

April 5, 1982  
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no new info*

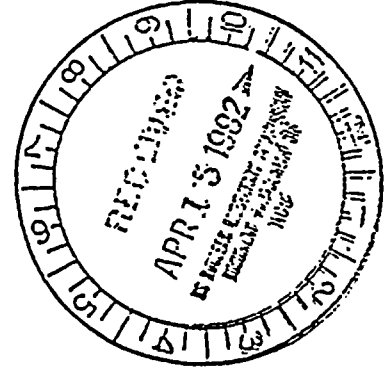
# Attachment 6

Mr. G. A. Maneatis, Senior Vice-President,  
Facilities Development  
Pacific Gas and Electric Co.  
77 Beale Street  
San Francisco, California 94106

Mr. H. R. Denton, Director  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Mr. R. H. Engelken, Regional Administrator  
Office of Inspection and Enforcement  
Region V  
U. S. Nuclear Regulatory Commission  
1450 Maria Lane, Suite 210  
Walnut Creek, California 94596

CONTROLLED DOCUMENT



Subject: Independent Design Verification Program: Potential or Apparent Conflicts of Interest of Individuals

Reference: Docket No. 50-275, Diablo Canyon Unit 1, License No. DPR-76

Gentlemen:

During the meeting of March 25, 1982 (transcript, page 167, lines 5-12), I committed to submitting a Program Procedure draft on this subject for NRC and PG&E approval.

That draft is enclosed, and would be included as Appendix G of the IDVP Program Plan when fully approved. We believe the enclosed draft is responsive to the directions and needs of this program; but recognize that it is a procedure imposed by others and we will modify it in accordance with your comments.

Very truly yours,

TELEDYNE ENGINEERING SERVICES

*W. E. Cooper*  
William E. Cooper  
Project Manager

WEC/th

Enclosure

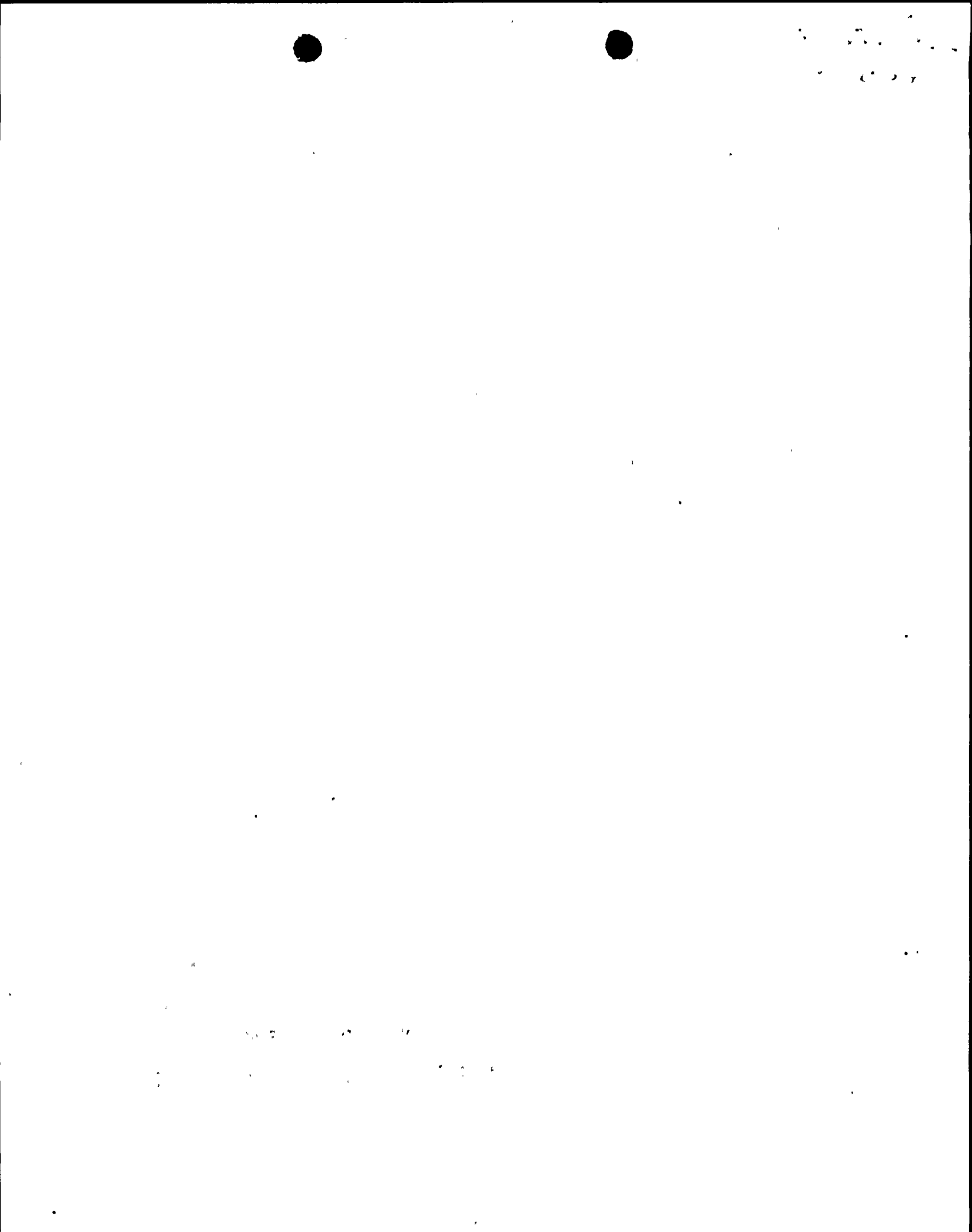
cc: H. Schierling (NRC)  
R. R. Fray (PG&E)  
R. L. Cloud (RLCA)  
R. F. Reedy (RFR)

