7c, 7d

DEC 03 1984

DO NOT DISCLOSE

Ms. Billie P. Garde
Government Accountability Project
1555 Connecticut Avenue, NW
Suite 202
Washington, D.C. 20036

Dear Ms. Garde:

On Tuesday November 27, 1984. Mr. R. Wessman and members of the Comanche Peak Technical Review Team (TRT) met with [redacted] and yourself to discuss certain aspects of the TRT investigation into allegations raised regarding the Comanche Peak facility. In accordance with your request, we are enclosing a copy of the transcript of the interview. We will provide you with a Safety Evaluation Report when it has been completed.

If you have any questions, please call me or Mr. R. Wessman at the following numbers (301) 492-7903 and/or 492-8432.

Sincerely,

Vincent S. Noonan, Project Director
Comanche Peak Technical Review Team

Enclosure: As stated

DIST:
w/o encl.
J. Zudans

OFC	:TRT	:PD:TRT	:	:	:	:
NAME	:RWessman:pf	:VNoonan	:	:	:	:
DATE	:12/ /84	:12/ /84	:	:	:	:

FOIA-85-59

OFFICIAL RECORD COPY

R5

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

DO NOT DISCLOSE

Ms. Billie P. Garde
Government Accountability Project
1555 Connecticut Avenue, NW
Suite 202
Washington, D.C. 20036

Dear Ms. Garde:

On Tuesday November 27, 1984. Mr. R. Wessman and members of the Comanche Peak Technical Review Team (TRT) met with [redacted] and yourself to discuss certain aspects of the TRT investigation into allegations raised regarding the Comanche Peak facility. In accordance with your request, we are enclosing a copy of the transcript of the interview. We will provide you with a Safety Evaluation Report when it has been completed.

If you have any questions, please call me or Mr. R. Wessman at the following numbers (301) 492-7903 and/or 492-8432.

Sincerely,

Vincent S. Noonan, Project Director
Comanche Peak Technical Review Team

Enclosure: As stated

[redacted]

SENDER: Complete items 1, 2, 3 and 4.

Put your address in the "RETURN TO" space on the reverse side. Failing to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

1. ☒ Show to whom, date and address of delivery.

2. ☐ Restricted Delivery.

3. Article Addressed to: MS. BILLIE P. GARDE
1555 CONN. AVE., N.W., SUITE 200
WASH., D.C. 20036

4. Type of Service:

☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail

Article Number
P 574 485 818

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature – Addressee
X

6. Signature – Agent
X

7. Date of Delivery
DEC -7 1984

8. Addressee's Address (ONLY if requested and fee paid)

DEC 1984

PS Form 3811, July 1983 DOMESTIC RETURN RECEIPT

[redacted]

[redacted]

April, 1984

7c

DO NOT DISCLOSE

Does not include issues raised by [redacted] or other GAP witnesses whose affidavits have been submitted to OI, or other witnesses whose statements have been supplied to the NRC through the hearing process (13 witnesses), or others who have testified in D.O.L. proceedings, or provided supporting information.
this just from GAP sources not already in affadavit-form.

OI Issues and Witnesses — Witness

1. Pre notification of site visit of ASLB (3/20/84) — O

   (see anonymous letter) Also, Billie has more information regarding this incident from Witness O.

2. Harassment and Intimidation for accurately doing job, and for contacting the NRC — H

3. Engineering department is "pencil whipping" drawings to match "as built" without performing any analysis

4. Abuse of forms that should be NCR's -
   - TDR's
   - IR's
   - MAR's

5. Pre-notification of all NRC / audit inspections — J, I, H, K

6. QC Engineers (supv) makes it difficult for QC to do follow up inspections to NCR's — II

7. Craft (not QC) have been signing off NCR's that QC refuses to sign off — I

8. Illegal aliens being used to do Q-work without paperwork — I

9. Cheating on exams for QC inspectors (see affidavit) — C

Task Force Issues — Witnesses

1. ISO Drawings are no longer being sent to Gibbs and Hill (A/E), but are being corrected on site by BoR. — Witness O

2. "Iterative" design process has broken down, engineers are not performing any analysis on design changes. — Witness O, A, C

   → Look at AF-1-SB-Ø6, and AF-1-SB-Ø7. This is a BoR piping ISO which reflects a large run of pipe. Pull ALL the design changes in all revisions, as well as all NCR's and pipe hanger drawings on that line, and all material certs / and craft certification.
   → Trace all of the documents thru the stages of installation.
   → Review packages to the vault.
   → Be sure to also review all of the procedures that affect drawings listed. (i.e., MS-100 in all revisions with all design changes)

3. The flow diagram for the above named piping system is M1-605. It also affects many other systems. (Good example of extensive, excessive rework). — Witness C

   → Pull all revisions + design changes (CMC's, DCA's, DECD's, NCR's, NDER's, and IR's)
   → Ask for computer run
   ⇒ Verify against the packages in the vault.

