

EXHIBIT NO. 1

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 MILTON L. ANDREWS

STATE OF CALIFORNIA )

COUNTY OF )  
SAN LUIS OBISPO )

ss.

I, Milton L. Andrews, being duly sworn, depose and say:

I, Milton Andrews, am currently employed by Pullman Power Products as a superintendent at Diablo Canyon. I am submitting this affidavit to respond to Mr. Hudson's January 31, 1984 affidavit as contained in Joint Intervenors Motion on construction quality assurance dated February 22, 1984.

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PDR  
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1. In regard to the reduction of force (ROF) termination of Mr. H. Hudson #3383, and Mr. J. McDermott #3326, on 1/13/84, they were picked on a ROF lay-off which was caused by the reduction of force on the over-all jobsite. They were selected by using the process of who I felt were the best qualified people to keep. I was acting as General Foreman.
2. In the Area 10 Fab Shop there were approximately 20 men, I was told to cut the crew by 2 men.
3. I first picked the people I felt would be more apt to do a better job in the long run, for the benefit of the shop as a whole which, I might add, was being done over the whole jobsite, primarily the same way. I consulted with the foreman and he agreed. So, the consequence was the ROF of the two men mentioned above.
4. I was not instructed by my supervisors or anyone to layoff Mr. Hudson and Mr. McDermott. I was not aware that Mr. Hudson had contacted or made allegations to the NRC when I chose Mr. Hudson and Mr. McDermott for layoff on January 13, 1984.
5. I might add that since the ROF termination of these two men, approximately 300 more men have been ROF (terminated) with no prejudice.
6. The ROF was not based on where they were from, out-of-state or local union affiliation.

DATED: March 16, 1984

*Milton L. Andrews*

Milton L. Andrews

Subscribed and sworn to  
before me this 16th day  
of March, 1984

*Ida Dutra*

Ida Dutra  
Notary Public in and for the  
County of San Luis Obispo,  
State of California.  
My commission expires  
January 2, 1987

