

GOVERNMENT ACCOUNTABILITY PROJECT

Institute for Policy Studies
1901 Que Street, N.W., Washington, D.C. 20009

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USNRC

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March 19, 1984

Nunzio J. Palladino, Chairman
Victor Gilinsky, Commissioner
Thomas Roberts, Commissioner
James Asselstine, Commissioner
Frederick Bernthal, Commissioner
U. S. Nuclear Regulatory Commission
1717 H. Street, N.W.
Washington, D.C. 20555

DECLASSIFIED UNDER
PROB. & UNCL. ACT.

50-275/323

Dear Commissioners:

On behalf of the Mothers for Peace, the Government Accountability Project (GAP) commends the staff for renewing the dialogue with employees from the Diablo Canyon nuclear power plant. On Thursday and Friday representatives of Region V, the Office of Investigations (OI), and the Office of Nuclear Reactor Regulation (NRR) made commitments and/or arrangements for interviews, with court reporters or other formal documentation of the record created by the meetings. The whistleblowers include previous witnesses who raised allegations that will be covered by SSER 22, as well as the staff's recent licensing affidavits. Other witnesses are the authors of affidavits both from the Mothers' January 31 and a coalition's March 2, 1984 petitions under 10 CFR 2.206. Still other whistleblowers represent new witnesses with highly significant, additional allegations. Counsel has obtained over 100 allegations during the past two weeks and is formalizing a further petition. Consistent with the urgency of the Commission's review schedule, however, the witnesses are meeting first with the staff as the highest priority.

Counsel is gratified that the staff has recognized the seriousness of the issues raised by these witnesses; the attempt to arrange initial and followup interviews began two weeks ago. We hope that SSER 22 does not draw conclusions for previous allegations without followup interviews, because the allegers have been available since they made the charges in January. The Mothers are particularly relieved that the Office of Investigations has begun communications with the relevant whistleblowers, nearly four months after initial receipt of the evidence. The process the staff has renewed and begun could lead to development of an accurate, reliable record for the Commission to make its low power operating license decision.

Unfortunately, a reliable record does not yet exist. The Mothers believe that the uniform chorus of denials by PG&E over the last month

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of any significant problems are a bluff, consisting largely of asserted conclusions without citations or support on the record. The whistleblowers believe that in an alarming number of instances the denials represent material false statements, because internal corporate documents or eyewitness accounts directly contradict PG&E's assertions.

The most dramatic evidence of material false statements concerns the 1977 Nuclear Services Corporation (NSC) audit of PG&E's contractor Pullman. Here the new evidence is significant for statements in both the draft and final versions of IE Report 83-37. With the whistleblowers' assistance, many of the severe errors in IE Report 83-37 can be corrected. To illustrate the nature of the alleged false statements on the NSC audit, whistleblowers have evidence or can testify that during the mid-1970's PG&E fully realized--

1. the existence of generic deficiencies in the Pullman quality assurance program;
2. the possible effect of the QA violations described by NSC on the plant's hardware; and
3. the relevance of the NSC findings for licensing hearings then about to begin.

Among other issues to be discussed are 1983 PG&E statements on previous QA standards. The statements directly contradict internal records from the mid-1970's. Unfortunately, the staff previously had taken the 1983 version at face value.

The inaccurate responses accepted in IE Report 83-37 on the Pullman audit mirror false, misleading and/or incomplete statements in the numerous 1984 letters sent by PG&E to the NRC staff. Witnesses are prepared to call PG&E's bluff with respect to welding symbols and the seismic design review, as well as other Pullman QA violations from 1977-1984.

Some of the disclosures from new witnesses cast doubt upon PG&E's public reassurances about the sound condition of the plant. For example, a March 7, 1984 affidavit, enclosed as Exhibit 1, describes a breach of containment integrity at the end of February, when one of the main containment airlock doors blew open. Workers were sucked from outside into the inside of the containment by the force. Maintenance crews explained that the hinges for the 14 year old door were worn out before the plant began operation. Under the plant's safety technical specifications those flaws should have been caught by a surveillance program prior to fuel loading.