4. Cable trays → hangers have not been installed where designed to be, therefore stress analysis is inaccurate and do not have proper material traceability.

   → Get E1-7135 drawing (all supporting documentation). Also have to pull the FSE-159

drawings referenced on E1-7135. (FSE 159 is the original locator drawing and runs in numeric order from 001 – 13,000, get all materials for drawings reviewed.)

5. Overloaded cable trays — Witness A, H

→ Pull S-910 packages and all revisions, etc. review as built. (Check Tray # T130CC007)

6. Cables are being "butt-spliced" in violation of procedures.

→ Check the following cables

Termination Cabinet TC-22, A-Orange 104313, black and white conduit on TD # 2, termination point 76-77. The butt splice is about 2 feet back up the cable.

TC-23, A-Green 104528, TD # 2, term pt 76-77, approx 2 feet up cable.

Aux Relay Rack — APR 5 Cable # A-Green 009300 white conduit on term strip TRE, term pt. # 2, 15" up the cable

A-Green, 100800, black and red conduit on the term strip TRM, term pt 4-5 (6" up the cable)

E-Green, 016462, black/white on the strip TRH, term pt 11-12, (16" up the cable)

Non-Q — Massive amounts behind TRH and TRG

E-Orange 111105 / black/white conduit, on bottom where cable comes out of tray.

E-G 110062, red-green on TRM 7-8

Aux Relay Rack #1 (all over, widespread violations)

E-Orange ΦΦ93Φ7 hdr white on TRO11 8+9 term pt

ARR # 2 - E-Green 111126, (white and red) on TCC1 tp. 2+6
E Green 1Φ7128 (green w white) on TLS/7+8

~~[redacted]~~ (Check cables going to control room)

7. Violation of cable tray separation requirements. Witness H
Apparently there are inconsistent procedures regarding cable tray separation. [Check ES-100]

Examples: → Conduit C-12Φ9635 orange goes under ladder tray T-13GCCM02. (6" separation)
* Check accuracy of procedure per FSAR and NRC Reg Guide 1.75

→ C-15R1Φ537 goes under T-13GCCM15 (only 2" separation).

[Witness H told that 1" separations are allowable]

→ C-15B11396 goes under T-13DCCM06 (2")

→ C-12621191 " " T-14ΦCDJ31

8 Testing program for pre-operation and start up is flawed. Witness H

Ex. Pre-requisite testing is being used to satisfy FSAR commitments for pre-op testing. Creates "domino" effect that if pre-op was flawed the whole system could be flawed.

→ No QA being performed on testing of pre op safety equipment.

(Pre-req tests)

→ Procedure XCP-EE 8 allows for the "discretion" of the STE to authorize (allow) unauthorized procedures. (also check EE 10, EE 14) H

9. Functional testing is not proper, only doing continuity (acceptance) testing. H

→ Check latest safety injection pumps

10. System turnover is uncontrolled activity because there is neither a procedure that generates a computer check list to do "turnover from", nor is there any double check on the STE. *

→ No way to insure all testing was done, (30 different STE's do 30 different interpretation of the systems.

→ Some test records (100's) were never performed to begin with. [a technician discovered the cales were wrong, but upon checking found there was no paperwork to support test data] H

11. Vendor problems with Westinghouse components. H

12. Improper or inadequate training of testers H

x No supervision of testers in the field.

13. Dual numerical designation system in electrical/mechanical area has resulted in massive confusion regarding as-built. H

→ System numbers assigned for both components and not accurately reflected in each systems package. H

---

* During alarm testing (recent) STE wasn't even on site.

14. Packages arriving to STE's with DCA's several years old and not updated on the design drawings — H, A,

15. Pkgs arriving to STE's with DCA's issued against other drawings (Aux Relay Room) —

16. Unauthorized "cable pulling" to substitute cable that came up short (Control Room) — H

17. Print changes with NO DCAs in package arriving at STE. — H

18. NO PROCEDURE TO INSURE THAT STE HAS PROPER DOCUMENTATION. — H

19. Test Deficiency Report (TDR) # 853, TDR555 — H

(Good example of problems from HFT)

20. Documentation errors on welds for the steam generators. — H

21. Heat number traceability "fixing". — W, P

A craft person has a desk near the fab shop with a "block" of heat numbers that are being assigned when a heat number is needed on site

22. Reverification effort of heat numbers against vault documents. — W, P

23. Re-designation of materials to avoid proper rework or distribution. (see attch A). (also see affidavit of S.A.N.) — O

(piece changed to # 48, from 38)

24. Possible misuse of NCR's to cover more than one "traveler" — A, D

→ See NCR # M-83-01162 R2, issued against C583-1035-8903 and C583-1058-8903,

25. Extensive revisions in the electrical post-construction verification inspection — I

→ Check Procedures, (Inspection procedure 11-340)

→ Revisions are "writing items out" of the inspection

26. Current (as of March 7) procedures do not allow QC inspectors to get records out of the vault, allowing upper management to double check and doctor the documentation prior to QC review. — I, C

27. Inadequate training for recently hired QC inspectors — I

→ Suggest reviewing qualification and training record for ALL QC inspectors

→ Also suggest interviewing all QC inspectors.

