

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of )

LONG ISLAND LIGHTING COMPANY )

(Shoreham Nuclear Power Station, )  
Unit 1) )

Docket No. 50-322

AFFIDAVITS AND PROFESSIONAL  
QUALIFICATIONS

Attached are the affidavits and professional qualifications of:

Charles A. Daverio,  
T. Frank Gerecke,  
Brian R. McCaffrey, and  
David A. Robare.

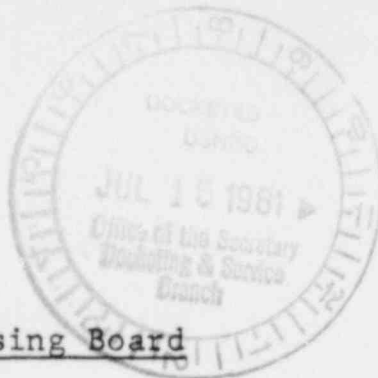
All of these men attest to one portion or another of the accompanying LILCO answers to SOC's interrogatories dated June 24, 1981; the particular replies linked with each of them are indicated in the answers.

Mr. Gerecke is also responsible for the affidavit that is designated "Exhibit 4" to LILCO's Motion for Summary Disposition of SOC Contention 6(a)(i), and Mr. McCaffrey sponsors the affidavits accompanying LILCO's Motions for Summary Disposition of SOC Contentions 2, 3 and 12 (Part Two).

  
W. Taylor Reveley, III

Hunton & Williams  
707 East Main Street  
P. O. Box 1535  
Richmond, Virginia 23212

Dated: July 13, 1981



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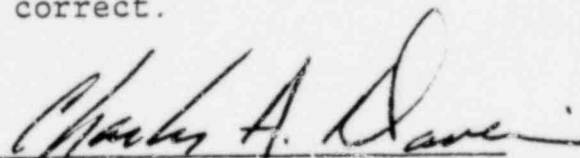
In the Matter of )  
LONG ISLAND LIGHTING COMPANY ) Docket No. 50-322  
(Shoreham Nuclear Power Station, )  
Unit 1) )

AFFIDAVIT OF CHARLES A. DAVERIO


Charles A. Daverio, being duly sworn, states as follows:

1. I am a Section Head in the Nuclear Licensing Division for the Long Island Lighting Company. A statement of my professional qualifications is attached to this affidavit.

2. As indicated in "Response of Long Island Lighting Company to SOC's June 24 Interrogatories and Requests for Production of Documents," portions of the answers were prepared under my supervision and direction. To the best of my information, knowledge and belief, the answers contained in that response are true and correct.

  
Charles A. Daverio

Subscribed and sworn to before me this 13th day of July, 1981.

  
Notary Public

My Commission Expires: July 20, 1983

CHARLES A. DAVERIO  
Licensing Section Head, Nuclear Licensing Division  
Long Island Lighting Company

My name is Charles A. Daverio. My business address is Long Island Lighting Company, 175 East Old Country Road, Hicksville, New York. I am currently the Licensing Section Head within the Nuclear Licensing Division, a position I have held since January 1979. In this capacity, I am responsible for providing corporate licensing and regulatory expertise over a broad range of technical and regulatory issues which may impact the Company's nuclear program.

I graduated from Manhattan College in 1972 with a Bachelor of Mechanical Engineering degree. I received a Master of Science in Industrial Engineering from New York University in 1975, and attended a Special Summer Program at the Massachusetts Institute of Technology on "Nuclear Power Reactor Safety" in 1974. I completed a Westinghouse PWR Introduction Course in 1976.

In 1972 I was employed by Cosentini Associates in their Field Supervision Department. My primary functions included checking HVAC vendor equipment submittals against specifications, preparing project estimates, field inspection to insure proper installation, and resolution of construction problems.

From 1973 to 1974 I was employed by Ebasco Services, Inc. as a Project Coordinator. My areas of responsibility were contract administration and coordination of Ebasco Engineering, Design, Scheduling, Purchasing, Expediting, Q.A. Inspection and Construction. I was part of a Scope Change Task Force, determining AEC, Client and Vendor changes affecting Scope of Work.

From 1974 to 1976 I was employed by Stone & Webster Engineering Corporation as a licensing coordinator on the Jamesport Project. In May of 1974 I was assigned to the LILCO office to assist them in their licensing effort on the Jamesport Project. In this capacity, I functioned as LILCO's licensing engineer on the PSAR effort. My responsibility included the following:

1. Coordinate with Stone & Webster to insure a timely licensing schedule.
2. Review answers to NRC PSAR questions to insure they comply with applicable NRC requirements.
3. Responsible for review and resolution of all comments submitted by LILCO.

