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NUCLEAR REGULATORY COMMISSION

Title: Deposition of Tresha Landers

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P-R-O-C-E-E-D-I-N-G-S

1
2 MS. EUCHNER: This is in the matter of
3 Tennessee Valley Authority, deposition of Tresha
4 Landers.

5 My name is Jennifer Euchner. I'm counsel
6 for the NRC staff. If you would please swear in the
7 witness.

8 Whereupon,

9 TRESHA LANDERS

10 appeared as a witness herein and, having been first
11 duly sworn, was examined and testified as follows:

12 EXAMINATION

13 BY MS. EUCHNER:

14 Q Okay. Ms. Landers, I'm going to ask you
15 a number of questions today, most of which are going
16 to involve some issues you raised about Sam Harvey
17 back in the '96 time frame. First I'd like to start
18 with your education and employment history. First
19 your education.

20 A I have two B.S. degrees in engineering,
21 and completing a Master's next week in business.

22 MR. DAMBLY: Is that an MBA?

23 THE WITNESS: Yes.

24 BY MS. EUCHNER:

25 Q When did you get your two Bachelor's

1 degrees?

2 A '95.

3 Q When did you start working at TVA?

4 A Best that I can remember, I think it was
5 '93, end of '93.

6 Q And what position did you start as?

7 A Co-opp. Environmental chemistry co-opp.

8 Q Were you at corporate or were you at one
9 of the sites?

10 A I was at corporate, and I frequently made
11 visits to the sites.

12 Q Which sites did you go to?

13 A Browns Ferry, Bellefonte, Sequoyah, and
14 Watts Bar.

15 Q Were you doing mostly environmental,
16 mostly chemistry, or both?

17 A Both. Well, it started out more
18 environmental for two or three months, then became
19 more chemistry. Then it just kind of mixed.

20 Q And how long were you a co-opp?

21 A Until I graduated.

22 Q So that was in 1995?

23 A Uh-huh (affirmative).

24 Q What position did you take when you
25 graduated?

1 A I was -- I was held as a co-opp for about
2 another three or four months, or as a contractor,
3 because nobody had any positions at that time. TVA
4 was going through a downsizing or not a hiring phase.

5 And so what happened was, is another
6 organization picked me up, and they -- they paid my
7 salary. So I stayed right where I was, but as an
8 entry level engineer.

9 Q Okay. Back when you were a co-op between
10 '93 and '95, who was your supervisor?

11 A To begin with it was David Sorrell. Let
12 me get this right. Then, Wilson McArthur was the
13 overall person there. David Sorrell was my immediate
14 supervisor for a short period of time, maybe eight to
15 ten months. And then Ron Grover came in. If I
16 remember correctly, David stayed a little while, left,
17 and Ron took over as the chemical environmental
18 supervisor. And basically at that point, they phased
19 the environmental department out.

20 Q Was McArthur sort of like your second line
21 supervisor?

22 A Yes.

23 Q All right. Then in 1995, when you became
24 an engineer...

25 A Yes.

1 Q ...who was your supervisor?

2 A I worked for engineering services, so
3 my -- my supervisor in that group was Kim Choate, C-h-
4 o-a-t-e. But I reported to Ron Grover. He did the
5 performance reviews and, you know, he -- he did --
6 because I was working for him, I was just out of
7 another organization.

8 Q And how long were you in that position?

9 A Several months. Several months. If I
10 remember correctly, it seems to me like he paid for an
11 entire year, and then turned around and paid for a
12 partial part of the other year, like maybe '96,
13 something like that. And I went over in June, July,
14 something like that, of I think '96 to work on hydro
15 stuff, and that disassociated me with nuclear.

16 Q Okay. When did you first meet Sam Harvey?

17 A Within the first week after I started.

18 Q Where did you meet him?

19 A There at the office. Corporate.

20 Q At corporate?

21 A Uh-huh (affirmative).

22 Q What was his position when you first...

23 A Same thing. The chemistry -- a PG-7 or 8,
24 chemistry program manager, something like that.

25 Q When did you first start having problems

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1 with Mr. Harvey?

2 A Pretty much odd and end things from after
3 I'd been there three or four months. Pretty well
4 started, just -- and then they just got bigger as time
5 went on.

6 Q Okay. When they first started, what sorts
7 of problems were you having with him?

8 A Basically just the way that -- he was
9 really bossy and non-respectful. He always made lude
10 comments to the effect like -- he had this thing about
11 chemical engineers and chemists. And so because I and
12 a couple of more of the other co-ops were chem-Es, he
13 was always making lude remarks like, "Well, chemists
14 are smarter. Chemical engineers don't mean much."
15 You know, he was always saying things like, "Well,
16 you're a female. You're not going to be hired here,"
17 you know. And just things I took offensive. And
18 then, as time went on is when he actually started
19 scratching body parts and groping and things to that
20 nature.

21 Q And did he do that to you, specifically,
22 or to you and to the other female co-ops?

23 A I witnessed it myself. To them, I
24 don't -- I don't know what they saw. They were aware,
25 because I made it very clear I -- that I didn't

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1 appreciate it. It didn't stop him. But to me he did
2 it. But at that time there were two other men in the
3 office, to other guy co-ops. So I -- I don't know,
4 you know, if that was routine with them or not.

