

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Appeal Board

In the Matter of)	
)	
LOUISIANA POWER & LIGHT COMPANY)	Docket No. 50-382 OL
)	
(Waterford Steam Electric Station,)	
Unit 3))	

AFFIDAVIT OF THOMAS F. GERRETS

THOMAS F. GERRETS, being duly sworn according to law, deposes and says:

1. My name is Thomas F. Gerrets. I am employed by Louisiana Power & Light Company as the Corporate Quality Assurance Manager, with principal duties related to the design and construction of the Waterford Steam Electric Station, Unit 3.

2. The December 10, 1983 issue of Gambit alleges on page 22 that at Waterford 3 there are "...missing [QA] documents that have been replaced by phony documents manufactured after the fact; faulty documents that have been altered or 'doctored'; and some instances involving possible forged signatures on safety inspections okaying the workmanship on critical safety-related structured." I and others in my quality assurance organization have investigated these allegations, and we have found no

instance of any records containing false or manufactured test or inspection data and no instance of malfeasance in the generation of testing or inspection reports.

3. I can only speculate on the source of these unexplained charges. The articles describe a meeting with George Hill, a QA records reviewer, myself, and other QA personnel which took place on July 7, 1983. Reference was made by Mr. Hill to a previously existing Nonconformance Report ("NCR"), NCR W3-6245, dated May 20, 1983, which identified 13 daily cadweld inspection reports (out of thousands of such reports) containing questionable initials of quality control inspectors whose job it was to inspect each cadweld of the reinforcing steel for the foundation mat. Each instance was investigated and supplementary and backup documentation, as well as personal on-site inspection of the reports by three of the inspectors involved, verified that the involved welds had, in fact, been properly performed and inspected. On this basis, the welds were determined to be acceptable, and the NCR was duly resolved in accordance with the QA program procedures.

4. I know of one other instance where questions arose concerning the authenticity of record signatures or initials. This is identified on NCR W3-7481, and involves cadweld tensile test laboratory reports where both an original and a reconstructed duplicate exists. The laboratory which performed the tests was contacted as well as other Ebasco personnel who

were involved with these specific records. The individual who was the manager of the testing lab during the time when the documents were generated has inspected the documents on site and has certified the original documents. Both the testing laboratory personnel and Ebasco personnel familiar with the procedure which were in effect at the time the documents were generated confirm that, in some cases during construction, it was thought that the original test document was lost and therefore a duplicate was constructed from original test data which existed in the testing laboratory log books. In all cases, the tensile test data on the duplicate document has been verified to be identical to that which exists on one or more of the following documents: the original document, a photocopy of the original document, and the original or a photocopy of "Record of Rebar User's Testing" (Form #QC-28). On this basis, the test data were determined to be proper and acceptable, and the NCR was duly resolved in accordance with QA program procedures.

Thomas F. Gerrets
Thomas F. Gerrets

Subscribed and sworn to before me
this 10th day of January, 1984.

Linda P. St. Amant
Notary Public

My Commission expires June, 1984