I joined the Long Island Lighting Company in 1976 as an Associate Engineer in the Licensing Section of the Nuclear Engineering Division. I was responsible, except legal, for Jamesport's licensing under NRC rules and regulations. This included coordinating with Stone & Webster to insure timely licensing schedules, review answers to NRC questions in order to insure compliance with applicable regulations, and review/resolve with Stone & Webster all comments submitted by LILCO reviewers. I coordinated and helped prepare presentations before the Advisory Committee on Reactor Safeguards and testimony before the Atomic Safety and Licensing Board.

I assumed my present position as Licensing Section Head, Nuclear Licensing Division in January of 1979 and assumed the additional responsibility of emergency planning in January of 1980 by being appointed Chairman of the Emergency Planning Task Force.

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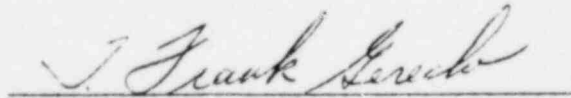
AFFIDAVIT OF T. FRANK GERECKE

T. Frank Gerecke, being duly sworn, states as follows:

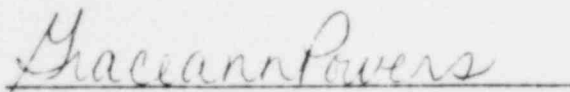
1. I am Manager of Quality Assurance for Long Island Lighting Company. A statement of professional qualifications accompanies my attached affidavit concerning Shoreham's construction QA/QC program.

2. As indicated in "Response of Long Island Lighting Company to SOC's June 24 Interrogatories and Requests for Production of Documents," portions of the answers were prepared under my supervision and direction. To the best of my information, knowledge and belief, the answers contained in that response are true and correct.

3. The affidavit referenced in paragraph 1 above was prepared under my supervision and direction. To the best of my information, knowledge and belief, the information contained in it is true and correct.

  
T. Frank Gerecke

Subscribed and sworn to before me this  
10th day of July, 1981

  
Notary Public

Notary Public, New York  
State of New York  
County of Suffolk  
Commission Expires Mar. 30, 1982

My Commission Expires: March 30, 1982

T. FRANK GERECKE  
Manager, Quality Assurance Department  
Long Island Lighting Company

My name is T. Frank Gerecke. My business address is Long Island Lighting Company, 175 East Old Country Road, Hicksville, New York. I am Manager of the Quality Assurance Department reporting administratively and functionally to the Vice President, Engineering. My responsibilities include development and direction of the overall quality assurance program for the Company's nuclear power program.

I graduated from the Georgia School of Technology in 1945 with a Bachelor of Science Degree in Electrical Engineering. I received a Master of Science Degree in Physics from the U.S. Navy Postgraduate School in 1955, and from 1967-1970 I completed the academic requirements for a Master of Science Degree in Nuclear Engineering at C. W. Post College of Long Island University.

From 1945 to 1965 I served in the U.S. Navy as a Commissioned Line Officer, retiring as a Commander in August 1965. Navy assignments included 3 years as a Research Assistant at the Lawrence Radiation Laboratory, Livermore, California and 3 years as Head of the Nuclear Weapons Development Technical Section in the Office of the Chief of Naval Operations.

I have been employed by the Long Island Lighting Company since December 1965. From 1965 to 1972 I held the position of Engineer in the Gas Engineering Organization. My responsibilities included preparation of specifications and procurement documents, drawing review, vendor inspection and surveillance of prime contractor performance during the installation of high pressure gas mains and the construction of a liquefied natural gas plant.

Since June 1972, I have been Administrator and Manager of the LILCO quality assurance organization as it developed to its present status as the corporate Quality Assurance Department. I am presently responsible for the overall quality assurance program from the initial design through the operational phase of the nuclear power station.

I am a registered Professional Engineer in Quality Engineering in the State of California.



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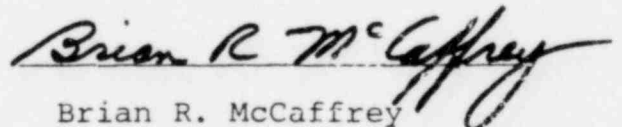
AFFIDAVIT OF BRIAN R. MCCAFFREY

Brian R. McCaffrey, being duly sworn, states as follows:

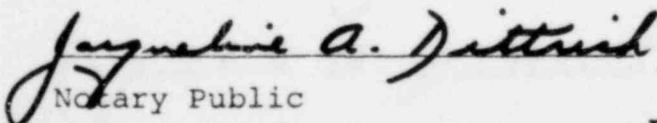
1. I am Manager, Project Engineering for Shoreham for the Long Island Lighting Company. A statement of my professional qualifications is attached to this affidavit.

2. As indicated in "Response of Long Island Lighting Company to SOC's June 24 Interrogatories and Requests for Production of Documents," portions of the answers were prepared under my supervision and direction. To the best of my information, knowledge and belief, the answers contained in that response are true and correct.

