

AFFIDAVIT

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USNRC

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MY NAME IS

I HAVE WORKED FOR

OFFICE OF SECRETARY
DEFENSE & SERVICE

THE HENRY J. KANER COMPANY SINCE

AFTER INITIAL INDOCTRINATION AND TRAINING, I WAS

CERTIFIED AS QUALITY ENGINEER, LEVEL , IN PIPING

AND MECHANICAL DISCIPLINE IN ACCORDANCE WITH

ANSI N45.2.6. AS A LEVEL WITH EXTENSIVE

BACKGROUND AND CREDENTIALS TO REVIEW DOCUMENTATION

ON WELDER QUALIFICATIONS AND WELDING PROCEDURES,

I HAVE WORKED ON THESE ISSUES FREQUENTLY AT ZIMMER.
I AM ALSO AN AMERICAN WELDING SOCIETY ("AWS") CERTIFIED WELDING INSPECTOR
AND AM CERTIFIED LEVEL II IN ALL NONDESTRUCTIVE EXAMINATION ("NDE")
DISCIPLINES AT ZIMMER.

REPEATEDLY I HAVE WARNED KANER AND CG&E

MANAGEMENT OF SEVERE PROBLEMS IN THE WELDING PROGRAM.

ALTHOUGH MANY MANAGEMENT OFFICIALS AGREED WITH MY

CRITICISMS,

THE PROBLEM HAS BEEN LARGELY

COVERED-UP. OTHER MANAGEMENT OFFICIALS TOLD ME TO STOP BRINGING PROBLEMS TO THEM AND TO STOP WRITING MEMOS ABOUT DEFICIENCIES. I HAVE ALSO ENDURED REPEATED THREATS AND RETALIATION SUCH AS LOSS OF DUTIES, TRANSFERS AND DENIED PROMOTIONS.

THE LATEST EXAMPLE OF MANAGEMENT REJECTING MY WARNINGS OCCURRED ON JULY 8, 1982, WHEN I WAS CALLED TO ATTEND A MAJOR KASER AND CG&E MANAGEMENT POLICY MEETING. THE MEETING WAS TO FINISH SETTING THE CG&E/KASER POSITION FOR A MEETING THE NEXT DAY WITH THE NRC ABOUT WELDER QUALIFICATION PROBLEMS. CG&E REPRESENTATIVES INCLUDED VICE PRESIDENT RALPH SYLVIA; QUALITY ASSURANCE ("QA")

MANAGER HARLAN SAGER; PROJECT MANAGER BARNEY CULVER; JIM SCHAFFER AND OTHERS.

KASER MANAGEMENT AT THE MEETING INCLUDED SITE CONSTRUCTION MANAGER MARK ALBERTIN; SITE QA MANAGER WALTER HEDZICK; WELD ENGINEERING MANAGER MANFRED GOEDECKE; DOCUMENTATION MANAGER GREG FONES, WELD ENGINEER MIKE BUTTERWORTH, WELD ENGINEER WORLEY PUCKETT; — QUALITY ENGINEERING MANAGER NORM VITALE, WHO ARRIVED LATE; AND OTHERS.

AT THIS MEETING -- WHICH HAD BEGUN THE DAY BEFORE LARGELY WITHOUT ME -- WE WERE TOLD THAT OF OVER 470 WELDERS, SEVEN WERE QUALIFIED WITHOUT ANY PROBLEMS. ^{SECOND} THERE WERE OTHERS THAT

KAISER AND CG+E THOUGHT WERE QUALIFIED, BUT SAID THAT CLERICAL ERRORS EXISTED ON THE CURRENT PAPERS. THERE WERE OUTSTANDING NONCONFORMANCE REPORTS ("NR'S") AND CORRECTIVE ACTION REPORTS^("CAR") ON A THIRD GROUP OF WELDERS. THIS WAS THE LARGEST CATEGORY, WITH OVER 300 CASES UNRESOLVED. THE FOURTH CATEGORY INVOLVED THOSE WHOSE QUALIFICATIONS WERE INDETERMINATE, BECAUSE THEIR DOCUMENTATION WAS INCONSISTENT. I AM NOT POSITIVE ABOUT THE EXACT FIGURES BUT THESE ARE APPROXIMATELY CORRECT.

ANOTHER MAJOR ISSUE AT THE MEETING WAS HOW TO DISPOSITION REASONABLE NR'S AND/OR CAR'S INVOLVING INCONSISTENT^{RECORDS} OR INSUFFICIENT BACKUP DOCUMENTATION. IT CAME UP THAT THERE ARE NO SUPPORTING DOCUMENTS --

LIKE RADIOGRAPHS, RADIOGRAPHIC REPORTS, AND/OR
IN-PROCESS SURVEILLANCE REPORTS -- FOR THE QIG
WELDER QUALIFICATION FORMS. THIS WAS A PARTICULAR
PROBLEM WHEN ----- A PERSON NOT QUALIFIED OR
CERTIFIED (AS REQUIRED BY KASER'S OWN QA PROGRAM)
SIGNED THE FORMS, AS FREQUENTLY HAPPENED. MARK
ALBERTIN, I BELIEVE IT WAS, RESPONDED THAT THIS WAS
OK BECAUSE THE CODE DOESN'T REQUIRE US TO
KEEP THE SUPPORTING DOCUMENTS.