DESIGNATED ORIGINAL

Certified By *Patty Anderson*

*BOO!  
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PDR ADDCK 05000279  
PDR



MARCH 29, 1982 DRAFT OF DCNPP-IDVP-PP-005

POTENTIAL OR APPARENT CONFLICTS OF INTEREST OF INDIVIDUALS

1.0 POLICY

In order to assure the independence of the Independent Design Verification Program (IDVP), it is essential that responsible individuals assigned to the verification program be free of potential or apparent conflicts of interest. This consideration includes previous work on the Diablo Canyon Nuclear Power Plant, financial interest in PG&E, and employment of relatives by PG&E.

2.0 APPLICABILITY

This Program Procedure applies to the following types of persons who are assigned to the IDVP:

- a. All exempt employees, as defined by the Fair Labor Standards Act, who are participating in an engineering function.
- b. All "Contract Engineers," consultants, or subcontractor employees.

3.0 PROCEDURE

- a. Each of the organizations participating in the IDVP (TES, RLCA, RFR and SWEC) shall prepare a "Statement Regarding Potential or Apparent Conflicts of Interest." Similar to, but no less inclusive than, that of Appendix A to this Program Procedure.
- b. The term "immediate family" as used on the form includes, as a minimum, the employees spouse and the parents, siblings and children of the individual and his or her spouse.



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- c. Each individual to whom this Program Procedure applies shall be asked to complete a "Statement" and file the completed form with the Personnel Relations Manager, or similar appropriate individual as determined by the participating organization.
- d. The completed form shall be retained by the Personnel Relations Manager, or equivalent, and shall be auditable by authorized NRC and PG&E personnel.
- e. The Personnel Relations Manager, or equivalent, shall review the completed forms and shall notify the organization's Project Manager if a question arises as to the use of a particular individual on the IDVP.
- f. If the Project Manager is in doubt, he or she will address a letter to the NRC (Denton) and PG&E (Maneatis) outlining the facts, without identification of the individual, and request concurrence that the individual be assigned to the IDVP.
- g. Each semimonthly report shall include the following statement:

"As required by DCNPP-IDVP-PP-005, individuals assigned by this organization to the IDVP have completed an acceptable Statement Regarding Potential or Apparent Conflicts of Interest."



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APPENDIX A

STATEMENT REGARDING POTENTIAL OR APPARENT CONFLICTS OF INTEREST

To: Teledyne Engineering Services

Whereas, the undersigned employee ("Employee") understands that he or she is being considered as a participant to provide services to Pacific Gas & Electric Company with respect to the Design Reverification Program for the Diablo Canyon Nuclear Power Plant - Unit I; and

Whereas, Employee understands that it is necessary that proposed participants be screened for any potential or apparent conflicts of interest with respect to this assignment;

Therefore, for the above stated purposes Employee makes the following representations to Teledyne Engineering Services:

1. Employee has not engaged in any work or business involved with or related to the engineering or design of the Diablo Canyon Nuclear Power Plant;
2. Neither Employee, nor any members of his or her immediate family, own any beneficial interest in the Pacific Gas & Electric Company, including but not limited to common or preferred stock, bonds or other securities issued on behalf of the Pacific Gas & Electric Company; and
3. None of the members of Employee's immediate family are employed by Pacific Gas & Electric Company.

This statement is based upon the Employee's best information and belief and any exceptions to the representations contained herein have been described on the reverse side of this document.

Dated: \_\_\_\_\_

Signature: \_\_\_\_\_

\_\_\_\_\_  
Print Name



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April 16, 1982

Attachment 7

Note to: T. Sullivan, DE


From: M. Messier, AEAB

Subject: DIABLO CANYON DESIGN VERIFICATION PROGRAM

DESIGNATED ORIGINAL

Certified By Patty Anderson

I have reviewed Appendix G of the IDVP submitted on April 5, 1982 by TES. The criteria they suggest to avoid any conflicts of interests for any members of the Project Team meet what I suggested in my April 14, 1982 memo (attached) with one exception. TES would prohibit anyone who previously worked on Diablo Canyon while I recommended that no one who has worked for PG&E within the past twelve months be allowed on the Project Team.

  
Maurice Messier  
Antitrust and Economic Analysis  
Branch  
Division of Engineering

Enclosure:  
As stated

