UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOAPD

In the Matter of

TEXAS UTILITIES ELECTRIC COMPANY, et al.

(Comanche Peak Steam Electric Station, Units 1 and 2) Docket Nos. 50-445 50-446

AFFIDAVIT OF VINCENT S. NOONAN

I, Vincent S. Noonan, being duly sworn, do depose and state that:

- I am the Director of the NRC Staff's Comanche Peak Project. In that capacity I am responsible for directing of the Staff's task force activities relating to Comanche Peak Steam Electric Station (CPSES), including the CPSES Technical Review Team ("TRT").
- 2. The TRT was commissioned to conduct a comprehensive review of many discrete issues relating to the adequacy of design, construction, and quality assurance ("QA") at CPSES. These matters were brought to the TRT's attention through testimony presented in ongoing ASLB hearings and through allegations received by the NRC outside of the hearing process. The TRT completed the major portion of its onsite inspection activities by the end of October 1984. On September 18 and November 29, 1984, and January 8, 1985, Applicants were notified by letter of the status of the TRT's activities and requested to provide the TRT with additional information. The September 18, 1984

letter advised Applicants of the status of the TRT's evaluation of their electrical/instrumentation, civil/structural, and testing programs. A copy of this letter was furnished to the Board as part of Board Notification 84-160 (September 21, 1984). 1/ The November 29, 1984 letter notified applicants' of the status of the TRT's evaluation of their protective coatings program and requested them to submit additional information relating to the mechanical piping and miscellaneous programmatic areas. A copy of this letter was transmitted to the Board in Board Notification 84-185 (December 10, 1984). The January 8, 1985 letter similarly advised Applicants of the status of the TRT's activities and of the TPT's preliminary views regarding the quality assurance/quality control program at CPSES and requested Applicants to submit additional information. A copy of this letter was transmitted to the Board in Board Notification 85-01 (January 9, 1985).

Applicants' electrical/instrumentation and test programs were published in Supplementary Safety Evaluation Report No. 7 ("SSER 7"). The TRT's findings and conclusions on the remaining issues will be issued in future SSER volumes. The Staff currently anticipates that these SSERs will be issued by the end of March 1985.

Due to the number and breadth of the issues which the TRT must

The September 18, 1984 letter is actually bound into the transcript of a September 18, 1984 meeting between the Staff and Applicants, which was also provided in Board Notification 84-160.

consider, it should be emphasized that this date represents only the TRT's best estimate of the time needed to complete the remaining SSERs and may well prove to be optimistic. The TRT, however, will alert the Board if it appears unable to meet this target date.

- A. In addition to the TRT, two panels comprised of NRC senior Staff management have been formed to assist the Comanche Peak Project Director in the development of the Staff's position on intimidation and the other unresolved CA/QC issues encompassed by Contention 5. Copies of the directives establishing these tasks forces were provided to the Board in Board Notification 85-04 (January 9, 1985). The Staff currently anticipates that each of these task forces will complete its deliberations and provide its input to the Comanche Peak Project Director before the end of March 1985.
- 5. Because CASE's Motion for Establishment of an Evidentiary Standard and Pequest for Board Directed Independent Inspection raises many complex questions of a technical nature, the Board will be better able to consider CASE's motion if it has available to it the Staff's views and recommendations with respect to the matters raised therein.
- 6. Recause the Staff has not completed its evaluation of Applicants' quality assurance program nor reached a final position regarding its adequacy, the Staff is unable at this time to assist the Board in determining (i) whether the adequacy of Applicants' quality assurance program is "indeterminate" and (ii) the need for, or scope of,

any reinspection of CPSES. Accordingly, the Board should defer further action on CASE's motion until twenty days after the issuance of the SSERs covering the subjects listed in paragraph 2 and the task forces described in paragraph 4 complete their deliberations and provided their input to the Comanche Peak Project Director with respect to the matters within their jurisdiction.

The above statements are true and correct to the best of my knowledge and belief.

Subscribed and sworn to before me this day of February, 1985

ANNETTE M. ORDA

My Commission expires: My Commission Expires July 1, 1986

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In the Matter of
TEXAS UTILITIES ELECTRIC COMPANY
et al.

(Comanche Peak Steam Electric Station, Units 1 and 2) Docket Nos. 50-449CKETING & SERVICE 50-446 BRANCH

CERTIFICATE OF SERVICE

I hereby certufy copies of "NRC STAFF REQUEST FOR EXTENSION OF TIME TO RESPOND TO CASE'S MOTION FOR ESTABLISHMENT OF EVIDENTIARY STANDARD AND REQUEST FOR BOARD DIRECTED INDEPENDENT INSPECTION" 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 Niclear Regulatory Commission's internal mail system, this 20th day of February, 1985:

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