28. Use of non-Q material in Q-components — J

→ Fire sprinkler system done by Grinnel

→ pipe hangers

29. Use of open-ended Field Job Order - "blank check" — J
4Φ or Φ4 makes work appear to have been pre-approved
→ # 4Π or Π4. makes work appear to have been pre-approved

30. Seal penetration flaws (unclear) K

31. Documentation problems

→ As of last week hanger packages are being pulled out of vault and "screened"; old material is being put in manilla folders so that it is not looked at, instead of pkgs reflecting all documentation. (25-50 per day) H, I

→ The screening is being done by the Hanger Task Force and QCC clerks

32. Other "permanent" documentation is being pulled out of the vault and new NCRs written on old problems because the documentation did not match the log book. C

Ex. Check NCR # M-11678-N
M-11660-N
(all on flanges) M-11675-N
M-11687-N

[List of 41 package #'s available from witness C immediately before needed]

33. Over the weekend a ~~hanger~~ → cable tray, held by a temporary hanger, fell several levels in one of the reactors and ripped out instrumentation wires going to the control room. (Anonymous)

34. Stainless steel liner plates contain falsified documents, "hold points" signed off by QC years after inspections completed by Witness ——, FREDERICKS (was it even on site during insp period) C

35. Supports on tanks to RH heat exchanger has undersized welding filler materials (Westinghouse) C, I

36 Extensive delay in repairs on Q-Materials,

Ex. CC2-SB-042-ITT 1 (spool) C
(over 2 years to correct defect)

37. (ANI) - Numerous complaints about ANI accepting flawed packages and known deficient documentation (all)

(A)

ISO # CT-[illegible] SR-[illegible] Reviewed by [illegible] Date

Weld Number	Problem	Group Responsible	Return To	Return From	Comments	Correction Completed
(1) Cannot	track ITT spools in this			→	(1)	
ISO. (2)	What happened to CMC # 87454?				(2) [illegible]	
(3) What	are boundaries of ITT-5?			→	(3) [illegible]	
	[illegible] 3-30-83	[illegible]			[illegible]	
	THIS CMC does not pertain to this ISO! [illegible]				(1) CMC 87642 [illegible] issued [illegible] by Snow 4-18-83	
What	is valve number in detail "D"? [illegible]					
What is be clarified sides of	boundary of ITT-5? This needs to [illegible] in ISO [illegible] ICT-013 [illegible]				CMC 87642 [illegible] 4-18-83	
ITT 2	no item # 33 in ITT 2 shown in ISO (W) [illegible]	WE →			CMC [illegible] [illegible] [illegible] [illegible]	

Recd from S. Treby on 7/16/84

DO NOT DISCLOSE

AFFIDAVIT

OF

[redacted] 7c

My name is [redacted] I am submitting this affidavit freely and voluntarily without any threats, inducements or coercion to Mr. Ernest Hadley, who has identified himself as an investigator with the Government Accountability Project (GAP).

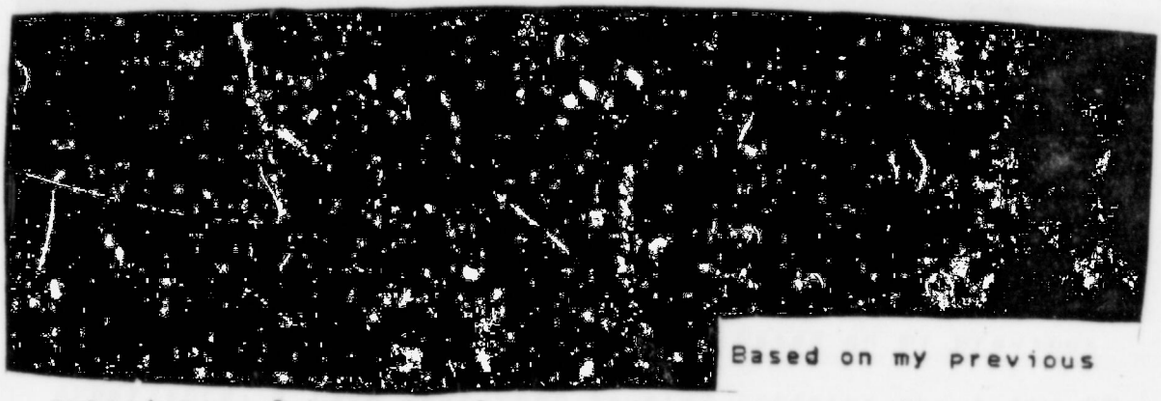
This statement covers my concerns over the breakdown of the Quality Assurance (QA)/Quality Control (QC) program at the Comanche Peak (CP) nuclear power plant under construction in Glen Rose, Texas.

