

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

In the Matter of)

PACIFIC GAS AND ELECTRIC)
COMPANY)

(Diablo Canyon Nuclear Power)
Plant, Units 1 and 2))

Docket Nos. 50-275
50-323

Construction Quality Assurance

AFFIDAVIT OF C. M. NEARY, F. J. LYAUTEY, J. P. WATSON

STATE OF CALIFORNIA)

COUNTY OF SAN LUIS OBISPO)

ss.

The above, being duly sworn, depose and say:

I, C. M. Neary, am Quality Engineering Group Welding Engineer for the
Pullman Power Products Corporation.

I, F. J. Lyautey, am Assistant QA/QC Manager at Diablo Canyon for the
Pullman Power Products Corporation.

I, J. P. Watson, am QC Welding Supervisor at Diablo Canyon for the
Pullman Power Products Corporation.

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Jl #1, Motion at 9.

It is alleged that:

Pullman welders recently have been qualified without any QA coverage. On December 8, 1983, a production foreman admitted that welders were being tested and approved without any quality control (QC) oversight due to "an understanding" with the welding qualifications supervisor. (citing Lockert Aff. at A13-14, A-16.)

1. This allegation is based upon Mr. Lockert's erroneous interpretation of ASME Code and AWS D1.1 code requirements for QC overview during welder qualification testing. ASME Code, Section III, Paragraph NA 3764.1d, referred to by Mr. Lockert, does not pertain to the work of Pullman at Diablo Canyon; this section of the code applies only to "Material Manufacturers". ASME, Section III, NA 4000 governs the work of certain on-site contractors. This code does not require the participation of a QC inspector during the welder performance qualification.
2. While not required by code, QC inspection was nevertheless provided for the welder qualification tests questioned by Mr. Lockert. As acknowledged by Mr. Lockert (p. A14), Mr. Pat Watson, QC Welding Supervisor, was performing the duties of a field QC inspector overseeing the welder test shop during the three day period following the resignation of the test shop QC inspector. Also, Mr. Lockert admits he was shown records of welder qualification for the days in question (December 7, 8 and 9, 1983) which documented the inspections performed by Mr. Watson on welder performance tests.
3. During the three days in question, 13 welder's performance tests were given. Five tests involved new welders of which four welders were passed and one was failed by Mr. Watson. Six tests involved upgrading

welders' qualification, of which five welders were passed and one was failed by Mr. Watson. Two tests involved requalification of welders; of which one was passed and one welder was failed by Mr. Watson.

4. Records of each of the 13 welder performance tests show QC inspection occurred for fitup, root pass, filler pass, final visual and bend test. Mr. Watson completed certain of these QC inspections that had been initiated by the previous QC test shop inspector for 5 of the 13 tests and completed all QC inspections for the remaining 8 tests.
5. The "understanding" that Mr. Watson had with the production foreman (Mr. Art Savacoul) was that the performance tests would be stopped at the QC inspection points described in 4 above, until Mr. Watson was available to inspect the test welds. While this "understanding" obviously slowed the completion of welder performance test qualifications, it was necessary until a QC inspector could be made available on a full time basis. A full time QC inspector was available on the following Monday, December 12, for the test shop.
6. All ASME Code requirements and Pullman QC procedural requirements involving welder performance test qualifications were fully met and exceeded during this three day time period following the resignation of the test shop QC inspector.

JI #2, Motion at 9.

It is alleged that:

Management did not demonstrate any commitment to welder qualifications when notified of the violation. On December 9, 1983, a QC inspector informally documented the violation. The area weld qualifications supervisor's initial response was to refuse the memorandum, which was never answered. (citing Lockert Aff. at 4, A14, A16.)

7. This allegation is false. No response to Mr. Lockert's note to Mr. Watson was required for the reasons stated in paragraphs 1 and 2 of the response to JI #1 above. However, Messrs. Neary, Lyautey and Watson met with Mr. Lockert on December 9, 1983, to explain why a response to his note was not required.
8. The information in Mr. Lockert's affidavit (at A14, A16) does not correctly indicate the action management took in regard to Mr. Lockert's memo dated December 9, 1983. When Mr. Lockert first presented his informal memo to Mr. Pat Watson, Mr. Watson rejected it because it was without any merit and outside Mr. Lockert's area of responsibility. Mr. Watson indicated he should give the memo to Mr. Karner. Later in the day Mr. Watson met Mr. Lockert and offered to deliver the memo to Mr. Karner for him. When Mr. Karner was made aware of the memo, he asked Mr. Frank Lyautey, the Pullman Assistant QA/QC Manager, to investigate the situation.
9. In response to this direction, as stated at page A14 of his affidavit, Mr. Lockert's concerns were brought to the attention of the Pullman Corporate Welding Engineer, Mr. Chris Neary. The affidavit of Mr. Lockert also states, at A14 and A15, that Messrs. Lyautey, Neary, and Watson discussed the situation with Mr. Lockert and indicated there was no problem in regards to the testing of the welders since the necessary inspections had been performed by Mr. Watson. At this time, Mr. Lockert did not express any additional concerns about testing and all parties felt that his concerns had been adequately addressed.
10. Therefore, it was believed that it was not necessary to answer Mr. Lockert in writing. Also, written responses to informal memos, such as

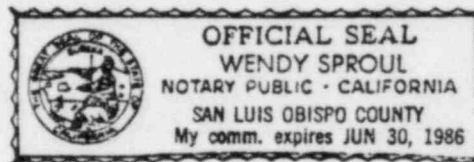
the one submitted by Mr. Lockert, are not required by applicable procedures. The conclusion that "management did not demonstrate any commitment to welder qualifications" is not warranted by the facts.

Dated: March 18, 1984

C. M. Neary
C. M. Neary

Subscribed and sworn to
before me this 18th day
of March, 1984.

Wendy Sproul
Wendy Sproul
Notary Public in and for the
County of San Luis Obispo
State of California
My commission expires
June 30, 1986



Dated: March 19, 1984

F. J. Lautey
F. J. Lautey

J. P. Watson
J. P. Watson

Subscribed and sworn to
before me this 19th day
of March, 1984.

Ida Dutra
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January 2, 1987



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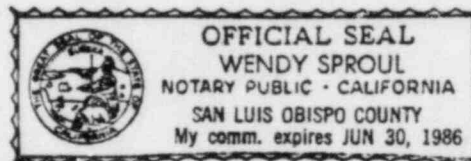
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