

June 7, 1985

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

DOCKETED
USNRC

In the Matter of:)
COMMONWEALTH EDISON COMPANY)
(Braidwood Nuclear Power)
Station, Units 1 and 2))

Docket Nos. 50-456 OL
50-457 OL

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AFFIDAVIT OF MICHAEL J. WALLACE

I, Michael J. Wallace, being first duly sworn,
depose and state as follows:

I am employed by Commonwealth Edison Company as the Assistant Manager of Projects and as the Project Manager of Braidwood Nuclear Power Station. As Project Manager of Braidwood, I have primary responsibility for completion of the Braidwood Project, through fuel load of Unit 2, including the management of construction, testing, and operating activities. More specifically, my management responsibilities include, among other things, the scheduling and completion of construction activities, and verification and corrective action programs, giving due consideration to quality, budgetary, schedule and regulatory constraints.

In the course of my duties, I have been advised by

Commonwealth Edison's counsel in the Braidwood licensing proceeding that a quality assurance ("QA") contention may be admitted in that proceeding. Counsel advised that admission of such a contention could necessitate litigation of the following corrective action programs: the heating, ventilation, and air conditioning ("HVAC") configuration program, the HVAC duct fitting verification program, the HVAC housings and air risers program, the concrete expansion anchor ("CEA") inspection program, the safety-related mechanical equipment reinspection program, and the electrical document review. Counsel further advised that such litigation could not be undertaken and the record in the NRC licensing proceeding could not be closed on such a contention until these corrective actions and programs have been implemented to the point where reasonably complete actions have been taken or reasonably final results are available. I have prepared this affidavit to address how the scheduling of these program would be altered by the necessity to support the currently proposed hearing schedule. In addition, I have included a discussion of the fuel load dates for Braidwood, Units 1 and 2.

A. Scheduling of programs in support of hearings.

For work on Braidwood Unit 1, the completion of the programs listed above is scheduled as follows: HVAC

hanger configuration by February 15, 1986; HVAC duct fitting verification program by December 15, 1985; HVAC housings and air risers program by February 15, 1986; CEA inspection program in March 1986; reinspection of safety-related mechanical equipment in March 1986; and electrical document review in December 1985. The current completion schedules for the programs were based upon engineering and management judgments made over the preceding 2 years as to the most efficient way to complete the corrective actions coincident with ongoing work, in terms of quality, schedule, and budgetary considerations.

I have reviewed each program to determine whether the completion dates could be advanced to support the currently proposed hearing schedule. Such rescheduling efforts would be constrained by a number of practical and managerial considerations. For example, the extent to which completion dates can be advanced will depend upon the other responsibilities of the contractor's existing personnel, the availability of additional personnel, and the practical constraints on how quickly such additional personnel can be integrated into the project so that they become productive. My estimates of the extent to which the completion dates for the corrective action programs can be advanced depend upon judgments as to these practical constraints as well as on maintaining appropriate levels of quality in the ongoing

construction activities.

The results of my review indicate that, even if the scheduling of work at Braidwood is revised to make the programs implicated by Intervenor's contention the first priority for completion at Braidwood, all of these programs cannot be completed in time to support the efforts of counsel in meeting the currently proposed hearing schedule. If, at the time the need for these corrective actions became apparent or even as recently as six months ago, I had been advised that the corrective actions would need to be completed well in advance of their currently scheduled completion dates in order to accommodate the scheduling needs of the hearing process, I would have scheduled the conduct of these programs differently.

Based on my review of the three HVAC programs being implemented by Pullman Sheet Metal, I estimate that it would not be possible to finish the hanger configuration program for Unit 1 until approximately December 1, 1985, while advancing the duct fitting verification program to October 1, 1985 and the housing and air riser program to November 1, 1985. I also reviewed the feasibility of advancing the CEA inspection program and the safety-related mechanical equipment reinspection program of the mechanical erection contractor, Phillips-Getschow. Realistically, I estimate that the CEA program could be advanced to completion

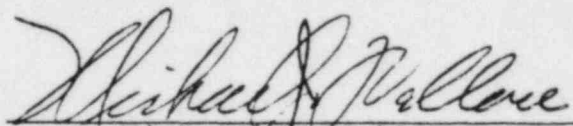
by October 1, 1985, but the safety-related equipment program could not be completed until November 1, 1985. For the electrical contractor, L. K. Comstock, I reviewed the scheduling for the CEA inspection program and the electrical document review. These programs could probably both be completed by October 1, 1985.

