

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

In the Matter of	)	
	)	
COMMONWEALTH EDISON COMPANY	)	Docket Nos. STN 50-454 OL
	)	STN 50-455 OL
(Byron Nuclear Power Station,	)	
Units 1 & 2)	)	

AFFIDAVIT OF  
LOUIS OWEN DEL GEORGE

I, Louis Owen Del George, being first duly sworn  
do hereby depose and state:

1. I am an Assistant Vice-President for Commonwealth Edison Company. I have held that position since November, 1983. My responsibilities include management of the Company's Station Nuclear Engineering, Nuclear Fuel Services and Nuclear Licensing activities. Prior to that time, I held various positions in the Station Nuclear Engineering and Nuclear Licensing Departments. I joined the Company in February, 1974, after resigning from the position of lead design engineer at the Bettis Atomic Power Laboratory. I received a Bachelor of Science degree in Engineering Science from the Illinois Institute of Technology (1970). I have a Juris Doctor degree from the Chicago Kent College of Law of the Illinois Institute of Technology (1977). I am also a member of the Bar of the State of Illinois.

2. In 1982, in my capacity as Director of Nuclear Licensing for the Company, I managed the development of a program for verifying the effectiveness of Contractor practises for the qualification and certification of QA/QC inspectors at the Byron site, hereafter referred to as the "Reinspection Program."

3. At the time the Byron hearing record was closed in August, 1983, the conduct of the Reinspection Program was still ongoing. Although a great deal of data had been developed from the reinspection of work previously inspected, all reinspections had not been completed, and conclusions relative to the data then available were not final.

4. On October 28, 1983, a preliminary report containing a portion of the data gathered under the Reinspection Program was submitted to the NRC Staff. A subsequent submittal was made on January 12, 1983 in which the data for all Contractors but one (Hatfield Electric Company) were finalized. This latter document stated that final results for all contractors would be available on February 10, 1984, and that the evaluation of those results would also be completed by that time.

5. The Byron Reinspection Program was completed on February 4, 1984. A report of the final results of that Program, as well as the evaluation of those results and the Company's conclusions drawn from the results is in final

preparation and will be available shortly.

6. a. The final report will set forth all of the data accumulated by the Reinspection Program (over 200,000 inspections having been performed). The report will discuss the reliability of inspectors certified prior to September, 1982, as well as the conclusions to be drawn from the data on the effectiveness of individual Contractors practises for the qualification of QA/QC inspectors. A thorough review of the bsses for and implementation of the Reinspection Program will be provided to validate the integrity of the conclusions drawn from the Program. In addition, an extensive evaluation of the results is provided, from which it can be concluded that former inspectors were qualified, and Contractor practises for qualification and certification of inspectors were effective.

b. The final report will discuss in detail those limited exceptions where inspector qualification or Contractor effectiveness could not be demonstrated. In this regard, the expansion of the reinspection effort in those areas where anomalies were identified will be addressed.

c. The final report will discuss in depth the engineering evaluation made of all observed discrepancies identified in the Reinspection Program. This evaluation effort will clearly indicate that the quality of work performed at the Byron site is good.

7. It is expected that other corporate officers and employees of the Company, and I will be the principal witnesses offered by the Company to testify with respect to the Reinspection Program report and, if appropriate, to describe those activities undertaken by the Company's Quality Assurance Department to assure adequate oversight of contractors' QA/QC programs. Certain additional witnesses may be provided to explain detailed aspects of the Program, such as the evaluation of the visual weld discrepancies and, among other subjects, the statistical significance of inferences to be drawn relative to inspector qualification and construction quality.

8. In addition, the Company has engaged Mr. John L. Hansel, the President-Elect of the American Society of Quality Control Engineers, a consultant to the Kemeny Commission and a panel member of the group that is reviewing NRC's approach to nuclear power plant construction and design quality assurance practises. Mr. Hansel, who has over 30 years of QA/QC experience, has been engaged as an independent third-party expert to review the Byron Reinspection Program as well as the Contractor practises for qualification and certification of QA/QC personnel at Byron. Mr. Hansel will

provide a report of his findings, which will be made available within 30 days.

*Louis Owen Del George*  
Louis Owen Del George

Subscribed and Sworn to  
before me this 13<sup>th</sup> day  
of February, 1984.

*Eleanor S. Swanson*  
Notary Public

My Commission Expires January 14, 1987

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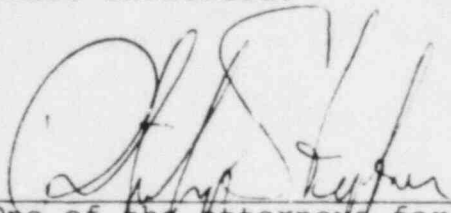
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OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

CERTIFICATE OF SERVICE

The undersigned, one of the attorneys for Commonwealth Edison Company, certifies that he filed the original and two copies of the attached "BRIEF OF APPLICANT COMMONWEALTH EDISON COMPANY" and "APPLICANT'S MOTION IN THE ALTERNATIVE TO REOPEN THE RECORD" with the Secretary of the Nuclear Regulatory Commission and served a copy of the same on each of the persons at the addresses shown on the attached service list, by deposit in the U.S. Mail, first-class postage prepaid, this 13th day of February, 1984. Expedited means of service were used where indicated.

  
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