CG & E STARTED TO PROTEST. KASER MANAGEMENT
RESPONDED BY ASKING WHAT THEY WANTED TO DO?

KASER OFFICIALS ADMITTED THAT WE DON'T HAVE THE
DOCUMENTATION AND SUPPORTING EVIDENCE,
PROPER ----- WHICH VIOLATES KASER'S OWN QUALITY

PROGRAM. DID THEY WANT TO COOK THE GATES AND SHUT THE PLANT DOWN, OR ACCEPT IT LIKE IT IS?

SEVERAL KANSAS OFFICIALS MADE THIS CHALLENGE TO CG&E.

AT THIS POINT RALPH SYLVIA ASKED WHY WE NEEDED THE DOCUMENTS TO PROVE QUALIFICATIONS. HE SAID WE COULD ALWAYS GET AN ASME EXEMPTION. HE THOUGHT THE WELDS WERE OK, SO HE DIDN'T SEE WHAT THE FURS WAS ABOUT.

THERE WAS A LONG DISCUSSION. CG&E AND KANSAS RELUCTANTLY DECIDED TO ACCEPT THE PAPERWORK, SINCE THERE WAS NO ALTERNATIVE. EVERYONE KNEW WHAT THEY WERE DOING, BECAUSE THE MEETING COORDINATOR SPELLED IT OUT TO THEM: THEY WERE ACCEPTING

DOCUMENTATION THAT WAS FULL OF WHITE-OUTS,
UNQUALIFIED SIGNATURES AND UNEXPLAINED CHANGES,
THAT DID NOT MEET THE CODES OR OUR OWN STANDARDS.

WALTER MEDZICK ANNOUNCED THAT WE ALL

AGREED. ALBERTIN ADDED WE HAD DONE
EVERYTHING POSSIBLE. I COULDN'T KEEP SILENT ANYMORE.
I ROSE AND SAID I HAD TO CORRECT THESE STATEMENTS.
I EXPLAINED THAT THE REAL FACTS WERE THAT KAISER
Q A MANAGEMENT HAD DESTROYED THE ^{SUPPORTING} DOCUMENTS, AND
THAT'S WHY WE DON'T HAVE THEM NOW. I ADDED
THAT THERE HAD BEEN CRIMINAL NEGLIGENCE. ALBERTIN
SAID I WAS NOT QUALIFIED TO MAKE THAT
STATEMENT. HE ALSO ASKED ME HOW I KNEW,

I RESPONDED THAT I WAS AN EYEWITNESS. I HAD ALSO WORKED WITH THE KAISER LEVEL III NOT MAN WHEN NEEDED. I SAID I EVEN WORKED ON VARIOUS OCCASIONS AS THE ACTING LEVEL III WELD/NOT QA ENGINEER. I SAID I WAS MORE QUALIFIED TO MAKE THAT STATEMENT THAN MANY OTHER PEOPLE AT THE MEETING.

HARLAN SAGER ASKED WHAT DID I DO ABOUT IT? I TOLD HIM THAT I HAD REPORTED IT TO MY MANAGEMENT -- MAYBE A DOZEN TIMES IN THE LAST YEAR. WHEN SAGER ASKED, I TOLD HIM THAT I HAD REPORTED IT TO NORM VITALE, PAUL KYLER AND WOODY WARNER, AMONG OTHERS. SAGER ASKED WHAT HAPPENED. I

RESPONDED THAT I ROUTINELY WAS THREATENED WITH FIRING. I EXPLAINED THAT THE PREVIOUS SEPTEMBER I HAD TAKEN RADIOGRAPHIC READER SHEETS AND KE-1 CARDS OUT OF THE TRASH CAN AND SHOWED THEM TO NORME VITALE. I SAID THAT VITALE TOLD ME HE DIDN'T WANT TO HEAR IT AND WOULD FIRE ME IN FIVE MINUTES IF I KEPT TALKING ABOUT IT. AROUND THIS TIME, ALBERTIN SAID THAT IF WE HAD BEEN DOING IT ALL ALONG, THERE COULDN'T BE ANYTHING WRONG. I SAID MANAGEMENT KNOWS BETTER.

