

EXHIBIT NO. 3

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 RUSSELL NOLLE

STATE OF CALIFORNIA)

COUNTY OF)
SAN LUIS OBISPO)

ss.

I, Russell Nolle, being duly sworn, depose and say:

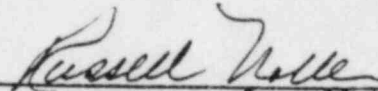
I am currently employed by Pullman Power Products as a QC Supervisor at the Diablo Canyon Power Plant. I am submitting this affidavit to address Mr. Steve Lockert's misquoting of remarks that I made to him during the course of a discussion referred to in Joint Intervenors Motion, Allegation #131.

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PDR ADDCK 05000275
G PDR



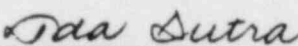
1. On October 17, 1983, I approached Mr. Lockert in Mr. Karner's office. Mr. Lockert was apparently doing research on some of the codes and standards located in the office. After a brief discussion to ascertain what Mr. Lockert was doing, I asked him if he had informed his lead that he was leaving his assigned work area. Mr. Lockert replied no. I informed Mr. Lockert that myself and Harold Karner had it up to here (pointing to the upper portion of my body) with receiving phone calls from superintendents complaining that the craft could not proceed with work (hours at times) without QC performing their required inspections.
2. At that time I strongly related to Mr. Lockert that leaving his assigned work area without authorization was cause for termination and that he should not leave his work area without notifying his lead or supervisor and that he should return to his work area immediately.

DATED: March 19, 1984

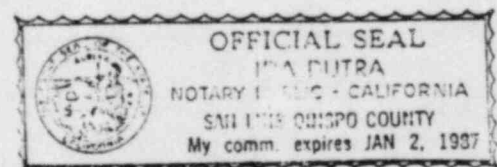


Russell Nolle

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



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



INDEX

INSERT (1)

PG&E's Answer in Opposition to Joint Intervenor's Motion to Augment or, in the Alternative, to Reopen the Record.

- Attachment A -- Affidavit of ^{H. R. ARNOLD} ~~F. G. Breismeister~~, et al. (With Exhibits 1 - ¹² ~~8~~).
- Attachment B -- Affidavit of ^{Neary} ~~M. R. Tessler~~, et al. (With Exhibits 1 - 9).
- Attachment C -- Affidavit of L. B. Mangoba.
- Attachment D -- Affidavit of A. Shusterman.
- Attachment E -- Affidavit of R. D. Etzler.
- Attachment F -- Affidavit of H. B. Friend.
- Attachment G -- Affidavit of D. J. Curtis.
- Attachment H -- Affidavit of J. D. Shiffer, et al. (With Exhibits 1 - 14).
- Attachment I -- Affidavit of R. C. Anderson, et al. (With Exhibit 1).
- Attachment J -- Professional Qualifications of Affiants.

PULLMAN POWER PRODUCTS
DEFICIENT CONDITION NOTICE

EXHIBIT NO. 4

DATE: 12/13/83	NOTICE NO. 1640-022
AREA: AREA 10 TEST SHOP	DEFICIENT CONDITION: NON-PARTICIPATION OF A FIELD-QC INSPECTOR IN THE WELDER QUALIFICATION PROCESS. CONTRARY TO QA MANUAL INSTRUCTIONS, M.F.P.-15 PARAGRAPH 15.2, THE AREA 10 TEST SHOP DID NOT HAVE AN INSPECTOR AVAILABLE TO MONITOR WELDER QUALIFICATION TESTS FROM MON. DEC 7 THRU SUN. DEC 11. SUPERVISION OF THE TEST SHOP WAS LEFT TO A
HOLD TAG APPLIED: NO	ORIGINATOR'S SIGNATURE: <i>[Signature]</i>
TAG # NA	INITIALS <i>[Signature]</i> DATE 12/13/83
	FIELD ENGINEER

RECOMMENDED DISPOSITION:

FIELD QC INSPECTOR
STEVEN LOCKERT
CHIEF ENGINEER
LEVEL III
FIELD QA/QC MANAGER

FIELD QA/QC MANAGERS EVALUATION:

☐ APPROVED AS RECOMMENDED ☐ OTHER

CAUSE CODE

- ☐ NON-CONFORMANCE - D.R.# _____
- ☐ REPAIR ORDER
- ☐ REWORK/REINSPECT
- ☐ INTERNAL AUDIT
- ☐ OTHER

COMMENTS:

DATE

FIELD QA/QC MANAGER

NOT LATER THAN:

CORRECTIVE ACTION REQUIRED BY:

STEPS TO PREVENT RECURRENCE:

☐ NOT APPLICABLE

RESPONSIBLE SUPERVISOR

DATE

FIELD QA/QC MANAGER

DEFICIENT CONDITION CLOSED:

DATE

SIGNATURE:

OCN 1640-022

PRODUCTION FOREMAN. HOWEVER, DUE TO THE REQUIREMENTS FOR QUALITY ASSURANCE, AS IN SEC III PARA NA 4133.10, THE PRODUCTION FOREMAN CAN NOT BE HELD ACCOUNTABLE FOR MONITORING THE ACTIONS OF THE WELDERS IN THE TEST BAY.

J. J. J. 12/13/83

IN FURTHER INVESTIGATION OF THE MATTER AND AS PART OF MY MONTHLY MAINTENANCE SURVEILLANCE, I REQUESTED TO SEE THE ACTUAL Q.C. RECORDS OF THE INSPECTIONS PERFORMED. I WAS DENIED ACCESS TO THE RECORDS BY THE PRODUCTION FOREMAN RUNNING THE TEST SHOP. I INFORMED THE PRODUCTION FOREMAN THAT HIS ACTION WAS ILLEGAL AND COULD RESULT IN HIS BEING INCLUDED IN THE LEGAL MATTER.

J. J. J. 12/14/83