

STONE & WEBSTER ENGINEERING CORPORATION



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DESIGN
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| PRINCIPAL STAFF | | | |
|-----------------|----|------|--------|
| RA | MA | DRP | |
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| A/RA | | DR | |
| RC | | DRMA | |
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| SGA | | ML | |
| ENF | | File | MA |

Mr. J. J. Harrison
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

January 16, 1984

J.O.No. 14358
MPS-45

DOCKET NO. 50-329/330

MIDLAND PLANT - UNITS 1 AND 2

INDEPENDENT ASSESSMENT OF UNDERPINNING

AFFIDAVITS AND RESUMES FOR ADDITIONAL TEAM MEMBERS

Stone & Webster's subcontractor, Parsons Brinckerhoff Michigan, Inc., has found it necessary to supplement their staff assigned to the Independent Assessment Team. In this regard, affidavits and resumes are enclosed for Mr. John P. Oliveira and Mr. Bernard A. Metros. Mr. Oliveira and Mr. Metros meet the independence requirements for this work. The original Parsons Brinckerhoff team members may still participate in the continuing assessment work.

If you have any questions, please contact me at (617) 589-2067.

A. S. Lucks
Project Manager

Enclosures

ASL:nsd

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PDR ADOCK 05000329
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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD

In the Matter of
CONSUMERS POWER COMPANY
(Midland Plant, Units 1 and 2)

Docket No 50-329 OM
50-330 OM
Docket No 50-329 OL
50-330 OL

December 28, 1983

AFFIDAVIT OF _____

My name is Bernard A. Metros as employed by Parsons Brinckerhoff/Tudor
as Construction Engineer Engineering Company

I am currently assigned to the team which is conducting an independent assessment of soils work at the Midland Nuclear Plant site. Prior to being given this assignment, I have never worked on any job or task associated with the Midland Project, or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Mergentime Company relating to soils or underpinning. I have never been employed by Consumers Power Company, Bechtel, or Mergentime Company. * I do not own any shares of Consumers Power Company, Bechtel, or Mergentime stock. Mutual funds or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Mergentime stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Mergentime Company.

* I was employed by Bechtel as Resident Engineer prior to 1977.

Sworn and Subscribed Before Me This 30 Day of 12 1983.

Notary Public
Jackson County, Michigan

Bernard A. Metros

My Commission Expires _____

Donna Tatel
Donna Tatel - Notary Public
Fulton County, Georgia

Notary Public, Georgia, State at Large
My Commission Expires Jan. 29, 1985

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

In the Matter of
CONSUMERS POWER COMPANY
(Midland Plant, Units 1 and 2)

Docket No 50-329 OM
50-330 OM
Docket No 50-329 OL
50-330 OL

December 28, 1983

AFFIDAVIT OF _____

My name is John P. Oliveira I am employed by Parsons Brinckerhoff Tudor
as Construction Engineer. Engineering Company

I am currently assigned to the team which is conducting an independent assessment of soils work at the Midland Nuclear Plant site. Prior to being given this assignment, I have never worked on any job or task associated with the Midland Project, or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Mergentime Company relating to soils or underpinning. I have never been employed by Consumers Power Company, Bechtel, or Mergentime Company.* I do not own any shares of Consumers Power Company, Bechtel, or Mergentime stock. Mutual funds or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Mergentime stock, of which I am unaware, A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Mergentime Company.

* I was employed as Construction Superintendent for a joint venture of P and Z/Mergentime prior to 1972.
Sworn and Subscribed Before Me This 30 Day of 12, 1983.

Notary Public
Jackson County, Michigan

My Commission Expires _____

John P. Oliveira

Notary Public
Fulton County, Georgia

My commission Expires _____
Notary Public, Georgia, State of Large
My Commission Expires Jan. 29, 1985

BERNARD A. METROS
Resident Engineer

Education
Chicago Tech, BSCE, 1954

Experience

Mr. Metros has over 35 years in the heavy construction industry, rising through the ranks from tradesman and foreman to superintendent and Engineer. His experience includes tunnelling, underpinning, highway, highway and railroad bridges, steel mill, water plant, and rapid transit. Mr. Metros' experience also includes the development and implementation of a viable construction program, utilizing native labor and supervisors, in an under-developed Asian nation.