From [redacted] assigned to the Comanche Peak power plant. Prior to [redacted]

AFFIDAVIT OF

[redacted]

DO NOT DISCLOSE



Based on my previous experience, I have developed several concerns about the CP plant.

My concerns over the breakdown of the QA/QC Program at Comanche Peak fall into two main categories: 1) flawed procedures which do not violate any particular regulation of which I am aware, but are not consistent with industry practices and pose potential safety hazards; and 2) procedures which represent regulatory violations and pose substantial safety hazards. The examples used in this affidavit do not represent an exhaustive list of my concerns and should not be used to limit my allegations.

It is my belief that the flawed QA/QC inspection procedures at Comanche Peak reflect a major problem with upper-level management at the plant. The tendency of upper-level management is to relax standards whenever

management feels interpretation will permit, rather than erring on the side of caution. Final Safety Analysis Report (FSAR) committments are construed liberally instead of conservatively. This is not consistent with my experience in the nuclear industry. If the Nucleaar Regulatory Commission (NRC) Regulatory Guide states that a certain item "should be" or "should not be" done a certain way, TUSE will usually interpret this committment as discretionary and not follow the NRC Regulatory Guide unless it suits the company's purpose. My own experience in the field indicates that the trend within the industry is to interpret such language narrowly and treat such provisions as mandatory.

An example of this liberal interpretation of committments is apparent in the practice at CP of using Craft personnel to perform functional testing. In particular, I am personally aware of several instances of Electrical Testing Group (ETG) Craft personnel performing functional tests without a Systems Test Engineer (STE) being present during actual testing. In one test performed by ETG Craft it was necessary for workers to rotate two wires on an alarm system in order to make the alarm work.

The test was performed without an STE being present in the field to observe and supervise the testing. I also know that approximately 100 percent of the breaker testing at the plant was performed by ETG personnel without an STE being present during testing.

Another example of this practice exists in the Emergency Evacuation Lighting System. [redacted] the STE [redacted] responsible for the system [redacted] had signed off on approximately 300 tests records where Craft had performed the prerequisite testing and the STE was not present during the majority of the testing. [redacted] wrote a Test Deficiency Report (TDR) against these tests, but I am uncertain of the number of the TDR or its disposition.

I feel this practice of allowing Craft personnel to perform functional testing without an STE being present is not consistent with ANSI 45.2.6., which requires that personnel have a certain level of qualifications in order to perform testing. It is also not consistent with my experience of the way functional testing is performed at

other nuclear plants.

An additional problem presented by this practice is that it is not apparent from looking at the documentation on the tests that they have been performed by Craft personnel without an STE being present. In fact, a review of the documentation would suggest the opposite. In order to fully understand this problem, it is necessary for me to describe my experience of the manner in which testing is peformed at other sites. In the normal scheme of testing, Craft personnel will carry out the physical testing under the direct supervision of an STE who is present in the field at the time of the testing. In this scheme, the "performed by" block would be signed by the STE. However, at CP the FSAR standard is interpreted to require only that an STE review the paperwork of the testing, and not that he or she be actually present during the testing. The signature by the STE only indicates that he or she has reviewed the testing documentation and that it appears to be in order. The result is that documentation at CP appears to comply with industry practice when, in fact, it does not.

I am concerned that these tests performed by Craft personnel without an STE are invalid since the personnel performing the testing do not have adequate qualifications, or at least do not have supporting documentation for their qualifications. I am further concerned that, because of the manner in which these tests are documented, it is not possible to identify which tests have been performed under the direct supervision of an STE. In fact, it may be necessary to reconduct all tests in order to ensure that they have been peformed properly by qualified personnel.

I also believe the testing procedures are flawed in other ways. For example, it is a common practice at CP to work on more than one system with one Start-up Work Authorization (SWA) and use only one system number. I am personally aware of instances where many systems were worked on in the Auxiliary Relay Rack, but only one system number was used on the SWA. The result is that different portions of the same system are tested by different STE's and, by the same token, one STE is responsible for testing portions of several systems instead of testing one entire system. The overlap is confusing and may lead to portions of a system being overlooked during inspection. This

practice is also not consistent with my experience in the industry where it is preferred to have one STE responsible for an entire system.

Another flaw in the testing process at Comanche Peak is that STE's are not provided with a computer printout which informs them of all tests that are required to be performed on a system. It is my experience that the Bechtel Corp. provides such a printout to its STE's at nuclear sites. Essentially, the printout provides the STE with a checklist and insures the STE performs all the relevant and necessary tests. The failure to provide such a printout at CP, means STE's are left to determine on their own which tests are required, and when they are finished testing a system. The likely result is that each STE devises his or her own scheme for testing a system. This means there is no consistency in testing at the plant and some tests may be overlooked or omitted.