Another new issue has policy implications for the Commission's whistleblower protection regulations under 10 CFR 50.7. On January 4, 1984

PG&E introduced its own version of Big Brother -- the "Behavior Observation Program" for supervisors to determine the psychological "fitness for duty" of employees with security clearances. It is enclosed as Exhibit 2. Among the "five criteria for nuclear behavior reliability" is "hostility towards authority," one of whose examples is described as follows -- "Refuses to take orders, challenges supervisor's authority, ... is extremely critical of the company." Each of these responses could represent activity protected under 42 USC 5851 and 10 CFR 50.7, if the employee is challenging illegal activity. The discovery of this new program coincides with lawsuits filed by three Diablo Canyon employees for slander and invasion of privacy connected with psychological evaluations. (See March 16, 1984 news article, enclosed as Exhibit 3.) The Mothers believe that the Commission should scrutinize this PG&E program to insure that the license prohibits all forms of psychological abuses directed against legally-protected freedom of speech.

On balance, despite the barrage of allegations and confirmation, Diablo Canyon has not been fixed. A March 6, 1984 PG&E letter, enclosed as Exhibit 4, describes the totality of repairs and modifications due to allegations since September 1983: 1) modification of one pipe support; 2) replacement of one half inch anchor bolt; 3) replacement of 84 feet of electrical wire; and 4) installation of a safeguard to isolate the effects of a fire in the control room.

In short, there is a long way to go towards identifying all the relevant issues; correcting and establishing accountability for any inaccurate PG&E statements in its recent barrage of denials; and fixing the hardware effected by the QA breakdown. Counsel is at the disposal of the Commission staff to expeditiously fulfill those requirements. Whistleblowers represented by GAP have indicated their willingness to cooperate fully with the staff. The Mothers, GAP and the witnesses all support the Commission's stated position that no licensing decisions will be made until all significant safety questions are resolved. We welcome the opportunity to help achieve that goal without further delay.

Sincerely,

Thomas Devine ds

Thomas Devine
Counsel for the
Mothers for Peace

AFFIDAVIT

My name is _____ I am submitting this affidavit freely 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. I am a security access guard at the Diablo Canyon nuclear power plant. This statement evidences two reasons why I am concerned that Diablo Canyon is not ready to go critical and begin low-power operations- 1) the suspect condition of the plant, illustrated by widespread pipe leaks during the hot function tests and a breach of containment integrity within the last two weeks when a door blew ^{open} off and sucked nearby workers into the containment; and 2) a systematic organizational breakdown within the security forces at the plant, caused by pervasive mismanagement and harassment that has thoroughly demoralized already overworked security guards, and illustrated by an incident around three to four weeks ago where a religious protester penetrated inside the perimeter and into protected areas.

I am also concerned that the Nuclear Regulatory Commission (NRC) does not appear to be reacting to these problems on-site; and that the public has not been able to learn of these incidents otherwise through the media. The public should not remain ignorant of what is happening at Diablo Canyon. The consequences could be too serious.

For the last months I have worked for Pinkerton Security at Diablo Canyon as a security access control officer. Previously I have served in the Marines, I believe that I

have a good record and have earned professional respect as a security officer at Diablo Canyon. During my employment I have not been formally (or informally) disciplined for any misconduct or other problems, except once for

. As a result, none of my allegations are motivated by "sour grapes." I simply am concerned, as a resident and eyewitness, that Diablo Canyon may not be ready to operate.

I. CONDITION OF THE PLANT

1. Shortly after noon on Friday, February 24, the integrity of the containment was breached when an airlock door ^{blew open} ~~broke off~~ at the 140 foot level of the main containment in Unit I. All access to the containment is through this entry, which consists of two pressurized airlock doors that can only be opened one at a time. After the first door is closed, employees have to wait in a space between the doors while the second one is opened.

On the morning of the ~~24th~~, I was on duty as a security access guard. Since there were too many people coming in and out, I had to back them up. Two employees got stuck inside the airlock when the doors didn't open. I reported the incident to ~~my~~ sergeant, and a PG&E crew arrived around 20 minutes later. The workers who had been stuck were drenched with sweat, because temperatures are high during hot functional testing.

Around 45 minutes later the incident happened again; this time four to five guys were stuck inside. Again it took around 20 minutes for the PG&E crew to arrive. Shortly afterward I was transferred to another post.

When I returned to the containment access door in early afternoon, ~~the containment was closed~~ ^{had been secured} and maintenance was at work. The crews described to me in detail what had ^{happened} ~~for the doors~~.

happened. The ^{outer} front door to the airlock blew open when some employees opened the ^{INSIDE} back door. There was a tremendous pressure, described to me by employees who were there as like a hurricane. Two fire watches standing near the outside were sucked clear through the airlock. A security officer was pulled toward the containment from around 15 feet outside the door, but held onto wooden scaffolding at the entrance. A foreman similarly was sucked in but successfully grabbed onto a door jam. A chair in the entryway flew into the containment at chest level. The outer door itself, which weighs several hundred pounds, swung open as if on a spring, according to witnesses.

