

ORIGINAL

UNITED STATES
NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF:

DOCKET NO: 50-322-1 (OL)

LONG ISLAND LIGHTING COMPANY

(Shoreham Nuclear Power Station)

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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In the matter of: :

LONG ISLAND LIGHTING COMPANY : Docket No. 50-322-1 (OL)

(Shoreham Nuclear Power Station):

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State Office Building,
Veterans Memorial Highway,
Hauppauge, New York.
Friday, November 9, 1984.

The hearing in the above-entitled matter was reconvened, pursuant to adjournment, at 9:00 a.m.

BEFORE:

JUDGE LAWRENCE BRENNER, Chairman,
Atomic Safety and Licensing Board.

JUDGE PETER A. MORRIS, Member,
Atomic Safety and Licensing Board.

JUDGE GEORGE A. FERGUSON, Member,
Atomic Safety and Licensing Board.

(Not present.)

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APPEARANCES:

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WRBeb 1

C O N T E N T S

2 WITNESSES EXAM BY BD REDIRECT RECROSS

3

4 Spencer H. Bush)

5 Adam J. Henriksen)

6 Carl H. Berlinger) 26180

7

8 By Mr. Perlis 26255

9 By Mr. Ellis 26259

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15 EXHIBITS Id. Evd.

16 Staff Diesel Exhibit No. 10

17 "Section through cylinder head stud" 26186 26187

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19

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21 Morning recess - 26252

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P R O C E E D I N G S

1
2 JUDGE MORRIS: Good morning. Judge Brenner has
3 given me the opportunity to start the proceeding this
4 morning.

5 Whereupon,

6 SPENCER H. BUSH,

7 ADAM J. HENRIKSEN,

8 and

9 CARL H. BERLINGER

10 resumed the stand and, having been previously duly sworn,
11 were examined and testified further as follows:

12 JUDGE MORRIS: We will proceed with Board
13 questions.

14 EXAMINATION BY THE BOARD

15 BY JUDGE MORRIS:

16 Q Dr. Bush, just because I don't think the record
17 is clear, I wonder if you could tell us what you mean by a K
18 field.

19 A (Witness Bush) This would be in terms of
20 fracture mechanics, and it could be either a positive field
21 or a negative field under the circumstances. And putting it
22 perhaps in an easier state, if I have tensile stresses
23 there, I would expect to have a positive K field -- tensile
24 or bending stresses.

25 If I have have compressive stresses and they are

WRBeb 1 fairly high, I would expect to have a negative field.

2 The significance is that in a positive field, if
3 it is high enough, there's a possibility or a probability
4 that a crack will continue to grow. If it moves into a
5 negative field, a negative K field, it will tend to stop or
6 grow much more slowly. And as the magnitude of the negative
7 K field increases, the probability is the crack won't grow
8 at all thereafter.

9 So what it amounts to is if you can visualize a
10 case where you could have tensile loads, a crack would
11 initiate and propagate but as it moves into a compressive
12 field where all the forces are in compression, then the
13 crack will essentially stop.

14 Q Thank you.

15 Dr. Berlinger, have you had an opportunity to
16 either perform or to review evaluations of failures in the
17 diesel generators resulting from through cracks?

18 A (Witness Berlinger) Judge Morris, --

19 Q I'm thinking in terms of the operational
20 consequences.

21 A An actual review as a result of an occurrence, or
22 a hypothetical?

23 Q A hypothetical.

24 A Yes.

25 Q Let's start with the cracks in the cam gallery.

WRBeb

1 Supposing there was a through crack from the cam
2 gallery region into the jacket coolant region. What would
3 be the operational consequences on the operation of the
4 engine?

5 A The water from the water jacket area would leak
6 into the cam gallery area because it is at a somewhat higher
7 pressure, not extremely high but a higher pressure.

8 The water would then drain down, along with the
9 oil that is circulated through the cam gallery area into the
10 crankcase, and it would mix with the oil in the crankcase.

11 The presence of water in the oil is not good; you
12 don't want to operate engines that way. And as I understand
13 it, operation with water in the oil for a period of time
14 could lead to overheating of bearings, failure of bearings,
15 and if it progressed far enough could lead to shutdown of
16 the engine.

17 If it was allowed to operate that way for a
18 long period of time, it could ultimately lead to what is -- I
19 think the phraseology is a crankcase explosion.

20 Q Mr. Henriksen, have you had experience or have
21 you reviewed experience of engines operating with water in
22 the lube oil?

23 A (Witness Henriksen) Yes.

24 Q Is it possible to describe the consequences as a
25 function of how much water is in the lube oil?

WRBeb

1 A You cannot put a quantitative measure on how much
2 oil is allowable in the oil -- how much water, the
3 percentage of water in the oil.

4 Maybe I misunderstood your question.

5 Q Well, let me try it quantitatively.

6 Suppose there was 20 gallons of water in the lube
7 oil system. How would that affect the operation of the
8 engine?

9 A I do not have the necessary data to say that it
10 will operate. Each engine will vary. The load will play a
11 factor in it, the marginal safety in the bearing, the type
12 of lube oi.

13 There are too many variables for anybody, without
14 either tests or calculations, to determine how much water
15 can be tolerated in the oil, and I don't think anybody wants
16 to run that test. And to the best of my knowledge, nobody
17 has made that calculation.

18 Q Were you present when Dr. McCarthy described the
19 experience of the engine which ran with substantial
20 quantities of water in the lube oil for a period of a week
21 or two?

22 A Yes, I was here.

23 Q Did that sound plausible to you?

24 A From my experience, no.

25 Q If water begins to leak into the lube oil, is

WRBeb 1 the performance of the engine affected?

2 A As far as combustion is concerned, no. And
3 obviously the engine can tolerate some quantity of water in
4 the oil, but how much is too much I don't know. It will
5 affect the lubricity of the oil. Definitely the viscosity
6 will be reduced.

7 It will eventually move over from what this
8 engine is designed to operate on the bearings at least, the
9 hydrodynamic lubrication over a mixed film or boundary
10 condition lubrication, in which case the friction factors
11 will be prohibitive, and there will be failure. Whether it
12 be one bearing, two bearings, piston seizure, nobody can
13 tell.

14 Q Are you familiar with the monitoring program for
15 water in the lube oil proposed for Shoreham?

16 A With frequent checking of the oil and running oil
17 samples, yes.

18 Q Do you think it would be more likely to detect
19 water in the oil from that surveillance or from engine
20 malperformance?

21 A It depends on the conditions. Under normal
22 conditions like this engine is supposed to operate, you
23 probably would be more likely to detect it through oil
24 tests and/or the fact that you have to replenish water in
25 the expansion tank.

WRBeb

1 Q Shifting now to ligament cracks, Dr. Berlinger,
2 what would be the effects on the performance of the engine
3 if there were a through-ligament crack?

4 A (Witness Berlinger) Judge Morris, I will try and
5 give you an answer but I honestly think that Mr. Henriksen
6 can do a better job.

7 Q Would you rather have him start?

8 A Please.

9 Q Mr. Henriksen.

10 A (Witness Henriksen) Judge Morris, I have a
11 sketch here which I think our Counsel has intended to
12 introduce as evidence which would help in explaining what
13 would happen.

14 JUDGE BRENNER: You have a different one than we
15 have.

16 MR. PERLIS: Yes, Judge. For the record, I was
17 planning to introduce an exhibit for his redirect, which I
18 believe he would like to refer to now.

19 JUDGE BRENNER: Can you give it to us now?

20 MR. PERLIS: Yes. The document I am going to
21 hand out is-- The drawing was first offered into evidence
22 as LILCO Exhibit B-9, but there have been some additional
23 markings made by the witness.

24 JUDGE MORRIS: Mr. Perlis, this would be Staff
25 Exhibit Diesel 10.

WRBeb 1

2 MR. PERLIS: Judge Brenner, I would request that
3 this exhibit be marked as Staff Exhibit Diesel 10.

4 JUDGE BRENNER: All right. We can even
5 short-circuit it quickly and admit it into evidence.

6 (Whereupon, Section through
7 cylinder head stud was marked
8 Staff Diesel Exhibit 10 for
9 identification.)

10 BY JUDGE BRENNER:

11 Q Mr. Henriksen, these additional marks on the
12 original sketch were made by you or some other witnesses?

13 A (Witness Henriksen) No, it was marked up--

14 Q Who did it? Who marked it up?

15 A I did.

16 JUDGE BRENNER: Why don't we just admit it into
17 evidence if there is no objection.

18 MR. BRIGATI: No objection from the County.

19 MR. ELLIS: Judge Brenner, I don't know what it
20 is that has been marked.

21 JUDGE BRENNER: We are going to find out-- You
22 mean what the changes are? Look at your own Exhibit B-9 and
23 the comparison will tell you instantly. Anything
24 handwritten was added; anything typed was there originally.

25 All right, we will admit this in evidence as
Staff Diesel Exhibit 10.

WRBeb 1

(Whereupon, Staff Diesel Exhibit
10, having been previously
marked for identification,
was received in evidence.)

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5 JUDGE BRENNER: Now you will have it so you can
6 follow it in explaining it to us, Mr. Henriksen.

7 WITNESS HENRIKSEN: Well, the doctoring up which
8 I have done on this is I have added the combustion chamber
9 for clarification. I have added jacket water for
10 clarification. I have indicated the gap between the
11 cylinder head and the cylinder block, and I have indicated
12 the clearance between the stud and the cylinder head which
13 was not indicated on the original sketch but which is a
14 fact, that they do exist on the engine.

15 So the shaded area is the crack as I visualize it
16 as hypothesized by Mr. Dynner. As it can be seen, the water
17 then would enter and go through to the top of the cylinder
18 block. By the time it reaches the cylinder block, water
19 absolutely has no more pressure, no more driving force so it
20 will just dribble, take the path of least resistance and
21 will run between -- in the clearance between the head and
22 the block.

23 Now as for operational purposes in the event of a
24 loop LOCA event, there is a gravity tank connected to the
25 jacket water -- the expansion tank I mean -- I'm sorry --

WRBeb 1 connected to the jacket water system. The tank is equipped
2 with an alarm which will indicate the loss of 20 gallons of
3 water. I don't know the exact size of this tank, but I
4 would guess it's a matter of several hundred gallons, so the
5 loss of 20 gallons does not represent any immediate danger.

6 Furthermore, the system is equipped-- As has
7 been mentioned earlier by LILCO personnel, the tank is
8 equipped with makeup feed.

9 Now in the case of a long-term operation or
10 relatively long-term operation, they can simply leave the
11 feedline open and feed it constantly.

12 The tank is further equipped with a drain line
13 which may or may not drain back to the reservoir. As has
14 also earlier been mentioned, the plant is equipped with
15 reservoirs literally in thousands of gallons. There should
16 be no immediate concern.

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WRB pp 1

BY JUDGE MORRIS:

2 Q Do I infer properly from what you have just said
3 that the engine would continue to operate at whatever load
4 it started?

5 A (Witness Henriksen) Absolutely.

6 Q Shifting now to the stud-to-stud cracks --
7 whoever would like to go first -- what would be the
8 operational consequences of such a through crack on the
9 performance of the diesel engine?

10 A As far as the water is concerned it would be the
11 same as a ligament crack. As to other consequences, I think
12 Dr. Bush is in a better position to elaborate.

13 A (Witness Bush) I confess I can't really give a
14 definitive answer on the thing. It's obvious if you have a
15 crack it'll be a path from the water area to the top
16 surface. A crack, per se, unless you lose -- continue
17 across and lose both ligaments -- and I've never seen an
18 analysis of this one, I'm not exactly sure what the effect
19 would be insofar as -- I can't visualize anything falling
20 apart as such. The worst thing I could see would be where
21 they would tend to pull apart from the stresses but I would
22 imagine they would be relieved, but I confess I haven't seen
23 such an analysis. So I really can't answer the question
24 definitively other than the water path which is a pretty
25 obvious one.

WRB pp

1 Q Dr. Berlinger, did you want to add something?

2 A (Witness Berlinger) Judge Morris, I think that
3 the only possible serious impact of a stud-to-stud crack is
4 if the crack somehow opened up wide enough that it might
5 relieve the forces that are holding the stud bolts -- the
6 head studs down into the block. But I think it is very
7 unlikely that that type of crack widening or expansion would
8 occur. That, I think, is one of the items which may --
9 should be considered but it's a very unlikely event.

