

AFFIDAVIT OF WILLIAM N. FADDEN
ON NECNP I.D.2


WILLIAM N. FADDEN, being on oath, deposes and says as follows:

1. I am a Senior Instrumentation and Controls 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. In response to Applicant's Interrogatory XI-5, NECNP has agreed with the position of the Applicant and the NRC Staff that Regulatory Guide 1.22 provides acceptable methods for performing periodic testing of Protection System actuation functions to show compliance with GDC 21. The Applicant's conformance to Regulatory Guide 1.22 is addressed in FSAR Sections 1.8 and 7.1.2.5.

The Protection System Actuation Functions listed in FSAR Section 1.8 and 7.1.2.5 that are not tested during reactor operation meet the criteria enumerated in that portion of Regulatory Guide 1.22 entitled Regulatory Position D.4. These exceptions to testing during reactor operation have been reviewed and accepted by the NRC Staff and are consistent with exceptions justified by operators of similar nuclear power plants that have recently been licensed by the NRC, thus the testing of the Seabrook Protection System actuation functions fully complies with the guidance of Regulatory Guide 1.22.

Any reference to NUREG-0737, Task II.D.1 is not relevant to compliance with GDC 21 as this task only relates to generic testing of relief and safety valves rather than periodic testing of Protection System actuation functions.

Based on the above, I feel there is no issue relative to NECNP Contention I.D.2 on which factual hearings are warranted.



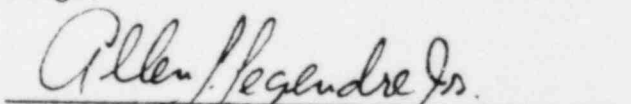
William N. Fadden

COMMONWEALTH OF MASSACHUSETTS

Middlesex, ss

February 10, 1983

Then appeared before me the above suscribed William N. Fadden 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

CERTIFICATE OF SERVICE

I, Thomas G. Dignan, Jr., one of the attorneys for the Applicants herein, hereby certify that on February 11, 1983, I made service of the within "Applicants' Thirteenth Motion for Summary Disposition (Contention NECNP I.D.2)," by mailing copies thereof, postage prepaid, to:

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