AFFIDAVIT OF RAYMOND J. SKWAREK

Commonwealth of Pennsylvania

County of Allegheny

Raymond J. Skwarek being duly sworn accordingly to Law deposes and says;

- (1) I am Manager of Reload Fuel and Forces Analysis, Nuclear Safety Department, for the Nuclear Technology Division, Westinghouse Power Systems Company, Westinghouse Electric Corporation ("Westinghouse"), and as such I am authorized to execute this Affidavit. A statement of my Professional Qualifications is attached.
- (2) With regard to evaluations of postulated valve failures at Diablo Canyon Power Plant (DCPP), Westinghouse has performed analyses of postulated loss of coolant accidents (LOCAs) in the pressurizer vapor space for a plant substantially identical to DCPP. These analyses were performed for 100 percent power level.

Analyses performed included the extremely unlikely case that all three pressurizer power-operated relief valves (PORVs) of the size installed at DCPP were postulated to have stuck completely open. These analyses were performed with a United States Nuclear Regulatory Commission approved evaluation model, which includes the assumption of minimum safeguards. No core uncovery was predicted to occur. Therefore, if all three of the pressurizer PORVs failed completely open at DCPP, no core uncovery would be expected.

It should be noted that these PORV LOCA analyses also assume that the pressurizer PORV block valves failed to close. Therefore, if all of the pressurizer PORVs failed to close at DCPP, no core uncovery would be expected.

Details of these analyses have been documented in WCAP-9601, "Report on Small Break Accidents for Westinghous .!SSS System."

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(3) As discussed above, even in the hypothetical case of the DCPP pressurizer safety, relief, and block valves failing to close, the public health and safety would not be endangered.

Further the affiant sayeth not.

Raymond J. Skwarek

Sworn to and subscribed before

me this 15th day of December, 1981. Releeu Begun

PROFESSIONAL QUALIFICATIONS

RAYMOND J. SKWAREK

WESTINGHOUSE WATER REACTOR DIVISIONS WESTINGHOUSE POWER SYSTEMS COMPANY WESTINGHOUSE ELECTRIC CORPORATION

My name is Raymond J. Skwarek. My business address is Westinghouse Electric Corporation, P. O. Box 355, Pittsburgh, Pennsylvania, 15230. I am employed by Westinghouse Electric Corporation as Manager of Reload Fuel and Forces Analysis within the Nuclear Safety Department of the Nuclear Technology Division. I am responsible for the safety evaluation relating to the licensing and operation of nuclear power plants with respect to the emergency core cooling system performance during a postulated loss of coolant accident (LOCA).

I attended Drexel University, Philadephia, Pennsylvania, from 1969 to 1974 and received a Bachelor of Science Degree in Mechanical Engineering. I attended graduate school at Stanford University in 1974-75 and received a Masters Degree in Mechanical Engineering with emphasis in the thermosciences.

In 1975, I joined Westinghouse Electric Corporation as an Engineer in the Safeguards Analysis I Group with responsibilities in the area of design, analysis and evaluation of emergency core cooling systems performance on light water reactors during LOCAs. Specific topics on which I have concentrated since joining that group include small break LOCA analysis and model development, and post-Three Mile Island LOCA concerns. In 1981, I was appointed to position of Manager, Reload Fuel and Forces Analysis, responsible for LOCA analysis, licensing, and model development for reload cores of Westinghouse and competitor nuclear steam supply systems. UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

PACIFIC GAS AND ELECTRIC COMPANY

Docket No. 50-275 Docket No. 50-323

Diablo Canyon Nuclear Power Plant, Units 1 and 2

CERTIFICATE OF SERVICE

The foregoing document(s) of Pacific Gas and Electric Company xback (have) been served today on the following by deposit in the United States mail, properly stamped and addressed:

Judge John F. Wolf Chairman Atomic Safety and Licensing Board U. S. Nuclear Regulatory Commission Washington, D. C. 20555

Judge Glenn O. Bright Atomic Safety and Licensing Board U. S. Nuclear Regulatory Commission Washington, D. C. 20555

Judge Jerry R. Kline Atomic Safety and Licensing Board U. S. Nuclear Regulatory Commission Washington, D. C. 20555

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Chairman Atomic Safety and Licensing Board Panel U. S. Nuclear Regulatory Commission Washington, D. C. 20555 Chairman Atomic Safety and Licensing Appeal Panel U. S. Nuclear Regulatory Commission Washington, D. C. 20555

Secretary U. S. Nuclear Regulatory Commission Washington, D. C. 20555

Attn.: Docketing and Service Section

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Byron S. Georgiou, Esq. Legal Affairs Secretary Governor's Office State Capitol Sacramento, California 95814 Judge Thomas S. Moore Chairman Atomic Safety and Licensing Appeal Board U. S. Nuclear Regulatory Commission Washington, D. C. 20555

Judge W. Reed Johnson Atomic Safety and Licensing Appeal Board U. S. Nuclear Regulatory Commission Washington, D. C. 20555

Judge John H. Buck Atomic Safety and Licensing Appeal Board U. S. Nuclear Regulatory Commission Washington, D. C. 20555

Philip A. Crane, Jr. Attorney Pacific Gas and Electric Company

Date: December 21, 1981