10 Q Finally, what would be the operational
11 consequences on the performance of the engine if a
12 circumferential crack were to proceed through the complete
13 section?

14 A (Witness Bush) This is a try. I would think
15 with the bolt loads and the fact that you are pushing down
16 on the thing, that fact that you have a crack, per se,
17 through there may not be that significant a factor. It
18 would go across -- I presume if it goes on a 45 degree angle
19 it would go over into the stud hole -- the stud holes on
20 there. But I can't visualize this as affecting the fact
21 that the studs hold and that in essence the head would tend
22 to retain this whole ring in place.

23 Q I believe you mentioned an angle of 95 degrees
24 yesterday, Dr. Bush?

25 A If I did, I didn't mean it. I thought I said 45

WRB pp 1 degrees.

2 Q Well, I may have misheard.

3 A If I did, I really didn't mean 95. I mean 45.
4 In other words the angle would be more like a shearload
5 which would go from the corner of the landing across and
6 terminate. That's the one I used in the testimony and if
7 I did use 95, I misspoke myself.

8 Q Thank you.

9 Mr. Henriksen, are you familiar with R-5 engine
10 testing?

11 A (Witness Henriksen) Only as it has been
12 reported. I have not attended any. I have not seen test
13 data.

14 Q Are you able to recall how many cycles the engine
15 performed at greater than 225 BMEP?

16 A Yes. Yesterday I made a statement that I thought
17 it was 600 hours plus. I have since had an occasion to go
18 through the records. The 600-plus hours refers to the A
19 pistons which, as you recall, I was also involved in. But
20 the actual figures for the block is in excess of 5000 hours.

21 Q Well, I asked the question in terms of operation
22 at 225 or greater BMEP?

23 A As I understand it, it was in excess of 275
24 BMEP, the 5000 hours.

25 Q 275?

WRB pp

- 1 A Yes.
- 2 Q Thank you.
- 3 Does the Panel -- well, let me ask it this way.
- 4 With respect to the new EDG 103, is there any evidence that
- 5 there were cracks in the cam gallery before operation?
- 6 A (Witness Berlinger) All the information that we
- 7 had is that the -- well, there were no reported cracks based
- 8 on the inspections prior to having put the block into
- 9 service in the engine.
- 10 Q But at the present time there are indications in
- 11 that area?
- 12 A At the present time they have identified some
- 13 cracks or linear indications in the cam gallery area, a
- 14 similar area as in the 101, 102, and 103 block in the saddle
- 15 area.
- 16 Q Have these cracks been examined with a view of
- 17 determining -- trying to determine their origin?
- 18 A There have been no destructive examinations. The
- 19 only examination that I'm aware of were nondestructive
- 20 examinations to try and determine the depth of those cracks.
- 21 A (Witness Bush) Judge Morris, could I expand a
- 22 little bit?
- 23 When one discusses visual examination there is a
- 24 high degree of subjectivity and, in fact, there are
- 25 quantitative data where on extremely tight cracks that

WRB pp

1 visual examination will not detect cracks. So one has to
2 say that either, one, there were no cracks there originally
3 or, there were cracks there that were not detected by the
4 visual examination.

5 I am unaware, at least from the record, of any
6 examination other than the visual examination in that area
7 prior to operation, which was your question.

8 The cracks -- in a meeting that was held in
9 September, certainly I came away with a definite feeling
10 that there was no evidence of cracking at that time. Now,
11 subsequent to that penetrant testing was done which tends to
12 be much more sensitive for very tight cracks. They were
13 detected, and it is my understanding, and I guess this is
14 hearsay since I haven't a piece of paper that I've been able
15 to look at to that degree with regard to the measurement of
16 the depths, which I understand may go up to 15 mills. I am
17 not stating that there were cracks there that were not
18 detected initially, but I'm simply indicating that that
19 possibility exists and is a very strong possibility because
20 it has been observed in other components many, many times.
21 You simply cannot detect very tight cracks by visual
22 examination in many instances.

23 JUDGE BRENNER: Dr. Bush, if I could interject.
24 We're getting a lot of repeat testimony and we are worried
25 about the timeframe of this hearing.

WRB pp

1 Judge Morris' question -- and let me remind you
2 of that in case you did want to add something that answers
3 the question -- was whether there has been any evaluation or
4 analyses or results trying to or succeeding in determining
5 the origin of the cam gallery crack indications in the new
6 103 block?

7 WITNESS BUSH: The reason for my statement was to
8 indicate that the very possible sense of origin is that it
9 existed from day one; that's all.

10 JUDGE BRENNER: But you have nothing to add
11 directly to the question?

12 WITNESS BERLINGER: No, we have no knowledge of
13 any origin determinations or analyses or inspections for
14 that purpose.

15 JUDGE BRENNER: Thank you.

16 BY JUDGE MORRIS:

17 Q So to put it another way, you can't tell whether
18 these were shrinkage induced or fatigue induced after
19 operation; is that correct?

20 A (Witness Bush) That's correct.

21 Q Gentlemen, now I'm going to turn to the
22 supplemental testimony of Dr. Anderson dated October 18.

23 I believe this was the one that got lost in the
24 mail to you, Dr. Bush. Have you had a chance to review it?

25 A (Witness Bush) Yes.

WRB pp

1 I should clear the record. I had it but
2 essentially all of my attachments were virtually illegible
3 so I only had words and I'll be referring to the words
4 mostly.

5 Q Will you turn to page 5, please? In the first
6 answer Dr. Anderson says that he believes the darkness of
7 color of what has been termed the oxide layer is
8 attributable to graphite from graphitization or graphitic
9 corrosion of the surface of the crack.

10 Do you agree with that statement, Dr. Bush?

11 A No, I do not. If this were true, let me site a
12 homely example. There's nothing magic about a crack and if
13 this mechanism were to occur there would be no reason
14 whatsoever that it wouldn't occur over the entire surface,
15 therefore, one would expect to see the total cam gallery
16 area covered with a layer of graphitic carbon.

17 Q And from the observations made it's clear that
18 that's not the case?

19 A I certainly -- that's a good question.

20 There is paint in that area. I guess I can't
21 say. However, the same thing would apply in the water
22 area which, to my knowledge, is not painted and I have heard
23 nothing about it. It would be very obvious if there were a
24 layer of graphitic carbon. My experience mainly in this
25 area where I see it -- have seen graphitic carbon -- was

WRB pp

1 where you have anaerobic bacteria around. And, quite
2 frankly, you can certainly get it under those
3 circumstances. However, I've also seen physical cases of
4 cast iron pipe that's been underground for 100 or more years
5 with no evidence of degradation.

6 Q Is there any possibility of an anaerobic
7 condition in this environment?

8 A Generally, this is a condition that you face when
9 you have a very dense clay and you exclude oxygen. Oxygen
10 is there. Normally, this is caused by a little bacteria
11 that generates sulphur compounds and they essentially form
12 ferritic iron sulphides and simply leave the graphite
13 behind.

14 Q In his answer to question 7, which begins on page
15 5, there are three points. With respect to the second
16 point, Dr. Anderson questions whether air could be present
17 in the environment of the hot casting. Do you agree with
18 his conclusions there?

19 A I think he is correct for the early phases
20 there. One has to remember that these castings stay
21 sometimes for days and I'm not at all certain that you would
22 exclude the air over that extended period of time when you
23 -- obviously when you're burning off the material the answer
24 is yes because you could have a reducing atmosphere. I
25 don't know how you'd keep the air out, however, because you

WRB pp 1 essentially have a porous medium there and so I would
2 certainly expect air movement in sometime during that
3 period. Perhaps not in the first few hours but thereafter.

4 Q I believe you said yesterday, Dr. Bush, that you
5 believed that the cracks in the cam gallery originated from
6 hot tears?

7 A That's correct.

8 Q And those occur at temperatures which are above
9 some level?

10 A Generally, hot tears where the material has a
11 very low strength it may be very close to the solidification
12 temperature, in general instances. Quite often they're
13 caused by changes in section which tend to retain the metal
14 to a degree and prevent the contraction or delay the
15 contraction. The strengths are so low in this instance that
16 the middle simply separates. Generally, you would expect to
17 find such things in areas where there are changes in cross
18 sections, thick to thin or turnaround corners, things of
19 that nature, more so than a flat surface.

20 Q What I was trying to lead up to was whether one
21 could establish in time the relationship between when the
22 hot tears occurred and the time that air might become
23 available to exposure in that region?

24 A As I indicated earlier, I would expect the cracks
25 to occur reasonably early in life when it has very, very low

WRB pp

1 strength particularly in there. I would anticipate that,
2 perhaps, the movement of air in would be later but I guess
3 one would have to get an individual who's an expert in the
4 casting field to see what the situation is there with a
5 regard to that possibility.

6 Q The third point that Dr. Anderson makes has to do
7 with what he believes is the possibility of the oxide layer
8 being present. Have you had a chance to read that?

9 A I believe so. You're talking about -- that's
10 touched on in three different places, which one specifically
11 -- are you still in this testimony or are you in one of the
12 others, because I have some which I'm not sure whether
13 they're in the record or not that discusses this too.

14 Q Right now I'm focusing only on Dr. Anderson's
15 response on pages 6 and 7.

16 A Okay.

17 Q And particularly the top of page 7.

18 A Talking about with regard to the welding and so
19 forth. All right.

20 I finally was able to do an evaluation of the
21 photomicrographs and able to reinterpret them since it was
22 six weeks and I'd had about 30 minutes at that time and have
23 never seen them since.

24 I believe I understand the photomicrographs. Now
25 I would like to see -- if it were at all possible -- a

WRB pp

1 measurement of the crystallographic structure.

2 Q Excuse me. In the interest of time I'm going to
3 cut you off.

4 A Okay.

5 Q It would be fun to talk about what you would like
6 to see but we have to go by what's before us.

7 A Yes.

8 I thought this was the same question. This gets
9 into the graphite corrosion.

10 JUDGE BRENNER: There is no question pending that
11 I know of. Judge Morris pointed you to part of the
12 testimony.

13 BY JUDGE MORRIS:

14 Q Particularly to the top of page 7 and the
15 question is whether you agree with that or not?

16 A (Witness Bush) No, I don't agree with it.

17 Q And the reason?

18 A This has to do with the removal prior to welding
19 if that's the one you're concerned with, I presume?

20 Q That's the way it starts, yes.

21 A Okay.

22 I can't visualize a hot tear, even if it opens up
23 a fair amount, is still not something that gapes open by a
24 very large degree. So in the preparation of this, and I
25 would presume this would be an all-grinding operation, I

WRB pp

1 would say that there would be a removal certainly from the
2 mount area which is, I think, the area of concern because
3 you would have to expand that area several fold. You would
4 be talking of a very narrow V that might open up, let's say,
5 a tenth of an inch in that vicinity or perhaps even more
6 than that. Let's make it as much as two-tenths of an inch.
7 To make that weld you're talking of opening it up to roughly
8 three-quarters of an inch. You're also beveling the thing
9 down at an angle in order to make the weld and that would
10 say that from the surface to an appreciable distance down
11 you would remove metal away by a factor of, oh, a 100 or
12 more perhaps compared to the oxide thickness. So I
13 visualize no mechanism for retaining an oxide under those
14 circumstances.

15 Q Thank you.

16 BY JUDGE BRENNER:

17 Q Dr. Bush, the portion that you were just focusing
18 on which begins at the top of page 7 of the supplemental
19 testimony is an alternative proposition presented by
20 Dr. Anderson. I think, arguably, his main proposition is at
21 the bottom of page 6. If you can turn back and look at that
22 and in that paragraph -- the one that begins "A third". In
23 that paragraph Dr. Anderson is saying, in effect -- I hope I
24 paraphrase this accurate -- that the dark oxide layer is, in
25 his opinion, uniform from the top to the bottom of the crack

WRB pp 1 and he believes that supports the proposition that the layer
2 occurred after the welding because otherwise it, indeed,
3 would have been removed, in part at least, as part of the
4 welding process.

5 A (Witness Bush) It should have been, that's
6 correct.

7 Q All right.

8 So then do you agree with what he's saying in
9 that paragraph and why or why not?

10 A I think he's referring to the specimens that,
11 quite frankly, were the topic of conversation yesterday that
12 unfortunately were mislabeled.

