

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 ROBERT T. KNOWLES

STATE OF CALIFORNIA  
COUNTY OF SAN LUIS OBISPO

SS

I, Robert T. Knowles, hereby duly sworn, depose, and say:

I, am the Staff Electrical Engineer for the H. P. Foley Company at the  
Diablo Canyon Nuclear Power Plant.

I am submitting this affidavit in response to the unfounded, anonymous allegation #109 as contained in the Joint Intervenor's Motion.

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PDR ADCK 05000275  
G PDR

I have read the JI Motion at paragraph 109, Page 31 and the anonymous allegation dated January 16, 1984 at Paragraph 3, pages 5-6. Specifically, I am responding to the statement "One of Foley's managers told his supervisor about the problem. In response, he was lead to believe that he had a choice of keeping quiet or losing his job." This unsupported statement is unfounded.

I was the Howard P. Foley Company's Electrical Engineer responsible for the installation of the Unit I Incore Thermocouple modifications, per Field Change Order No. 537. At the onset of the job we were advised that the termination boxes on the reactor head (known as the Beta shields) were not safety related. Later in February, 1982, I became aware that the Beta shield portion of the work should have been treated as safety-related. I confirmed this by use of an Engineering Disposition Request to PGandE. At this point, I revised the work process traveler so as to include the Beta Shields as a quality item, and informed an H. P. Foley Quality Control inspector, Mr. Dennis High, and the H. P. Foley Quality Manager, Mr. Virgil Tennyson, that as a result of the new requirements it was necessary to initiate an H. P. Foley Company Non Conformance Report (NCR). This NCR was required because some materials had been purchased as Non-Class I. I worked with Mr. High in the preparation of the NCR (H. P. Foley NCR #8802-683). At no time was there any reason not to involve QA/QC in the documentation or reporting of the NCR. All information that I had was given to Mr. High and all parties involved. PGandE Enngineering and QA/QC and Howard P. Foley Engineering and QA/QC were aware of the nature of the discrepancy. Every aspect of the system that required quality review and inspection was described, documented, and corrected in accordance with the approved H. P. Foley Quality Program. At no time during

the processing of the NCR did Mr. High express any dissatisfaction with corrective action. He had no reason to believe that his choice was "keeping quiet or losing his job." In fact, the NCR was written by Mr. High at my request and was approved by Mr. Tennyson. There was never any suggestion that Mr. High should "keep quiet." In light of the facts, any such allegation is simply ludicrous.

DATED: March 17, 1984

R. T. Knowles  
R. T. KNOWLES

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