As an example, I am aware that on or about March 15, 1984 it was discovered that the instantaneous trip setting calculations on approximately 100 breakers had not been performed corre tly. This omission was only discovered because [redacted] employee went beyond what he was qualified and required to do and attempted to check the calculations. [redacted] was checking the paperwork related to these breakers to verify the size and attempted to check the calculations at the same time. I am not certain how it was determined that only 100 breakers were involved. I believe that there could be more, but without a computer system it is impossible to tell except by checking all the present test records. A TDR should have been written against these faulty test records.

Another flaw in the testing procedures occurs in the breakdown of interaction between Prerequisite Testing (Prereq.) and Preoperational Testing (Preop.). It is my experience that at other nuclear power plants certain steps of testing performed during Prereq. are again performed during Preop. to insure they were, in fact performed, and performed properly. This is not the case at CP where it is assumed that Prereq. Testing has been completed and performed properly. This means that, in some cases, at Comanche Peak portions of Prereq. Tests are being used to prove FSAR committments.

CPSES Prerequisite Test Instruction XCP-EE-8, "Circuit Control Testing", Rev. 6, further complicates the flaw in the interaction between Prereq. and Preop. testing. Note (1) to Section 7.8 provides that "(e)nergized functional testing of control circuits is desireable; however, if the STE deems this impractical, de-energized functional testing will suffice." Since steps performed during Prereq. are not necessarily repeated during Preop., this means that it is possible that a system can pass through both stages of testing without ever undergoing an energized functional test. It is highly possible that this has happened with many light indicators. I am further concerned because the test instruction provides no guidelines that assist an STE in determining when energized functional testing is "impractical", and there is no notation on test documentation that indicates the functional testing was de-energized.

The above paragraphs represent my concerns over what I consider to be flawed testing procedures that can lead to errors and omissions in the testing process. As I stated above the examples cited in this affidavit should not be used to limit my concerns. Rather the examples are used

DISCLOSE

for illustrative purposes and I believe indicate an overall failure of the QA/QC program at Comanche Peak.

My second category of concerns regards procedures that I believe represent actual violations of specific regulations and, in some instances, represent substantial safety hazards. I also believe the following examples further indicate the breakdown of the QA/QC program at Comanche Peak.

As an example, I believe that Cable Separation Specification 2323-ES-100, Rev. 2, is in violation of Regulatory Guide 1.75. A portion of ES-100, Section 4.11.3.2, provides, "(m)inimum separation between a conduit (safety related or non safety related) and a bottom or side of a tray (solid bottom or ladder) shall be one inch." This is not consistent with the minimum separations required by Regulatory Guide 1.75, which provides that conduit separation should be at least five feet from the bottom of a tray and three feet from the side, except in the cable spreading room where it can be two feet from the side and three feet from the bottom.

I am particularly concerned about the above situation

since, if I am correct in my interpretation of the regulations, then the entire plant has been built using errant specifications. In order to correct this situation, it would be necessary to reinspect all cables and conduits at the plant to ensure proper separation. I am not the only one who believes that ES-100 is in violation of Regulatory Guide 1.75. I am aware of one instance where a Design Change Authorization (DCA) was written against ES-100 to change a portion of the procedure unrelated to cable separation. The Gibson Hill employee who was asked to authorize the change refused to sign off on the DCA because of the violation existing in ES-100.

Another example of the violation of regulations at CP is in the practice of regularly using "butt splices" on both quality and non-quality cables. Butt splicing is used on a routine basis at Comanche Peak where cables are not long enough to reach their intended destinations. (Butt splicing is a means of physically attaching a new length of cable to an existing length of cable using a crimp to secure the attachment.) The problem with butt splicing is that, if it is not properly done, the cables can separate posing a potential fire hazard. This potential hazard is heightened by the fact that the majority of the butt

splices are in bundles of cables and the hazard extends beyond the cable that has been spliced to the cables that surround it.

It is my understanding that butt splicing is specifically prohibited by the NRC. I have confirmed this belief by contacting the NRC Region V Office. In particular, it is my understanding that Regulatory Guide 1.75 specifies that cable splices in raceways should be prohibited and further, that if such splices do exist, the resulting design should be justified by analysis and submitted as part of the FSAR. However, at Comanche Peak, DCA 19264 and several other DCA's allow butt splicing of quality cables. At Comanche Peak not only do the butt splices exist, but in some cases no notation is made on design drawings that the splices exist. As a result, there may be no record of where butt splices have been made. It is my belief that it will be necessary to reinspect all cables and conduits for butt splices since no records are kept of their existence or location.

I am particularly concerned about the practice of butt splicing because of its potential for starting fires, and because it is my experience that there are many fossil fuel

plants where butt splicing is not allowed.

Another incident which I believe shows a failure on the part of upper-level management to follow nuclear regulatory guidelines and a lack of committment on the part of management to an adequate QA/QC program involves the breakdown of ferroresonant transformers provided by Westinghouse. In February of 1983, two of the transformers failed on same weekend and a third transformer failed within one month of that time. There are four inverters and each inverter has its own transformer. If any two of the transformers fail there is an automatic scram and the plant shuts down. Although these problems occurred in February of 1983, it was not until February of 1984 that TUSE filed a report pursuant to 10 C.F.R. 50.55(e) with the NRC. This delay is particularly disconcerting since shortly after the failure [redacted] these transformer failures were similar enough to cause me concern particularly since Westinghouse [redacted]

maintained that no other nuclear plants had reported having problems with the transformers. It is also my belief that after the transformers at Comanche Peak failed, Westinghouse discovered some defective transformers in its factory.