13 I can't tell in this case because the only
14 evidence I have of the oxide is on the other surface. The
15 surface that matches is a single fracture at 1X. So I don't
16 know anything about the condition there. I can't look at
17 it.

18 Now, I have looked at the side view there that is
19 adjacent and certainly in that area there is no evidence of
20 an inherent dark oxide approaching -- I won't even call it
21 an oxide -- an inherent dark material approaching the
22 thickness that is below the weld.

23 Q In this latter point you're talking about the
24 area where the weld did not separate?

25 A That's where the weld did separate.

WRB pp 1 Q Okay. That's the area I'm interested in.

2 A Yes. In other words, there are a series of
3 cracks there. These are cross-section as contrasted to a
4 fractograph and one can see a limited amount of material, X,
5 if we don't want to call it an oxide, as contrasted to a
6 more substantial amount in the thickness context as you go
7 further and further down into the crack below the weld under
8 these circumstances. That's the only thing I have to go by
9 is the photomicrographic record of the thing in cross
10 section as contrasted to, say, in the physical examination
11 of the female section that had been removed from the weld by
12 the fracture process.

13 Q Well, when you look at the photomicrograph that
14 you just described, what does that tell you about what you
15 said was a difference in the substance X, if you will, from
16 the top of a crack area down to the bottom.

17 A When I look at it at magnifications of 50 and
18 100X and in some instances as 500X on there, I can see a
19 clear separation of the base metal at the heat affected zone
20 layer, vis a vis, the weld, per se. I can see in a few
21 instances adhering to the one side a material that seems to
22 be of lesser thickness than as you move down below the
23 weld. And I am inferring that this is a similar material in
24 the absence of anything else and I'm going on the basis that
25 it appears -- it either is nonexistent or it appears to be

WRBpp

1 less thick than it is as we go further down into the crack
2 below the weld.

3 MR. BRIGATI: Judge Brenner, could we have an
4 identification of the photographs he's referring to?

5 JUDGE BRENNER: No, it's not important. You can
6 do what you want later in terms of following up.

7 BY JUDGE BRENNER:

8 Q You don't know if, in fact, there is any layer in
9 the upper levels of the crack from the photomicrographs, is
10 that what you just said?

11 A (Witness Bush) I see in a few instances an
12 example that seems to have the same color. I have no one
13 else's on it. I have seen no indication of analysis in this
14 particular area. I did note -- well, there also are
15 fractographic representations, the different magnifications
16 on it, that are somewhat difficult to interpret in this area
17 It apparently is a film, it clearly is not the middle, per
18 se, but that's about the only thing I have at this time.

19 Q What do you think it is and when do you think it
20 formed?

21 A I, quite frankly, I still think it's an oxide.
22 If I look --

23 Q All right. Let me focus you. Stay with the part
24 of the crack from which the weld metal separated from the
25 base metal, that part. Now, there's some layer there,

WRB pp 1 correct?

2 A There is in a few instances limited evidence of a
3 layer; that's correct.

4 Q What do you think that is, given the fact that
5 you think the welding process would have been -- that there
6 would have been a grinding process performed in connection
7 with the welding process, which you earlier testified, I
8 believe, would have removed the oxide?

9 A The original oxide should have been removed by
10 the grinding process. The thing we don't know is how they
11 made the weld because, obviously, even if you don't put in
12 preheat in the object, any time you put down weld beads
13 there's substantial temperature there and you're doing this
14 in an atmosphere that may or may not be inert, depending on
15 what type of a welding process you're using. So it's quite
16 conceivable that one would essentially lay down a fairly
17 thin layer of -- for want of something better to call
18 it -- oxide during that process, depending, again, on how
19 they build up the weld. That's something I really can't
20 tell.

21 If that were the case I would expect at least
22 some degree of puddling of the oxide into the metal. And
23 at least the examination, the photomicrographs I have seen,
24 may or may not indicate that. It's difficult to tell in the
25 iron-nickel alloy whether there is anything around such as

WRB pp

1 that. That's an inference only, sir. That's about all I
2 can do.

3 Q Is it an equally correct inference or an equally
4 possible inference that the weld metal separated from the
5 base metal during operation and that whatever smaller
6 deposit, smaller layer of deposits you saw at that point
7 formed at that time?

8 A It certainly is possible. The temperatures are
9 pretty low compared to the other conditions and I would
10 normally not expect to see a very thick layer at 100 degrees
11 or so. You should be talking of layers in the micron range.

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WRBeb 1 Q I'm sorry, I thought we were talking about a
2 layer that you said was not very thick.

3 A Yes, but the layer we're talking about is thicker
4 than that.

5 Q All right.

6 JUDGE BRENNER: Just to help Mr. Brigati a little
7 bit, I don't want to get hung up on the numbers of the
8 individual photographs because I don't need to. If he wants
9 to he can pursue it.

10 BY JUDGE BRENNER:

11 Q You are talking about photomicrographs taken from
12 the cam gallery area samples of the original 103 block?

13 A (Witness Bush) This is correct. They are all
14 from Number 7. It's the sequence there.

15 And I believe, with the possible exception of one
16 number that may be in error on what I call the female
17 section, the record that is available there should be the
18 same as the one I have before me here.

19 Q One more thing. You mentioned the color of these
20 thinner deposits. I hesitate to call it a layer from your
21 description. Would I be wrong to call this the area where
22 weld metal separated? Is it incorrect to call it a layer of
23 Substance X? It sounded like spottier deposits than the
24 word layer would imply.

25 A There are some surfaces, at least in the

WRBeb 1 photomicrographs, that seem to have nothing whatsoever
2 attached thereto. There are others where, as one moves down
3 where there seems to be a limited amount on there. It is
4 not, at least in the one I examined, continuous in the ones
5 at 50 or 100 X. That's about all I can say.

6 Q Well, in the areas where no deposit shows, then
7 it would be equally possible that that separation occurred
8 during operation, based on what you previously said,
9 wouldn't it?

10 A That is possible. I can see two possibilities.
11 One is if they did the welding as I suspect they
12 did, I would not be at all surprised if there were cracks
13 that occurred shortly after they completed the welding
14 process. I would not expect complete cracking, and
15 certainly if you superimposed -- if you posed loads on the
16 system, it is conceivable, quite probable in fact, that
17 there would be additional cracking.

18 So one could have cracking over an extended
19 period of time and in fact, one might re-examine certain
20 areas, say in 101 and 102, and I wouldn't be at all
21 surprised to see a change in the penetrant patterns around
22 these welds from time T-1 to time T-2.

23 Q In passing, in one of your answers a few minutes
24 ago you mentioned color of these thinner deposits. You
25 didn't specify a color, you just said "color."

WRBeb

1 I thought you could not tell color from the
2 photomicrographs. Am I missing something?

3 A Well, it's a shading. Perhaps that's the wrong
4 term, but it tends to be what I call a gray or a tan in
5 appearance as contrasted to the microstructure per se, so
6 there is a gradation in here that is clearly visible to the
7 eye under those circumstances. And in shade or color it is
8 comparable as one would see as you move further and further
9 into the crack, as you follow the crack down toward the
10 tip.

11 Q Yesterday you mentioned I think in effect that
12 you preferred to rely on photographs, either
13 photomicrographs or -- I hope I have the right term --
14 fractographs --

15 A Yes, sir.

16 Q -- rather than looking at the samples
17 themselves. Am I correct?

18 A I have nothing against looking at samples,
19 obviously. However, if you scan a sample with a microscope,
20 that's exactly what you're doing. You're depending on your
21 memory to tell you what you saw as you moved from one field
22 to another field.

23 I prefer, when I used to do more metallography
24 than I've done in a long time, to look at a sample under the
25 microscope in different magnifications and decide what areas

WRBeb

1 I want, and then take a series of picture that overlap so
2 that I have a permanent record, because I have found that my
3 memory isn't that good of something if I don't have the
4 record to refer back to.

5 That's the reason, sir.

6 Q Okay.

7 I was wondering, as applied to these particular
8 questions we've been asking you, which all go, as we all
9 recognize, to the potential origin of these different
10 deposits or layers and what they are, whether, if you had
11 actually looked at them, whether that would tell you more
12 than you have been able to tell us from the photographs,
13 either because of color or something else.

14 A I don't think I could depend on that alone. If
15 one were concerned in this case, I think you would go to a
16 different approach. You'd go to a microprobe to get a feel
17 for what compositionally is there, or you would do something
18 of that nature.

19 Q Let's assume we learned it was an oxide, but then
20 there's an argument that there are different types of
21 oxides, and depending on the types, they formed at different
22 times under different conditions.

23 What should we do then to try to--

24 A I think I placed in the record yesterday that it
25 would really be very nice to have an analysis of the

WRBeb 1 crystallographic structure because I think that would
2 resolve the issue once and for all. It is not easy,
3 however.

4 Q You mean in connection with determining whether
5 it is wustite or hematite?

6 A That's correct.

7 Q Well, tell me, if we determine that the thinner
8 layer or thinner deposits in the area where the weld
9 separated from the metal was not wustite, don't we still
10 have the question of when this -- it was not wustite and it
11 isn't oxide, don't we still have the problem of deciding
12 whether it formed during the welding process or formed after
13 separation during operation, although under much lesser
14 temperatures than are present in the forging cooling
15 process?

16 A I would answer it this way:

17 I guess my personal interest would be to
18 establish unequivocally with regard to what is in the crack
19 below the weld, so I would like to see if that is the
20 high-temperature form of an oxide.

21 If one had a large enough sample, which looks
22 like it is not very probable, I wouldn't be too surprised,
23 particularly if it formed by a mechanism such as I
24 suggested, simply by the weld bead thing, to see that this
25 is a lower-temperature form of the oxide.

WRBeb 1

That would tend to indicate that they did indeed
form at different times and under different conditions.

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BY JUDGE MORRIS:

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Q Proceeding with Dr. Anderson's testimony,
Dr. Bush, on page 7, in answer to Question Number 8,
Dr. Anderson concludes that the calcium which was observed
was introduced after the block had been cast and cooled
completely.

9

Do you agree with that conclusion?

10

A (Witness Bush) I think it's a possibility. One
of the possibilities -- and again, I simply do not have
information -- is that many weld electrodes have a coating
that may or may not be proprietary, but almost invariably is
some kind of a calcium compound on it. And when you make a
weld, in fact it's the standard procedure that you deposit a
bead and then you get a wire brush out and remove the
layer. And so it would not surprise me too much if these
were coated electrodes there.

19

I can find absolutely no information in the
record anywhere related to what was done with regard to the
welds. But that to me is a potential source for the
calcium.

23

The sulfur could be that same thing because some
of these are sulfites that are used, but I wouldn't say for
sure whether that would be the case. Cast iron per se does

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WRBeb 1 have sulfur in it to a degree. Whether it is enough to
2 account for it, that's another matter.

3 Q But do you also agree that calcium sulfite could
4 have been present during the casting?

5 A I would expect sulfur, yes. Calcium, less so,
6 but it is not impossible because again what they do is they
7 coat the molds with layers that often are a calcium
8 compound, and it could in theory be carried in under those
9 circumstances. So I cannot eliminate that as a
10 possibility.

11 Q Turning to Question and Answer Number 10 on page
12 8,--

13 A Yes, sir?

14 Q -- Dr. Anderson concludes that because of its
15 brittle nature, cast iron does not form beachmarks during
16 the presence of crack propagation.

17 A I disagree with this one completely.
18 Globally, cast iron may be considered to be
19 brittle, but between any flakes of graphite, you usually
20 have areas normally of laminar perlite. And if,
21 particularly in a high-cycle fatigue operation where we are
22 talking of movements measured in ten's or thousand's of an
23 inch, as it moves through an area such as this, there is no
24 reason whatsoever that you wouldn't expect to see
25 beachmarks.

WRBeb 1

Q For this particular cast iron, Class 40?

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A I would make it more general than that. I don't care whether you are talking of 40 or 50, or anything, because the only thing that would affect it would be if the graphite were so thick that essentially it cored that, and in that case you wouldn't have any strength in the cast iron anyhow.

3

Q Would the presence of Widmanstaetten degenerated graphite affect this conclusion?

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A I still think that there are enough islands. The Widmanstaetten tends to degrade the properties, but we would still have that and certainly under high cycle fatigue I would expect to see an indication of that at high magnifications.