Pacific Gas and Electric (PG&E) officials Mielke and Thornberry came by to survey the damage. Maintenance employees told me that to repair it they would probably have to borrow parts from Unit II. They explained that the doors are 15 years old and aren't made any more.

2. Maintenance workers described the cause of the accident to me as shear hinges on the door which were already worn out from overuse. This concerns me, because the plant has not yet started operation. If the maintenance workers were correct, all safety-related doors should be rechecked to see if they are worn out before the plant goes critical.

3. I am concerned at the absence of any visible NRC presence or known response to the containment door accident. The incident was widely known; everyone was talking about it by the end of the day. The estimates on-site were that the NRC would fine PG&E \$50,000 - \$100,000, but no one saw the NRC around to take a report. Nor has the incident been discussed in any of PG&E's public reassurances about Diablo Canyon's readiness to operate. I hope that a cover up is not in progress.

4. At least twice during the last week and a half, the containment area has been closed off; due to bad air

when there was less than the minimum amount of oxygen, and release of fumes from paint as the pipes heat up during hot functional testing. Once the containment area was closed off for a whole day. A foreman working in containment told me that the heat from the pipes was releasing toxic acetone, due to the type of paint which had been applied. Security guards no longer are regularly permitted to go into the containment, although general construction security used to be posted inside, *as are fire watches.*

5. There are so many pipe leaks in the hot functional tests that crews are working constantly to fix them; with some areas closed off continuously and water everywhere you look. In particular, I have observed this condition ~~at the 85 foot level in the turbine building, the southeast side just north of door 129.~~ This week I saw two new leaks at the 145' foot level, east penetration area by door 365, between the turbine building and the containment in the piping penetration area. I hope that the NRC is aware of all these leaks, either through ~~its own~~ its own investigators or through PG&E reports. The intensive rate of leakage appears inconsistent with PG&E's reassurances about the sound condition of the plant.

II. SECURITY BREAKDOWN

6. Around three to four weeks ago a religious protester breached extensive security around the perimeter and reached a yard that is inside the main protected areas. After climbing two fences and entering around gate 11, the protester sat down and started chanting before he was arrested. It was about 3:30 or 4:00 A.M. on a Monday, *I believe.* From the spot he reached, the protester could not enter the reactor. But he did have access to vital areas, such as the condensate tanks and a pipe gallery on the lower side of the northeast yard, had he chosen to continue. I believe that this was a major breach of security, because

supposedly demonstrators have been trying to breach the perimeter for years without success. This would mean that our security force is weakest just at the time it should be most effective -- as the plant is about to go critical. If a religious chanter could get that far, I wonder what a professional terrorist could do? Helicopters and dogs were used unsuccessfully in efforts to stop this protester. I am concerned that the public has remained ignorant of the security breach; it was the major news of the day on-site. I hope that PG&E properly reported the incident to the NRC. A licensee of an operating plant has to report such a security breach to the NRC within an hour as a significant event under 10 CFR 50.72.

7. The breach of perimeter incident illustrates a generic breakdown over the last six months for security on-site. Those of us who have maintained pride in our work think that our job as security has become an embarrassment. Guards often do not ^{pay close attention} ~~look~~ at the X-ray ^{screens} ~~photos~~ on individuals who pass through the security machines. Similarly, because there are ^{so} ~~too~~ many patdowns, guards lose their concentration and effectiveness ^{and} ~~by~~ just going through the motions. I have observed and reported suspected security breaches in the field, without seeing ^{much} ~~any~~ evidence of response.

8. Part of the reason for the deteriorating quality of security is overwork. Security work demands continuous concentration to be effective. Last August we went from eight hour days to 12 hour days, without a second break. I believe that decision represents mismanagement, because many guards can not maintain necessary alertness for such long periods. The types of security breaches and errors described above hardly ever occurred when we were on eight hour shifts before last August.

9. Another major cause for the security breakdown is poor morale among the guards, due to management harass-

ment that has reached the point of an adversary relationship where officers are more concerned about job threats from supervisors than security threats from protesters. There is an intensive dismissal rate on-site. The solution to personnel deficiencies routinely is to immediately fire the officer, instead of providing needed training or re-training.

