

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

BEFORE THE NUCLEAR REGULATORY COMMISSION

In the matter of)
)
 PACIFIC GAS AND ELECTRIC)
 COMPANY)
)
 (Diablo Canyon Nuclear Power)
 Plant, Units 1 and 2))
 _____)

Docket Nos. 50-275
50-323

AFFIDAVIT OF PHILLIP HAFFEY

State of California)
 COUNTY OF SANTA BARBARA)
~~County of San Luis Obispo)~~
~~City of San Luis Obispo)~~
 CITY OF SANTA MARIA)

ss

The above being duly sworn deposes and says:

My name is Phillip Haffey. I am giving this statement freely and voluntarily, without any threats, inducements or coercion, to Mr. Thomas Devine. This affidavit is to file allegations of misconduct by the Nuclear Regulatory Commission (NRC) Region V staff in response to my initiatives to work with the NRC, and of material false statements by Pacific Gas and Electric Company (PGandE) in response to my previous allegations.

1. NRC Region V staff destroyed my confidentiality prior to an April 1984 plant tour by only requesting the Deficient Condition Notice (DCN) logs for myself and another anonymous alleger, which identified us by our work, in preparation for the event.

2. On the morning of the April 1984 NRC plant tour of Diablo Canyon, immediately after my identity had been effectively

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revealed, my house was the target of an unprecedented symbolic attack -- a 12 inch cut-off saw wheel was stuck in the lawn outside as an apparent warning.

3. After breaking our confidentiality agreement, the NRC made this sacrifice all for nothing by accepting an irrelevant excuse by PGandE to remove me from the plant tour before it started; at the time, I had not filed any written allegations.

4. If the NRC had permitted me to attend the plant tour, I could have pointed them to examples of oversized bolt holes on safety-related systems, covered only by washers and not by fishplates as required by code.

5. The deficient bolt holes were the result of a bolting rework program that may have left the bolts less secure than before the repairs, since the wire that originally packed the holes was removed and not replaced during the rework program.

6. The cause of the lost wirepacking was the uncontrolled nature of the repair program: supervisors informally gave instructions to ignore requirements for inspection prior to bolt and nut torque, and no one kept track of the lost wire stuffing, which was merely swept up by laborers.

7. PGandE's response to allegation V-28A -- that I was intent on going beyond contractual requirements for bolt holes -- is misleading, because the slotted holes that I challenged represented a problem with design control; they were not reflected on the design drawing in that condition.

8. I repeatedly attempted to gain written documentation from PGandE that would justify the verbal instructions to deviate from the design through slotted bolt holes, but none was ever provided.

9. PGandE failed to correct the drawings to even accurately reflect the slotted holes, which still are misrepresented on the design documents.

10. PGandE's statement in response to allegation V-28B -- that the bolting rework program was covered by QA Instruction #64 -- is false, misleading, a joke or all three, since despite my frequent requests, no one from QA Manager Harold Karner down to my supervisor ever produced such an instruction during my experience working in the program.

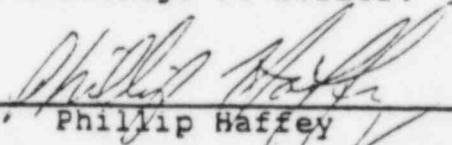
11. QC inspectors did not have the organizational freedom to override supervisory commands and comply with code requirements for fitup inspection during the bolt rework program, since the space on the inspection form consistently was marked "N/A" ("Not Applicable").

12. I disagreed with the stated management attitude underlying the bolting re-torque program -- "go as fast as you can get away with" -- since the repairs were due to poor quality work in the first place and I believed management should make a commitment to control the quality of corrective action.

13. PGandE's reponse to allegation V-29 -- denying discrimination on the job against aggressive inspectors -- is false, since my supervisors personally told me that I was denied overtime because I would just use it to reject welds.

14. PGandE offered a red herring to attack me for not offering complaints when I resigned, since the complaints went to QA Manager Harold Karner -- the target of my allegations and the man who could be called on for references that might cause me to lose my upcoming new job.

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


Phillip Haffey

STATE OF CALIFORNIA
COUNTY OF SANTA BARBARA) ss.

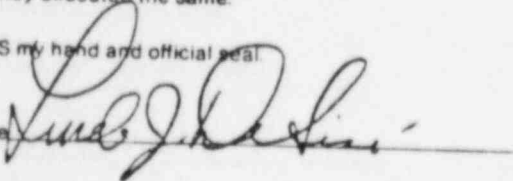
On JANUARY 22, 1985 before me, the undersigned, a Notary Public in and for said State, personally appeared

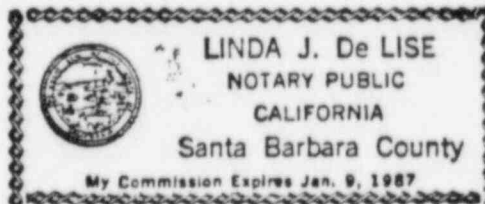
Phillip Haffey

personally known to me (or proved to me on the basis of satisfactory evidence) to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same.

WITNESS my hand and official seal.

Signature





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