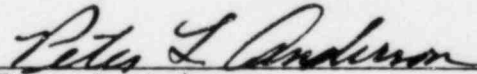


AFFIDAVIT OF PETER L. ANDERSON
ON NECNP I.C

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. NECNP contends that the entire Heating Ventilation and Air Conditioning (HVAC) System for the emergency feedwater pump house must be environmentally qualified. Under the regulations, however, only those portions of the emergency feedwater pump house HVAC System which are essential to support the safety function associated with the equipment within this area, need be safety-related and environmentally qualified. In responding to NECNP's first set of interrogatories, it was stated that the fans, dampers, motors, electrical cable, and instrumentation and control components are, in fact, safety-related and environmentally qualified.
3. In responding to the Applicant's interrogatories, NECNP states that the HVAC System is required to maintain ambient temperature within a particular temperature range during an accident to assure that equipment within the area remains functional. While this is technically correct, however, the primary concern during equipment operation is that of providing sufficient ambient cooling to remove the heat generated by the emergency feedwater pumps. As was stated in the NRC Staff's response to NECNP's first set of interrogatories: "Once the EFW pumps are operating, its own heat generation will protect the equipment in the pump house from freezing".
4. In both NRC Staff and Applicant responses to NECNP interrogatories, it has been stated that routine operator rounds, on at least a once-a-shift basis, specific inspections required by procedures for occurrences such as earthquakes and ambient temperature alarms provide adequate advance warning of HVAC malfunctions to allow operator corrective actions.

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

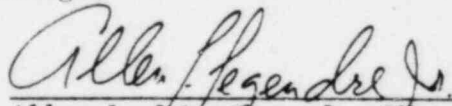

Peter L. Anderson

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