10. Another program deficiency is that management has not informed us what we can and cannot do with respect to protesters. For example, we were taught how to use fire hoses but not told when we could use them.

11. Another cause of the unreliable security system may be an unreliable computer system which over the last several months has erroneously permitted around a dozen holders of expired key cards to pass through security. The computer showed a green light, when it should have flashed red.

12. I have been forced to go outside our system, because there is nowhere to work within Pinkerton's system and guards are afraid to raise serious, legitimate questions, because we are afraid of getting fired. Raising issues of security or morale problems typically leads to a response such as, "If you don't like it, you can go on down the road" (or "say goodbye").

13. It is a punishable offense to raise problems outside the chain of command. That means a guard can only dissent to the sergeant initially. Blowing the whistle directly to a PG&E security shift supervisor leads to a written reprimand with a warning on the first offense, and is grounds for dismissal the second offense. The restriction means that constructive efforts to discuss problems often lead to threats from sergeants, instead of solutions.

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

March 7, 1984

State of California {
County of San Luis Obispo

_____, being duly sworn, deposes and says:
That he has read the attached six page affidavit, and to
the best of his knowledge and belief, it is true and accurate
and complete.

Subscribed and sworn to before me on March 7, 1984.

Effie McDermott
Effie McDermott, Notary Public
in and for said state



From Division or Department NUCLEAR PLANT OPERATIONS
Diablo Canyon Power Plant
FILE NO. 710.2
RE LETTER OF
SUBJECT Behavioral Observation Program
Letter No. 84000046
To Division or Department

January 4, 1984

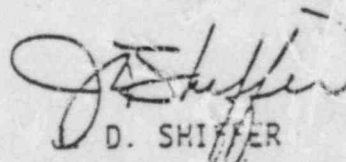
TO: ALL SUPERVISORS OF PERSONNEL CLEARED FOR UNESCORTED ACCESS
TO THE DIABLO CANYON POWER PLANT

The attached outline describes the NRC requirement for maintaining a program of behavioral observation of all employees granted unescorted security access at the Diablo Canyon Power Plant.

Although we already have the framework of such a program in effect in existing personnel practices and accident prevention rules, i.e., supervisors take action when an employee is not "fit for duty", it is necessary that we accomplish the following steps to bring us into full compliance with NRC requirements:

1. Supervisors of employees with unescorted security access must submit documentation that they have maintained "continuous observation" of their employees during 1983. This should be completed on the attached form, using the information in the attached outline and returned to R. G. Todaro by February 29, 1984.
2. To supplement the written instructions and to further develop supervisory abilities in this area, we will be providing on site behavioral observation training during the first quarter of 1984 for all Diablo Canyon supervisors of employees with unescorted security access. Alternative training will be arranged for off site supervisors.

Please direct any questions to Brian Jalbert, Employee Assistance Counselor, extension 3191.


D. SHIFFER

BNJalbert(69-3191):dli

Attachment

BEHAVIORAL OBSERVATION PROGRAM

SCOPE

It is a matter of PGandE Company policy as well as our commitment to the NRC that specific measures be taken to insure the behavioral reliability of employees granted unescorted security access. In addition to the already familiar pre-employment psychological screening process, the NRC requires that we maintain a program of continuous behavioral observation of those individuals granted unescorted security access. Specifically, the requirement has three elements:

1. That all individuals with unescorted security access be observed during the course of their employment for any indication of unreliable/untrustworthy behavior or emotional instability.
2. That the Behavioral Observation Program include documentation on an annual basis.
3. That supervisors receive training in recognizing unusual behavior.

PURPOSE

As an important part of our commitment to the government, to the community and to our employees and their families that safe operation of the Plant is our highest priority, the purpose of the Behavioral Observation Program is to insure a high standard of employee reliability. It is based on the premise that an unreliable person in any position could jeopardize the personal safety of others as well as the physical integrity of the Plant.

As outlined in NUREG 0768, several facts have demonstrated the need for a behavioral reliability program:

1. Over a period of time, internal and external stressors can affect changes in an employee's job performance and reliability.
2. Incidents related to employee unreliability have already occurred in nuclear environments.
3. The public is demanding plant safety and safeguards.

