

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Appeal Board

'84 NOV 15 A9:46

In the Matter of	)	
	)	
LOUISIANA POWER AND LIGHT COMPANY	)	Docket No. 50-3820L
	)	
(Waterford Steam Electric Station,	)	
Unit 3)	)	
	)	

JOINT INTERVENORS' COMMENTS ON HARSTEAD CONFLICT OF INTEREST

In the Appeal Board's October 3, 1984 order, the Board allowed for a comment period on possible conflict of interest by Gunnar Harstead. Joint intervenors' comments follow.

It is clear that Gunnar Harstead, President of Harstead Engineering Associates, has a conflict of interest with respect to studies he conducted on the Waterford 3 basemat. Mr. Harstead worked on a Waterford 3 basemat study while employed by the NRC. He was later employed by Louisiana Power and Light Company to do an "independent" review of the same basemat. Mr. Harstead's theoretically independent review could have been influenced by his earlier work upon the basemat.

What is clear is that the Brookhaven National Laboratory (BNL) studies conducted to date have relied upon the Harstead Engineering reports for some of the calculations. See BNL Report of April 16, 1984, pages 1 and 9. Page 1 demonstrates that Brookhaven National Laboratory has performed a review and evaluation of Harstead Engineering reports. ". . . BNL undertook a review and evaluation of the HEA Waterford III mat analysis documented in Harstead Engineering Associates (HEA) Reports, Nos. 8304-1 and 8304-2." On page 9, BNL states, "The validity of BNL conclu-

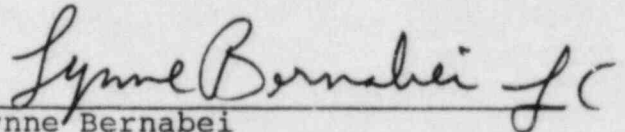
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sions depend mainly on the information supplied by Ebasco, HEA and LP&L, either verbally, in reports or in computer outputs."

From these facts it is clear that due to Mr. Harstead's conflict of interest, there has been no independent analysis of the basemat done to date. What is not truly clear is what effect Mr. Harstead's participation in the NRC study had upon his work for LP&L.

Due to Mr. Harstead's conflict of interest, a truly independent study still must be performed on the basemat to assure it is structurally safe for the operation of the facility.

Respectfully submitted,



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