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JUDGE BRENNER: I'm sorry you used a lot of pronouns in that last sentence. What do you mean by "that"?

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WITNESS BUSH: Beachmarks.

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BY JUDGE MORRIS:

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Q Turning now to page 10, to Question and Answer 15, Dr. Anderson concludes that the cracks in the cam shaft gallery area initiated or propagated from subsurface defects during and as a result of the operation of DG 103.

12

13

Do you agree with that?

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A (Witness Bush) I don't know. There is no way for me to agree or disagree.

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WRBeb

1 Obviously if one had something immediately
2 beneath the surface there is no doubt about it that under
3 cyclic loads, it can propagate to the surface. There is
4 lots of evidence of this, just not in there.

5 As I say, as I indicated in an answer to an
6 earlier question, an equally plausible postulate is that the
7 cracks were there, they were formed at or near room
8 temperature because of high residual stress fields and they
9 simply either opened up after the examination, or they were
10 there but were so tight they weren't visible.

11 But I cannot rule out the possibility of the
12 subsurface defects.

13 Q At the top of page 12 Dr. Anderson says that he
14 observed below the tip of the 3/8th inch crack, multiple
15 small disconnected cracks branching out into the cast iron
16 material.

17 Are you aware of any other evidence for these
18 branch cracks?

19 A This one-- I have only seen the words here, and
20 I have seen the words in the testimony by Dr. Rau. I have
21 never seen the samples myself and I really don't know what
22 he's talking about, so I guess I can't answer this question
23 intelligently.

24 Q You have not seen the samples?

25 A I have not seen the samples.

WRBeb 1 Q Dr. Berlinger, do you have anything to add on
2 this?

3 A (Witness Berlinger) Judge Morris, I just want to
4 make sure I understand your question. You are referring
5 just to a sample of the circumferential crack, the
6 cross-section of the old 103 block?

7 Q Well, I'm referring to Dr. Anderson's testimony
8 where he says he observed that below the tip of the 3/8th
9 inch crack, which was a circumferential crack, he observed
10 multiple small disconnected cracks branching out into the
11 cast iron.

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WRBagb 1 A The only photographs that I saw were, I think, 1X
2 scale, no magnification. It was just a photograph of, I
3 guess, a sample, a cross-section --

4 Q Let me interrupt. Do you know what Dr. Anderson
5 looked at?

6 A I'm not quite sure. I really don't. And it was
7 not possible for me, from that photograph, to identify
8 cracks such as this. So I really can't give you any
9 additional information.

10 Q Mr. Henriksen, in question and answer number 20,
11 do you have that testimony before you?

12 A (Witness Henriksen) Yes.

13 Q This relates to the consequences of
14 circumferential cracking. And in his answer Dr. Anderson
15 states that the liner would move up and down.

16 Do you agree that that's possible?

17 A Theoretically possible but not very likely.

18 Q Would such movement cause leakage of combustion
19 gases?

20 A Not necessarily.

21 Q Well do you think this scenario that he has
22 described here is a reasonable one?

23 A It's a little far-fetched.

24 BY JUDGE BRENNER:

25 Q The scenario -- quote/unquote -- Mr. Henriksen,

WRBagb 1 you say is a little far-fetched.

2 Do you say it is far-fetched that the combustion
3 gases would get into the cooling water, is just that part of
4 the scenario alone far-fetched in your view?

5 A Well I was referring to the exhaust getting into
6 the water.

7 Q Okay.

8 And you think that's far-fetched?

9 A Yes.

10 Q All right.

11 Beyond that the scenario of the County's
12 witnesses, they take it beyond that and they say if
13 combustion gases get into the cooling water that this would
14 cause problems for engine operation.

15 A I don't necessarily agree.

16 Q All right.

17 Can you tell me why or why not?

18 A The gases will at that point follow the jacket
19 water, go out through the jacket water discharge and the
20 majority of the gas bubbles would go up to the expansion
21 tank.

22 Q I'm inferring from what you're saying that the
23 jacket water cooling system in this diesel engine is not a
24 closed system but is a system that flows, not closed within
25 the engine jacket, but flows through and out and so on,

WRBagb 1 is that right?

2 A It has a loop. But like I said it does have an
3 expansion tank that allows for expansion of the water from
4 cold to operating temperatures.

5 Q All right.

6 In saying that the scenario is far-fetched, did
7 you also have in mind what the County witnesses say in their
8 expansion on the same point in their rebuttal testimony of
9 November 7 at question and answer 5 on page three of that
10 testimony?

11 A Page....?

12 Q Page three of the rebuttal testimony, the first
13 question and answer on that page.

14 Have you read that, Mr. Henriksen, previously?

15 A I read it last night. I will have to reread it
16 right now.

17 Q My question is -- after you have completed
18 reading it -- whether any information in that answer would
19 cause you to change your opinion that the scenario is
20 far-fetched?

21 A No, it doesn't. If you look at the sketch that
22 was presented earlier as Exhibit 10, I believe, you will see
23 that if the exhaust gases do manage to negotiate the two
24 gaskets it will simply go out into the gap between the block
25 and the cylinder head which is at atmospheric pressure. It

WRBagb 1 will have no driving force to enter the jacket water. There
2 is nothing to contain the gases at that point.

3 The only way gases could enter the jacket water
4 in this area would be if the cylinder liner cracked, and I
5 don't think that's a problem at the moment.

6 BY JUDGE MORRIS:

7 Q Staying with the rebuttal testimony which
8 Dr. Anderson submitted on November 7, 1984 and at other
9 places, at the bottom of page four -- and this will be for
10 Dr. Bush -- Dr. Anderson states that the characteristics of
11 nickel iron weld material are such that they minimize
12 shrinkage and therefore minimize the likelihood of tensile
13 stress caused by post-cooling shrinkage.

14 Is that correct, Dr. Bush?

15 A (Witness Bush) That's telling part of the story
16 but not all of the story.

17 The nickel iron alloys will have co-efficients of
18 thermal expansion that, at a first approximation, will be
19 close to that of a ferritic material of which I will put
20 gray cast iron.

21 The more important factor would be whether there
22 was preheat on the system in the first place. If there is
23 no preheat then you have the shrinkage from the melting
24 point all the way down and you would develop very high
25 tensile stresses.

WRB:agb

1 Now the only way I could get higher tensile
2 stresses is to go to an austenitic alloy which is not
3 normally used under these circumstances which would have a
4 higher coefficient of thermal expansion to get the same
5 thing. So it does not really tell the whole story.

6 Q So that you do believe the weld shrank during the
7 process?

8 A There is no doubt about it. The melting point is
9 up there, the weld is going to shrink under any
10 circumstances. And unless I have preheat on the system or
11 unless I peen every bead essentially in the process in order
12 to reduce the residual stresses -- and even then I should
13 probably use a post-weld stress relieving process; I am most
14 certainly going to have high tensile stresses.

15 Q In relationship to Dr. Anderson's next answer, I
16 won't ask you about what he said but I will ask you to
17 hypothesize that a crack in the cam gallery propagates all
18 the way through to the jacket coolant water wall.

19 Can you describe how that might happen in terms
20 of the size of the crack as it reaches the wall?

21 The reason for asking is that I believe Dr. Rau
22 testified that he thought the initial manifestation of the
23 crack reaching the wall would be a pinhole.

24 A I don't know if I would classify it as a
25 pinhole. I would expect it to be very tight. I guess I

WRBagb 1 would have to lean on extensive experience in the
2 austenitics with stress corrosion cracks which one could use
3 an analogy here. And in those instances when those cracks
4 come through they usually have leak rates that would be,
5 say, .0005 gpm, something of that nature, extremely small
6 values.

7 Now if you continue for an extended period the
8 cracks will continue to grow and you ought to realize that
9 these leak rates are with 1000 psi inside so it is a rather
10 tortuous path. And I would anticipate, assuming the crack
11 grows through, that there would be a very limited in-leakage
12 for a period of time. The crack would have to continue to
13 grow and spread lengthwise and open up in order to have an
14 appreciable movement.

15 One can do a calculation, there are definitive
16 equations that take into consideration the roughness of the
17 surface and the pressure and could establish on that basis
18 given a certain crack length exactly how much water you
19 would infer would move from one side to the other.

20 Q And if that area were under compressive stress
21 how would that affect what you have just told us?

22 A Well if it were under compressive stress we would
23 have to figure out how the crack got there in the first
24 place.

25 The one area that worries me a little bit is that

WRBagb 1 I would anticipate a compressive stress field. I get a
2 little nervous when a crack depth is say 75-80 percent
3 throughwall on the basis that I may have bending moments
4 then and so my compressive stress is either reduced or
5 actually may be changed.

6 Looking back it would have been very nice to have
7 had a few strain gages on the inside of the water side -- on
8 the water side in addition to the cam gallery side.

9 Q With respect to such a through crack we discussed
10 earlier what the consequences might be in terms of water in
11 the lubricant.

12 In the next question and answer Dr. Anderson
13 describes --

14 JUDGE MORRIS: And I believe, Mr. Brigati, that a
15 couple of times he used the word "crankshaft" when he should
16 have said "camshaft."

17 BY JUDGE MORRIS:

18 Q But assuming he meant "camshaft," he was
19 concerned about the horizontal support of the camshaft. He
20 concludes that there could be horizontal flexing of the
21 camshaft as a result of lack of structural integrity.

22 Are you able to comment on that?

23 MR. ELLIS: Judge Morris, could you direct me to
24 which one....

25 JUDGE BRENNER: It's the rebuttal testimony,

WRBagb 1 question and answer nine beginning.....

2 JUDGE MORRIS: The bottom of page five.

3 MR. ELLIS: Thank you.

4 JUDGE MORRIS: -- and over to page six.

5 MR. BRIGATI: I believe you're correct, he meant
6 camshaft there, Judge.

7 MR. ELLIS: What confused me was I think Judge
8 Morris --

9 JUDGE BRENNER: Well wait a minute, let's get an
10 answer instead of all these digressions.

11 You have the reference now, right?

12 MR. ELLIS: Yes, sir.

13 WITNESS BUSH: I believe for the record you're
14 talking about the Christensen/Eley testimony, is that
15 correct?

16 BY JUDGE MORRIS:

17 Q That's correct, I'm sorry.

18 A (Witness Bush) I read this testimony three times
19 and I still don't understand what the point is, and I guess
20 I would have to go back. Perhaps Mr. Henriksen can
21 understand it because quite frankly I don't.

22 A (Witness Henriksen) Yes, I think I understand
23 the question. I don't have the necessary data either to
24 refute or agree, but I think yes if the crack should develop
25 into that size that you have lost complete support for the

WRBagb 1 bearing into the block itself. I suppose there would be
2 some relative moment. But I think in that case that the
3 crack would be big enough that the water would be a problem
4 before the bearing would.

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WRB pp 1

BY JUDGE MORRIS:

2 Q Dr. Bush, are you aware whether or not FaAA did
3 finite element analysis in the circumferential crack area?

4 A (Witness Bush) If it has been done I haven't
5 seen such.

6 Q So you're not aware?

7 A I'm not aware.

8 Q With respect to the FaAA finite element analyses
9 that you are aware of, you have expressed some reservations,
10 I believe, with respect to the inputs?

11 A That's correct.

12 Q Could you be more specific as to any specific
13 inputs that you think are incorrect or uncertain?

14 A I attempted to re-read the document to refresh my
15 memory in this respect. The one I'm principally concerned
16 with, that I can't establish, is handled in here from the
17 information that has to do with the fast startup phase where
18 one develops a thermal gradient fairly rapidly from the
19 liner side over towards the bolt area in there. The
20 statement is made of thermal gradients relating to the hoop
21 area -- or to the liner expansion and contact and in the
22 absence of any definitive information in there I can't
23 really establish the values of the inputs as such. There
24 are some tables but you need more than tables in order to
25 walk through this.

WRB pf

1 Now, questions have been raised on this, this
2 particular document, and unless I've missed them I haven't
3 seen a followup document that answers the thing so my --
4 anything I've expressed is based on the June 1984 report
5 entitled, "Design Review of TDI R-4 and RV-4 Series,
6 Emergency Diesel Generator Cylinder Blocks and Liners."

