

4/10/82

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
FLORIDA POWER AND LIGHT COMPANY)	Docket Nos. 50-250
(Turkey Point Nuclear Generating)	50-251
Unit Nos. 3 and 4))	(Proposed Amendments to Facility
		Operating Licenses to Permit
		Steam Generator Repair)

AFFIDAVIT OF DARREL A. NASH ON
CONTENTIONS 5(a) AND 7(b), (c), (d)

I, Darrel A. Nash, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Section Leader in the Office of State Programs.

2. Contention 5 states, in part:

In evaluating the steam generator repair, the following has not been considered:

(a) The cost of a full-flow condensate polishing demineralizing system.

3. Contention 7 states, in part:

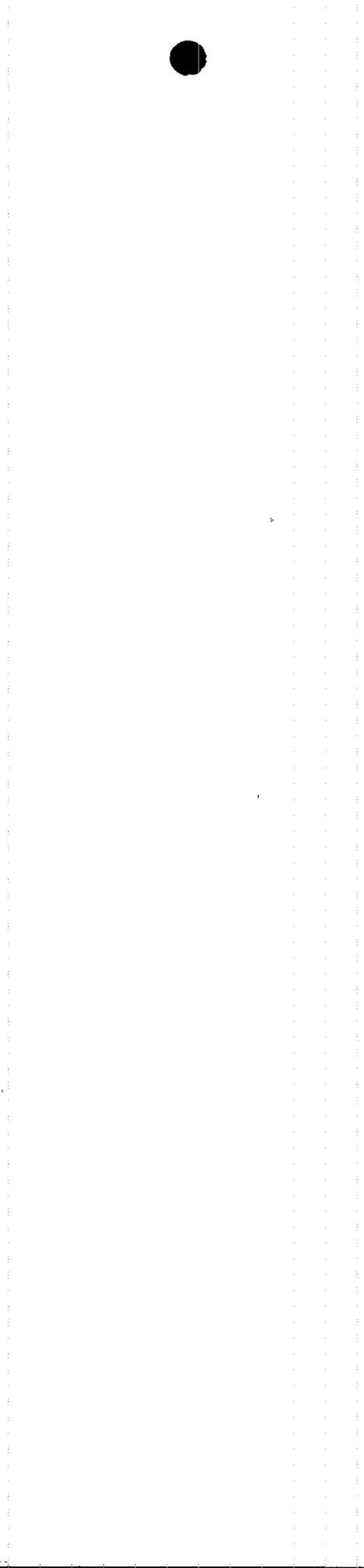
The Steam Generator Repair Report is inadequate because:

(a) it has used the inaccurate figure of \$300,000 per day per unit for replacement power costs for reactor outage,

(c) it has failed to consider the costs of addition of a full-flow condensate polishing demineralizing system and of condenser retubing, and

(d) it has failed to update costs from December 1977 due to inflation.

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4. The Applicant has supplied the costs of the above-specified items for consideration by the NRC in its review of the proposed repairs. These costs are identified in section 4.2 of the Final Environmental Statement (FES) (NUREG-0743), dated March, 1981. As stated therein, the costs of a full-flow condensate polishing demineralizing system is estimated at \$9,000,000 for both units. Present estimates of replacement power costs for the unit 4 outage in 1981-1982 are \$756,000 per day and \$809,000 per day for the unit 3 outage in 1982-1983. The total cost of retubing the condenser with titanium tubing between 1976 and 1980 was approximately \$8,000,000 for both units.