Mr. Metros is currently the resident engineer for the Metropolitan Atlanta Rapid Transit Authority (MARTA) performing construction management of three major transit projects: the \$50 million Five Points Station; a \$13 million open cut subway and at-grade line segment; and a \$10 million at-grade and aerial structure line segment. His major responsibilities include contract administration and quality assurance. Construction involved on these projects include soldier pile and slurry wall excavation support systems, tie-back and external bracing of support systems; underpinning; cast-in-place and precast concrete; post tensioned segmental precast concrete members; structural erection; marble, granite and tile architectural finishes and associated electrical and mechanical features.

Previous Experience

As resident engineer for the Washington Metropolitan Area Transit Authority he was responsible for construction management of the \$40 million L'Enfant Plaza Station.

Chief of Construction section, Third Combat Tactical Zone in Vietnam. Mr. Metros was responsible for development and implementation of a \$120 million construction program utilizing indigenous labor and contracting forces. This program was non-existent prior to this effort and involved supervision of design, specifications, awarding of contract, and construction management.

Resident engineer for the City of Chicago, Department of Public Works, Division of Bridges and Viaducts. Mr. Metros was in complete control of the following projects which involved dredging, cofferdam construction, sewer and road construction, and movable and fixed bridges with related electrical and mechanical work..

- o Railroad Underpass at 40th and Ashland.
- o Fixed Bridges at Archer and Ashland.,
- o The East 95th Street Movable Bridge.
- o The Halsted Street River bridge over the North Branch of the Chicago River.
- o The Damen Avenue Sky-Way which extends for one and one quarter miles over railroad facilities.

JOHN PATRICK OLIVEIRA

Technical Specialist for Tunneling and Underpinning

Education

Johns Hopkins University, B.S. Chemical Engineering, 1963

Mr. Oliveira is a technical specialist for tunneling and underpinning and has served in the technical services division of the firm's joint venture for construction of the Metropolitan Atlanta Rapid Transit Authority (MARTA) system. In nearly 20 years of construction experience, he has worked on several stations and line sections of both the MARTA system and, with other firms, the Washington Metropolitan Area Transit Authority (WMATA) subway system in Washington, D.C.

He is coauthor of a monograph on tunnel photography for the Urban Mass Transportation Administration. His work with the firm includes several roles at the MARTA rapid transit project in Atlanta:

- MARTA technical specialist responsible for pile load tests; concrete and painting tests; instrumentation for stress analysis; and inspection of plant-fabricated structures.
- MARTA field inspector for drilling and blasting, steel-setting, and shotcreting phases of tunneling. In this capacity, he worked on several types of tunneling: compressed air, soft-ground, and hard-rock.
- MARTA building underpinning inspector. Mr. Oliveira worked on the underpinning of the Continental Insurance Building and the Merchandise Mart. The work involved installation of rock dowels and bolts, installation of tie backs, cut-and-cover, and shotcrete.

Previous Experience

- Pile driver foreman for a foundation company, Bethesda, Maryland. Mr. Oliveira was foreman for pile

driving and for sheeting, shoring, and foundation work, including setting up and laying out.

Mr. Oliveira participated in various phases of construction of the WMATA system as an employee of three firms:

- Underpinning superintendent for a New York City firm working on the WMATA system. He supervised the underpinning of buildings for the Clarington Station.
- Employee for another New York City underpinning and foundation company working on the WMATA system. He worked on underpinning of buildings for the 7th Street subway station, including work with welding machines, hydraulic pumps, and jacks.
- Foreman for shaft and tunneling operations for three stations of the METRO system and foreman for underpinning and sheeting and shoring of a fourth station, all while employed as miner and miner foreman for a Washington, D.C., firm. The stations for which he was foreman for shaft and tunneling operations were Union Station, 9th Street Station, and G Street Station; he was foreman for underpinning and sheeting and shoring for the National Gallery Station.

Publications

- Monograph on Tunnel Photography (coauthor), UMTA-GA-06-0007-81-1, March 1981.