7 Q Is the finite element analysis a time dependent
8 analysis?

9 A You could put a time factor in it if you wish to
10 in the thing. Usually what you're doing is looking at the
11 stress fields and you could look at the stress fields -- you
12 could look at the change in that, if you wish to, as a
13 function of time.

14 Q But you are more concerned with a particular
15 stress situation, not the rate in which it changes; is that
16 correct?

17 A I'm concerned with a changing stress gradient as
18 it may effect an area that has an high discontinuity. That,
19 quite frankly, is where my concern arises. My major concern
20 is on the ligament side down in the -- on that one
21 particular side of the counterbore as much as anything
22 because I haven't seen enough information that convinces
23 me. I recognize the stresses, per se, may be higher at the
24 top surface but I am always worried about a very high stress
25 concentration factor because I recognize that one can have

WRB pp 1 lower stresses and still have a crack introduced in
2 contrast to higher stresses when there is no severe stress
3 concentration factor. That's my problem.

4 Q So you're concern here is with what, I guess, has
5 been characterized as a low cycle fatigue situation; is that
6 correct?

7 A That would be a good way to state it, yes, sir.

8 Q Do you have any concerns with the high cycle
9 FaAAs?

10 A Not particularly because this, in essence, is the
11 way that a diesel operates under steady state conditions.
12 And so I think one can extrapolate pretty well from online
13 conditions under this.

14 Q Do you have any other concerns with the low cycle
15 stress analysis?

16 A That's the major one that I'm concerned with. I
17 can see that one and I haven't been able to satisfy it
18 myself that it was handled satisfactorily and this -- as I
19 say, this has been posed as a series of question and
20 answers.

21 Q But you have not pointed to anything that you
22 think is in error, is that correct?

23 A That's correct and I'm not saying that the model
24 that they suggest where the crack initiates at the top
25 surface isn't the correct one. I simply don't have enough

WRB pp 1 information to rule out the other one and see what the
2 factor would be.

3 Q So is it correct that you do agree with the
4 methodology that FaAA has used for cumulative damage?

5 A You changed that on me.

6 I'd say generally, yes. This is really -- a lot
7 of that is based, quite frankly, on the fact that you looked
8 at the behavior of a lot of blocks and then kind of back
9 calculate what appears to be a quasi-steady state or a
10 steady state condition of after a crack gets to a certain
11 depth and you measure it, I think. Which is quite often
12 used, of course.

13 BY JUDGE BRENNER:

14 Q Dr. Bush, in the last series when you're talking
15 about your concern about input for the finite element
16 analysis, a minor pedantic point, you said counterbore, and
17 there are two counterbores. Which counterbore do you mean?

18 A (Witness Bush) I'm thinking of the stud
19 counterbore in this instance on the ligament side.

20 Q You say your concern about those ligament cracks
21 in conjunction with finite element analysis for the reasons
22 you gave. Does your concern go to what the effects of
23 ligament cracks might be or are you only limiting your
24 thinking, at least, to the occurrence and propagation of
25 ligament cracks?

WRB pp

1 A Pretty much to the occurrence and propagation of
2 the ligament cracks. My problem is if I find that it
3 doesn't seem to match up in this area then I begin to worry
4 about other areas so it's kind of chain reaction thing. So
5 I'd like to be able to put this one to bed, so to speak, and
6 say, yes, I'm satisfied that this is not a major factor and
7 it will not, therefore, perturb the overall model that has
8 been developed. I'm generally satisfied with the model. If
9 I could tie down this one then I would be able to step back
10 and say, yes, all of the parts of the model seem to make
11 sense.

12 MR. ELLIS: Judge Brenner, he said this was not a
13 major factor. I was just going to request that while we're
14 here we clarify that now. It would be impossible to come
15 back later and try and clarify what was meant by "this is
16 not a major factor".

17 WITNESS BUSH: What I'm really stating -- maybe I
18 should state it more clearly is that any analysis of this
19 nature starts out with a series of assumptions. If you
20 invalidate some of these assumptions it may simply alter the
21 model to a minor degree. On the other hand, it may
22 essentially destroy that particular model. What I would
23 like to see is if this is a significant factor. My
24 suspicion is --

25 JUDGE BRENNER: Mr. Ellis wants to know what

WRB pp

1 "misquote" is.

2 WITNESS BUSH: That's what this is, I think.

3 JUDGE BRENNER: You worry about it later,

4 Mr. Ellis.

5 Let me ask a question.

6 BY JUDGE BRENNER:

7 Q I understand what you said about if you see
8 things different than would have been predicted for ligament
9 cracks then you might begin a question other things for
10 which the same analysis is used.

11 But I thought that your main concern as to
12 whether or not the inputs are even considered or correctly
13 considered related to phenomenon that would have a much
14 lesser effect on the potential for stud-to-stud initiation
15 and propagation. So if they're wrong for the reasons you're
16 concerned about on those inputs with respect to ligament
17 cracks, why should we then be worried about use of the
18 analysis for stud-to-stud cracks.

19 A (Witness Bush) Probably shouldn't be.

20 Because what I'm suggesting is mainly aimed at
21 the ligament and not the stud.

22 BY JUDGE MORRIS:

23 Q Dr. Berlinger or Dr. Bush, there was some
24 discussion yesterday of putting wire gages or strain gages
25 on the cracks in the cam gallery area. That's for the new

WRB pp

1 engine 103?
2 A (Witness Bush) No, sir.
3 Q Where would they --
4 A Oh, I'm sorry. The discussion, at least, earlier
5 discussion had been with regard to 101 and 102, which had
6 the deep cracks where the concern was to establish that they
7 are truly static. That they aren't moving any -- I guess my
8 personal opinion would be that considering the depth of the
9 existing cracks and presuming that the measurements that are
10 being made during this time interval confirm that the cracks
11 haven't changed and I wouldn't suggest -- my personal
12 opinion would be that it wouldn't be necessary to use wire
13 gages on the new 103 block. That's a personal opinion only.
14 A (Witness Berlinger) I can answer with regard to
15 the Staff's position. The wire gages at this point would
16 only be suggested or requested for the 101 and 102 blocks in
17 the cam gallery area. And we agree with Dr. Bush's
18 suggestion with regard to 103, the new 103. Unless there is
19 some unusual discovery during the presently ongoing
20 inspection, there would be no reason to instrument those
21 cracks.
22 Q That's 103?
23 A In the 103.
24 Q And your decision is not yet made on 101 and 102;
25 is that correct?

WRB pp

1 A I think the decision is made. It's just that we
2 haven't done anything with it yet.

3 Q Well, supposing that such gages were used what do
4 they measure?

5 A (Witness Bush) They are crack opening
6 displacement gages. So essentially what they would do is
7 show a separation of the crack and the inference where the
8 crack separates is that it also gets longer. I believe that
9 has been presented in testimony. If they are essentially
10 static, that's the answer.

11 Q What would be the sensitivity of such an
12 instrument.

13 A That one, I think, is beyond me. That got sent
14 to -- it should be certainly in the mill range but I don't
15 consider myself enough of an expert to state for certain it
16 should be a very, very -- providing it's calibrated
17 correctly, it should be quite accurate.

18 A (Witness Berlinger) But it would be used
19 primarily to observe any relative changes during operation
20 of the engine.

21 Q Well, I guess it doesn't know the initial width
22 of a crack but would tell you if there were subsequent
23 displacement.

24 A When it's installed, it's installed in such a way
25 that there is a non-zero reading. In other words, it's

WRBpp

1 called prestress, and then if the crack were to open more it
2 would show a change in measurement.

3 Q Well, just for talking purposes, let's suppose
4 that it showed you a displacement after going to the
5 operation of two mills. By what criteria would you decide
6 to take any section?

7 A (Witness Bush) Obviously, I'm not writing
8 criteria or can establish criteria for the NRC. One has to
9 apply a kind of rule of reason in this. And I think what
10 one would like to do you would expect some changes on that
11 thing and I don't think we're concerned. I think we're
12 concerned with larger changes and this is -- in fact, if
13 these welds cracked a little bit more, which is quite
14 possible, you might get more than two mills. But I think
15 what you're looking for is what I call a steady change, an
16 increase over a period of time, a continued increase.
17 That's what you're really worried about because that
18 indicates that perhaps our model wasn't very accurate and
19 the crack is continuing to move toward the back face..

20 It's a conservative thing, is all.

21 Q So would it be correct to say that you're not
22 concerned so much about the actual separation at that point
23 but you're concerned about continuing opening up of such a
24 crack?

25 A That's my concern. Because if that crack

WRB pp 1 continues to open up one can pretty strongly infer that it
2 is getting deeper and that indicates generally that many of
3 the tenets about compressive stresses may or may not be
4 valid. That's the thing we're interested in examining.

5 A (Witness Berlinger) Judge Morris, that's what I
6 meant by saying we would look at that at the relative
7 change during operation.

8 Q So just to finish up on that there won't be any
9 definitive criteria. It'll be a question of observing the
10 experience and making the judgment based on that experience;
11 is that correct?

12 A That's correct. Looking for a gross change in
13 the condition in that area.

14 Q I just have one final question. Why is an
15 analysis for the situation of one loop LOCA incident
16 sufficient to satisfy General Design Criterion 17?

17 A A loop LOCA is not the only event that is
18 evaluated in determining what the maximum required load
19 would be. I think what you look at is you look for the most
20 limiting event, the combined loss of offsite power and LOCA
21 event turns out to be the most limiting because of the
22 specific electrical loads that are required from the onsite
23 power source, given that the offsite power is lost. It
24 requires the most electrical power to power the emergency
25 equipment.

WRB pp

1 Q Well --

2 A Maybe I misinterpreted your question?

3 Q No, you understand the question, but I don't

4 think you see what I'm trying to get at which was indicated

5 a little bit by some of Mr. Dynner's questions yesterday in

6 talking about the rated load in these engines. The rated

7 load is described in terms of service continuously for a

8 year at some kilowatt rating combined with a two-hour in any

9 24-hour period at an added load. However, in the analysis

10 that you've done for this situation you have described

11 as the most severe requirements on the machine, you take

12 not the rated load but you start at the high load and then

13 decrease it in terms of what you say the demand will be on

14 the engine for the equipment needed as a function of time

15 and terminates at the end of a week.

16 That's correct; is it not?

17 A Yes. The adequacy of the diesel generators to

18 satisfy the requirement is done separate from determining

19 what that requirement is.

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WRBeb

1 There is a separate analysis that is done to
2 determine whether all the assumed loads are in fact counted
3 when you add them all up.

4 The review as to the adequacy of these diesels
5 will be done in determining whether or not they will provide
6 reliable service for their intended function. Their
7 intended function is to provide emergency onsite power in
8 response to an event, of which a loop LOCA is the event.

9 We do not require that the engine be run for an
10 hour continuously to prove that it is a qualified engine.
11 We don't require that during this one-year period of testing
12 that it be run two hours out of every 24.

13 Q I understand.

14 A I'm not certain....

15 Q I may be wrong, Dr. Berlinger, but I don't recall
16 that qualification of diesels, emergency diesels, has used
17 this approach for a long period of time, say going back 10
18 or 15 years. Is that correct?

19 A You may be right. Prior to about a year ago, I
20 was never involved in this aspect of NRC's review, so I
21 cannot attest to what has been done that far back in the
22 past.

23 Q But is it your opinion that a careful
24 consideration of this approach has been made, and that the
25 Staff's position is that qualification using this approach

WRBeb 1 does satisfy General Design Criterion 17?

2 A Yes, that's correct.

3 I tried to clarify one point yesterday, but I
4 don't think I really completed my answer.

5 Basically GDC 17 states the requirement for
6 onsite emergency power.

7 Q Yes, I am familiar with that. Of course it
8 states it in terms of functional requirements --

9 A That's correct.

10 Q -- in terms of the integrity of the fuel and the
11 pressure boundaries, and so forth.

12 A Right.

13 Q Thank you.

14 JUDGE MORRIS: That's all the questions I have.

15 BY JUDGE BRENNER:

16 Q Picking up on your last answer, you said a
17 careful analysis has been made. I guess what I'm trying to
18 find out and what I think some of Judge Morris' questions
19 were going to is what is that careful analysis that leads to
20 the conclusion that the performance criteria that you are
21 going to apply to these Shoreham diesels now gives you
22 reasonable assurance, with whatever margin is appropriate,
23 of meeting GDC 17, reasonable assurance that the intended
24 function will be carried out?