I also feel the NRC should review the results of test PT 55-11. This is a thermal expansion test on piping where I understand that 60 percent of the test points failed the acceptance criteria. These failures were due to the fact that the pipe either moved too far or moved in the wrong direction. The reason for this movement could be that some 260 pipe supports were not installed prior to the test run. The test was further flawed by the fact that temperature readings of the pipe were not properly taken. Although temperatures were taken and logged during the test, the calibration of the test devices was not logged. The result is that traceability of the testing devices has been lost. At least two TDR's (853 and 855) have been written against these tests. However, I am uncertain as to their resolution. I am further concerned about this test because Engineering has provided no justification for the "use as is" determination on this piping.

Another area of concern exists in the practice of QC personnel keeping log sheets of problems spotted during inspections instead of writing Non-Conformance Reports (NCR). The QC procedures provide that before components are turned over to TUGCO, QC inspectors do not have to write NCR's on problems they discover. Instead of writing NCR's, the inspectors are instructed to keep a log of the problems they discover and their disposition. I believe, but am not sure, that this procedure is covered by the Construction Procedures in the section on Procedures for Non-Conformance Reports. This informal practice of keeping logs means that no formal records are kept of many of the problems discovered by QC inspectors.

I am communicating these concerns to Mr. Hadley so that the information contained in this affidavit can be transmitted to the NRC for investigation. I have asked Mr. Hadley to hold my identity in confidence because I have been subjected to substantial harrassment and intimidation for bringing my concerns to the attention of my supervisors and others.

[redacted]

AFFIDAVIT OF

[redacted]

DO NOT DISCLOSE

I have read the above 16 page affidavit and it is true and accurate to the best of my knowledge.

[redacted]

Sworn and subscribed to before me this 22 day of June, 1984.

Thomas D. Sofran

Notary Public

Notary Public, State of [redacted]
My Commission Expires April 13, 1987

My commission expires _____

Based on the attached Conversation Record, and that there is no appearance of anything other than a normal duplication of records (copies), this allegation or concern is hereby closed.

G. Lead – H. Livermore
9-15-84

I concur

TC Appleton
9/15/84

FOIA-85-59
R4

7c

Annex 3

Conversation Record

Allegation Number N/A Time 4:30 P.M. Date 09/14/84

Type ____ Visit ____ Conference __X__ Telephone

____ Incoming
__X__ Outgoing

Name of Person(s) Contacted or in Contact With You	Organization	Telephone Number
[redacted]	[redacted]	[redacted]

SUBJECT: POTENTIAL ALLEGATIONS AS PREVIOUSLY INDICATED TO R. WESSMAN BY GAP.

SUMMARY: [redacted] said that he had received two telephone calls from GAP (names not known) but he did not have anything for them. He did not have any QA/QC concerns about CPSES, nor did he ever talk to anyone about anything. The only incident he could recall at all was the following: 4 months ago, his supervisor [redacted] asked him to make copies of all CMTRs (Certified Materials Test Reports) for materials supplied by the vendor, Gulfalloy Co., fromthe vault and return the original CMTRs to the vault. This request [redacted] apparently from [redacted] who works for [redacted] and involved 350 sets of CMTRs [redacted] speculated that these copies of the CMTRs were taken (cont.)

Name of Person Documenting Conversation RC Tang

Signature RC Tang Date 09/15/84

Name(s) of Other Persons Who Were Present During Conversation

N/A

I have reviewed the summary of the conversation with the individual(s) named below and agree that it accurately represents the conversation.

Signature of Person Providing Information RC Tang

File: Allegation Work Package

cc: Project Director
Group Leader

Additional pages may be attached as needed. Additional pages should be identified, signed, and dated.

SUMMARY: (cont.) to Dallas or some hearings, but claimed that he had no knowledge as to whether they were falsified and that GAP had told him that he had information re falsified records. [redacted] said that the originals of the CMTRs had been returned tothe vault after he made the copies. He said that the copies had been left in the box at the vault for pickup and apparently were picked up since they were not there the next day. [redacted] said that he had informed his supervisor [redacted] of the phone calls from GAP and NRC, and would call NRC if he had more information later.

Name of Person Documenting Conversation RC Tang

Signature RC Tang Date 9/15/84

Signature of Person Providing Information RC Tang

[redacted]

DATE [redacted] TIME 6:35 PM

M[redacted]

OF [redacted]

WA[redacted]

PHO[redacted]

[redacted]

MESSAGE [redacted] left (or)

He works until 5:30 AM call at Plant or call at home tomorrow, later

SIGNED [redacted]

UTHO IN USA

TOPS FORM 3006R

3)

another plant affidavit w/ GAP request confidentiality (GAP) working with. She's sending an unsigned affidavit.