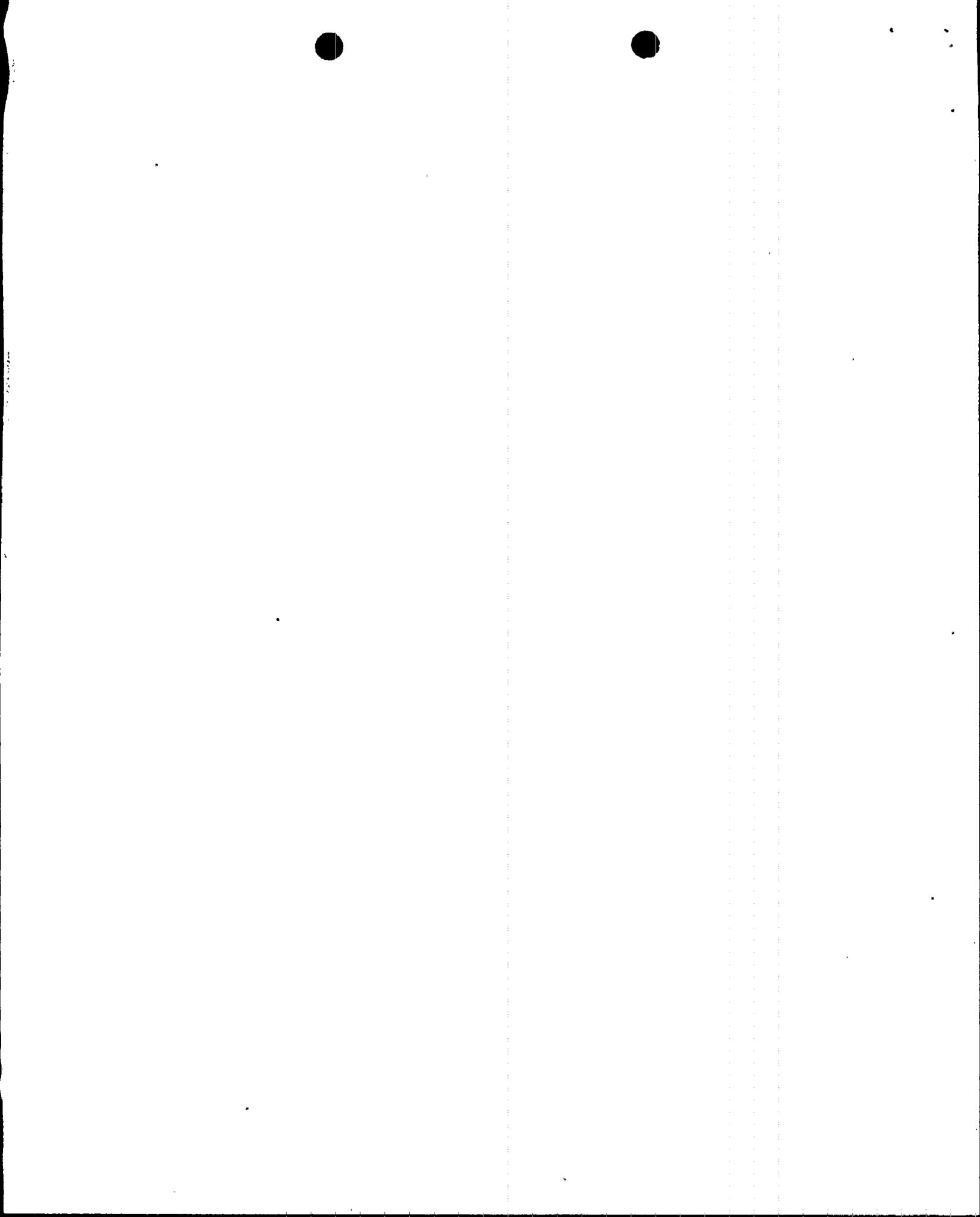
5. The total project is estimated to cost \$459,000,000. This combines the \$136,000,000 cost of purchasing and installing the new steam generators and disposing of the old steam generators and the \$323,000,000 cost for replacement power for both units. This does not include the \$9,000,000 cost of the condensate polishing demineralizing system which is not regarded as an integral part of the repair project (See SER, §3.2.4). These cost figures are both reasonable and realistic for the items involved.


Darrel A. Nash

Subscribed and sworn to before me
this *10th* day of *April* 1981.


Notary Public

My Commission expires: *July 1, 1982*



STATEMENT OF QUALIFICATIONS OF DARREL A. NASH

I am employed as a Section Leader, Licensee Relations, Office of State Programs, located in Bethesda, Maryland. My educational and professional qualifications are set forth below.

Education

B.S. Agricultural Economics - Colorado State University 1958
M.S. Agricultural Economics - Montana State University 1960
Ph.D. Agricultural Economics - University of Illinois 1964

In addition, I have taken advanced courses in econometrics. My formal educational program has encompassed, and emphasized, studies in micro-economics, mathematics, and statistics as they relate to land and water resources and agricultural production.