25 A (Witness Berlinger) Well, first of all, whether

WRBeb 1 we talk about the FSAR as it is approved today or--

2 Q That's what I mean, today, not the proposed.

3 A In that particular case, the FSAR includes
4 analyses and information which document what the required
5 loads would be in the event of a loop LOCA. In that
6 particular event, the loads are identified based on a design
7 analysis, not experimental information but a design
8 analysis.

9 That information indicates that two of the three
10 engines require somewhere on the order of 3450 kilowatts.
11 The 103 engine I think was identified as requiring just
12 under 3900 kilowatts.

13 The determination as to whether or not these
14 diesels are adequate to provide that service by the Staff
15 has in fact not been reached, and the recommendations in our
16 original testimony as a means, a possible means to resolve
17 this particular question is to test the engines at the
18 required load, or call it the rated load, and if necessary,
19 the overload condition.

20 Clearly, we have not been able to determine,
21 based on the evidence, that the diesels are qualified at 35
22 and 39 hundred, but clearly we have not been able to say
23 that they would not provide adequate service. So the best
24 way would be to prove it by running the engines at
25 conditions for a long enough period to be able to verify

WRBeb 1 their capability.

2 That is basically what our recommendation has
3 been to the Board in our testimony.

4 JUDGE BRENNER: Let's see if I can extend the
5 break a little more to finish my questions so people will
6 have the benefit of the break.

7 BY JUDGE BRENNER:

8 Q In terms of what the cam gallery crack strain
9 gages for 101 and 102 would measure -- and you told
10 Judge Morris what the Staff's purpose would be to have them
11 -- why wouldn't any movement disprove the assumption that
12 the forces are compressive, any widening of the crack?

13 A (Witness Bush) I can visualize that because of
14 -- that there could be one of the weldments where there has
15 been essentially no cracking but there is still a high
16 residual stress field, or there may be cracking on one side
17 only, and it is quite conceivable under those circumstances
18 that even in a compressive field that that crack -- that a
19 crack could initiate and of course there would be a
20 movement on there.

21 And that would be an example of something that
22 may be relatively innocuous but would certainly show a
23 movement.

24 A (Witness Berlinger) Just to add, if I am not
25 mistaken I think on the 101 and the 102 blocks at each of

WRBeb 1 the cam gallery locations there has been a weldment and to
2 the best of my knowledge, I think that they have all
3 indicated cracks. So I don't think that there would be any
4 new cracks develop in the weld area.

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WRBeb

1 The chances are that the only movement you are
2 going to see during the operation if the engine might very
3 well just be vibration which would be picked up by the gage.

4 Q You are aware, Dr. Bush, of differences between
5 the new 103 block and the 101 and the 102 block, are you
6 not?

7 A (Witness Bush) To a degree, yes. The
8 dimensional difference is the depths of the counterbores and
9 things of that nature. I wouldn't say that I'm aware of all
10 the changes; I am only aware of changes in areas where I had
11 a look at it.

12 I certainly haven't tried to make a comparison
13 dimensionally across the board of the two.

14 Q All right.

15 You aware that it is claimed by LILCO to be a
16 Class 45 gray iron rather than a Class 40, are you?

17 A Yes, sir.

18 Q All right.

19 The 103 block is the one that is being used in
20 the endurance run to attempt to verify whether or not the
21 cam gallery area is compressive. Correct?

22 A Yes, sir.

23 Q And that some of the verification in your oral
24 testimony you said you would find helpful. Correct?

25 A That's correct, sir.

WRBeb 1 Q Is there anything about the 103 block that would
2 make those results not fully valid for the 101 and the 102
3 blocks, given the differences in the blocks and the greater
4 existing cracks -- the believed to be greater existing
5 cracks in those blocks' cam gallery cracks?

6 A I suppose it's conceivable. The obvious reason
7 for picking 103 was that the instrumentation be possible and
8 be meaningful because the absence of cracks is a highly
9 desirable condition under these circumstances to measure the
10 actual stress profiles in there.

11 Certainly if you have cracks and if the stress
12 fields are less compressive than one would assume, it would
13 be an indication, in the case of the 101 and the 102, that
14 we might be faced with continued growth. There is no
15 evidence of it so far, but that's the type of thing you're
16 trying to get at.

17 So that could be a function of mechanical
18 properties and of the existence of the cracks.

19 A (Witness Berlinger) Judge Brenner, to try to
20 directly answer your question, the strain gage measurements
21 on the 103 are intended in part to confirm that the stress
22 field is compressive. Structurally the blocks are quite
23 similar.

24 The differences, as I think we have addressed in
25 the testimony, such as the thickness of the block top

WRBeb 1 surface, the depth of the boss areas, the increased
2 heaviness or weightiness in the boss areas, and the
3 particular way the bolt-up is done in this engine, whether
4 we're talking 101, 102, or the new 103 block, I think that
5 the loads as transmitted down through the cam gallery area
6 would be the same.

7 I don't believe that they would be different in
8 any significant way.

9 Q What about the factor of the greater cracks in
10 the 101 or 102? Could that result in the net effect, if you
11 will, in the 101 and 102 cam gallery of being less
12 compressive than the results that you receive from 103, if
13 we assume for the moment that the 103 results show that it
14 is in fact compressive?

15 A No, I don't think there would be any difference.

16 Q Dr. Bush?

17 A (Witness Bush) I was going to say about the same
18 thing.

19 From a bolt-up point of view I would expect that
20 the bolt stresses, compressive stresses to be about the
21 same. Whether they would be exactly at the crack tip would
22 be another question, but I would not expect that much of a
23 difference I guess.

24 Q Remind me if you will the endurance run that is
25 being done -- and I don't want to get into details of any

WRBeb 1 results at this point, but there is also gaging of-- Is
2 there also gaging in the block top, strain gages or other
3 type indications?

4 A (Witness Berlinger) No. The only
5 instrumentation on that engine were the strain gages in the
6 cam gallery area. We did not require them to strain gage
7 the block top.

8 Q From a point of view of all the cracks -- of each
9 of the cracks we're talking about, cam gallery type cracks,
10 ligament cracks and stud-to-stud cracks and circumferential
11 cracks, I'll ask you a general question. And if it is too
12 general I will try to do better.

13 Could you tell me whether or not, and if so how,
14 those cracks are sensitive to different loads, both steady
15 operational loads for a relatively longer period of time,
16 say days, a week, and also high startup type peak loads?
17 Is there any effect at all?

18 A I assume you are looking for some insight as to
19 whether or not these cracks would be affected individually
20 or as a group by repeated startup and shutdown of the
21 engine, or under conditions of continuous operation at full
22 load.

23 Q Right. And whether it matters if that repeated
24 startup is at 3900 versus some lower level, in the vicinity
25 of 33 or 34 hundred Kw, and whether the longer-term load

WRBeb 1 would make a difference at something like 3500 or something
2 in the vicinity of 3300.

3 A As a general response I would say that the most
4 strenuous loads that you put on the engine are during rapid
5 starts, fast starts. The Staff is in the process of
6 modifying their approach to the technical specifications
7 which would require frequent fast starts to high loads.

8 And basically our recommendations would be to
9 reduce the number of fast rapid starts and also to, as far
10 as loading, we would not want to routinely load the engine
11 during testing, surveillance testing above the maximum load
12 that would be required in response to an accident.

13 The main reason for this approach -- and it is
14 not an approach we are using just on the Shoreham engines,
15 but on the TDI engines as a first place to start, and we are
16 also going to look at other diesels. The NRC will be
17 evaluating this approach with regard to other diesels.

18 But basically we could want to minimize the
19 stresses placed on the engine during quick starts where you
20 go up to speed and become synchronous in less than ten
21 seconds, seven to ten seconds. That puts a worse load on
22 the engines than continuous operation.

23 My own personal opinion is I think if you started
24 up these engines, you could run them for hundreds and
25 hundreds of hours without any problems at all at maximum

WRBeb

1 load, at -- call it rated load or nameplate load or
2 whatever. I think they will run and will continue to run.

3 But I think some of the problems that we have
4 seen have been more related to fast starts.

5 Q Let me ask a more particular question or two.

6 Dr. Bush, you talked about the fact that the
7 rapid startup effect on ligament cracks might not have been
8 properly modeled and might not be fully known at this time.
9 Am I correct so far?

10 A (Witness Bush) Yes, sir.

11 Q All right.

12 In that context, would there be--

13 MR. ELLIS: Judge Brenner, may I have your
14 question read back, please?

15 JUDGE BRENNER: Surely.

16 (Whereupon, the Reporter read from the record
17 as requested.)

18 BY JUDGE BRENNER:

19 Q In that context, would it be material to the
20 possible effect as to whether or not the rapid startup was
21 going to a load of 3900 Kw as opposed to a load in the
22 neighborhood of 3300 Kw?

23 A (Witness Bush) Yes, I think it probably would.
24 Obviously the one condition would be more severe-- Well, I
25 shouldn't say "obviously," but I believe that the one

WRBeb 1 condition would be more severe than the other, namely, the
2 3900 vis-a-vis the 3300.

3 Q All right.

4 What about the effects of either-- Well, let me
5 try to ask my general question again.

6 What about the effects of different loads, 3500
7 as compared to 3300, at a longer time of operation, to, say,
8 a week, days, many days, and also a comparison of short -- a
9 relatively short period of operation, say, an hour at 3900
10 versus 3300?

11 Would those kind of load differences be material
12 in terms of the effect on the initiation and propagation of
13 each of the cracks we have been considering?

14 A I think that the short time higher kilowatt loads
15 would have a greater effect on the initiation of the cracks
16 in the early stages of propagation than would the longer
17 period of operation at a lower kilowatt value.

18 I think the question that isn't quite resolved
19 is, would a certain number of cycles from cold startup have
20 a higher value, end up ultimately driving the crack deeper
21 than you would see under a steady-state condition at either
22 that same kilowatt value or at a lower kilowatt value.

23

24

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WRBagb

1 Certainly the possibility exists. I personally
2 feel that the initiation phase would be affected. I simply
3 don't have enough information to draw too many conclusions
4 about the final propagation aspects, the depths, in other
5 words, whether they stabilize regardless.

6 Q But am I correct that nothing in the Staff's
7 testimony, either written or oral, calls for any more test
8 data of rapid startups at any load in conjunction with
9 cracks in the block?

10 I'll let you think about it over the break, if
11 you want.

12 A (Witness Berlinger) I want to make sure I
13 understand. Could you run that by me one more time?

14 Q Yes.

15 My background context is that I certainly am
16 aware of your testimony of the endurance run and the strain
17 gaging of the cam gallery cracks during that run. And
18 there's also a requirement as I recall for -- I don't want
19 to get into the details, but looking at the block top cracks
20 but without disassembly -- I guess it's eddy current of the
21 stud-to-stud area and certain liquid penetrant things also.
22 But that is on this endurance run at a steady level. And as
23 I recall, the Staff is not seeking any further rapid startup
24 tests at any load in terms of the block cracks.

25 A If you like, I'll give you a brief answer.

WRB:agb

1 The Staff doesn't have a problem as far as the
2 reliability of TDI diesels to start. Compared to other
3 diesels manufactured and in service in nuclear plants. The
4 TDI reliability to start is as good if not better than most
5 of the other manufacturers' engine.

6 In addition to the items that have been addressed
7 in our testimony the Staff intends to issue a Safety
8 Evaluation Report which will address not only the particular
9 components which are the subject of this litigation but the
10 entire engine design. It will also address all of the
11 components pertinent to the TDI owners' group program
12 review. We will also address any additional maintenance and
13 surveillance programs which we feel we would like to have
14 the utility put in place to increase reliability over time.

15 Q The only thing I had in mind was the potential
16 effect on any of the different types of cracks on the
17 blocks.

18 A If we are going to do anything by actions
19 relative to that limited subject, we would modify the
20 technical specifications to reduce the number of fast starts
21 that we would require these engines to perform on a monthly
22 surveillance basis.

23 Q You discussed the Staff recommendation in the
24 written testimony and also orally of -- I don't know if
25 strain gage is the right term, but gaging of the mouth of

WRBagb 1 the cracks.

2 A Wire gaging.

3 Q Wire gaging.

4 Is there any consideration of the need to have
5 instrumentation on the block top during operation?

6 A No, we have not considered that to be absolutely
7 necessary and most probably it would be a very difficult
8 thing to do.