GAP client.

(least = [redacted] will arrange

may get anon call coming in both current employees - in vault

C. = SAN

A = [redacted]

P = not GAP witness don't mention GAP when we call [redacted] —

R.C. —

Don't know if [redacted] has anything at all

7c.

Telecon with B. Garde

1/24/85 (1342)

I contacted B. Garde in order to ascertain the names of various GAP witnesses so that the TRT may arrange for feedback interviews with these individuals. Ms. Garde told me that she could not divulge these names since many are still employed by TUGCO and they want to maintain confidentiality. Specific GAP witnesses I requested included C, D, I, J, P, W, O, #4, #37.

Additionally, Ms. Garde indicated that many of these witnesses have additional concerns which she would like to pass on to us if their confidentiality could be guaranteed.

On another matter she mentioned that she has available unnotarized affidavits which she would like to pass on to NRC if we can guarantee their confidentiality. The individuals involved are no longer at TUGCO.

J.J. Zudans

R6

CONFIDENTIALITY AGREEMENT

7D A-79

I have information that I wish to provide in confidence to the U.S. Nuclear Regulatory Commission (NRC). I request an express pledge of confidentiality as a condition of providing this information to the NRC. I will not provide this information voluntarily to the NRC without such confidentiality being extended to me.

It is my understanding, consistent with its legal obligations, the NRC, by agreeing to this confidentiality. will adhere to the following conditions:

(1) The NRC will not identify me by name or personal identifier in any NRC initiated document, conversation, or communication released to the public which relates directly to the information provided by me. I understand the term "public release" to encompass any distribution outside of the NRC with the exception of other public agencies which may require this information in futherance of their responsibilities under law or public trust.

(2) The NRC will disclose my identity within the NRC only to the extent required for the conduct of NRC related activities.

(3) During the course of the inquiry or investigation the NRC will also make every effort consistent with the investigative needs of the Commission to avoid actions which would clearly be expected to result in the disclosure of my identity to persons subsequently contacted by the NRC. At a later stage I understand that even though the NRC will make every reasonable effort to protect my identity, my identification could be compelled by orders or subpoenas issued by courts of law, hearing boards, or similar legal entitites. In sucy cases, the basis for granting this promise of confidentiality and any other relevant facts will be communicated to the authority ordering the disclosure in an effort to maintain my confidentiality. If this effort proves unsuccessful, a representative of the NRC will attempt to inform me of any such action before disclosing my identity.

I also understand that the NRC will consider me to have waived my right to confidentiality if I take any action that may be reasonably expected to disclose my identity. I further understand that the NRC will consider me to have waived my rights to confidentiality if I provide (or have previously provided) information to any other party that contradicts the information that I provided to the NRC or if circumstances indicate that I am intentionally providing false information to the NRC.

Other Conditions: (if any)

I have read and fully understand the contents of this agreement. I agree with its provisions.

[redacted]

5/8/85
Date

Name:
Address:

Agreed to on behalf of the US Nuclear Regulatory Commission

5/8/85
Date

Chester Poslusny
Signature
Name: Chester Poslusny
Title: Committee PEAK Project Program Coordinator

ENCLOSURE R8

CONFIDENTIALITY AGREEMENT

I have information that I wish to provide in confidence to the U.S. Nuclear Regulatory Commission (NRC). I request an express pledge of confidentiality as a condition of providing this information to the NRC. I will not provide this information voluntarily to the NRC without such confidentiality being extended to me.

It is my understanding, consistent with its legal obligations, the NRC, by agreeing to this confidentiality. will adhere to the following conditions:

(1) The NRC will not identify me by name or personal identifier in any NRC initiated document, conversation, or communication released to the public which relates directly to the information provided by me. I understand the term "public release" to encompass any distribution outside of the NRC with the exception of other public agencies which may require this information in futherance of their responsibilities under law or public trust.

(2) The NRC will disclose my identity within the NRC only to the extent required for the conduct of NRC related activities.

(3) During the course of the inquiry or investigation the NRC will also make every effort consistent with the investigative needs of the Commission to avoid actions which would clearly be expected to result in the disclosure of my identity to persons subsequently contacted by the NRC. At a later stage I understand that even though the NRC will make every reasonable effort to protect my identity, my identification could be compelled by orders or subpoenas issued by courts of law, hearing boards, or similar legal entitites. In sucy cases, the basis for granting this promise of confidentiality and any other relevant facts will be communicated to the authority ordering the disclosure in an effort to maintain my confidentiality. If this effort proves unsuccessful, a representative of the NRC will attempt to inform me of any such action before disclosing my identity.

I also understand that the NRC will consider me to have waived my right to confidentiality if I take any action that may be reasonably expected to disclose my identity. I further understand that the NRC will consider me to have waived my rights to confidentiality if I provide (or have previously provided) information to any other party that contradicts the information that I provided to the NRC or if circumstances indicate that I am intentionally providing false information to the NRC.

