

AFFIDAVIT

My name is Billie Pirner Garde. I am the Director of the Environmental Whistleblower Protection Clinic, which is a joint project of the Government Accountability Project (GAP) and Trial Lawyers for Public Justice (TLPJ), at 1555 Connecticut Avenue, N.W., Washington, D.C. 20036.

I am making this statement freely, of my own volition, without any threats, inducements or promises of rewards to the Nuclear Regulatory Commission (NRC) about the Vogtle nuclear power plant, Units 1 and 2 being constructed in Georgia.

This affidavit is being prepared for the Atomic Safety and Licensing Board to state the reasons that I am unable at this time to provide affidavits in response to the affidavits submitted by Georgia Power Company in their Motion for Summary Disposition.

During the months of August and September I have had contact with current and former employees, both craft and QA/QC inspectors of Pullman Company, Williams Company and Georgia Power Company.

Some employees have contacted me by telephone and mail, or at the local office of the Government Accountability Project in Augusta, Georgia. I have not, at this time, asked any of these employees to put their concerns or experiences into an affidavit for submittal to the licensing board.

Information that I received from these workers was general in nature in response to my questions about procedural issues, the implementation of the quality control program, and the specific deficiencies of which they were aware.

Some of the workers have filed complaints with the Department of Labor alleging that they were discharged, demoted, transferred or in other ways discriminated against for raising safety concerns to their management. Some of these workers have agreed to provide information to this licensing board regarding their knowledge of quality control/quality assurance problems at the Vogtle Plant.

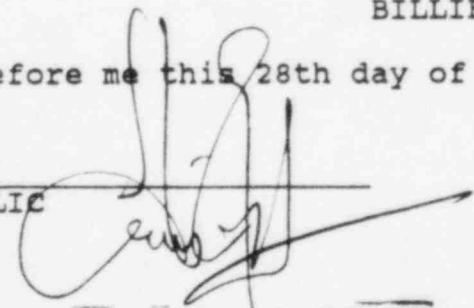
To date no affidavits have been completed from any of the workers who have contacted the Environmental Whistleblower Protection Project, or the Government Accountability Project. Such affidavits are normally prepared after GAP has concluded a verification study of the workers allegations. The affidavits usually are then submitted to the Regional Office of the NRC for inspection, investigation or other enforcement purposes.

If the Board grants the Motion for Reconsideration all workers who have contacted GAP or the Environmental Whistleblower Protection Project will be apprised of the opportunity to participate in these hearings. Affidavits from those who agree to participate will be submitted. These workers have already been informed by GAP representatives of the rights and responsibilities under 10 C.F.R. 50.7, and Section 210 of the 1974 Energy Reorganization Act, as amended.

Signed and sworn


BILLIE PIRNER GARDE

Sworn to before me this 28th day of October, 1985.


NOTARY PUBLIC

Commission Expires March 14, 1989

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
)
GEORGIA POWER COMPANY, et al.) Docket Nos. 50-424 OL
) 50-425 OL
(Vogtle Electric Generating)
Plant, Units 1 and 2))

SERVICE LIST

I hereby certify that copies of the foregoing Motion for Reconsideration (Memorandum and Order on Summary Disposition of Contention 8 Re: Vogtle Quality Assurance) were mailed, first class, postage prepaid, this 28th day of October, 1985, to:

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