

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
DUKE POWER COMPANY, et al.) Docket Nos. 50-413
(Catawba Nuclear Station,) 50-414
Units 1 and 2))

AFFIDAVIT OF J. C. ROGERS
PALMETTO ALLIANCE'S CONTENTION NO. 6

1. My name is J. C. Rogers. I am employed by Duke Power Company as Project Manager for the Catawba Nuclear Station. I have been employed in this position since 1981. My professional qualifications are contained in an attachment to this affidavit.

2. In the position that I hold, I am responsible for all construction activities at the Catawba site.

3. The purpose of this affidavit is to address Palmetto Alliance's Contention No. 6, which reads:

"Because of systematic deficiencies in plant construction and company pressure to approve faulty workmanship, no reasonable assurance exists that the plant can operate without endangering the health and safety of the public."

4. Mr. Hoopingarner alleges that green water in UHI Building is unsafe. HD Tr. Vol. 1, p. 19; Vol. 2, pp. 66-67. During construction, the "green" water stands in the bottom of the blow out chambers of the UHI Building. These two chambers are open to the atmosphere, collect rainwater and are equipped with floor drains to carry excess water to yard drainage. This does not indicate an unsafe condition.

5. Mr. Hoopingarner alleges that scaffold boards were improperly placed on pipes and unistruts. HD Tr. Vol. 1, P. 19; Vol. 2, pp. 34, 63-65. Present procedures allow scaffolding on piping greater than 3". Scaffold boards used to support personnel may be placed on cable tray or unistrut supporting cable tray. This is allowed by Construction Procedure 371. Unistrut cable tray hangers are designed for a dead load of more than 600 lbs; therefore, scaffold boards used to support personnel would not affect the integrity of the design.

6. Mr. Hoopingarner alleges the contact of carbon steel and stainless steel compromises the integrity of the materials. HD Tr. Vol. 2, p. 67. Design Engineering has no restriction on carbon steel coming into contact with stainless steel. It is normal fabrication practice to minimize contact where possible for cosmetic reasons only, due to rust discoloration formation. This in no way will decrease the integrity of the piping.

7. Mr. Hoopingarner alleges that concrete was improperly poured into forms that were wet. HD Tr. Vol. 1, p. 22; Vol. 2, p. 69. ACI 347-11, Section 3.2.13 requires concrete formwork to be sufficiently tight to prevent loss of mortar from the concrete, it does not require them to be caulked or sealed. QA Procedure M-2 requires an inspection to verify that the forms are free of excess water prior to concrete placement. It does not require the formwork to be dry.

It is unclear as to when the water was on the floor, prior to placement or after. If before, it is acceptable because the formwork does not need to be dry and procedurally the excess water was removed prior to placement. If it was observed after placement, it was most likely from the concrete "bleeding" which is normal during the placement/curing process.

Mr. Hoopingarner states that he was not present during the period from formwork completion to concrete placement, therefore, he does not know what intermediate procedural steps were taken.

8. Mr. Hoopingarner alleges that certain valves were installed backwards. These valves have a directional arrow to indicate flow direction. After craftsmen complete erection process, each valve has three inspections that check for proper flow direction, craft post check, welding inspection and mechanical QC inspection. Any errors are detected and corrections will be made as necessary.

9. Mr. Hoopingarner alleges that the diesel generator room flooded and damaged panels in the area. HD Tr. Vol. 1, p. 13; Vol. 2, pp 13-17. This incident was documented in accordance with QA procedure Q-1. The matter was reviewed and corrective action was taken to assure that the equipment will be restored to an acceptable condition.

10. Mr. Hoopingarner alleges that pipes were misaligned. HD Tr. Vol. 1, p. 19; Vol. 2, pp 19-20. Piping passing through sleeves have standard clearance requirements established. A very detailed inspection is performed by QC on these clearances. Evaluation and necessary corrective action is taken on any deviation.

11. Mr. Hoopingarner alleges that pipe and rebar have been improperly lying on the ground in storage area. HD Tr. Vol. 2, pp 76-78. Rebar is stored above the ground for cleanliness purposes. Prior to concrete being placed around the rebar, QA procedure M-2 requires the rebar to be inspected to insure that it is free of all tags, mud, oil, or other materials that may adversely affect the bond. Storing it above ground is a preventive measure to assure that this M-2 inspection can be passed. However, for rebar lying on ground, it too must pass the M-2 inspection prior to concrete placement.

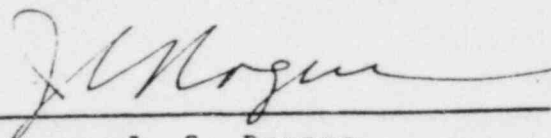
Piping is cleaned and flushed at later intervals of installation. This process assures the piping will meet the cleanliness condition for its intended use.

