

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:

SOUTH CAROLINA ELECTRIC & GAS  
COMPANY, et al.

Docket No. 50-395-OL

(Virgil C. Summer Nuclear  
Station, Unit 1)

COUNTY OF ALLEGHENY  
STATE OF PENNSYLVANIA

ss

AFFIDAVIT OF W. D. FLETCHER

My name is W. D. Fletcher. I am Manager, Steam Generator Development and Performance Engineering in the Nuclear Technology Division of the Westinghouse Electric Corporation. My business address is P.O. Box 855, Pittsburgh, Pennsylvania 15230. I have previously prepared an Affidavit for use in this proceeding with regard to the "Petition to Intervene and Request for Hearing" filed by Fairfield United Action ("FUA") dated April 9, 1982. I have reviewed the "Motion for Admission of New Contentions" dated April 14, 1982 submitted by Brett A. Bursey in this proceeding. Mr. Bursey's New Contention 1 is very similar to FUA's Contention B1<sup>1</sup>. The purpose of this Affidavit is to address whether, as Mr. Bursey contends (Motion at 2), his motion raises significant safety questions. I have reviewed the results of the data gathered from

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<sup>1</sup>For this reason, I have made several references to my earlier Affidavit. I wish to incorporate my April 22, 1982 Affidavit herein. A copy is attached for ready reference.

operating plants, utilizing Model D steam generators. In my opinion, the interim operation program developed by Westinghouse and South Carolina Electric & Gas Company ("SCE&G") for the V. C. Summer plant will preclude any significant steam generator tube wear until modification to the steam generators can be implemented. New Contention 1 does not present, in my opinion, significant safety issues. As explained in greater detail in my Affidavit of April 22, 1982 referenced above, I have concluded that the interim operating program for the Summer plant within the specified parameters will minimize the potential for significant tube wear.

Beyond the interim operation program, Westinghouse currently has an engineering design program to modify Model D steam generators to alleviate tube wear. The anticipated design modification can be implemented in the field. An extensive testing program is in progress to verify that the anticipated modification to the steam generator preheater section addresses and corrects tube wear. The testing program incorporates a variety of testing facilities such as 0.417, 2/3 and full scale model testing. These test results, when combined with actual plant performance data, are expected to provide verification that the design modification will perform as predicted by engineering design analysis.

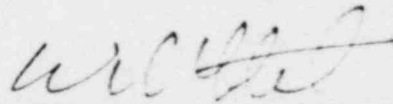
Mr. Bursey argues in his New Contention 1 that if the plant is not safe to operate at full power, it should not be allowed to operate at half power. The logic of that argument escapes me, and I certainly disagree both with the premise and the conclusion. As outlined for Summer, the interim program for operation is designed to minimize the potential for significant tube wear, based on laboratory findings and other plant operating experiences at reduced power levels. This program

includes periodic tube inspections in addition to analysis of tube motion instrumentation data taken while the plant is in operation. This program for interim operation is explained in my April 22, 1982 Affidavit. Moreover, subsequent to the modification, which will have been tested prior to installation, it is expected that the plant will be operated at full power without experiencing excessive tube wear.

The other issues raised in New Contention 1 are not concerns during the V. C. Summer interim program as described above and in my April 22, 1982 Affidavit. Operation during this period is designed to minimize the potential for tube wear so that tube rupture, multiple tube rupture and/or LOCA events and actions of the PORV are not relevant.

FURTHER AFFIANT SAYETH NOT.

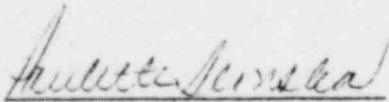
Before me, the undersigned authority, personally appeared W. D. Fletcher, who, being by me duly sworn according to law, deposes and says that he is authorized to execute this Affidavit on behalf of Westinghouse Electric Corporation ("Westinghouse") and that the averments of fact set forth in this Affidavit are true and correct to the best of his knowledge, information, and belief:



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W. D. Fletcher, Manager  
Steam Generator Development  
and Performance Engineering

Sworn to and subscribed  
before me this 28 day  
of April 1982.



Notary Public  
JULIE SLONSKA, NOTARY PUBLIC  
MONROEVILLE BORO, ALLEGHENY COUNTY  
MY COMMISSION EXPIRES MARCH 10, 1986  
Member, Pennsylvania Association of Notaries