

AFFIDAVIT OF WILLIAM J. JUMP

I, WILLIAM J. JUMP, being duly sworn, say as follows:

1. I am currently employed by Houston Lighting and Power Company (HL&P) as the Manager-Nuclear Licensing at the South Texas Project Electric Generating Station (STPEGS).
2. On February 11, 1992, Mr. Donald P. Hall, Vice President-Nuclear of Houston Lighting & Power Company, assigned to me the task of reviewing concerns alleged in a petition filed by Mr. Thomas J. Saporito with the NRC pursuant to 10 C.F.R. 2.206. Among other things, this petition requested that the NRC take action to immediately stop all maintenance activities at STPEGS and to suspend all escorted access of visitors to STPEGS. However, the petition provided little in the way of any specific basis for the requested actions.
3. Because the petition was formatted as a legal document, and because we were unfamiliar with such petitions, Mr. Hall instructed me to contact legal counsel concerning its significance.
4. Upon contacting legal counsel, and describing the petition to counsel, I was informed that Mr. Saporito had filed such petitions in the past, and had been in litigation before the Department of Labor against previous employers.
5. On February 12, 1992, I assigned an individual from my department to investigate and evaluate the concerns alleged in the 2.206 petition. I instructed this individual to coordinate these investigations with knowledgeable persons from the various departments responsible for the activities subject to concerns alleged in the petition, but to keep the identity of the petitioner confidential. During the next several days, investigations of various files and records were conducted in an attempt to determine whether the very general allegations made by Mr. Saporito could be substantiated. The individuals performing these investigations were specifically instructed to conduct their investigations on a confidential basis and not to discuss them with other persons.
6. After the efforts to investigate Mr. Saporito's safety concerns failed to provide significant specific information to support those concerns, I determined that it would be necessary to interview Mr. Saporito in order to see if he could provide any specifics. For this purpose, on the morning of February 20, 1992, I met with Mr. Don

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Bohner of the STPEGS SPEAKOUT Program and one of the supervisors who reports to Mr. Bohner, Mr. Rick Cink, to arrange for Mr. Saporito to be interviewed regarding his safety concerns. It was decided that Mr. Cink would attempt to interview Mr. Saporito that day. I did not discuss any issues related to Mr. Saporito's access authorization with Mr. Bohner or Mr. Cink.

7. As part of the investigation of Mr. Saporito's safety concerns, I had reviewed his access authorization file in order to determine what areas of the plant he could access. Also, I had been made aware that Mr. Saporito had only received unescorted access to the STPEGS site on the very same day that HL&P received his 10 C.F.R. 2.206 petition. Accordingly, I was curious as to how he had been able to identify such allegedly serious safety concerns during such a short period of time at the site. On February 20, 1992, counsel provided me with a Department of Labor (DOL) decision involving Mr. Saporito, ATI Career Training, and Florida Power and Light Company (FPL). Upon reviewing that decision, I determined that there appeared to be a number of omissions or misstatements in the access authorization paperwork submitted by Mr. Saporito in order to gain access to the STPEGS site. These included failure by Mr. Saporito to mention that he had been employed or terminated for cause by ATI, and failure to mention litigation he pursued against ATI and FPL before the DOL. While aware that the previous filing of cases under Section 210 of the Energy Reorganization Act was not cause for revocation of access authorization or termination of employment, I nevertheless noted the apparent discrepancies between the statements in Mr. Saporito's access authorization request and the information reflected in the ATI DOL decision. I also was aware that falsification or omission of material information on access authorization paperwork is a violation of the STPEGS access authorization program which is mandated by NRC regulations.
8. Based on my concerns with Mr. Saporito's access authorization paperwork, on the morning of February 20, 1992, I provided the ATI DOL decision to Mr. Watt Hinson of the STPEGS Security Investigations Department. Among Mr. Hinson's normal functions is the review of access authorization paperwork and investigation of any discrepancies in the paperwork. At the time that I provided Mr. Hinson with the ATI DOL decision, I did not inform him that Mr. Saporito had filed a 2.206 petition, and I do not believe that Mr. Hinson was aware that Mr. Saporito had made safety allegations. I informed Mr. Hinson of my concerns regarding the access authorization paperwork signed by Mr. Saporito, and requested that he

review the ATI case against Mr. Saporito's file in accordance with the normal procedures applicable to cases in which new information about an individual arises. Mr. Hinson agreed to do so.

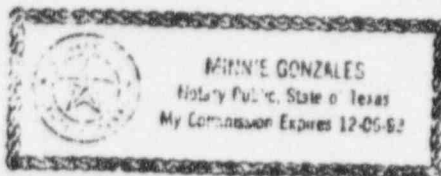
9. Later that afternoon, Mr. Hinson and Mr. Richard Balcom, the STPEGS Manager of Security, and I discussed the results of Mr. Hinson's review of Mr. Saporito's access authorization forms. Mr. Hinson informed Mr. Balcom and I that he had noticed several discrepancies in Mr. Saporito's access authorization forms related to previous employment, previous terminations for cause, and participation in litigation. Because I had requested him to perform the review and report back to me, Mr. Hinson brought this information to my attention. I told Mr. Hinson and Mr. Balcom that they needed to deal with that information in the manner normally required by applicable procedures. After consulting with Mr. Hinson as to the past practice in such cases, Mr. Balcom determined that the appropriate course would be to interview Mr. Saporito to see if there was some reasonable explanation for the discrepancies. During this conversation, Mr. Hinson, Mr. Balcom and I did not discuss the fact that Mr. Saporito had filed a 2.206 petition or had otherwise alleged safety concerns.
10. At approximately 6:00 p.m. on February 20, 1992, Mr. Hinson, Mr. Balcom, Mr. Cink and myself met. Mr. Hinson informed me that he had just concluded an interview with Mr. Saporito, which Mr. Cink had witnessed. During this interview Mr. Saporito confirmed the discrepancies that Mr. Hinson had previously identified, and identified several others. Mr. Hinson reported the results of the interview to Mr. Balcom. Mr. Balcom determined that the omissions were wide-spread and material, and warranted denial of Mr. Saporito's access pursuant to STPEGS access authorization procedures. This was Mr. Balcom's decision, made in consultation with Mr. Hinson, and neither Mr. Cink nor I advised him as to whether Mr. Saporito's unescorted access should be revoked or continued. During this meeting, we did not discuss the fact that Mr. Saporito had filed a 2.206 petition or had otherwise raised any safety concerns.

11. Until the week of February 24, 1992, I was unaware that Mr. Saporito had met with the NRC or raised any safety concerns relating to STPEGS other than those listed in his 10 CFR 2.206 petition.

William J. Jump
William J. Jump
Manager-Nuclear Licensing

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Subscribed and sworn to before me, a Notary Public in and for the State of Texas, this 2nd day of April, 1992.



Minnie Gonzales
Notary Public in and for
the State of Texas