

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

On the matter of	:	
	:	
GEORGIA POWER COMPANY, et al.,	:	DOCKET NUMBERS
	:	50-424 and 50-425
	:	
(Vogtle Electric Generating	:	
Plant, Units 1 and 2)	:	

AFFIDAVIT OF E. J. TURNER

COUNTY OF BURKE
STATE OF GEORGIA

Before the undersigned officer duly authorized to administer oaths did appear E. J. TURNER, who after being duly sworn, did state as follows:

1. My name is Ed Turner. My business address is Vogtle Electric Generating Plant, Route 2, Waynesboro, Georgia 30830. I am employed by Georgia Power Company as Vogtle Project Procurement Manager. In that position I am primarily responsible for the management and direction of activities of the Vogtle Project Procurement Group. I am a professional engineer. A summary of my professional qualifications and experience is attached hereto as Exhibit "6A."

2. I make this Affidavit in support of Applicants' Motion for Summary Disposition of Joint Intervenor's Contention No. 8 (Quality Assurance). I have personal

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knowledge of the matters stated herein and believe them to be true and correct. I will describe the Procurement practices at VEGP, and I will include within that discussion a description of the organizational responsibility relative to Procurement.

PROCUREMENT PRACTICES

3. Georgia Power Company Vogtle Project Procurement has overall management responsibility for the procurement of equipment, material, and services for Plant Vogtle. GPC ensures that equipment, material and services necessary for construction and Plant operation are delivered to the job site on time to meet construction schedules, and in conformance to purchase orders and specification requirements. The Vogtle Project Procurement Group purchases exclusively for the Project and has no other procurement responsibilities within GPC. VEGP Procurement is under the direct management control of the Project Procurement Manager (PPM) Vogtle who reports to the Vice President and General Manager Vogtle Project for Project direction, and to the Manager of Procurement and Traffic-GPC, for technical and functional direction.

4. Procurement teams from GPC, Southern Company Services, Inc., ("SCS") and Bechtel Power Corporation ("Bechtel") participate in Procurement activities. These groups report either directly or indirectly to the PPM, and are assigned specific Procurement responsibilities.

5. Each of the participating Procurement groups is responsible for soliciting bids for specific kinds of equipment, material and services, and for either making purchase recommendations to GPC or for actual purchase of the required items. Safety-related equipment and materials are only purchased based on specifications developed and approved by Bechtel.

Commitments and Method of Implementation

6. The applicable requirements for Procurement are found in 10 C.F.R. 50 Appendix B Criterion IV (Procurement Document Control), and Criterion VII (Control of Purchased Materials, Equipment, and Services). The specific methods by which these requirements are implemented are described in several documents.

7. The Project Reference Manual, Part C, Sections 8 and 24, and Part D, Section 1-9, set forth requirements for purchase of material, equipment and services for Bechtel Procurement activities.

8. The Bechtel Power Corporation Supplier Quality Manual provides the requirements for quality surveillance activities performed by the Bechtel Procurement Supplier Quality Department to determine supplier compliance with contractual quality requirements.

9. The Bechtel Power Corporation Contracts and Purchases Manual establishes the accepted methods of implementing Bechtel management policies and procedures

uniformly throughout Bechtel Procurement in the formation of contract and purchase commitments.

10. The Bechtel Power Corporation Expediting Manual contains general instructions which are intended to form the basic guidelines for expediting functions.

11. The Georgia Power Company Project Procurement Procedures Manual establishes the procedures and policies for GPC procurement activities on the Vogtle Project.

12. The Georgia Power Company Field Procedures Manual establishes the procedures and policies for the requisition of equipment, material and services by GPC construction personnel.

13. The Southern Company Services Quality Assurance Department Procedures Manual establishes the procedures and policies for SCS QA activities on the Vogtle Project, and for the administration of the supplier quality surveillance program used to control supplier conformance to procurement documents.

