

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

KANSAS GAS AND ELECTRIC COMPANY

(Wolf Creek Generating Station, Unit 1)

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Docket No. 50-482

AFFIDAVIT OF ARNOLD J. H. LEE

I, Arnold J. H. Lee, being duly sworn do depose and state:

1. I am employed by the Nuclear Regulatory Commission as a Mechanical Engineer in the Equipment Qualification Branch, Division of Engineering, Office of Nuclear Reactor Regulation. A copy of my professional qualifications is attached to this affidavit as Exhibit A. The statements made are true and correct to the best of my knowledge, information and belief.

2. I am responsible for the review of equipment seismic and dynamic qualification program of Wolf Creek Generating Station and Callaway Plant.

3. Wolf Creek Generating Station, like its sister plant, Callaway Plant, is part of the Standardized Nuclear Unit Power Plant System (SNUPPS). With the exception of minor differences related to the cooling water system, the two plants are identical in design and construction. The seismic qualification review team (SQRT) led by the staff conducted the site audit for both SNUPPS plants on December 5 through December 9, 1983. The site audit, including review of equipment field installation and detailed qualification documentation, indicated that the seismic and dynamic qualification program of equipment as installed in Callaway 1 and Wolf Creek 1 meets the requirements of current licensing criteria as described in

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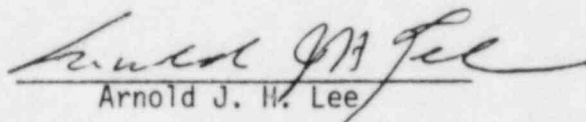
Standard Review Plan (SRP) Section 3.10, Regulatory Guides 1.100 and 1.92, and Institute of Electrical and Electronics Engineers' IEEE Standard 344-1975. The staff has further concluded that the SNUPPS equipment seismic and dynamic qualification program has been substantially implemented to the above current staff criteria. The exceptions are those staff concerns related to the audited items identified during the site audit and a list of 12 equipment items yet to be qualified for which justification for interim operation (JIO) has been presented by the applicant. Based on the information provided the staff has accepted the JIO to the extent that the Callaway plant can be operated up to 5% power.

4. As stated in the Supplement to Safety Evaluation Report, the applicants for both SNUPPS plants are to resolve all the equipment specific open items related to the site audit prior to the fuel load dates. Since the fuel load of Callaway 1 is scheduled in July 1984, the staff expects that all the open items for Callaway 1 and some open items for Wolf Creek 1 will have been resolved by that time. We further anticipate that by the fuel load date of Wolf Creek in October 1984, all the open items related to the site audit, which are either in the SNUPPS scope or Wolf Creek plant-specific, will also have been resolved.

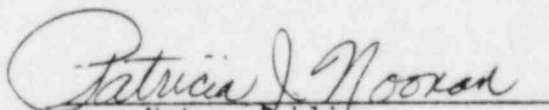
5. Furthermore, it is also anticipated that by the time of Wolf Creek fuel load all the SNUPPS unqualified equipment covered under the previous mentioned JIO will all have been qualified and that no JIOs will be needed for Wolf Creek licensing.

Conclusion

It is our position that the unresolved generic safety issue A-46 applies only to the seismic qualification of equipment in operating plants. For many older operating plants detailed seismic qualification requirements were not available at the time of their licensing. In reviewing Callaway 1 and Wolf Creek 1 the staff has used the current licensing criteria embodied in Standard Review Plan Section 3.10. Based on our review, the staff concludes that the equipment seismic and dynamic qualification program of Callaway 1 and Wolf Creek 1 meets the current licensing requirements and the operation of these plants should not be affected by the forthcoming resolution of USI A-46.


Arnold J. H. Lee

Subscribed and sworn to before
me this 13th day of June, 1984


Notary Public

My Commission Expires: July 1, 1986

EXHIBIT A

ARNOLD J. H. LEE
EQUIPMENT QUALIFICATION BRANCH
DIVISION OF ENGINEERING
U. S. NUCLEAR REGULATORY COMMISSION
EDUCATIONAL AND PROFESSIONAL QUALIFICATIONS

I am employed as a Mechanical Engineer in the Seismic/Dynamic Loads Section of the Equipment Qualification Branch, Division of Engineering.

In June, 1964, I graduated from National Taiwan University with a Bachelor of Science degree majoring in Agricultural Engineering. In January, 1967 I received from Rutgers University a Master of Science degree with a major in Mechanical Engineering. In March, 1971 I received from the Pennsylvania State University a Ph.D degree with a major in Engineering Mechanics.

I have been continuously employed in the nuclear power industry since March 1971; by Gilbert Associates Inc. between March 1971 and December 1977 and by Westinghouse Electric Corporation between January 1978 and December 1978. Since January 1979 I have been employed by the Nuclear Regulatory Commission.

My present work assignment at the NRC includes review responsibility of seismic and dynamic qualification of safety-related equipment. I am a member of IEEE Committee Working Group 2.5 responsible for revision of IEEE Std. 344-1975, "Recommended Practices for Seismic Qualification of Class IE Equipment for Nuclear Power Generating Stations."