9 Q Okay. It would be difficult to place gages
10 during operation that could detect signs of beginning of
11 stud-to-stud cracking, for example?

12 A A simple answer is I think it would be very
13 difficult, if not impossible, to put them in the right
14 locations.

15 Q Do you agree, Dr. Bush?

16 A (Witness Bush) I think it could be done but it
17 would be difficult.

18 Q I thought the stud-to-stud area at least was
19 available, if you will.

20 A I think one method is that we made an assumption
21 that near the studs is where the cracks are going to
22 initiate. Since everything indicates a compressive area in
23 the middle region if one put them quite close to that area
24 and if there were a gross perturbation in the strain gage
25 reading, assuming you were getting continuous readout, it

WRBagb 1 would be highly suspicious. So I guess that would be the
2 way one would look at it. Whether one wants to do it or not
3 is another question.

4 Q All right.

5 I guess in lieu of that recommendation and if you
6 agree or disagree with me, Dr. Berlinger or Dr. Bush, that's
7 why the Staff has the block top inspection requirements
8 after each operation of the diesel?

9 A (Witness Berlinger) That's correct.

10 Q I think one more question.

11 Dr. Bush, can you tell whether or not
12 Widmanstaetten structure is present from looking at these
13 replications that FaAA prepared?

14 I have in mind the plastic-like replications that
15 were done.

16 A (Witness Bush) Well I suspect if they are
17 an accurate enough replication of the surface that you might
18 get a feel for the structure of the thing. I must confess
19 that I haven't looked at too many of those in quite a while.

20 I have seen them used in other purposes and they
21 gave a very faithful reproduction of the surface. And so I
22 see no reason that it shouldn't be able to do that.

23 But my -- it is secondhand information, not
24 firsthand information.

25 Q All right. Thank you very much.

WRBagb 1

JUDGE BRENNER: That's all I have.

2

I apologize for the late break but I wanted

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everybody to be able to have the break to put their

4

questions together when we come back. I don't know if we

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are going to make it or not today with these witnesses so we

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took longer than we thought, so we now join the crowd of

7

many in the hearing who have done that.

8

We'll come back at 11:25.

9

(Recess.)

10

JUDGE BRENNER: Back on the record.

11

Mr. Perlis.

12

MR. PERLIS: I have brief redirect, but I do have

13

one scheduling problem I feel compelled to mention before

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getting into redirect.

15

Dr. Bush has a number of conflicts next week

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which were mentioned earlier but there is one in particular

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next Thursday which involves an ASME section meeting which

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is the culmination of two years of work on a question and I

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am wondering if there is some way we can arrange on the

20

schedule where the Board panel -- the panel that the Board

21

is requesting could meet some day other than Thursday of

22

next week.

23

JUDGE BRENNER: I don't know at this time because

24

I don't know how next week is going to play out, and I'm

25

sorry --

WRB:agb 1

2 WITNESS BUSH: Then I think you would have to
3 subpoena me, Judge, because --

4 JUDGE BRENNER: Dr. Bush, I don't want to have an
5 argument or any other discussion with you on the record. I
6 don't know how it will play out next week. If there is
7 flexibility we will attempt to achieve it, and if there is
8 no flexibility it will be not because we started out saying
9 we would refuse to be flexible but just because the
10 circumstances had that result. And that's where I leave
11 it. I just can't do any better than that now. If you ask
12 me my best guess, I think Thursday may turn out to be a
13 problem.

14 I don't know how long everything is going to take
15 before we get up to that because after we finish this
16 witness panel we are going to go to LILCO's
17 cross-examination of the County's witnesses on blocks, and
18 it is after that is completed that we are going to put the
19 panel together. And that's the best I can say.

20 If there is flexibility we'll adjust, but I don't
21 know if there is going to be.

22 MR. PERLIS: Okay. The only thing I would
23 request is I was wondering if it was possible to have the
24 panel get together on Friday as opposed to Thursday.

25 JUDGE BRENNER: I don't know if that will allow
enough time to finish the panel, that's the problem.

WRBagb 1 And I'm not going to go -- it would not be very useful to go
2 to the subject of pistons -- this panel is going to be the
3 last witnesses on the subject of blocks and it is not going
4 to be very useful to switch subjects completely to pistons
5 and then have to come back here. You haven't been here for
6 all of the schedule problems in this hearing, Mr. Perlis.

7 MR. PERLIS: I am familiar with a number of them.

8 JUDGE BRENNER: I'm just saying I can't do any
9 better at this time.

10 MR. PERLIS: I just have very brief redirect.

11 JUDGE BRENNER: There is the obvious fact that
12 whatever flexibility there is gets to be less at the end of
13 the hearing and we have already exhibited considerable
14 flexibility for witnesses for all parties including Dr. Bush
15 earlier in the hearing. It worked out so that there was no
16 problem but we were prepared to be flexible at that point if
17 there had been a problem, and we were in fact in part.

18 MR. PERLIS: I just did want to alert the Board
19 that we would greatly appreciate it if it could be some day
20 other than Thursday.

21 JUDGE BRENNER: We can't take those witnesses
22 ahead of the completion of the cross-examination of the
23 County's block witnesses for obvious reasons, given the
24 purpose of that panel.

25 MR. PERLIS: I understand.

WRBagb 1

2 JUDGE BRENNER: And because I don't know when
3 that will end I don't know what to tell you. And I'm not
4 going to have everybody in this hearing sit here doing
5 nothing on Thursday and then come in on Friday and try to
6 finish in half a day for one person. I'm sorry.

7 REDIRECT EXAMINATION

8 BY MR. PERLIS:

9 Q Dr. Bush, there was discussion Wednesday about
10 the monitoring of potential stud-to-stud cracking and, in
11 particular, over what diesel operating conditions should
12 trigger such monitoring.

13 Under what operating circumstances do you believe
14 such inspection should take place?

15 A (Witness Bush) I think because of the difficulty
16 in establishing the loads in there that any time there is a
17 run -- and I will define it -- the crack or the eddy current
18 device should be used to monitor.

19 Let me go back and define what I mean by a run.

20 For example, if one made several starts in a
21 period of 24 to 48 hours, I would classify that as a run. I
22 wouldn't expect an examination after every one of these,
23 however, after you finished a series of these -- and perhaps
24 the next one might be assumed to be a month or so downstream
25 -- then I would anticipate that you should do such an eddy
current examination.

WRBagb 1 A (Witness Berlinger) Mr. Ferlis, can I add
2 something?

3 Q Please.

4 A Basically I agree with what Dr. Bush has said but
5 I would put it slightly differently. I would say that after
6 the engine has been run but prior to being put back into
7 service that the eddy current inspection should be done for
8 stud-to-stud cracks and that would permit some maintenance
9 or some surveillance tests to be performed or repeated
10 without having to repeat the inspections many times.

11 Q Thank you.

12 Dr. Bush, on the same subject, do you make any
13 differentiation between blocks 101 and 102 and the new 103
14 block in terms of inspection for stud-to-stud cracking?

15 A (Witness Bush) No, not particularly. I think
16 you should really examine -- no, I have the caveat that I
17 wouldn't worry about the 103, say, until after the refueling
18 and you have taken the block apart and if you observe or do
19 not observe ligament cracking. Now until you observe
20 ligament cracking I wouldn't be concerned with looking for
21 the stud-to-stud cracking. That's a subjective judgment.

22 Q Just to make things clear, is it your
23 recommendation that the block 103 be inspected after each
24 operation before the first refueling, or does that
25 recommendation only extend to blocks 101 and 102?

WRB:agb 1 A I'm afraid you lost me on that one.

2 Q In the context of the stud-to-stud cracking, you
3 have recommended that the diesels be examined after service
4 before they are declared operable again and my question is
5 in the period before the first refueling does that
6 recommendation go to all three diesels or does it just go to
7 diesels 101 and 102?

8 A The use of the eddy current device, assuming that
9 the examination that's currently underway shows no ligament
10 cracks, would be applied to 101 and 102. That would be my
11 recommendation.

12 Q And not 103?

13 A And not 103.

14 Q Thank you.

15 Dr. Berlinger, do you agree with that
16 recommendation? Does the Staff agree with that
17 recommendation?

18 A (Witness Berlinger) Yes, I do.

19 Q Thank you.

20 Dr. Bush, you were asked yesterday whether you
21 were aware or had performed any analysis of residual
22 stresses in the block top area. In your professional
23 judgment do you believe any such analyses are necessary in
24 order to determine whether the engine blocks are adequate
25 for nuclear service?

WRBagb 1 A (Witness Bush) I do not consider them necessary.

2 Q Thank you.

3 This morning there were a number of questions
4 dealing with page five, question nine, of the County's
5 rebuttal testimony, and in particular whether there might be
6 horizontal flexing of the camshaft bearing supports in the
7 event of a crack in the camshaft area.

8 I would also you to also please refer to the
9 sketch at the bottom of page two, the lower sketch in the
10 Staff's supplemental testimony. And my question to you,
11 Dr. Bush, is:

12 Does the bottom sketch on page two represent the
13 configuration of the camshaft gallery as you have observed
14 it on the original engine 103 block during your examination
15 of that block on September 21?

16 A Yes, sir.

17 Q Given the structure, would you anticipate that
18 known cracks in the camshaft gallery could influence
19 horizontal flexing of the camshaft bearing supports?

20 A No, I do not, if I understand the question. If
21 one examines the amount of support -- you have effectively a
22 vertical ligament that extends down to the plate. You have
23 the base plate, that is not unaffected, and then the
24 horizontal or another vertical ligament. And what we're
25 talking about is a crack that essentially affects virtually

WRBagb 1 none of this major ligament. Therefore I would not
2 anticipate any effect.

3 MR. PERLIS: I have no further redirect of these
4 witnesses.

5 JUDGE BRENNER: Is there followup from LILCO?

6 MR. ELLIS: Yes, sir.

7 RE-CROSS-EXAMINATION

8 BY MR. ELLIS:

9 Q Dr. Berlinger, we had some testimony concerning
10 the cam gallery geometry for 101, 102 and new 103. Am I
11 correct that it is the Staff's position that strain gage
12 testing to ascertain whether the stresses are compressive in
13 the cam gallery area if done on 103 would be appropriate and
14 applicable to the 101 and the 102 blocks as well?

15 A (Witness Berlinger) Yes, that's correct.

16 Q And the reason for that is that the Staff has
17 determined that the geometries of the 101 and the 102 blocks
18 and the new 103 blocks in the cam gallery area are
19 essentially the same for that purpose?

20 A Yes, that's correct. And I will also add that
21 the strain gage installation on the 103 block was determined
22 by the Staff to be the preferable block to be instrumented
23 because of the absence of repair welds and that we could get
24 more reliable strain gage data from that block than either
25 the 101 or the 102. But clearly the Staff believes that the

WRBagb 1 data is applicable to all three blocks.

2 JUDGE BRENNER: Mr. Ellis, I don't mean to jump
3 on your first two questions but I will do it mildly and just
4 point out my view that you have just got a repeat of
5 testimony just now and nothing now and that your questions
6 were in fact asked and answered previously this morning. I
7 just make the comment. You don't have to respond.

8 MR. ELLIS: All right, Judge. My silence won't
9 be taken as --

10 JUDGE BRENNER: No.

11 BY MR. ELLIS:

12 Q Mr. Henriksen, do you know how much oil is in the
13 crankcase in the TDI engines?

14 A (Witness Henriksen) I have heard the number 700
15 gallons mentioned.

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WRB pp

1 Q Assuming there are 700 gallons of oil in the
2 crackcase, isn't it true that you always get water in the
3 crankcase as a result of blowby from the combustion chamber?

4 A You probably do get some quantity, I cannot
5 tell. The majority of the vapor that would come down with
6 the blowby would go out with the crankcase vacuum system.

7 Q And the water that does get into the crankcase
8 from blowby, does that evaporate?

9 A I don't think I understood your question.

10 Q What happens to the water vapor or water that
11 gets into the crankcase, into the oil, from blowby?

12 A I just said I think -- I would believe that the
13 majority would be going out with the crankcase vacuum
14 system. It comes down in the vapor form, it mixes with the
15 lube oil vapor and there is a crankcase vacuum system on
16 there which will maintain vacuuming the crankcase. Most of
17 the vapors would go that way.