A Description of the Procurement Program at VEGP

14. It is the intent of the Vogtle Project to competitively procure equipment, material and services at the lowest overall cost consistent with Project policies, technical specifications, quality requirements, and construction schedules. Various procedures address the evaluation and selection of bidders; the processing of proposals; the preparation, review, approval, and issue of

requisitions, purchase orders, and purchase order changes; source surveillance inspection (as required), and expediting of drawings, documentation, and hardware to meet established schedules.

15. Purchasing actions, whether initiated by GPC, SCS, or Bechtel Procurement groups, are the result of written requests or direction received from the appropriate engineering group. Project Procurement does not have the authority to purchase equipment, material or services without receiving such a request or direction. Engineering provides Procurement with the complete technical and quality requirements.

16. GPC Procurement prepares and issues all formal purchase orders, contracts, and change orders for safety-related items based on the results of engineering evaluation and selection. The purchase orders and contracts incorporate the requirements of the engineering requisition and technical specification. Procurement cannot change technical or quality requirements which are imposed by engineering.

17. The procedures utilized at VEGP ensure that only conforming equipment, material and services are procured and delivered to the job site by qualified suppliers and contractors.

Approved Bidder List Developments and Approval

18. GPC is responsible for the review and approval of bidder lists generated and submitted by Bechtel and SCS, and for developing bidder lists for the equipment, materials and services under its own scope of purchasing. The specific details of developing the bidder lists are set forth in the GPC Project Procurement Procedures Manual. In summary, bidder lists are developed by GPC as follows:

19. For purchases of non-safety-related (referred to as Non-"Q") materials and equipment and services, the assigned GPC buyer selects the bidders based upon GPC's previous experience with the supplier, the quality of service rendered, and the supplier's ability to deliver the commodity on schedule. Input from various groups is solicited as needed.

20. The process for selecting suppliers for the purchase of safety-related "Q" material, equipment and services is more detailed than for Non-"Q" purchases, and involves a review of each potential supplier's ability to provide safety-related items which will conform to both technical and quality requirements.

21. For "code" items (ASME Boiler and Pressure Vessel Code, Section III) used in piping systems covered under the BPC "N" certificate program, the GPC Material Supplier program is followed. Suppliers of code items must be an ASME material supplier or manufacturer's quality system

certificate holder, or be an approved supplier on the Bechtel Evaluated Supplier List (ESL). Bechtel must qualify suppliers that are not previously qualified to the above requirements prior to GPC awarding purchase orders or contracts to them.

22. Bidders for Non-Code "Q" items are selected from either Bechtel ESL or the GPC Qualified Suppliers List (QSL), or are evaluated and qualified through a review and approval of the Suppliers QA Manual, a shop survey of the supplier's facility, or documentation that the supplier of commercial grade "Q" items has successfully performed for GPC in the past.

23. Bechtel and SCS are responsible for developing and forwarding to GPC for approval bidders lists for the equipment, material and services for which they issue inquiries, evaluate proposals, and make purchase recommendations. These bidders lists are developed from suppliers, manufacturers and contractors who expressed an interest in bidding, and who appeared to offer products or services which were included in the specifications. They are included in the bidders list only after they are evaluated and approved in accordance with the criteria established in Project procedures.

24. The criteria include reasonable assurance that the bidder can provide the goods or perform the services under consideration; the bidder's performance based on

current or past work as determined from a review of available data, and whether the bidder has an established quality assurance program which has been properly implemented.

