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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
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In the Matter of )  
LONG ISLAND LIGHTING COMPANY )  
(Shoreham Nuclear Power Station, )  
Unit 1) )

Docket No. 50-322-1  
(OL)

NRC STAFF RESPONSE TO "LILCO'S MOTION TO  
STRIKE PORTIONS OF NRC STAFF TESTIMONY OF  
JOHN L. KNOX AND PORTIONS OF NRC STAFF  
JOINT TESTIMONY OF SPENCER H. BUSH, ET AL."

On February 11, 1985 Applicant Long Island Lighting Company (LILCO) filed a Motion to Strike (Motion) portions of the NRC Staff Testimony of John L. Knox and NRC Staff Joint Testimony of Spencer H. Bush, Et Al. For the reasons set forth below, the NRC Staff opposes the Motion.

(1) Testimony of John L. Knox

LILCO has moved to strike the first and second full paragraph on page 6 of Mr. Knox's testimony on the ground that the testimony is unresponsive, unfounded and not within the scope of diesel generator load contention a(i) and (iv). LILCO argues that the portions of the testimony it seeks to have stricken has nothing to do with intermittent and cyclic loads. LILCO also argues that the testimony in question should be stricken on the ground that Mr. Knox lacks expertise or training in the operation or analysis of diesel engines. LILCO also asserts that the testimony is outside the scope of the above referenced portions of the contention.

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The testimony in question is responsive to cyclic and intermittent loads because it does, in fact, discuss an intermittent load on the diesel generator. Mr. Knox's review, on which the testimony is based, includes an observation of what the electrical and voltage frequency response to loading would be and does not require that he be an expert in the operation or analysis of diesel engines. Other Staff witnesses can speak to the question of the effect that adding additional loads would have on the diesel generator BMEP's. The testimony in question, on its face, addresses itself to intermittent loads and should not be stricken.

(2) Testimony of Professor Arthur Sarsten referencing Det Norske Veritas calculations

The Staff opposes the Motion to Strike this testimony in which Professor Sarsten, in his analysis of the Shoreham crankshafts, has relied, in part, upon calculations performed, at his request, by a recognized engineering society. The use of Det Norske Veritas conclusions in prior evidentiary sessions was precluded as being outside of the scope of the contention dealing with Diesel Engine Manufacturers Association (DEMA) calculations of engine capacity, or ratings, as Det Norske Veritas was not one of the classification societies identified in the text of the contention.

In this testimony, Professor Sarsten, a recognized expert in the torsional vibration analysis of crankshafts, has relied, in the normal course of preparing his testimony, on calculational input furnished to him, after submission by him of data, by an engineering society chosen by him to perform such calculations. The nature of Professor Sarsten's

input to the result, the nature of the calculations performed by Det Norske Veritas, and Professor Sarsten's ability to explain or verify each of these matters and their underlying methodologies is a proper matter for cross-examination, and should not be preemptorily decided by Motion practice.

In the event that Professor Sarsten is not considered by the Board, at any point in time, to be the proper witness to explain the Det Norske Veritas testimony upon which the referenced testimony is based in part (he also relies upon TDI (Transameric Delaval Inc.) test curves for a Shoreham engine, which he did not prepare, to reach his conclusions on bending stresses), the Staff will attempt to make available an appropriate witness from Det Norske Veritas to explain this testimonial input. Preliminary inquiry indicates that such a witness would be available to testify upon minimal notice.

Accordingly, the NRC Staff opposes Applicant's Motion.

Respectfully submitted,

*Richard J. Goddard*  
Richard J. Goddard  
Counsel for NRC Staff

Dated at Bethesda, Maryland  
this 19th day of February, 1985

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NUCLEAR REGULATORY COMMISSION

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In the Matter of )  
LONG ISLAND LIGHTING COMPANY ) Docket No. 50-322-1  
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CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF RESPONSE TO LILCO'S MOTION TO STRIKE PORTIONS OF NRC STAFF TESTIMONY OF JOHN L. KNOX AND PORTIONS OF NRC STAFF TESTIMONY OF SPENCER H. BUSH, ET AL." in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class or, as indicated by an asterisk, through deposit in the Nuclear Regulatory Commission's internal mail system, or as indicated by a double asterisk, by hand delivery, this 19th day of February, 1985.

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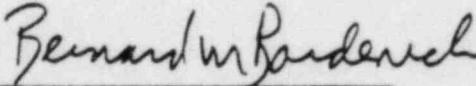
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