Experience

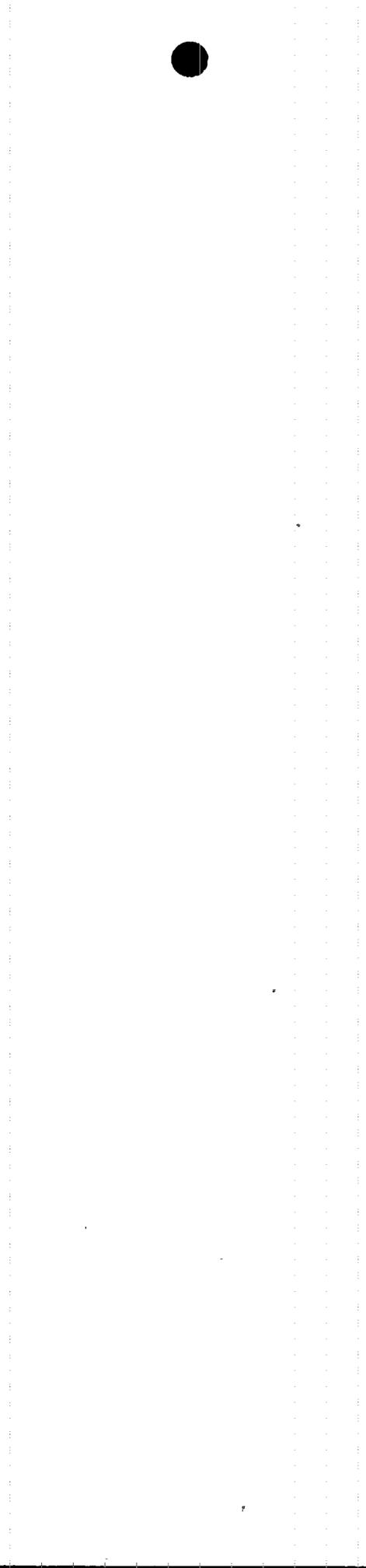
I joined the Regulatory Staff of the Atomic Energy Commission in August 1973, being assigned to the Cost-Benefit Analysis Branch. As a Senior Analyst, I was responsible for reviewing and analyzing environmental reports and preparing cost-benefit portions of environmental statements. I was responsible for developing criteria for analysis of alternative sites, alternative fuels and alternative cooling systems to be used in environmental statements. In addition, I conducted generic economic research on topics related to environmental impacts of nuclear power plants.

I have been a Section Leader since 1975, responsible for supervising and conducting the activities above. In April 1980, as a result of reorganization, I was given additional areas of management and supervision. These are need for power and system reliability, financial qualifications of applicants and indemnification under provisions of the Price-Anderson Act. In March 1981, as a result of minor changes in organization, I was transferred to my present position with responsibilities similar to those previously held.

From April 1965 to August 1973, I was with the National Oceanic and Atmospheric Administration in the U.S. Department of Commerce and its predecessor agencies. During the course of this employment I was responsible for (1) research and research supervision in fishery marketing, including consumer and marketing studies culminated in a study making long-range projections of the demand and supply of fishery products on a worldwide basis, and (2) fishery management wherein social, economic, and biological studies were conducted to determine needed institutional changes to better allocate the utilization of fishery resources.

Also, under loan to the U.S. Agency for International Development (AID), I traveled to eight countries to evaluate potential for producing and distributing fish protein concentrate within these countries.

During 1964 and 1965, I was employed as a resource economist by the Bureau of Land Management in the U.S. Department of Interior and developed models for



determining optimum multiple use of public lands for such activities as grazing, watershed management, recreation, and forestry. My duties there emphasized development and analysis of the economic consequences of different land uses.

From 1969 to 1973, I had an appointment as Visiting Assistant Professor in the Agricultural and Resource Economics Department at the University of Maryland and have taught graduate courses in Industrial Organization and Economics of Marketing in that Department.

I have authored or coauthored about 20 publications -- more important areas being cost analysis of energy alternatives and fishery demand and resource utilization.

Numerous unpublished papers have also been written on these and related areas such as cost-benefit analysis of public land use and analyses of financial assistance programs for marine fishing vessels.

