

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
CONSUMERS POWER COMPANY)	Docket No. 50-155
)	
(Big Rock Point Nuclear Power Plant))	
_____)	

AFFIDAVIT OF A. DAVIS MULLHOLAND, JR.

I, A. Davis Mullholand, Jr., of lawful age, being first duly sworn, do state as follows:

I am currently employed by Consumers Power Company as a Senior Engineer in the Plant Modifications and Miscellaneous Projects Engineering Department. Since September 4, 1981 I have been the Project Engineer for the proposed spent fuel pool expanded storage modification at the Big Rock Point Plant and as such am responsible for all technical, cost and schedule considerations necessary to complete this project. A summary of my educational and work experience is attached to and made a part of this affidavit as Exhibit A.

The purpose of this affidavit is to detail the urgency of Consumers Power Company's request to expand fuel storage capability at the Big Rock Plant and to point out that further delays in the licensing proceedings could jeopardize continued plant operation.

The spent fuel pool at the Big Rock Point Plant will accomodate storage of 193 spent fuel assemblies. Of these 193 storage locations, 108 are presently occupied with spent fuel bundles. The remaining 85 unoccupied locations will accept one full core off-load of 84 spent fuel assemblies. Without storage locations being added to the pool in the form of additional spent fuel racks, there will be only 61 unoccupied locations following the 1982 refueling outage. This is not enough storage capacity to allow for a full core off-load.

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The ability to have spent fuel storage locations available to accept a full core off-load is a matter of prudent design and operation, even though it is not a safety requirement. The necessity to unload the entire reactor core may come about during either a planned or unplanned outage when access to areas normally obstructed by the core is required in order to perform maintenance activities such as inservice inspection of the reactor vessel and components or repairs to the reactor vessel or components. Without sufficient storage capacity, an unplanned outage could become unpredictably long or required inspections would be delayed until the necessary storage locations become available.

Consumers Power Company had originally intended to have the additional spent fuel racks fabricated following the granting of a license amendment by the NRC authorizing an increase in spent fuel pool capacity. Due to delays that have occurred in the licensing process and the Company's concern over not having full core off-load capability at the Big Rock Point Plant following the next refueling outage, the Company decided to proceed with rack fabrication in parallel with the licensing proceedings and to accept any additional financial risks that might be incurred should a license amendment not be granted.

The 1982 refueling outage at Big Rock Point Plant is presently scheduled to begin on February 6, 1982. Delivery of one of the fuel racks, with 81 storage locations, is scheduled so that it could be installed during this outage. Allowing two weeks for installation of just this one spent fuel rack prior to the scheduled startup following the outage, the license amendment authorizing expansion of spent fuel pool capability would be required on or before mid-February 1982 in order to maintain full core off-load capability at Big Rock Point Plant. The remaining two spent fuel racks would have to be

installed at a later time. Delay in issuance of a license amendment until after the mid-February 1982 date would force Consumers Power Company to either delay startup until receipt of the amendment or start up without full-core offload capacity, increasing chances of an extended outage in certain maintenance situations. Either alternative involves the prospect of increased costs for replacement power for the portion of any outage attributable to the regulatory delay.

To the best of my knowledge and belief, the foregoing statements are true and correct.

A. Davis Mullholand, Jr.
A. Davis Mullholand, Jr.

Subscribed and sworn to before me
this 18th day of December, 1981.

Phyllis Bogart
Notary Public, Jackson County, Michigan
My Commission Expires *Feb. 24, 1982*

Name: Alfred Davis Mullholand, Jr.

Address: 1035 South Thompson Street
Jackson, Michigan

Educational Background:

High School: Baltimore Polytechnic Institute (1955)

College: Duke University, Durham, NC (1959)
BS in Mechanical Engineering

Pennsylvania State University
University Park, Pennsylvania
MS in Mechanical Engineering (1962)

Industrial: Company sponsored technical, contractual, and management courses.

Work Experience:

Feb. 1981 to
Present:

Consumers Power Company
Jackson, Michigan

Senior Engineer - Plant Modifications and Miscellaneous Projects Engineering Department.

Responsible for the technical, cost and schedular aspects of selected nuclear power plant modification projects at Palisades and Big Rock Point. Also responsible for certain miscellaneous engineering assignments in support of routine plant operations. Project coordination with plant operations personnel, architect-engineering firms, and equipment suppliers.

Oct. 1977 -
Feb. 1981

Consumers Power Company
Jackson, Michigan

Senior Engineer - Project Engineering Services Department.

Responsible to provide engineering support to the plant modifications department for modifications to existing nuclear plants. Duties consist of review of all technical areas addressed by subcontractors (primarily A/E's) for design and construction. Previous responsibilities within Consumers include technical and licensing support for the Midland Plant Project Management primarily in the area of the Nuclear Steam Supply System. Served as an alternate member to the Safety Audit and Review Board.