3. The attached affidavits concerning SOC Contentions 2, 3 and 12 (Part 2) were prepared under my supervision and direction. To the best of my information, knowledge and belief, the information contained in those affidavits is true and correct.

  
Brian R. McCaffrey

Subscribed and sworn to before me  
this 10th day of July, 1981

  
Notary Public

JACQUELINE A. DITTRICH  
Notary Public, State of New York  
No. 62 - 4601469, Suffolk County  
Term Expires March 30, 1982  
JACQUELINE A. DITTRICH  
Notary Public, State of New York  
No. 62 - 4601469, Suffolk County  
Term Expires March 30, 1982

My Commission Expires: 3/30/82

BRIAN R. McCaffrey  
Manager, Project Engineering for  
Shoreham Nuclear Power Station  
Long Island Lighting Company

My name is Brian R. McCaffrey. My business address is Long Island Lighting Company, Shoreham Nuclear Power Station, P. O. Box 618, Wading River, New York. I am Manager, Project Engineering for the Shoreham Nuclear Power Station. As such I am responsible for the overall engineering and licensing of the Shoreham Station. In this capacity, my organization directs and approves the engineering efforts of the Architect Engineer and Nuclear Steam Supplier. This organization is also responsible for directing the activities leading to an Operating License from the NRC.

I graduated from the University of Notre Dame in 1967 with a Bachelor of Science Degree in Aerospace Engineering, and received a Master of Science Degree in Aerospace Engineering in 1972 from the Pennsylvania State University and a Master of Science Degree in Nuclear Engineering in 1978 from the Polytechnical Institute of New York. I have also completed a General Electric BWR Design Orientation Course in 1978.

My professional experience follows:

Since 1973, employed by Long Island Lighting Company. From January 1979 to April 1980 held the position of Project Engineer for the Shoreham Nuclear Project, and from April 1980 to June 1981 was Assistant Project Manager -- Engineering and Licensing. Responsibilities basically as set out above.

From October 1977 to December 1978 held the position of Senior Licensing Engineer for the Shoreham Nuclear Project. Responsible for the licensing activities leading to an Operating License.

From June 1975 to September 1977 held the position of Senior Engineer in the Power Engineering Department with responsibilities as Project Coordinator for gas turbine installations and Lead Mechanical Engineer for nuclear projects.



From January 1973 to May 1975 held the positions of Associate Engineer and Engineer in the Power Engineering Department involved with balance of plant engineering on both fossil and nuclear power stations.

From 1968-1972, employed by Grumman Aerospace Corporation. Primary responsibilities were in the areas of aircraft aerodynamics and flight test stability and control.

I am a member of the American Society of Mechanical Engineers and the Long Island Section of the American Nuclear Society, and I am a Registered Professional Engineer in the State of New York.

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LONG ISLAND LIGHTING COMPANY	)	Docket No. 50-322
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(Shoreham Nuclear Power Station,	)	
Unit 1)	)	

Affidavit of David J. Robare

See attached page.

David J. Robare, being duly sworn, states as follows:

1. I am Principal Licensing Engineer for the General Electric Company. A statement of my professional qualifications is attached to this affidavit.

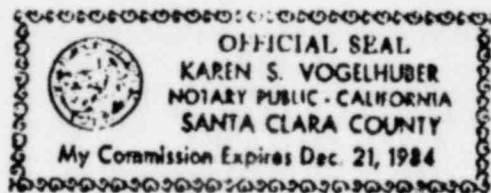
2. As indicated in "Response of Long Island Lighting Company to SOC's June 24 Interrogatories and Requests for Production of Documents," portions of the answers were prepared under my supervision and direction. To the best of my information, knowledge and belief, the answer contained in that response are true and correct.

David J. Robare

David J. Robare

Subscribed and sworn to before me this  
10th day of July, 1981

Karen S. Vogelhuber  
Notary Public



My Commission Expires: 12/21/84

David J. Robare

Education

B.S. - Electrical Engineering, 1963  
University of Massachusetts

Additional Qualification

Professional Engineer, California (Licensing NU1839)  
Nuclear Engineering

Experience

Mr. Robare is currently serving as a Principal Licensing Engineer, responsible for all licensing technical support work arising from the General Electric Licensing interfaces with the NRC, utility, and A/E for the Shoreham Nuclear Power Plant project, including FSAR preparation, NRC question responses, and participation at customer/NRC licensing meetings and public hearings.

As General Electric's licensing engineer for Shoreham, Mr. Robare has been responsible for the licensability of NSS safety systems, LOCA and transient analyses and the technical specifications which provide for monitoring and testing of system capability and limits on reactor operating levels to assure that safe plant conditions are always maintained.

Mr. Robare is also responsible for GE's licensing leadership of generic programs concerning loose parts monitoring, recirculation pump performance under accident conditions and

the reactor internals vibration startup program.

Mr. Robare has been with General Electric since June 1957, and has been involved in the nuclear field with GE since February 1970.