SAGER SAID HE HAD HEARD BEFORE THAT I KNEW ABOUT IRREGULARITIES AND EVEN SENT A CONTACT TO ME TO LEARN WHAT HAPPENED, IN FACT I HAD

TALKED WITH THE CONTACT AND CG&E DID NOT
FOLLOW UP, BUT I DIDN'T ARGUE WITH SAGER.
SAGER SAID I SHOULD HAVE COME DIRECTLY TO HIS
OFFICE. I RESPONDED THAT I WAS SCARED OF
REPRISAL BEFORE, BUT I WASN'T ANYMORE.

THE OFFICIALS AT THE MEETING ASKED
ME WHAT ELSE WAS WRONG. I TOLD THEM ABOUT
RADIOGRAPHIC FILMS THAT DIDN'T HAVE MATCHING TEST
PIECES, OR COUPONS. I TOLD THEM I HAD ^{EVEN} GONE TO THE
DUMP TO LOOK -- FOR TWO HOURS -- AND COULDN'T FIND
ONE SINGLE TEST COUPON ^{THAT CORRESPONDED TO} THE FILMS IN
QUESTION. I OFFERED TO BRING A WITNESS
IMMEDIATELY, BEFORE SOMEONE CHANGED HIS MIND.

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I SAID I HAD TO TELL THE TRUTH, EVEN IF IT MEANT I HAD TO LOSE MY JOB. I STOOD UP TO GO OUT, BUT HEDZICK STOPPED ME. HE SAID, "THAT'S OKAY." HEDZICK ASKED ME WHO THE WITNESS WAS, AND I TOLD THE GROUP. I ASKED IF THERE WERE ANY MORE QUESTIONS, BUT NO ONE SPOKE FOR SEVERAL MINUTES. SEVERAL OF THE MANAGERS LOOKED VERY SICK AND PALE. SYLVIA, WHO WAS SITTING NEXT TO ME, LEANED OVER AND COPIED MY NAME AND BADGE NUMBER.

GOEDECKE FINALLY SAID WE SHOULD JUST TELL THE NRC WE DIDN'T NEED ANY MORE RECORDS THAN WE HAD. I ^{LATER} EXPLAINED THAT WITH ALL THE

WHITE-OUTS, INCONSISTENCIES, UNEXPLAINED CHANGES AND APPROVAL BY UNAUTHORIZED PERSONNEL, WE HAD TO HAVE SOME SUPPORTING DOCUMENTS. THEY TALKED FOR A LONG TIME ABOUT HOW TO EXPLAIN WHAT HAPPENED, BUT NO ONE COULD FIGURE OUT A GOOD ANSWER. THEY FINALLY DECIDED TO JUST TELL THE NRC WE HAD ACCEPTED THE WELDER QUALIFICATIONS OVERALL AS IT STANDS, AND HOPE THE NRC WOULD ALSO ACCEPT IT.

THERE WERE MANY OTHER STATEMENTS MADE BY PEOPLE AT THE MEETING. THERE WERE MANY ARGUMENTS. BASED ON THEIR EXPRESSIONS, I BELIEVE SOME PEOPLE SUPPORTED ME. I ALSO MAY NOT

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REMEMBER THE IDENTITY OF EACH SPEAKER, BUT
THIS IS WHAT HAPPENED TO THE BEST OF MY MEMORY.

IT HAS NOT BEEN AN EASY DECISION TO
MAKE THIS AFFIDAVIT. I HAVE GONE THROUGH SEVERE
STRAIN AS I MADE UP MY MIND. I AM A 100%
SUPPORTER OF NUCLEAR POWER. ^{BUT I} BELIEVE THAT
RESPONSIBLE ENGINEERING AND
QUALITY ASSURANCE MANAGEMENT ^{MUST} RESPOND TO
PROBLEMS. I ~~can~~ BELIEVE THAT ZIMMER CANNOT
BE SAVED WITHOUT A TOP TO BOTTOM MANAGEMENT
SHAKEUP. I AM MAKING THIS STATEMENT TO
SAVE ZIMMER, NOT TO DESTROY IT.

I HAVE SUBMITTED THIS AFFIDAVIT TO

FREELY AND VOLUNTARILY
WITHOUT ANY PROMISES, INCITEMENTS OR COERCION.
I HAVE INSTRUCTED TO SEND MY
AFFIDAVIT TO THE NRC, WITH MY IDENTITY DELETED
UNTIL CONFIDENTIALITY IS ARRANGED.

I HAVE READ THE ABOVE 14 PAGE AFFIDAVIT
AND IT IS TRUE, ACCURATE AND COMPLETE TO THE
BEST OF MY KNOWLEDGE AND BELIEF.

WILKIE S. BUCHANAN
Notary Public, State of Ohio
My Commission Expires Mar. 14, 1983

Wilkie S. Buchanan

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Intervenor MVPP's Submission of Affidavits in Support of Eight New Contentions and Intervenor MVPP's Motion to Strike Applicants' Answer to Intervenor's Motion for Protective Order have been served upon the following by mailing copies first class, postage prepaid, this 26th day of July, 1982:

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