

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

SECRETARY  
DOCKETING & SERVICE  
BRANCH

In the Matter of	)	
	)	
COMMONWEALTH EDISON COMPANY	)	Docket Nos. 50-454 OL
	)	50-455 OL
(Byron Nuclear Power Station,	)	
Units 1 & 2)	)	

AFFIDAVIT OF CHARLES W. DICK

I, Charles W. Dick, being first duly sworn, do hereby depose and say:

1. I am employed by Bechtel Power Corporation. My business address is Fifty Beale Street, San Francisco, California 94105. Bechtel Power Corporation (BPC) is an engineer-constructor engaged in the design and construction of nuclear power plants, and other types of thermal power plants for production of electric power.

2. I have a Bachelor of Science Degree in Electrical Engineering from the California Institute of Technology, and a Master of Science Degree in Electrical Engineering from Stanford University. I am a registered professional engineer in the States of California (Electrical, Mechanical, Nuclear, New York (Electrical) and Pennsylvania (Electrical).

3. I have been employed by Bechtel Power Corporation and its related entities for more than 19 years, joining Bechtel in 1965 as an assistant project engineer. I have held increasingly responsible technical and managerial

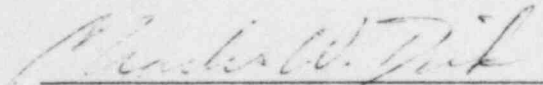
positions related to Bechtel's nuclear power activities, including Project Engineer for the Limerick Power Station (Philadelphia Electric Co.), Engineering Manager, Manager of Engineering and Manager of Quality Assurance for the San Francisco Power Division of Bechtel Power Corporation. I am presently the Independent Design Review Programs Manager and previously was the Byron IDR Project Manager.

4. BPC has been directly involved as either the reviewer or the reviewee in some 14 independent design reviews, as listed in the Program Plan. Also, there is related experience in most of the 112 nuclear units with which BPC has been involved. The design review experience covers detailed design engineering, design process evaluations, quality assurance, and FSAR evaluations. These reviews have covered systems components and structures and have ranged from in-depth technical reviews to partial system reviews. Also, BPC has been directly involved in other reviews covering construction, which adds to its ability to assess adequacy of design.


5. During an assignment to the Diablo Canyon Nuclear Project (Pacific Gas & Electric Co.) I participated in an independent design verification program which included Teledyne, Stone & Webster, R.L. Cloud Associates, and R.F. Reedy, Inc. Also, in my project engineering and engineering management assignments I reviewed and issued or approved numerous nuclear plant design documents, and participated in

formulating the ANSI N45.2.11 standard for design control. In quality assurance management I had overall responsibility for numerous quality programs and audits.

6. I have been asked by Counsel to explain the objective, implementation and results of an August 1984 final report documenting an independent design review of the Byron Station. This review and the final report were conducted and prepared under my overall supervision and direction. I was also requested by counsel to address the criticisms of that report levied by the Intervenors in their September 12, 1984 Motion to Reopen the Byron Hearing Record. My discussion of these matters is set forth in the attached "Joint Statement of Charles W. Dick and Edward M. Hughes." The statements made therein are true and correct to the best of my information and belief.

  
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CHARLES W. DICK

SUBSCRIBED and SWORN to  
before me this 28<sup>th</sup> day  
of September, 1984.

  
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NOTARY PUBLIC

My Commission Expires January 14, 1987