

In the Matter of

PACIFIC GAS AND ELECTRIC
COMPANY

Diablo Canyon Nuclear Power
Plant, Units 1 and 2

AFFIDAVIT OF

STATE OF

COUNTY OF

CITY OF

My name is _____ I am submitting this affidavit
and voluntarily, without any threats, inducements or
coercion, to Mr. Thomas Devine, who has identified himself to me
as the legal director of the Government Accountability Project
(GAP). I have instructed Mr. Devine not to release my affidavit
into the public record without first removing my name.

The statement evidences my concern over the Nuclear Regulatory Commission staff's response to my November 27, 1984 disclosure of significant engineering errors and quality assurance (QA) violations for the design of pipe supports at Diablo Canyon where I worked as a design engineer. I believe that the violations are more systematic and severe than at other nuclear plants where I have been employed. But based on the staff's response, I fear that my disclosure will only result in

violating my confidentiality without leading to corrective action for the serious problems that remain at Diablo Canyon. Most significant, the NRC refused to permit me to confirm my allegations of engineering errors by obtaining random calculations for our mutual review.

I. RELEVANT ISSUES NOT YET ON THE PUBLIC RECORD

Issues that were disclosed to the NRC staff

1. The staff failed to include my allegations on the frequency of errors, which is significant since they occurred on such a widespread basis that nearly all pipe supports which I had reviewed contained certain of the engineering mistakes listed in the December 20 NRC letter.

2. The staff failed to include my allegations on the significance of the errors, which is important since the mistakes described in issues 1 and 2 alone of the NRC December 20 letter each could cause up to 10% of small bore pipe supports to fail which previously had passed and involved errors such as underestimating the loads up to 1400%.

3. When describing my allegation on limitations in the procedure to check for mistakes in preliminary calculations, the staff failed to include the effect of the limitations--the required worst case scenario was only checked in about 10% of the cases.

4. The staff failed to include my allegation that when engineering personnel discovered errors on work that already had been approved, management responded by reprimanding the personnel who discovered the error rather than by checking for the full

extent of similar deficiencies--even if the alleged error had been confirmed and corrected.

5. The NRC staff failed to include my allegation that after management confirmed erroneous engineering work that would cause a previously checked and approved calculation to fail, management still refused to fail the hanger on grounds that the errors should not have been caught anyway, due to its approved status.

6. The NRC staff failed to include my allegation that site management personnel rejected suggestions to upgrade the checking methodology so that the worst case scenario would be checked, on grounds that there wasn't time to be that thorough.

7. The NRC staff failed to include my allegation that site management personnel removed individuals from checking assignments who attempted to go beyond the standard combination for review of preliminary calculations.

Issues not previously discussed with the NRC

8. The level of training was so poor that engineering personnel assigned to calculate and/or check weld stresses were not always familiar with welding properties.

9. Site management rejected internal staff initiatives to upgrade training informally.

10. To date the staff has refused to obtain any calculations for me to confirm in private the deficiencies that I alleged in our meeting, although Mr. Devine informs me that in the past the staff has obtained and reviewed calculations with

allegers, and I informed the staff that because the errors were routine I could readily pinpoint them on any random sample of calculations.

I have read the above 5 page statement and it is true, accurate and complete to the best of my knowledge and belief.

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