While the formal establishment of a Behavioral Observation Program is a new concept for Diablo Canyon, in effect what it does is provide an effective means of enabling supervisors to implement PGandE guidelines of fitness for duty. Accident Prevention Rule 11b states:

"Any employee in charge having reasonable grounds to suspect that an employee under his jurisdiction is either mentally or physically unfitted for the work assigned, shall prohibit such employee from working until satisfactory medical or other evidence indicating his fitness is secured."

Thus, the NRC's requirement for a Behavioral Observation Program is a formalization of PGandE guidelines already in effect.

BEHAVIORAL RELIABILITY CRITERIA

NUREG 2076 presents the results of research conducted by the Edison Electric Institute and Assessment Design, Inc. to establish criteria for determining behavioral unreliability and emotional instability. Five criteria for behavioral unreliability were established:

1. Hostility towards authority
2. Irresponsibility
3. Defensive incompetence
4. Psychopathology
5. Reaction to accumulated stress

Specific behaviors for each of these five criteria are listed in Attachment A. The list provides examples of how unreliable behavior might be manifested on the job. The list is by no means exhaustive, and any one of the behaviors taken alone generally does not imply unreliability. The listing does not take into account important variables such as quantity, intensity or duration of behavior. The criteria are job related behavioral patterns that a supervisor can observe.

It is the change from typical to atypical behavior that may indicate behavioral unreliability or emotional instability. A supervisor's responsibility in behavioral observation is to know how his/her employees typically behave and perform and then to be able to identify when changes occur in their behavior. The behavioral criteria in Attachment A serve as guidelines for this.

TRAINING FOR SUPERVISORS

During the first quarter of 1984 we will be conducting training sessions for all supervisors with responsibility for employees with unescorted security access. The purpose of this training will be:

1. To help supervisors become more familiar with their role and responsibilities.
2. To help supervisors to identify and describe behavioral unreliability or emotional instability.
3. To help supervisors approach and talk to employees whose behavior is questionable.
4. To teach supervisors the administrative steps necessary when behavioral unreliability is observed.

DOCUMENTATION

It is an NRC requirement that we maintain annual written verification that supervisors have observed for signs of behavioral unreliability on the part of employees granted unescorted security access. To accomplish this, the attached form has been developed.

INSTRUCTIONS TO SUPERVISORS

READ BEFORE FILLING OUT THE FORM

1. Time Period Covered

- a. Where applicable, the intent is to cover the entire calendar year, January 1 - December 31. For each employee, fill in the dates during which you have supervised and had direct observation of the employee.
- b. The dates should be adjusted accordingly for employees who have not had unescorted access at Diablo Canyon for the entire year.
- c. For employees who have had multiple supervisors during the year, department heads should coordinate with the supervisors to insure coverage for the entire period of employment during the year.

2. As a supervisor, you will have to exercise judgement as to whether an isolated incident constitutes "unreliable or untrustworthy behavior." Using the guidelines in Attachment A will help you to identify trends versus isolated incidents. For example, if an employee missed a single deadline or made a mistake on the job, such an isolated incident may have little significance, but when such behaviors become repeated this may indicate a change in behavior toward unreliability or untrustworthiness.

3. Sign and date the form.

4. Return form to Security Supervisor for further processing.

5. Please direct any questions to Employee Assistance Counselor Brian Jalbert, extension 3191.

FIVE CRITERIA FOR NUCLEAR BEHAVIORAL UNRELIABILITY

1. Hostility Toward Authority

Includes behaviors such as:

- Exhibits fits of temper, argues or fights with others, screams or swears when questioned.
- Refuses to take orders, challenges supervisor's authority, shows arrogance, is extremely critical toward the Company.
- Refuses to comply with established procedures and safety precautions, bends rules.
- Overreacts to real or imagined criticism.
- Displays rigidity or inflexibility, becomes agitated if work routines are interfered with.
- Attempts to perform all operating activities alone.
- Refuses to accept help from others.
- Argues about established policies and procedures.

2. Irresponsibility

Includes behaviors such as:

- Takes action without thinking.
- Shows questionable judgement on the spur of the moment.
- Plays frequent pranks.
- Shows little concern for disciplinary threats, laughs off errors or reprimands.
- Is often tardy or absent.
- Denies mistakes.
- Operates equipment carelessly.
- Is frequently sloppy or fails to complete work.
- Ignores time limits or procedures.
- Creates excitement when bored on the job.
- Lies about work issues.