Other Conditions: (if any)

I have read and fully understand the contents of this agreement. I agree with its provisions.

5-8-85
Date

[redacted]
Name:
Address:

FOIA 85-50

Agreed to on behalf of the US Nuclear Regulatory Commission

5-8-85
Date

Chester Poslusny
Signature
Name: Chester Poslusny
Title: Program Coordinator
Comanche Peak Project

ENCLOSURE

R9

CONFIDENTIALITY AGREEMENT

I have information that I wish to provide in confidence to the U.S. Nuclear Regulatory Commission (NRC). I request an express pledge of confidentiality as a condition of providing this information to the NRC. I will not provide this information voluntarily to the NRC without such confidentiality being extenced to me.

It is my understanding, consistent with its legal obligations, the NRC, by agreeing to this confidentiality. will adhere to the following conditions:

(1) The NRC will not identify me by name or personal identifier in any NRC initiated document, conversation, or communication released to the public which relates directly to the information provided by me. I understand the term "public release" to encompass any distribution outside of the NRC with the exception of other public agencies which may require this information in futherance of their responsibilities under law or public trust.

(2) The NRC will disclose my identity within the NRC only to the extent, required for the conduct of NRC related activities.

(3) During the course of the inquiry or investigation the NRC will also make every effort consistent with the investigative needs of the Commission to avoid actions which would clearly be expected to result in the disclosure of my identity to persons subsecuently contacted by the NRC. At a later stage I understand that even though the NRC will make every reasonable effort to protect my identity, my identification could be compelled by orders or subpoenas issued by courts of law, hearing boards, or similar legal entitites. In sucy cases, the basis for granting this promise of confidentiality and any other relevant facts will be communicated to the authority ordering the disclosure in an effort to maintain my confidentiality. If this effort proves unsuccessful, a representative of the NRC will attempt to inform me of any such action before disclosing my identity.

I also understand that the NRC will consider me to have waived my right to confidentiality if I take any action that may be reasonably expected to disclose my identity. I further understand that the NRC will consider me to have waived my rights to confidentiality if I provide (or have previously provided) information to any other party that contradicts the information that I provided to the NRC or if circumstances indicate that I am intentionally providing false information to the NRC.

Other Conditions: (if any)

I have read and fully understand the contents of this agreement. I agree with its provisions.

5-8-85
Date

[redacted]

Agreed to on behalf of the US Nuclear Regulatory Commission.

5-8-85
Date

Chester Rodriguez Jr
Signature
Name: Chester Rodriguez Jr
Title: Prog. Coordinator
Comanche Peak Proj.
NRC.

FOIA-85-59

ENCLOSURE

RIC

CONFIDENTIALITY AGREEMENT

I have information that I wish to provide in confidence to the U.S. Nuclear Regulatory Commission (NRC). I request an express pledge of confidentiality as a condition of providing this information to the NRC. I will not provide this information voluntarily to the NRC without such confidentiality being extended to me.

It is my understanding, consistent with its legal obligations, the NRC, by agreeing to this confidentiality. will adhere to the following conditions:

(1) The NRC will not identify me by name or personal identifier in any NRC initiated document, conversation, or communication released to the public which relates directly to the information provided by me. I understand the term "public release" to encompass any distribution outside of the NRC with the exception of other public agencies which may require this information in futherance of their responsibilities under law or public trust.

(2) The NRC will disclose my identity within the NRC only to the extent required for the conduct of NRC related activities.

(3) During the course of the inquiry or investigation the NRC will also make every effort consistent with the investigative needs of the Commission to avoid actions which would clearly be expected to result in the disclosure of my identity to persons subsequently contacted by the NRC. At a later stage I understand that even though the NRC will make every reasonable effort to protect my identity, my identification could be compelled by orders or subpoenas issued by courts of law, hearing boards, or similar legal entitites. In such cases, the basis for granting this promise of confidentiality and any other relevant facts will be communicated to the authority ordering the disclosure in an effort to maintain my confidentiality. If this effort proves unsuccessful, a representative of the NRC will attempt to inform me of any such action before disclosing my identity.

I also understand that the NRC will consider me to have waived my right to confidentiality if I take any action that may be reasonably expected to disclose my identity. I further understand that the NRC will consider me to have waived my rights to confidentiality if I provide (or have previously provided) information to any other party that contradicts the information that I provided to the NRC or if circumstances indicate that I am intentionally providing false information to the NRC.

Other Conditions: (if any)

I have read and fully understand the contents of this agreement. I agree with its provisions. 7d

5-9-85
Date

[redacted]

Agreed to on behalf of the US Nuclear Regulatory Commission.

5-9-85
Date

Chester Poslusny
Signature
Name: Chester Poslusny
Title: Program Coordinator
Comanche Peak Project

FOIA-85-59

ENCLOSURE R14