Bidding, Evaluation, Recommendation, Approval
and Award of New Purchase Orders

25. Based on an approved request from an engineering or construction group, an appropriate procurement buyer (Bechtel or GPC) prepares either an inquiry package or a request for quote containing all necessary technical, quality and commercial requirements and/or attachment documents (specifications), and transmits this to the supplier selected as outlined in the previous section. Upon receipt of the proposals, the buyer evaluates the bid from a commercial standpoint and in most cases forwards the proposal to the appropriate engineering, construction, and QA group as needed for evaluation of technical and quality elements of the bids. It is the responsibility of these groups to resolve any technical or quality issues which may exist and any exceptions taken by the bidder. For most commodity type purchases where pricing and/or delivery is the only consideration, the buyer may select the supplier without further involvement from engineering or construction. Once the decision has been made and/or recommendation received from the appropriate engineering/construction group the buyer will prepare an appropriate

Procurement document (purchase order, contract), secure appropriate approvals, and issue the document to the vendor. (NOTE: In the case of items procured by Bechtel, the Bechtel buyer will prepare appropriate documentation and will forward this to GPC for actual preparation and issuance of the purchase order/contract).

26. In certain cases, when time is of the essence, the request for proposals and the actual award to the successful supplier may be handled by telephone or by telex, telecopy, or other such expedient communications. However, in all cases involving safety-related materials, the appropriate paperwork, including specification and other technical or quality documents, is forwarded to the supplier as soon as possible.

Post Award Purchase Order/Contract Administration

27. Post-award purchase order/contract administration includes the responsibility for soliciting proposals for changes, additions and deletions to an existing supplier's scope of work; negotiating the commercial aspects of those changes, including procurement and delivery; resolving disputes and claims arising during the course of the supplier's performance under a purchase order/contract; and issuing purchase order changes and contract amendments. The organizational assignments of these various responsibilities are outlined in Procurement procedures.

28. When it becomes necessary to modify a purchase order or contract because of added or deleted scope, changes in technical requirements, or other similar reasons, the responsible engineering/construction organization will prepare an appropriate request form or letter. This request for change will be reviewed and approved, using the same controls as the original purchase request. This request is then forwarded to the appropriate Procurement group for handling. Generally, when a request involves a change in scope or potential price changes, the appropriate buyer will solicit a proposal from the supplier for the work involved in the change request. In any case, all appropriate technical, commercial and quality information is forwarded to the supplier in order for him to perform the change as outlined. Upon receipt of a proposal, the buyer generally forwards this information to the appropriate engineering/construction group for review to determine if pricing is reasonable and to resolve any technical or quality issues or exceptions which may have been taken by the supplier. If acceptable, the appropriate engineering/construction group communicates their approval to Procurement which is then responsible for preparing the appropriate change order document. As in the case of an original purchase order, Procurement is not allowed to make any technical or quality changes to the change order, and must communicate

all technical and quality requirements to the supplier as outlined by engineering/construction.

Supplier Quality Program

29. For all major equipment and material purchases handled by Bechtel to approved specifications and for safety-related purchases requested by GPC construction to approved specifications, the supplier is required to submit for review and approval a copy of the quality assurance program under which he operates (except in cases where exceptions are defined in the PSAR/FSAR). Prior to the award of a purchase order, a review/approval of the supplier's quality assurance program/plan is conducted by the appropriate engineering and/or QA organization. Following the award of a purchase order, the supplier is required to submit a controlled copy of the quality assurance program description, which is reviewed and retained by the appropriate engineering QA organization. In addition, the supplier is required to submit any and all revisions to this quality assurance program for review and acceptance by the appropriate engineering QA organization.

Supplier Quality Surveillance Program

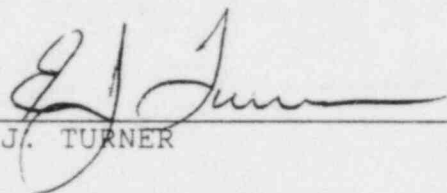
30. The Vogtle Quality Surveillance Program (SQSP) was established to provide additional confidence that suppliers of selected safety-related materials and equipment to Plant Vogtle comply with procurement and engineering document requirements. The Southern Company

