UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
TEXAS UTILITIES ELECTRIC COMPANY, et al.) Docket Nos. 50-445 and 50-446
COMPANI, et al.) (Application for
(Comanche Peak Steam Electric Station, Units 1 and 2)) Operating Licenses)

AFFIDAVIT OF JOHN C. FINNERAN, JR. REGARDING CASE'S MOTION CONCERNING SAMPLING OF CINCHED DOWN U-BOLTS

I, John C. Finneran, Jr., being first duly sworn, hereby depose and state as follows:

I am the Pipe Support Engineer for the Pipe Support
Engineering Group at Comanche Peak Steam Electric Station. In
this position, I oversee the design work of all pipe support
design organizations for Comanche Peak. I have praviously
provided testimony in this proceeding. A statement of my
professional and educational qualifications was received into
evidence as Applicants Exhibit 142B.

The purpose of this Affidavit is to provide information responding to CASE's Motion of November 5, 1984 regarding sampling of torques in cinched down U-bolts at CPSES. At the outset I would like to state that the Unit 2 U-bolts at CPSES are identical in make, manufacture and sizes to, and were torqued

using the same construction practices as the Unit 1 and common U-bolts. In short, the torques recorded in the Unit 2 U-bolts were representative of the torques in the Unit 1 and common Ubolts. (In this regard, the October 8, 1982 procedure referenced by CASE in its motion was written at the suggestion of the NRC resident inspector at that time (Robert Taylor) to document the construction practice that had been and currently was being used to torque U-bolts.) It should be noted that, in any event, Unit 1 had already been painted and any torque values measured on Unit 1 U-bolts would have been suspect if not altogether meaningless for our purposes. Accordingly, we sampled the only representative population available to us -- the U-bolts in Unit 2. It never occurred to us that there would even be a concern with the fact that Unit 2 U-bolts were sampled rather than Unit 1. It was certainly obvious to us that due to the circumstances the sampling of Unit 2 was representative of Unit 1, and the only feasible option.

In our sample, we also used non-safety related U-bolts. In that all cinched down U-bolts at CPSES (safety related and non-safety related) are identical in make and manufacture and were torqued using the same construction practice, the torque on non-safety related U-bolts are representative of the torque on safety related U-bolts. Indeed, a comparison of the torque measured on non-safety and safety related U-bolts demonstrates this point, and CASE has not, and cannot state otherwise. I would note that,

if anything, use of non-safety related U-bolts in the sample was conservative in that workers may be less careful with torquing of such U-bolts.

In response to CASE's request as to whether Applicants have utilized other random representative samples from Unit 2 rather than Unit 1, I am unaware of any other instance where a random field sample of Unit 2 was conducted in lieu of and as representing a sample in Unit 1. In this regard, however, in Affidavit of Messrs. Iotti and Finneran Regarding Consideration of Force Distribution in Axial Restraints (at 10), attached to Applicants' Motion on this issue (July 9, 1984), Applicants' sample consisted of 29 supports employing lugs, 24 of which are in Unit 1 and common and five of which are in Unit 2.

John C. Finneran, Jr.

STATE OF TEXAS

Subscribed and sworn to before me this 19th day of November, 1984.

Notary Public BILL J. HODGES
MY COMMISSION EXPIRES MANON 28, 1988

This is a telecopy facsimile. The original will be forwarded under separate cover.

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Docket Nos. 50-445 and 50-446

COMPANY, et al.

(Comanche Peak Steam Electric Station, Units 1 and 2)

Docket Nos. 50-445 and 50-446

(Application for Operating Licenses)

CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicants' Reply to CASE's Motion Concerning Information Regarding Cinching Down U-Bolts" in the above-captioned matter were served upon the following persons by deposit in the United States mail, first class, postage prepaid, this 19th day of November, 1984.

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