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NUCLEAR REGULATORY COMMISSION  
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U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dr. Richard F. Cole\*\*  
Administrative Judge  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dr. Peter A. Morris\*\*  
Administrative Judge  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

In the Matter of  
PHILADELPHIA ELECTRIC COMPANY  
(Limerick Generating Station, Units 1 and 2)  
Docket Nos. 50-352 and 50-353

Dear Administrative Judges:

This letter forwards the NRC staff Testimony of Dr. Sarbeswar Acharya, Dr. Myron Fliegel, Rex G. Wescott and John C. Lehr relative to City of Philadelphia Issue 15. In addition, Lewis G. Hulman will be present at the hearing as a back-up witness. As such, Mr. Hulman does not have any prefiled direct testimony. He will be called as a witness only in the event his expertise is found necessary to amplify matters addressed by the Staff's principal witnesses. A statement of Mr. Hulman's professional qualifications is enclosed.

Sincerely,

Benjamin H. Vogler  
Counsel for NRC Staff

cc: See page 2

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Certified By Ben Vogler

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LEWIS G. HULMAN  
PROFESSIONAL QUALIFICATIONS

I am the Chief of the Accident Evaluation Branch, Division of Systems Integration, in the Office of Nuclear Reactor Regulation. I was formerly the Chief of Systems Interaction Branch and Chief of the Hydrology-Meteorology Branch, also both in the Office of Nuclear Reactor Regulation.

My formal education consists of study in Engineering at the University of Iowa where I received a BS in 1958, and an MS in Engineering Mechanics and Hydraulics in 1967. In addition, I have taken post-graduate courses at the University of Nebraska, MIT, Colorado State University, and the University of California, and numerous management, technical and computer utilization courses sponsored by the government.

My employment with NRC (formerly AEC) dates from February 1971 with both the Office of Nuclear Reactor Regulation and the former Office of Reactor Standards, and for consultation on the siting of materials utilization facilities. I have been responsible for the assessment of the potential for accidents resulting from natural phenomena, system performance under accident conditions, the generation and transport of fission and activation products within and outside nuclear power plants, and the radiological consequences of accidental releases. Since December, 1981 I have supervised the preparation of all the accident sections for DES's and FES's, and participated in the staff's evaluation of the Indian Point and Limerick PRA's. In addition, I participated in the development of the technical bases for safety guides and standards, and in research assessments.

From March 1980 through mid-April 1981 I was employed in private industry as a Vice President with Tetra Tech, Inc. in Pasadena, California. During this period I was responsible for business development, and for managing several contracts involving various engineering studies, including several contracts for government and industry. Of note were studies of a nuclear power plant in Yugoslavia for the International Atomic Energy Agency, risk and risk aversion studies in the Dominican Republic, a refinery intake design in Indonesia, and hurricane risk assessments in Texas, North Carolina, Florida, and New Jersey.

From 1968 to 1971, I was a Hydraulic Engineer with the Corps of Engineers' Hydrologic Engineering Center in Davis, California, where I worked as a consultant for most Corps' offices, participated as an instructor in training courses, and conducted research.

From 1963 to 1968, I was a Supervisory Hydraulic Engineer with the Philadelphia District, Corps of Engineers. As Assistant Chief of the Hydrology Branch, I was responsible for design aspects of multi-purpose dams, navigation projects, coastal engineering development and special studies on modeling of dams, inlets, water supply, and shoaling, salt water intrusion, and the effects of dredging. I acted as advisor to the

District Engineer, Philadelphia, on drought problems in the 1960's and represented him in technical meetings of the Delaware River Basin Commission - chaired interagency committee which evaluated the effects of the drought.

From 1958 to 1963, I was a Hydraulic Engineer with the Omaha District of the Corps of Engineers. I was responsible for the hydraulic design of flood control channels, hydraulic design of structures for large dams and several flood control projects. I also received training in, probabilistic assessments, hydrologic engineering, structural engineering, sedimentation, river training studies and design, and water resource project formulation.

I have published in journals of the American Society of Civil Engineers, the American Water Works Association, the Journal of Marine Geodesy, the National Society of Professional Engineers, the American Geophysical Union, and in internal technical papers and seminar proceedings of the Corps of Engineers, the AEC, and the NRC.

I am a registered Professional Engineer in the States of Nebraska and California. I am a member of the American Society of Civil Engineers, the American Meteorological Society, and the American Geophysical Union.