

ISHAM, LINCOLN & BEALE
COUNSELORS AT LAW

1120 CONNECTICUT AVENUE, N.W. • SUITE 840
WASHINGTON, D.C. 20036
202 833-9730

EDWARD S. ISHAM, 1872-1902
ROBERT T. LINCOLN, 1872-1889
WILLIAM G. BEALE, 1885-1923

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CHICAGO OFFICE
ONE FIRST NATIONAL PLAZA
CHICAGO, ILLINOIS 60603
TELEPHONE 312-682-7500
TELEX 2-5288

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

February 5, 1982

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

Ralph S. Decker
Administrative Judge
Route No. 4, Box 190D
Cambridge, Maryland 21613

Dr. Frederick P. Cowan
6152 N. Verde Trail
Apt. B-125
Boca Raton, Florida 33433

Dr. Jerry Harbour
Atomic Safety & Licensing
Board Panel
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Dear Administrative Judges:

Enclosed is Applicant's testimony with respect to Underground Piping and Tanks at the Midland Plant. This testimony has three authors, who will be presented as a panel in the evidentiary hearings beginning in Midland on February 16. The principal author is Donald F. Lewis, who is Acting Assistant Project Engineer and Engineering Group Supervisor, Midland Project, Bechtel, Ann Arbor. Donald F. Landers, Senior Vice President, Teledyne Engineering Services is responsible for Section 3.5 (Subsections 3.5.1 through 3.5.7) relating to acceptability criteria for ovalization. James K. Meisenheimer, Coordinator of Geotechnical Activities for Consumers Power Company is responsible for Sections 2.1 and 2.2 relating to soil conditions and predicted settlement. The impressive qualifications of these witnesses are described in more detail in the affidavits attached to this testimony.

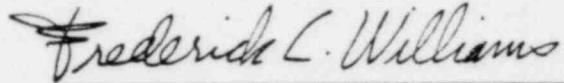
The level of information in this testimony relating to the Underground Piping and Tanks exceeds that normally available at the construction permit stage in NRC licensing proceedings. This testimony provides an adequate basis for a

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finding that there is reasonable assurance that the Underground Piping and Tanks will perform their intended functions without undue risk to the public health and safety. Definitive operating license type findings must of course await later stages of this proceeding.

Respectfully submitted,



Frederick C. Williams
ISHAM, LINCOLN & BEALE
1120 Connecticut Avenue, N.W.
Washington, D.C. 20036