- Engages in theft or sabotage, lies or cheats, commits acts of vandalism.
- Provides incorrect or inaccurate information when questioned.
- Refuses to offer expertise to others, tries to establish self as "expert" by withholding operating information from others.
- Sleeps on the job.
- Displays a low boredom tolerance that results in a lack of vigilance.

3. Defensive Incompetence

- Refuses to enter contaminated areas when appropriate to enter.
- Worries excessively about radiation overexposure.
- Covers up mistakes to conceal lack of system comprehension.
- Displays excessive timidity on the job.
- Fails to inform others of relevant information.
- Is reluctant to act without direct orders or explicit instruction.
- Tries to fake or bluff when uninformed.

4. Reaction to Stress

Includes behaviors such as:

- Responds inappropriately to critical or emergency situations, becomes indecisive or incapacitated, disappears from the work scene when faced with a crisis.
- Startles or cries easily.
- Loses the ability to discriminate the problem and the action needed, treats normal situations as crises, freezes, becomes indecisive or incapacitated, forgets important or obvious things.
- Shows deteriorating performance.
- Displays unusual physical signs of nervousness such as sweating, tremors, hesitation.
- Complains excessively about pressures outside of work such as family or finances.
- Abuses or is dependent upon chemicals, alcohol or other drugs.
- Memory loss.

5. Emotional and Personal Non-Adaptability

Includes behaviors such as:

- Displays recurrent mood swings from extreme euphoria to extreme depression.
- Chronic fatigue, insomnia or appetite changes.
- Extreme suspiciousness.
- Demonstrates an excessive need for approval or hesitates to act without direct instructions.
- Tends toward social isolation or withdrawal.
- Displays a lack of attention to personal appearance.
- Is reluctant or refuses to work as a member of a team.
- Appears disoriented, has a loss of memory or shows a marked decline in intellectual functioning.
- Displays a delayed reaction time.
- Shows no emotion at all.
- Has an inability to perform job tasks as a result of medical or physical symptoms.
- Sees or hears things that do not exist.
- Makes suicidal threats.
- Has difficulty comprehending or responding to questions, jumps from topic to topic in speech.

Diablo workers file slander suit

By Tom Fulks
Staff Writer

Three Diablo Canyon nuclear power plant workers are claiming Pacific Gas and Electric Co. slandered them by telling their co-workers the men are mentally unfit.

Jack Doody, Larry Brindle and Harold Williams filed separate complaints this week in Superior Court.

All claim they were fired from their jobs as the result of psychological evaluations conducted by the Behaviordyne Psychological Corp.

The three men were employed by the Pullman Power Products company, also named in the suit, when they were fired in 1983.

All have since been rehired and given back wages by Pullman, according to PG&E spokeswoman Suzanne G. Brown.

Behaviordyne was hired by PG&E to evaluate the mental fitness of employees who work in the plant's high security area, Brown said.

The three men claim personal injury, interference with their privacy interests, negligence, slander, libel and wrongful discharge.

The complaints claim Behaviordyne released the results of confidential psychological tests to PG&E officials, who then said over a loudspeaker system at the plant that all three had been fired because they were security risks.

Brown said the claim of the men's dismissal being announced over the loudspeaker system is false.

The suits say the men were wrongfully

discharged as the result of evaluations by Behaviordyne psychologists that the men were "psychologically unfit and mentally unstable."

The men expected the evaluations would remain private, due to the confidential nature of doctor-patient relationships, according to the complaints.

PG&E and Pullman violated the privacy interests of the men, the complaint said, by publicly disseminating the evaluations and announcing the findings over the loudspeaker.

The men claim that action caused them "humiliation, mortification and shame," and that they suffered loss of reputation.

The suits say the psychologists prepared "negligent, false and incorrect evaluations of the psychological fitness" of the fired workers.

Behaviordyne, PG&E and Pullman also were negligent, the suits claim, in failing to "investigate the false, damaging and incorrect charges" against the men, and in failing to keep accurate personnel records and failing to correct them.

The suits also said Behaviordyne, PG&E and Pullman slandered the men by announcing they were being fired.

The announcement was heard by hundreds of Diablo Canyon workers, the suits claim, who allegedly knew "security risk" in fact meant the men failed to pass the psychological tests and interviews.

The complaints say many of the workers at Diablo Canyon had taken the same tests, which gave them special knowledge of the testing procedures and results.

Some of the 500 yes or no questions given workers to determine psychological makeup included:

"My sex life is satisfactory."