Services Project Quality Assurance Engineer (PQAE) is responsible for overall management and administration of the SQSP. During the preparation of engineering specifications for equipment and material, it is the responsibility of the engineering organization preparing the specification to consider the need for surveillance and audits to be conducted in the supplier's facility, as well as for defining other inspection, testing, and witnessing requirements which should be met in the manufacture of the particular item being procured. If it is determined that surveillance and audits are required to be performed in the supplier's facility during manufacture, a recommendation is submitted to the SCS QA Department which is responsible for reviewing the recommendation and either approving or disapproving the need for supplier surveillance and audits. If the recommendation is approved, the SCS PQAE is responsible for assuring that these surveillances and audits are conducted at proper times following the award of the purchase order. Detailed procedures describe the assignment of supplier quality representatives, the training and qualification of these representatives, the initiation and handling of surveillance/audit reports and nonconformance reports, and other similar requirements.

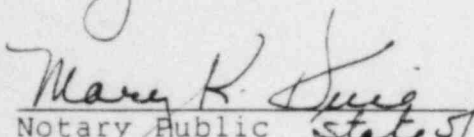
31. When replacement parts are required, or when other changes to the original purchase order are required as outlined in the previous section, it is the

responsibility of the appropriate engineering organization requesting the change to consider the need for further shop surveillance/audits. If the need is identified and approved, the SCS PQAE is then responsible for carrying out these surveillance/audits as outlined above.

Further Affiant sayeth not.


E. J. TURNER

Sworn to and subscribed
before me this 20th day
of June, 1985.


Notary Public State of Ga.
My Comm. expires 6/23/86

RESUME

Edward J. Turner (Ed), P.E.
138 Overlook Court
Ellenwood, Georgia 30049
(404) 981-6219

Personal Data

Born 4-7-54, Atlanta, Georgia
Married, 2 children ages 3 and 6
Height: 6'0", Weight: 210 lbs.

Education

Gordon High School, Decatur, Georgia - 1967-1972
Bachelor of Mechanical Engineering, with honor,
Georgia Institute of Technology - 1976

Work Experience

Sept. 1984 - present - Vogtle Project Procurement Manager
Overall responsibility for approximately 30 people involved
in all aspects of procurement for the Vogtle Electric Generating
Plant. (Approx. cost \$4.5 billion)

June 1983 - September 1984 - Hatch Quality Assurance Manager
Responsibility for the definition, documentation and monitoring
for compliance of the overall Hatch QA Program. Included was
the direct supervision of the Site QA Manager and his staff of
approximately 13, as well as indirect oversight and management
of the corporate QA engineering/support group and Southern
Company Services and Bechtel QA groups.

January 1982 - June 1983 - Assistant to the Vice President and
General Manager - Vogtle Project
Responsible for support and assistance for the Vice President in
areas of administration, budgets, procedures, handling of project
meetings and interfaces with construction, engineering, licensing,
QA, etc. During the spring of 1983, functioned as Acting General
Manager during extended absence of the Vice President.

January 1980 - January 1982 - Supervisor, Engineering Technical
Services, Power Supply Engineering and Services Department
Supervision of approximately nine people involved in procedure
preparation and control, cost/schedule support and administrative
support for the PSE&S Department.

Work Experience (Cont'd.)

April 1978 - January 1980 - Assistant to Vice President - Power Supply Engineering & Services
General administrative and technical support and interface with all groups in PSE&S concerning procedures, job planning, scheduling, environmental matters, etc.

March 1976 - April 1978 - Junior, then Associate Engineer in the Mechanical Division of Power Supply Engineering & Services
Responsible for preparing specifications, designing systems and overseeing implementation for retrofit project including new pulverizers for Plant Branch Unit 1, various coal sampling systems, equipment for ash handling systems and National Pollutant Discharge Elimination System compliance.

Prior to March 1976 - various odd jobs while attending school

Societies

American Society of Mechanical Engineers
National (and Georgia) Society of Professional Engineers

Training

Various Supervisory and Management Courses
Southern Electric Seminar
Managerial Grid

Licenses/Certificates

Georgia Professional Engineer #12722

Outside Interests

Church activities (Ordained Deacon)
Woodworking - furniture, etc.
Building houses
Tennis
Softball