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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

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)	)	

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AFFIDAVIT OF JOHN C. FINNERAN, JR. IN SUPPORT OF  
APPLICANTS' REPLY TO CASE'S ANSWER TO APPLICANTS'  
MOTION FOR SUMMARY DISPOSITION REGARDING  
DIFFERENTIAL DISPLACEMENT OF LARGE-FRAMED,  
WALL-TO-WALL AND FLOOR-TO-CEILING PIPE SUPPORTS

I, John C. Finneran, Jr., being first duly sworn hereby  
depose and state, as follows: I am the Project Pipe Support  
Engineer for the Comanche Peak Steam Electric Station. In this  
position I oversee the design work of all pipe support design  
organizations for Comanche Peak. A statement of my educational  
and professional qualifications was received into evidence as  
Applicants' Exhibit 142B.

Q. What is the purpose of this affidavit?

A. This affidavit provides information in support of Appli-  
cants' Reply to CASE's Answer to Applicants' Motion for  
Summary Disposition Regarding Differential Displacement of  
Large-Framed, Wall-to-Wall and Floor-to-Ceiling Pipe  
Supports.

Q. In his Affidavit, Mr. Walsh alleges that in 1982, Applicants informed the Special Investigation Team that there were no large-framed, wall-to-wall or floor-to-ceiling pipe supports designed by ITT or NPSI. Is this correct?

A. No. I was present during discussions with and made statements to the NRC Staff regarding this issue. It's obvious that we could not have made this statement to the SIT team, when I had already testified (Applicants' Exhibit 142 at 25) that there were Service Water support frames in a fuel building tunnel which also span from floor to ceiling. These frames are items 17 through 24 on Attachment 1 to Applicants' Affidavit attached to Applicants' motion for summary disposition regarding this issue. These frames were designed by ITT. When asked this question by the SIT, we actually replied that we were not aware of other of these type supports other than what had been previously discussed or testified to. We made no statement that there were not any more. The only way to know for sure would have been to review all designs.

Q. In his Affidavit, Mr. Walsh alleges that no PSE guidelines existed on design of large-framed wall-to-wall and floor-to-ceiling pipe supports prior to late 1981. Is this correct?

A. No. Attached to this Affidavit is documentation signed by a hanger engineer on 1-6-81, that he had added certain pages of Revision 1 to Section II of the Engineering Guidelines-

Pipe Support Designs.\* Page 2-6 is also attached.

Paragraph 3.13.1 of page 2-6 concerns design of large frames. The above noted documentation demonstrates that Applicants not only had guidelines prior to late 1981, but also that those guidelines contained information related to large framed wall-to-wall or floor-to-ceiling supports.

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\* Prior to the reorganization of CPSES in late 1981 that lead to the formation of PSE, the pipe support design group on site was called PSDG (Pipe Support Design Group). The attachment to this Affidavit is from the design manual for that group.

STATE OF TEXAS  
COUNTY OF SOMERVELL

John C. Finneran Jr.  
John C. Finneran, Jr.

Subscribed and sworn to before me this 28<sup>th</sup> day of September, 1984.

Bier J. Hodges  
Notary Public  
MY COMMISSION EXPIRES MARCH 28, 1988

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In the Matter of )  
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TEXAS UTILITIES ELECTRIC ) Docket Nos. 50-445 and 06  
COMPANY, et al. ) 50-446  
 )  
(Comanche Peak Steam Electric ) (Application for  
Station, Units 1 and 2) ) Operating Licenses)

CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicants' Reply to CASE's Answer to Applicants' Motion for Summary Disposition Regarding Differential Displacement of Large-Framed, Wall-to-Wall and Floor-to-Ceiling Pipe Supports," in the above-captioned matter was served upon the following persons by express delivery (\*), or deposit in the United States mail, first class, postage prepaid, this 1st day of October, 1984, or by hand delivery (\*\*) on the 2nd day of October, 1984.

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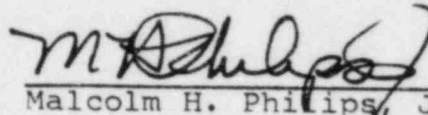


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Malcolm H. Phillips, Jr.

cc: John W. Beck  
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