

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 D.R. GESKE

STATE OF CALIFORNIA )

COUNTY OF SAN LUIS OBISPO )

ss.

I, D.R. Geske, being duly sworn, depose and say:

I am Lead Maintenance QC Inspector for Nuclear Plant Operations for the Pacific Gas and Electric Company. In 1978, I was the Assistant QA/QC Manager for Pullman Power Products and authorized an August 15, 1978, memorandum on the subject of Authorized Weld Procedures.

JI #7, 34, and 35, Motion at 10-11, and 16.

It is alleged that:

From 1974-79, welder qualifications are indeterminate, because the welders received approval to perform one type of weld procedure assignment after being tested to a different weld procedure. The switch involved weld who worked on structural steel assignments covered by the American Welding Society (AWS) code. Unfortunately, they had been qualified for work on piping covered by Code

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92/93, a different welding procedure based on the distinct American Society of Mechanical Engineers (ASME) code. The switch was accepted through an August 15, 1978 memorandum, rather than through an accountable procedure with review, authorized approval and a Contract Specification Change Notice. (citing Hudson Aff. at 10 and related exhibits.) These safeguards are necessary to assure that the two procedures involve equivalent welding skills and can therefore be switched for welder qualification tests.

Pullman also improperly substituted welding procedure Code 92/93 for pipe rupture restraints when the process sheets specified that the work would be done to Code 7/8. The switch was accomplished informally on August 15, 1978, without required review and approval and without changing the process sheets -- which left a record of work to a different procedure than had actually been used. (citing Hudson Aff. at 10.) The only records accurately reflecting the weld procedure used were the weld rod requisition forms.

The informal approval of the welding procedure switch was based on the false premises that both procedures were qualified to unlimited thickness and were technically equivalent. In fact, neither premise is accurate. They only bear a passing resemblance. (citing Hudson Aff. at 10.) As a result, the welding was uncontrolled and its quality is legally indeterminate.

1. The allegation that welder qualification was indeterminate is incorrect. The example given, that welders qualified under ASME WPS 92/93 performed rupture restraint AWS work under WPS 7/8, does not state all the facts. Mr. Hudson incorrectly implies that the work was performed to a different WPS than was specified on the process sheet. The following fully explains the Pullman program with regard to rupture restraints.
2. The Pullman welders were qualified using a ASME IX groove weld test, which qualified the welders to perform welding using either WPS 7/8 or 92/93. As discussed in response to JI #8, this test would qualify a welder for AWS D1.1 welding.

3. Pullman further restricted the welders' qualifications beyond the code requirements on the basis of their skills. One restriction was to not allow certain welders to make pressure piping welds. These welders were restricted to using WPSs such as 92/93, even though they were qualified by code to use WPS 7/8, or another WPS, for both groove and fillet welds.
4. During the mid-1970s, a number of welders with these non-code and management imposed restrictions upon their qualifications were used to complete rupture restraint welds and other non-pressure boundary welds.
5. Because these welders were restricted from receiving weld rod for use with WPS 7/8, weld rod was issued to these welders on requisitions indicating WPS 92/93, even though the process sheets specified WPS 7/8. Although the welder was, in fact, fully qualified by code to make these welds, the restriction imposed by Pullman on his qualifications resulted in documentation inconsistencies. Reference to 92/93 was a method to issue weld rods to these welders restricted from pressure boundary work. In all cases, the welders were appropriately qualified and the welding was performed in accordance with WPS 7/8, as required by the process sheets.
6. The memorandum of August 15, 1978, was developed to explain the use of WPS 92/93 on the electrode withdrawal forms compared with WPS 7/8 in process sheets where the specific welder qualification problem was encountered. This letter was not an authorization to deviate from process sheet requirements, but rather was an explanation for the differences which were encountered in a review of the documentation.
7. Additional information supporting the qualification of welders during this time period is found in NRC Inspection Report 50-275/83-37 dated

February 29, 1984. After extensive investigations by the NRC stemming from the allegations regarding the 1977 NSC QA audit of Pullman, no noncompliances were identified relating to welder qualifications.

8. The welder qualifications were not indeterminate; there was no switch in welder assignments. All welders were properly qualified with groove weld tests.
9. The memorandum of August 15, 1975, did not authorize a switch because there was no switch. It attempted to record obvious documentation inconsistencies and to put these into proper technical perspective. No approval, review, or specification change was required. Mr. Hudson apparently is concerned because he did not fully understand the program in effect at that time.
10. Pullman did not substitute WPS 92/93 for WPS 7/8 indicated on the process sheet. Reference to 92/93 was a convenience to allow these welders to draw electrodes.
11. The record of work performed was correct. Welding was done to the requirements of WPS 7/8 as shown on the process sheet. The electrode withdrawal records did not show the WPS the work was performed to, but are an accurate record of the material requisitioned.
12. There is absolutely no safety significance to these documentation inconsistencies because the welders were adequately qualified in accordance with code requirements to make welds on the rupture restraints and the correct welding electrodes were used.

Dated: March 18, 1984

D. R. Geske  
D.R Geske

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

