

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

In the Matter of )  
LOUISIANA POWER AND LIGHT COMPANY ) Docket No. 50-382  
(Waterford Steam Electric Station, )  
Unit 3) )

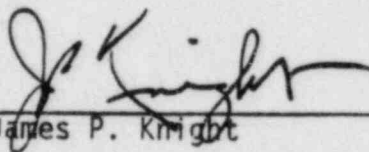
SUPPLEMENTAL AFFIDAVIT OF JAMES P. KNIGHT

I, James P. Knight, being duly sworn, do depose and state:


1. On August 7, 1984, I finalized and executed an Affidavit related to the concrete cracking which has been observed in the base mat at Waterford Unit 3; that Affidavit was attached to and filed in support of the "NRC Staff's Answer to Joint Intervenors' Amended and Supplemental Motion to Reopen Contention 22," on August 7, 1984.

2. Upon a re-reading of my Affidavit, and based upon subsequent telephone conversations with Staff counsel, it appeared that a clarification of page 22 of my Affidavit should be made, in order more accurately to reflect the Staff's evaluation of the Waterford base mat. Accordingly, after discussing the specific language of the clarification by telephone, I authorized Staff counsel to provide the necessary clarification to the Atomic Safety and Licensing Appeal Board and to indicate that I would confirm this clarification upon returning to my office. In accordance with these conversations, on August 9, 1984, Staff counsel provided the necessary clarification to the Appeal Board and parties in this proceeding.

3. The clarification of page 22 of my Affidavit, as previously submitted to the Appeal Board and parties by Staff counsel, is attached hereto as Attachment 1. This clarification is necessary and appropriate in order to reflect more accurately the Staff's evaluation of the Waterford base mat. This clarification should be incorporated as part of my Affidavit of August 7, 1984.

  
James P. Knight

Subscribed and sworn to before me  
this 31<sup>st</sup> day of August, 1984

  
Notary Public

My Commission expires: 7/1/86.

judgment as to the performance of the base mat and supported structures under design basis seismic loads; however, all participants in this review agreed that the performance of the base mat and supported structures, under all other design loading conditions, are adequately addressed by the present analyses and that safety of the plant is assured under such other conditions with appropriate monitoring programs in place (as previously recommended by the Staff).

I have concluded, along with other members of the Division of Engineering and our BNL Consultants, In considering the required schedule for completion of the confirmatory analyses, ~~the Staff concluded~~ that these confirmatory analyses need not be received by the Staff prior to licensing. This decision is based upon the Staff's satisfaction as to the safety of the Waterford facility even under design basis earthquake loads, as determined in the evaluation and conclusions drawn by the structural and geotechnical experts who comprised the BNL review team. These experts have probed the Applicant's analyses and performed sufficient independent analyses to satisfy themselves that significant changes to the predicted performance of the base mat was unlikely to result from the observed cracking (including consideration of the NDT results), notwithstanding their recommendation that improved analytical methods be employed to provide a final analysis of record and to confirm the BNL results.

Under these circumstances, the Staff has concluded that while these confirmatory analyses should be performed with reasonable promptness (that is, they should not be permitted to linger over an indefinite period), there are no safety reasons for restricting plant operation until the confirmatory analyses are completed. Accordingly, the Staff intends to discuss with the Applicant a schedule for the