

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

'84 OCT -5 AM 11:25

In the Matter of)
COMMONWEALTH EDISON COMPANY)
(Byron Nuclear Power Station,)
Units 1 & 2))

Docket Nos. 50-454
50-455 OL

OFFICE OF SECRETARY
DOCKETING & SERVICE
CLINCH

AFFIDAVIT OF KENNETH J. GREEN

I, Kenneth J. Green, being first duly sworn, do hereby depose and say:

1. I am employed by Sargent & Lundy Engineers. My business address is 55 East Monroe Street, Chicago, Illinois 60603. I am a Mechanical Project Engineer for the Byron/Braidwood Nuclear Stations.


2. I received a Bachelors Degree in Mechanical Engineering from the University of Illinois and a Masters Degree in Mechanical Engineering from Old Dominion University.

3. Upon graduation from the University of Illinois, I worked as a design engineer for Newport News Shipbuilding and Drydock Company in Newport News, Virginia for four years. This work was primarily in the areas of heat transfer and fluid-flow analysis and radiation-shielding design associated with Naval Nuclear propulsion power plants.

4. In 1976 I joined Sargent & Lundy as a Nuclear Analyst in the Nuclear Safeguards and Licensing Division. In this capacity I was responsible for analyzing the thermal hydraulic effects of postulated nuclear power plant accidents and transients. In 1981 I joined the Byron/Braidwood project team in

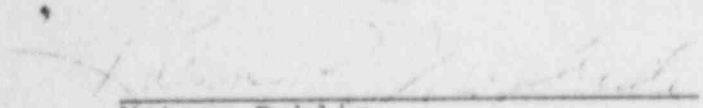
my present position of Mechanical Project Engineer. In this position I have been responsible for review and direction of mechanical engineering work in areas relating to high energy line design, equipment qualification, fluid system design, and licensing issues. I reviewed the NRC's Integrated Design Inspection (IDI) Report of September 30, 1983 and participated in preparation of responses to the questions raised in the IDI Report regarding mechanical engineering work at Byron.

5. I have been asked by counsel for Commonwealth Edison Company to address the IDI findings regarding mechanical engineering work at Byron which are referenced at pages 10-13 of Intervenor's Motion to Reopen the Byron Hearing Record filed September 12, 1984. My discussion of these matters is set forth in the attached "Joint Statement of Kenneth J. Green and Robert W. Hooks." Specifically, I was responsible for the statements which address IDI Findings 2-5, 2-6, 2-8, 2-9, 2-11, 2-16, 2-17 and 3-9. Those statements are true and correct to the best of my information and belief.



Kenneth J. Green

SUBSCRIBED and SWORN to
before me this 15th day
of October, 1984.



Notary Public

My Commission Expires July 6, 1987