:

1. At all pertinent times referred to herein, I have been employed by Southern California Edison Company (hereafter "SCE") as Manager, Generation Engineering Services or, since January 1, 1980, Manager, Nuclear Engineering and Licensing. In this capacity I have direct management responsibility for obtaining operating licenses from the Nuclear Regulatory Commission (hereafter the "NRC") for San Onofre Nuclear Generating Station, Units 2 and 3 (hereafter "SONGS 2 and 3").

2. My educational background and professional affiliations are as follows. I received my Bachelor of Science in Mechanical Engineering from the University of Southern California in 1960, and a Master of Science Degree in Nuclear Engineering from Purdue University in 1968. At all pertinent times referred to herein, I have been registered in California as a Professional Engineer in Mechanical Engineering and Nuclear Engineering. I am a member of the American Society of Mechanical Engineers, the American Nuclear Society, and the Pacific Coast Electric Association.

3. I have been employed as an engineer or manager by SCE for the last nineteen years and the positions I have held include those of Project Engineer, San Onofre Nuclear Generating Station, Unit 1, and Supervising Engineer and Project Manager for SONGS 2 and 3.

4. My responsibilities as Manager, Generation Engineering Services and subsequently Manager, Nuclear Engineering and Licensing

have at all pertinent times included management of the development of information submitted by SCE and its consultants to the NRC Staff in the licensing review of SONGS 2 and 3. I am and have been responsible for the extensive program for investigating, demobilizing, and determining the potential structural and seismic design impacts of the subsurface cavities caused by the temporary construction dewatering of the SONGS 2 and 3 site (hereafter the "Site"). I have also been responsible for keeping the NRC Staff fully informed as to the progress of the investigation and ultimate demobilization of the construction dewatering well system at SONGS 2 and 3.

5. In May, 1977, SCE first became aware of a potential problem associated with the dewatering well system at SONGS 2 and 3 when a subsurface cavity was indicated during decommissioning of Dewatering Well 6. Thereafter, SCE began a thorough investigation of all the other dewatering wells on the Site. In July, 1977 upon completion of a preliminary investigation, SCE reported its concerns regarding the dewatering well system to the NRC Staff.

6. In November, 1977, after a series of meetings and communications with the NRC Staff, SCE developed and presented to the NRC Staff, an investigation and demobilization program that had the following goals:

- * The investigation should be such that there is assurance that all cavities and the extent of cavities are determined both at the near surface and at depth.

- * The mechanism of cavity formation must be explained.

* Detailed information must be provided with respect to the volumes of material taken out of the various wells and the volumes of material utilized to demobilize the various wells.

* The NRC Staff must be kept advised of all efforts with respect to well investigation and demobilization as the program progresses.

* A firm basis must be provided for conclusion that the cavities would have no adverse affect on SONGS 2 and 3 structures and equipment.

* Program must insure that either all cavities were discovered and filled or that any cavity which could be remaining would have no unacceptable adverse effect on SONGS 2 and 3 structures and equipment.

Immediately thereafter a task force consisting of John A. Barneich, Woodward Clyde Consultants (hereafter "WCC"); Lucien Hersh, Bechtel Power Corporation; Jeffrey Yann, SCE; a representative from my staff; and Dr. Robert L. McNeill, geotechnical consultant to WCC and SCE (hereafter the "Task Force"), began to implement a dewatering well investigation and demobilization program that would meet each of these goals. SCE contracted with WCC, Bechtel, and Dr. McNeill to do this work. By virtue of this contractual relationship, I retained overall management of the Task Force's work.

7. During the period November, 1977 through August, 1979, the Task Force held several meetings with the NRC Staff. Two of

these meetings included a site tour of the SONGS 2 and 3 construction dewatering well system which were attended by representatives of Intervenor Friends of the Earth, et al. The last of these meetings was held on August 10, 1979 and involved a comprehensive presentation of the steps taken by the Task Force to meet the goals for investigating and demobilizing the SONGS 2 and 3 construction dewatering well system described in Paragraph 6 above.

During this same period I submitted to the NRC Staff the nine final reports, the nine status reports, and the other documentations (also contained in these reports) which are identified and given a project reference number in the accompanying "List of Project References in Support of Motion for Summary Disposition of Intervenor Friends of the Earth, et al.'s Contention 1a (Dewatering Wells)" (hereafter the "Project Reference List"). Each of the documents referenced in the Project Reference List was prepared by the Task Force for SCE at my direction and under my managerial control.

8. I have reviewed each of the reports described in Paragraph 7 above and referenced in the Project Reference List as Project Reference Numbers 1 through 18. These reports answer all known NRC Staff questions and concerns. NRC Staff requests for further information have also been answered and documented in said reports. I do not know of any requests for further information or questions from the NRC Staff since the meeting with the NRC Staff on August 10, 1979. For these reasons, as more fully documented in said reports, it is my professional and

managerial opinion that SCE has fully achieved each of the goals proposed by SCE for investigating and demobilizing the SONGS 2 and 3 construction dewatering well system. I have no reason to believe that the NRC Staff is dissatisfied with any aspect of the Task Force's work, or that there is any reason for the NRC Staff to disagree with the ultimate conclusion of the Task Force, which is that the subsurface cavities caused by the temporary construction dewatering of the Site can have no unacceptable adverse effects on SONGS 2 and 3, including the capability of structures and equipment of SONGS 2 and 3 to withstand the Design Basis Earthquake.

Kenneth P. Baskin
Kenneth P. Baskin

Subscribed and sworn to before me
this 5th day of June, 1980.

Diana B. Byers
Notary Public for the State of
California, County of Los Angeles