Mar. 1976 -
Oct. 1977

General Electric Company - Knolls Atomic Power
Laboratory. (MARF/S7G Project)

Project Engineer - On special assignment to prepare and obtain approval of test documents and to provide technical coverage of testing on the MARF/S7G Plant. This included all post construction phases of testing, such as, initial fill, initial criticality, low and high power physics testing and normal plant operational testing.

Mar. 1975 -
Mar. 1976

General Electric Company - Knolls Atomic Power
Laboratory. (D1G Project)

Chairman - Joint Test Group - Responsible for ensuring that all testing following refueling on the D1G power plant (a nuclear powered destroyer prototype) satisfied applicable contractual and technical requirements as established by the Naval Reactors branch of ERDA. Responsible for the safe and expeditious performance of the D1G plant acceptance test program, in acting as Chairman of the Joint Test Group (JTG).

Feb. 1974 -
Mar. 1975

General Electric Company - Knolls Atomic Power
Laboratory (MARF/S7G Project)

Co-Advisory Test Group Member - Position similar to that described above for period of March 1975 to March 1976, except reported to the Joint Test Group Chairman.

Sept. 1973 -
Feb. 1974

General Electric Company - Knolls Atomic Power
Laboratory (MARF/S7G Project)

Lead Engineer - Primary Systems and Arrangements - Provided technical direction to three engineers involved in nuclear systems design work. Participated in actual design work for those items not assigned to the other engineers. Coordinated primary (nuclear) systems group in work planning, priority setting, and interaction with MARF Plant installation subcontractor.

Jan. 1973 -
Sept. 1973

General Electric Company - Knolls Atomic Power
Laboratory (MARF/S7G Project)

Manager - Systems Design (Mechanical) - Responsible for the overall design of nuclear propulsion plant structures,

fluid systems, and equipment. This involved direct supervision of ten engineers in duties such as those described below.

May 1970 -
Jan. 1973

General Electric Company - Knolls Atomic Power
Laboratory (MARF/S7G Project)

Engineer - Systems Design (Mechanical) - Responsible for the design of certain nuclear plant systems and equipment. This involved preparation of system descriptions and detailed operating procedures, modification or application of existing equipment, interfacing with the lead shipyard and architect-engineer on their designs and specifications, and assisting with the training of civilian and Naval personnel. Financial and contractual relationship with subcontractors consisted of estimates of subcontractor's design, installation or manufacturing costs, obtaining funding approval for contract changes or additions, participating in negotiations, and preparing contract changes or amendments.

Mar. 1966 -
May 1970

General Electric Company - Knolls Atomic Power
Laboratory (D1G Project)

Plant Engineer - Responsible for operation and maintenance of a prototype nuclear power plant and the training of U. S. Navy personnel assigned to my shift section. Position included on-shift responsibility for the execution of test programs, timely and proper execution of plant maintenance, training of Naval personnel, maintaining the staff operational proficiency and supervising assigned civilian personnel. Position required certification as an A&C licensed reactor operator.

Apr. 1961 -
Mar. 1966

Baltimore Gas and Electric Company

Engineer - Performed routine performance tests and full scale acceptance tests of steam-electric generating station major equipment and auxiliaries. Accomplished miscellaneous engineering design and cost studies for new equipment purchases or replacement.

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
CONSUMERS POWER COMPANY) Docket No. 50-155-OLA
(Big Rock Point Nuclear Power Plant)) (Spent Fuel Pool
) Modification)
)

CERTIFICATE OF SERVICE

I hereby certify that copies of MOTION FOR EXPEDITED RULING were hand-delivered to Judges Grossman, Paris, and Shon and were served on the persons listed below by deposit in the United States mail, first-class postage prepaid, this 8th day of January, 1982.

Herbert Grossman, Esquire
Administrative Judge
Atomic Safety and Licensing
Board Panel
U. S. Nuclear Regulatory
Commission
Washington, D. C. 20555

Dr. Oscar H. Paris
Administrative Judge
Atomic Safety and Licensing
Board Panel
U. S. Nuclear Regulatory
Commission
Washington, D. C. 20555

Mr. Frederick J. Shon
Administrative Judge
Atomic Safety and Licensing
Board Panel
U. S. Nuclear Regulatory
Commission
Washington, D. C. 20555

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

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

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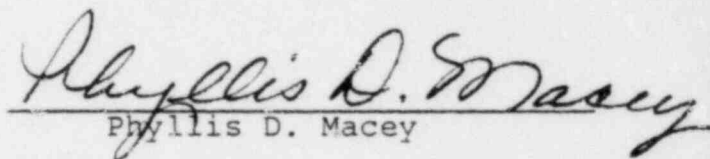
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Maple City, Michigan 49664

Judd Bacon, Esquire
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Ms. Christa-Maria
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204 Clinton
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Route 2, Box 108
Charlevoix, Michigan 49720


Phyllis D. Macey