18 Q Doesn't some water get into the oil which
19 evaporates as a result of the temperature of the oil?

20 A Some water, undeniably, will mix with the oil,
21 yes.

22 Q You say, I think, you haven't done any
23 calculations to determine how much water would get into the
24 crankcase from blowby?

25 A No, I have not.

WRBpp

1 Q Given the size of the engines and the other
2 factors that you know about the engine, would you be
3 surprised at 4 to 9 gallons as being the amount that would
4 get into the crankcase from blowby?

5 A As I recall the 4 gallons was calculated by
6 Failure Analysis. The 9 gallons was calculated by TDI. The
7 fact that there is better than 100 percent difference
8 between them would indicate that there is some difficulty in
9 determining the exact quantity that goes in.

10 Q Do you have any reason, though, to disagree with
11 the 4 gallons that FaAA calculated?

12 A No, I don't.

13 A (Witness Berlinger) Mr. Ellis?

14 Q Yes, sir.

15 A Is that 4 gallonr or 4 gallons per minute or 4
16 gallons per hour?

17 Q The 4 gallons I intended to be 4 gallons steady
18 state in the oil.

19 Is that what you understood, Mr. Henriksen?

20 A (Witness Henriksen) I understood it to be 4
21 gallons of water.

22 Q Okay.

23 On the basis, did you have something you wanted
24 to add, Dr. Berlinger?

25 A (Witness Berlinger) No, I needed that definition

WRBpp

1 in order to evaluate the question and the answers.

2 Q Dr. Berlinger, in your description of what would
3 occur in the event of a crack that was in the cam gallery
4 propagating through, given the testimony that you've heard
5 this morning about the size of the crack as it would
6 propagate through, given the other information that you
7 have, would you expect cam gallery cracks if they propagated
8 through to be an operational problem, a realistic
9 operational problem.

10 A Are you asking me to evaluate on a realistic
11 basis a totally hypothetical case. Do I understand your
12 question correctly?

13 Q Yes, sir.

14 A You want me to hypothesize that the crack does
15 propagate through to the water jacket with no limitation on
16 the size of that crack?

17 Q No, I'm asking you to -- let me restate the
18 question for you.

19 Given the low water alarm that is on the engine,
20 assuming that the crack propagates through the cam gallery,
21 and assuming further that the propagation of the crack
22 through results in a very small leak, as I believe Dr. Bush
23 testified to, would you realistically expect that to be an
24 operational problem with the engine?

25 A I do not believe that it would shut the engine

WRBpp

1 down immediately. The affect on any quantity of water, say,
2 up to 20 gallons would have on the ability of the oil to
3 provide adequate lubrication, I really can't address sitting
4 here. There are a lot of factors which I think
5 Mr. Henriksen has mentioned which would have to be taken
6 into consideration including the quality of the oil and the
7 film pressure that would have to be maintained on particular
8 bearing surfaces, et cetera. And the ability of the oil
9 mixed with some water to carry that I could not determine at
10 this point. I have not analyzed that.

11 Q Would you agree with me, Dr. Berlinger, that the
12 scenario that you discussed that culminated or ended in what
13 you term a crankcase explosion is not a realistic result to
14 expect in this instance?

15 A No -- the answer to your question is yes. I do
16 not believe that my answer was intended to be a realistic
17 assessment. It was response to a totally hypothetical
18 question in which there were no limitations on the amount of
19 water that was being added to the crankcase. Ultimately,
20 the water continued to leak into the crankcase and the
21 concentration built up to the point where it would destroy
22 the effectiveness of the oil, it could ultimately lead to
23 crankcase explosion.

24 Q If 20 gallons leaked in you would have an alarm,
25 wouldn't you?

WRBpp

- 1 A Yes, I believe so.
- 2 Q And wouldn't you expect some portion of that 20
- 3 gallons to evaporate from the hot oil?
- 4 A I think that's a reasonable assumption.
- 5 Q And it's fair to say, isn't it, that there are no
- 6 -- strike that.
- 7 Can you tell me whether or how much of the 20
- 8 gallons you would expect to evaporate if it leaked into the
- 9 oil?
- 10 A No, I have no way of guessing at it.
- 11 Q Would you be able to tell me whether, even if all
- 12 of the 20 gallons leaked into the oil, have you done any
- 13 analysis to determine whether the lubricating qualities of
- 14 the oil would be of the 700 gallons of oil would be
- 15 substantially degraded?
- 16 A I think I've already indicated that I have not.
- 17 I have no way of calculating that at the present time.
- 18 Q Dr. Berlinger, I think that earlier today either
- 19 you or Dr. Bush testified that the indications in the new
- 20 103 block were on the order of 15 mills. Will you agree
- 21 with me that these are of a size that, I believe, you term
- 22 very tight cracks that would be difficult if not impossible
- 23 to detect visually?
- 24 A Yes. And I would go so far as to say that I have
- 25 viewed the cam gallery saddles number 2 and 7 as recently as

WRBpp

1 last evening and, to be perfectly honest with you, of the
2 two cam saddles that I looked at, one of them had a black
3 marking pen circle drawn around what has been identified by
4 liquid penetrant inspection to be location of the crack.
5 And even with that identification I could not identify
6 location specifically of that crack.

7 So I've been able to verify with my own eyes that
8 I can't see anything visually of those cracks.

9 Q Thank you.

10 Dr. Bush, with respect to the origin of these
11 indications on the new 103 block would you agree with me
12 that the existence of what you have testified to as process
13 cracks in the 101 and the 102 blocks and the FaAA analysis
14 predicting compressive stresses in the cam gallery area
15 would make it more likely than not that these indications in
16 the new 103 block are process cracks rather than fatigue
17 cracks?

18 A (Witness Bush) I would suspect that's the case.
19 Obviously, I don't know for sure.

20 Q When the data relating to the strain gaging of
21 the cam gallery blocks -- if that were to show that the
22 stresses were in compression in a direction perpendicular to
23 the indications would that give you greater confidence that
24 they are process cracks and not fatigue cracks?

25 A If the compressive stresses were high enough at

WRB pp 1 the surface that would give me some degree of confidence;
2 that's correct, so far as initiation is concerned.

3 Q You referred, Dr. Bush, this morning to a thick,
4 dark layer in response to some questions from the Board. Is
5 that thick, dark layer -- strike that.

6 Are you aware that FaAA has done a microprobe
7 analysis to confirm that this is an oxide layer?

8 A I have seen it stated in testimony by
9 Dr. Anderson. I have not been able to locate a piece of
10 paper specifically that tells me that that's the case.

11 Q I take it's your opinion based on what you now
12 know that that thick, dark layer is an oxide layer?

13 A I suspect it's an oxide layer.
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WRBpp

1 MR. ELLIS: Judge Brenner, maybe I need some
2 guidance here. I will skip ahead. I'm anticipating the
3 formation of this Panel and that might assist me. Am I
4 correct in my anticipation? We certainly would support
5 that.

6 JUDGE BRENNER: That's our plan and I heard no
7 objection from any parties. Obviously, the Board asked
8 questions on that same subject this morning and the reason
9 we did was we wanted to get some further initial testimony
10 from Dr. Bush about what he thought about those things. We
11 already had quite an insight into what Drs. Rau, Wachob, and
12 Anderson thought about those things from a combination of
13 the oral and direct and supplemental and rebuttal
14 testimonies. So we wanted to have that initial indication
15 even though we expect to come back and probe as necessary
16 with that Panel. Am I right that no party objects on that
17 procedure?

18 MR. ELLIS: LILCO has no objection.

19 JUDGE BRENNER: I knew that.

20 MR. PERLIS: The Staff has none.

21 JUDGE BRENNER: I knew that because you told me
22 that the other day.

23 MR. BRIGATI: Judge, I'm not sure what the
24 procedure is.

25 JUDGE BRENNER: I'm sorry. I don't want to go

WRBpp 1 through the whole thing again. Mr. Dynner was here when we
2 discussed it.

3 MR. BRIGATI: I know you're reconvening the
4 Panel. Are you suggesting we defer any further questions on
5 the examination by the Board this morning concerning the
6 oxide layer on the cam gallery cracks from the 103 block
7 until the reconvention of that Panel?

8 JUDGE BRENNER: I think that would be a more
9 efficient way to proceed, yes. And the Panel won't be
10 limited to the oxide layer. It'll be limited to the subject
11 of metallography or metallurgy. You can tell that from the
12 makeup of the Panel we're talking about. And, for example,
13 there are some things in your rebuttal testimony presented
14 by Dr. Anderson which is not limited to the oxide layer.
15 But the short answer to your question was yes, I think
16 that'll be a better way to proceed at this point. But we're
17 not requiring that you do it that way.

18 MR. BRIGATI: The County has no objection to that
19 procedure at this point.

20 JUDGE BRENNER: And to fill out the thought I
21 think you can understand you can ask witnesses for all the
22 parties that affect the same question or to immediately
23 comment on the previous answer of the other witness.
24 They'll all be up there together.

25 MR. BRIGATI: I understand.

WRB pp 1

JUDGE BRENNER: All right.

2

How much more do you have, Mr. Ellis, if you skip questions on the oxide layer?

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MR. ELLIS: I would estimate a half an hour to 40 minutes. I might be able to shorten that a bit. I'm working hard at that even right now.

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JUDGE BRENNER: We might as well break now, then.

8

9

MR. ELLIS: I can cover two more quick ones, if that might help.

10

BY MR. ELLIS:

11

Q Dr. Bush, you and Dr. Berlinger were asked

12

questions concerning Suffolk County Exhibit 79, an eddy

13

current inspection report; do you recall that?

14

A (Witness Bush) Yes, sir.

15

Q Are you aware that LILCO and FaAA independently

16

investigated this eddy current dedication using liquid

17

penetrant techniques to confirm that the crack indication

18

did not grow out of the liner landing?

19

A I read the pages of the testimony, yes.

20

Q That transcript at 25,538?

21

A Yes, sir.

22

Q Do you have any reason to disagree with

23

Dr. Johnson's testimony at transcript 25,538 that all the

24

reinspections are consistent with the fact that no crack was

25

found running down out of the liner land area?

WRB pp

1 A Yes. I would anticipate that the most definitive
2 method would be -- at this location might be the penetrant
3 test and if that didn't show anything I would have a
4 considerable confidence.

5 Q So you're testimony is you would agree with
6 Dr. Johnson there?

7 A Yes.

8 A (Witness Berlinger) Mr. Ellis, can I answer?

9 Q Yes, sir, you may.

10 A I concur with Dr. Bush. I don't quite understand
11 why one person found an indication and another person didn't
12 but I also would believe in that particular geometrical
13 location that if no crack was identified as existing using
14 liquid penetrant, that it didn't exist, because I don't
15 believe it healed itself.

16 MR. ELLIS: Judge Brenner, maybe this would be an
17 appropriate time and I will make an effort to shorten it
18 even more.

19 JUDGE BRENNER: All right.

20 One reason we think short followup is in order of
21 these witnesses is a lot of people have asked a lot of
22 questions of the witnesses. Take a look at some of the
23 questions you asked this morning -- well, you don't have to,
24 but if you do at any time, see if you agree with me that a
25 fair percentage of them -- I'm not saying a majority, but

WRBpp

1 some percentage of them had, in fact, been asked and
2 answered and we really have no additional testimony on the
3 point as the result of it.

4 I'll just leave it at that.

5 Okay, we'll adjourn and we'll be back at 10:30 on
6 Tuesday.

7 (Whereupon, at 11:55 a.m., the hearing was
8 adjourned, to reconvene at 10:30 a.m., Tuesday, November 13,
9 1984, at this same place.)

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CERTIFICATE OF OFFICIAL REPORTER

This is to certify that the attached proceedings before the
UNITED STATES NUCLEAR REGULATORY COMMISSION in the matter of:

NAME OF PROCEEDING:

LONG ISLAND LIGHTING COMPANY
(Shoreham Nuclear Power Station)

DOCKET NO.: 50-322-1 (OL)

PLACE: Hauppauge, New York

DATE: November 9, 1984

were held as herein appears, and that this is the original
transcript thereof for the file of the United States Nuclear
Regulatory Commission.

(Sigt) William R. Bloom Anne G. Bloom
(TYPED) William R. Bloom & Anne G. Bloom

Official Reporter

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