"I am very seldom troubled by constipation."

"I do not always tell the truth."

"My soul sometimes leaves my body."

"I do not read every editorial in the newspaper every day."

"I would like to be a florist."

"I believe in the second coming of Christ."

"Someone has it in for me."

"I have never indulged in any unusual sex practices."

Brown said the tests are given to workers to determine individual personality traits. She said the questions are arranged in a manner to detect if a person is consistent with answers.

Those who fail the test are determined to be risks in high security areas, Brown said. "We have to have stable people in there."

Brown said the three men who filed the complaints failed the original psychological tests, but were given a chance to have their own psychologists examine them. All three did.

Brown said since the later test results conflicted with the originals, a third psychologist was called in for an opinion.

The final opinion cleared the three men as security risks and all were hired back, Brown said.

She said PG&E attorneys have not seen the complaint and will have no response until they do.

COPY

PACIFIC GAS AND ELECTRIC COMPANY

PG&E +

77 BEALE STREET, SAN FRANCISCO, CALIFORNIA 94106

TELEPHONE (415) 781-4211

March 6, 1984

PGandE Letter No.: DCL-84-094

Mr. John B. Martin, Regional Administrator
U. S. Nuclear Regulatory Commission, Region V
1450 Maria Lane, Suite 210
Walnut Creek, CA 94596-5368

Re: Docket No. 50-275, OL-DPR-76
Diablo Canyon Unit 1
Modifications, Repairs and Equipment Changes
Resulting From Allegations

Dear Mr. Martin:

On March 4, 1984, NRC Region V requested that PGandE provide, by March 6th, a description of Diablo Canyon modifications, repairs, and equipment changes which have resulted from the allegations investigation accomplished since September of 1983.

To respond to this request in the time available, Project Supervision in the Engineering, Construction and Licensing organizations has reviewed project activities and material prepared for submittal in response to allegations. The results of this review are enclosed.

PGandE believes this review has identified all items related to the NRC request; however, should additional items be identified NRC Region V will be notified.

Kindly acknowledge receipt of this material on the enclosed copy of this letter and return it in the enclosed addressed envelope.

Sincerely,

J. O. Schuyler

by T. A. Moulia

Enclosure

cc: T. W. Bishop
D. G. Eisenhut
H. E. Schierling
Service List

ENCLOSURE

MODIFICATIONS, REPAIRS, OR EQUIPMENT CHANGES
FROM ALLEGATIONS REVIEW PERFORMED SINCE SEPTEMBER 1983

Post September 1983 review of allegations and NRC inspection items concerning allegations has resulted in the following minor modifications and repairs.

1. PG&E review of small bore pipe support number 100-111, identified for NRC review by Mr. C. Stokes, resulted in a minor modification. The support provides restraint of the valve operator and the pipe at the valve. The modification was the addition of an axial restraint at the pipe to prevent transfer of forces to the operator in the axial direction. This change was made for consistency with Project standard practices even though analysis showed the change was not necessary to meet acceptance criteria.
2. One 1/2 inch diameter electrical raceway anchor bolt was replaced during the audit of concrete anchor bolts embedment. The original bolt was removed to verify, by physical measurement, the depth of embedment as indicated by ultrasonic measurement. The replacement bolt was fully embedded; however, engineering analysis would, in all probability, have shown qualification of the initial installation. Thirty-nine similar installations were analyzed and adequate safety factors were demonstrated as reported in PG&E letter DCL-84-059, dated February 16, 1984.
3. The NRC review of allegations related to electrical wire traceability led to the following changes:
 - a) Approximately eighty-four feet of Continental HTR wire, installed in the Control Room Positive Pressure Ventilation System was replaced. The wire was documented to be qualified and of the proper type and color code, however traceability to the source (wire reel) was not established. This is discussed in PG&E letter DCL-84-066, dated February 17, 1984.
 - b) Installation of a redundant isolation contact on the negative lead of Unit 1 RHK pumps and charging pumps control circuits, as specified by a Design Change Notice, had not been performed. This design change was made to assure that a fire in the Control Room would not affect control of this equipment from the Hot Shutdown panel in the Auxiliary Building. All similar design changes have been reviewed and proper installation verified. This discrepancy was documented in PG&E NCR DCI-RE-83-N008.

In addition to the above listed items, the investigation of allegations has resulted in extensive records review and some engineering analysis and testing to demonstrate the acceptability of existing installations.