

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	Docket Nos. 50-445 and
TEXAS UTILITIES ELECTRIC)	50-446
COMPANY, <u>et al.</u>)	
)	(Application for
(Comanche Peak Steam Electric)	Operating Licenses)
Station, Units 1 and 2))	

AFFIDAVIT OF RONALD G. TOLSON
AND C. THOMAS BRANDT REGARDING
CHANGES IN SAFETY CLASSIFICATION

We, Ronald G. Tolson and C. Thomas Brandt, being first duly sworn, hereby depose and state as follows:

(Tolson) My name is Ronald G. Tolson. I am employed by Texas Utilities Generating Company. A statement of my educational and professional qualifications was admitted into the record as Applicants' Exhibit 20.

(Brandt) My name is C. Thomas Brandt. I am employed by Ebasco Services, Inc. at Comanche Peak. A statement of my educational and professional qualifications was received into evidence as Applicants' Exhibit 141A.

This affidavit addresses the question of whether "reverse classification," i.e., classification of safety-related components, systems or structures as non-safety related, and then reversing that classification, has ever occurred at Comanche Peak. This question was posed by the Board in its March 15, 1984, Memorandum (Clarification of Open Issues) at 11.

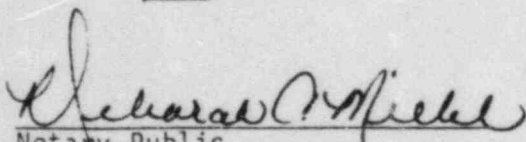
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Based on personal knowledge and an inquiry of Site and Home office Engineering personnel as well as members of the Construction Staff, we have been able to identify two instances where "reverse classification" has occurred. These instances related to platforms and monorails (including associated embeds). While we cannot conclusively say these are the only instances of reverse classification (to make such a conclusive statement would require a complete review of literally thousands of design documents), it is clear that there has not been a "practice" of reverse classification of items at CPSES.

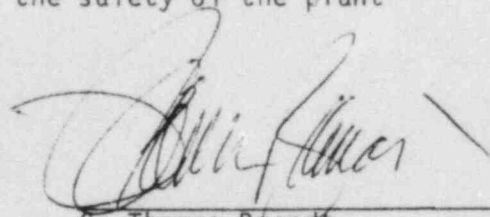
In any event, in every instance where a non-safety grade structure or component is classified or reclassified safety-grade, the QA program requires a complete and thorough inspection and analysis of the upgraded component or structure to assure conformance with the design specification requirements. Accordingly, regardless of the reclassification of a structure or component, the QA program provides assurance that the safety of the plant is not degraded.


Ronald G. Tolson

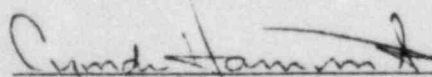
Subscribed and sworn to before
me this 12th day of April, 1984.


Notary Public

My Commission Expires February 14, 1986


C. Thomas Brandt

Subscribed and sworn to before
me this 11th day of April, 1984


Notary Public