If I had known of the need to expedite these corrective action programs soon after the issues arose in the public record or even as recently as six months ago, additional personnel could have gradually been integrated into the project so that the programs could have been completed in time to support the proposed hearing schedule. However, it now appears that it is not feasible to accelerate completion of the programs at this date so that the proposed hearing schedule can be met.

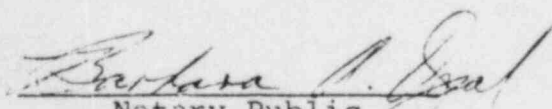
B. Fuel load dates.

In its annual schedule and budget review in December 1984, Commonwealth Edison Company estimated that fuel would be loaded in Braidwood Units 1 and 2 in April 1986 and July 1987, respectively. The Company uses these dates for planning purposes, although there are contingencies which could cause fuel load to occur later than the above dates. If the QA contention is not admitted, I believe it is possible to achieve an April 1986 fuel load date for Unit 1.

There are, however, a number of activities which must be concluded on an accelerated basis in order to achieve that date. Recent experience leads me to believe that this will occur. However, it is also possible that unforeseen events may lengthen the construction process and accordingly the fuel load date could be extended beyond April by several months.


Michael J. Wallace

SUBSCRIBED AND SWORN
to before me this
7th day of June, 1985.


Notary Public

My Commission Expires:

My Commission Expires August 16, 1988

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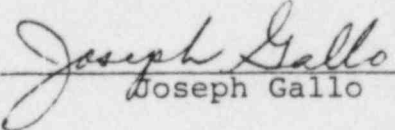
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CERTIFICATE OF SERVICE

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I, Joseph Gallo, one of the attorneys for Commonwealth Edison Company, certify that copies of Applicant's Response in Opposition to Intervenor's Motion to Admit Amended Quality Assurance Contention have been served in the above-captioned matter on those persons listed in the attached Service List by United States mail, postage prepaid, this 7th day of June, 1985, except where service was made this same day by hand delivery and Federal Express as directed.


Joseph Gallo

ISHAM, LINCOLN & BEALE
1120 Connecticut Avenue, N.W.
Washington, D.C. 20036
(202) 833-9730

DATED: June 7, 1985

SERVICE LIST

*Lawrence Brenner, Esq. Chairman Administrative Law Judge Atomic Safety and Licensing Board United States Nuclear Regulatory Commission Washington, DC 20555	Mr. William L. Clements Chief, Docketing and Services United States Nuclear Regulatory Commission Office of the Secretary Washington, DC 20555
*Dr. Richard F. Cole Administrative Law Judge Atomic Safety and Licensing Board United States Nuclear Regulatory Commission Washington, DC 20555	C. Allen Bock, Esq. P.O. Box 342 Urbana, IL 61801
**Dr. A. Dixon Callihan Administrative Law Judge 102 Oak Lane Oak Ridge, TN 37830	Ms. Bridget Little Rorem 117 North Linden Street P.O. Box 208 Essex, IL 60935
*Myron Karman, Esq. Elaine I. Chan, Esq. Office of the Executive Legal Director United States Nuclear Regulatory Commission Washington, DC 20555	* Robert Guild Douglass W. Cassel, Jr. Timothy W. Wright, III BPI 109 North Dearborn Street Suite 1300 Chicago, IL 60602
Atomic Safety and Licensing Board Panel United States Nuclear Regulatory Commission Washington, DC 20555	Ms. Lorraine Creek Route 1 Box 182 Manteno, IL 60950
Atomic Safety and Licensing Appeal Board Panel United States Nuclear Regulatory Commission Washington, DC 20555	Charles Jones, Director Illinois Emergency Services and Disaster Agency 110 East Adams Springfield, IL 62705

* Hand delivery on June 7, 1985

** Federal Express delivery