12. Mr. Hoopingarner alleges that a welder used a wet or damp rag to quench a weld. HD TR. Vol.1, pp. 11-12; Vol.2, pp.28, 70-71. The practice of using a wet or damp rag to quench a weld is presently allowed by the welding program for stainless steel pipe, however, prior approval is required from technical support.

13. Mr. McAfee alleges that he has not seen any evidence that the concrete anchor bolt in question (i.e., the one which Mr. Allgood examined) is the length it is supposed to be. MD Tr. 14. An ultrasonic test (UT) was performed on the subject anchor bolt. This test was performed by qualified UT personnel and the bolt was found to be acceptable.

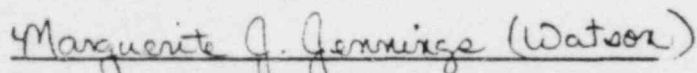
14. Mr. McAfee alleges that blueprints were improperly changed to reflect construction errors. Any print changes are handled in accordance with QA procedure R-3 or initiated by Design Engineering. No print changes are incorporated without Design Engineering evaluation and approval.

I, J. C. Rogers, of lawful age, being duly sworn, state that I have reviewed the foregoing affidavit, and that the statements contained therein are true and correct to the best of my knowledge and behalf.



J. C. Rogers

Subscribed and sworn to before me
this 15th day of July, 1983



Notary Public

My commission expires: 8-1-84

JOHN C ROGERS

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CLEMSON, SC 29631
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HOME (803) 654-3544

FORMAL
EDUCATION

Clemson University - BCE (Bachelor of Civil Engineering) 1949

ADDITIONAL
TRAINING

Advance Management Development - Duke Power
Effective Management Program - Harbridge House
Performance Management Program - Duke Power

PROFESSIONAL
INVOLVEMENT

Registered Professional Engineer - North Carolina (2453)
South Carolina (2094)

WORK
EXPERIENCE

<u>FROM</u>	<u>TO</u>	<u>TITLE</u>	<u>PROGRAM</u>	<u>COMPANY</u>
11/66	Present	Project Manager	Catawba Nuclear Sta. McGuire Nuclear Sta. Oconee Nuclear Sta. (Total of 7 nuclear units)	Duke Power

Responsible for providing overall site direction for the construction and timely completion of nuclear electric generating stations within the design, budget, code, and standards required by Duke Power Company and government regulatory agencies. Responsible for staffing the construction organization with competent, qualified personnel and development of schedules and budgets to meet the project objectives. Responsible for assuring that adequate construction procedures are developed and followed for meeting all construction activities and regulatory requirements. Responsible for interfacing with other Duke departments for the construction and completion of the projects. These units are built almost entirely with Duke employees. The scope of the Catawba Construction workforce is 180 exempt management, professional, and technical employees and 3,970 non-exempt employees.

JOHN C ROGERS
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WORK
EXPERIENCE

<u>FROM</u>	<u>TO</u>	<u>TITLE</u>	<u>PROGRAM</u>	<u>COMPANY</u>
11/60	11/68	Assistant Resident Engineer	Marshall Steam Sta. Allen Steam Sta. (4 coal fired generating units)	Duke Power

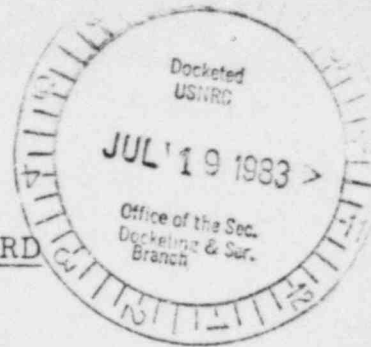
Responsible for the direction of all on site construction activities for the construction of large coal-fired steam electric generating stations. Responsibilities included the development of construction schedules, in coordination with Duke Design Engineering Department and Duke Steam Generator Department. These plants were constructed almost entirely with Duke Power construction forces. All units were completed on or ahead of schedule with costs that were more than competitive in the industry.

8/49	11/60	Various Engineering Titles	Three coal fired steam electric generating stations (7 units)	Duke Power
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Performed various engineering functions for the construction of coal fired steam electric generating stations. These functions included planning, scheduling, estimating, and technical support of the craft organization for construction activities. Received some managerial experience by being in field charge of the construction of a water treatment plant, including earth dam and pumping station.

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CERTIFICATE OF SERVICE

I hereby certify that copies of Applicants' "Motion For Partial Summary Disposition" of Palmetto Alliance Contention 6 in the above-captioned matter have been served upon the following by deposit in the United States mail this 15th day of July, 1983.

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U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

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Dr. Richard F. Foster
P. O. Box 4263
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Washington, D.C. 20555

Chairman
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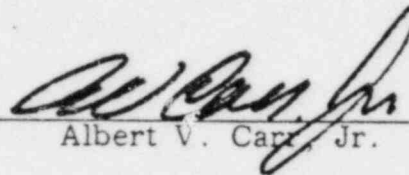
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Albert V. Carr, Jr.