

AFFIDAVIT OF PETER L. ANDERSON
ON NECNP I.B.1

PETER L. ANDERSON, being on oath, deposes and says as follows:

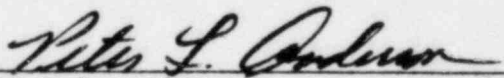
1. I am a Senior Systems Engineer, employed by Yankee Atomic Electric Company. I am currently assigned to the Seabrook Project. My professional qualifications appear in the Operating License Application (FSAR Chapter 13).
2. 10CFR50, Appendix A, General Design Criterion 34 states: "A (emphasis added) system to remove residual heat shall be provided...". It does not specify or make reference to the steam dump valves, turbine valves or the steam dumping system.

In responding to NECNP's first set of interrogatories, we have identified the system(s) in the Seabrook design which provide or support the function of residual heat removal and meet the requirements of GDC 34. The Seabrook design does not require the use of the steam dump valves, turbine valves or steam dumping system to meet these requirements.

Additionally, in responding to this same set of interrogatories, it was stated that all applicable portions of the identified systems, which are essential to perform or support the function of residual heat removal, are, in fact, safety grade and environmentally qualified pursuant to the requirements of GDC 4.

Therefore, it has been demonstrated that the Applicant has satisfied the requirements of GDC 34 in that a system has been provided to remove residual heat, and that system is safety grade and has been environmentally qualified satisfying the requirements of GDC 4.

Based on the above, I feel there is no issue relative to NECNP Contention I.B.1 on which factual hearings are warranted.

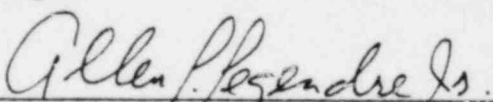

Peter L. Anderson

COMMONWEALTH OF MASSACHUSETTS

Middlesex, ss

February, 1983

Then appeared before me the above suscribed Peter L. Anderson and made oath that he was the author of the foregoing affidavit and the statements set forth therein are true to the best of his knowledge.


Allen L. Legendre, Jr., Notary Public
My Commission Expires August 5, 1988