

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	}	
Wisconsin Electric Power Company	}	Docket Nos. 50-266
(Point Beach Nuclear Plant,	}	50-301
Units 1 and 2)	}	(Repair to Steam Generator Tubes)

AFFIDAVIT OF PATRICK G. EASLEY

I, Patrick G. Easley, being duly sworn, depose and state:

1. I am presently a Nuclear Engineer in the Accident Evaluation Branch of the Division of Systems Integration, Office of Nuclear Reactor Regulation.
2. The purpose of this statement is to address the issues raised in Contention 2(a) by Wisconsin's Environmental Decade ("Decade") in its July 21, 1982 Motion Concerning Litigable Issues.

Contention 2(a) states:

Rupture of steam generator tubes during normal operation may release radiation to the environment from the plant's secondary side in excess of maximum permissible doses to the extent that:

(a) Iodine. The iodine levels in the primary coolant exceed Westinghouse Standard Technical Specifications for reactor coolant iodine activity;

3. The Staff is unaware of any pressurized water reactor (PWR) which has ever violated the Westinghouse Standard Technical Specifications (STS) for iodine coolant activity, and most PWR's operate well below the STS limits.

I certify that the foregoing is true and correct to the best of my knowledge and belief.

Patrick G. Easley  
Patrick G. Easley

Subscribed and sworn to before me  
this 16<sup>th</sup> day of August, 1982.

Joanne Hunt  
Notary Public

My Commission expires: 7/1/86.