5 Q Who were the two other male co-ops, if you
6 know?

7 A Kyle Cunningham, and then there was a Kurt
8 Watson that was there for just a brief period of time.
9 And he pretty well was fortunate enough to not have to
10 work much for chemistry.

11 Q Did you ever discuss your feedings about
12 Harvey's behavior with him directly, ask him to stop?

13 A Yes, I did. I told him that I felt -- I
14 was offended by that, and that I would appreciate it
15 if he didn't do that.

16 Q What was his response?

17 A Non-sensitive. He said -- well, basically
18 he said, "You're shit out of luck. I'm going to do
19 what I feel like doing." So I shut up at that point
20 to him.

21 Q Okay. Did you ever ask him again...

22 A No.

23 Q ...after that?

24 A No. No. No. No, tried to avoid all
25 communication at all.

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1 Q Did you ever discuss his behavior with
2 your supervisor?

3 A Yes. Yes. Not Sorrell. Ron Grover.
4 When Ron took over, that's when the behavior really
5 worsened. And yes, I did take it to Ron two or three
6 times.

7 Q Okay. And what was Ron's response?

8 A He would send out an Email or he would
9 call Sam in and speak with him. And then things would
10 get good for -- well, I say "good," things would get
11 better for two or three or four days, or maybe by the
12 end of the week, and then he'd revert back to his old
13 ways within just a few days.

14 Q And at that time, was Ron also Sam
15 Harvey's supervisor?

16 A Yes. Yes.

17 Q Okay. Did you ever discuss your problems
18 with Sam with anyone other than Ron Grover?

19 A In the -- well, I did complain to the
20 other co-ops about it, because they had complaints,
21 like they -- you know, he was making them feed his
22 pets and stuff when he was out of town and stuff like
23 that. Fortunately, I lived farther enough out to
24 where I didn't fall prey to feeding his little
25 animals.

1 But, anyway, I did relate -- yeah, I did
2 talk to them a lot. But not -- you know, we all were
3 just kind of in the same boat where we were wanting to
4 get paid, get through school, and get a job. So, you
5 know, nobody really -- we just tried to avoid him,
6 is -- but they were aware of it.

7 And then later on, after about two or
8 three discussions with Ron Grover, Gary Fiser -- I was
9 in a room similar to this in Blue Ridge. And I was
10 just -- I'd just had it. I was sitting there crying.
11 And he walked by, just -- see, he was a big coffee
12 drinker, so he was always going and getting coffee.
13 So he would come by. And he saw me in this room. And
14 I -- I don't think it was a deliberate thing, I just
15 think it was a -- he just happened to run up on me and
16 saw me in there. And I was just crying. And I'd just
17 had it.

18 And at that point I told him some bits and
19 pieces that Sam had done, things that he had done. He
20 asked me if Ron was aware of them, and I told him that
21 he was aware of, you know, many of them. And then he
22 said he would just recommend that -- he said, "Well,
23 I would recommend that you just continue talking with
24 either Ron or somebody higher, if Ron doesn't satisfy
25 you." And then that was pretty well the end of it.

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1 Q Did there come a point when you went to
2 the concerns resolution staff about Harvey's behavior?

3 A No. I went to Ben Easley in human
4 resources.

5 Oh, let me go back to the Gary Fiser in
6 the room deal. He asked me, he said, "Was this sexual
7 harassment?" He said, "Do you feel this is sexual
8 harassment?"

9 And I said, "No, this is just harassment
10 and intimidation." I said, "I don't think it has
11 anything to do with -- I'd just cut my throat if that
12 was the case, you know." I'm just kidding. But, you
13 know, I just felt like it was harassment and
14 intimidation. I made that clear to him. And then I
15 even made that clear to Ron when he had asked what
16 type of harassment I viewed this as.

17 MR. DAMBLY: You mentioned scratching body
18 parts need groping. Did he physically touch you?

19 THE WITNESS: Not -- not me. Himself.

20 MR. DAMBLY: Oh. He was groping himself?

21 THE WITNESS: Yes. No, no, no. Not me.
22 Nasty.

23 MR. DAMBLY: That's why I -- I was having
24 a little trouble with...

25 THE WITNESS: No, no. I'm sorry.

1 MR. DAMBLY: ...you said there was no
2 sexual contact, but you said scratching and groping.

3 THE WITNESS: No, no, no. No. No. It
4 was -- no, it was just him.

5 MR. MARQUAND: He was just rude?

6 THE WITNESS: Yes.

7 BY MS. EUCHNER:

8 Q You mentioned that you had complained to
9 some of the other co-ops.

10 A Yeah.

11 Q Can you identify some of...

12 A Kyle Cunningham. He was probably -- he
13 was there. He and I were there mostly, so he was
14 probably the one that I talked with about this the
15 most.

16 Q All right.

17 A And then I did take it to human resources,
18 Ben Easley.

19 Q Okay. About when did you go see Ben
20 Easley?

21 A Not long after I started discussing it
22 with -- with Ron. All this happened within a three or
23 four month period, when I had talked with Ben. I
24 forget exactly when.

25 Q Would this have been maybe in 1996?

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1 A Might have been. It might have been. I'm
2 not -- no, that couldn't have been. It might -- I
3 don't know. It's hard to remember. But I did take it
4 to him, and he filled out some paperwork. And -- and
5 he went and had meetings with Ron and Wilson McArthur.
6 They all had a team meeting. And I think Sam might
7 have even been invited. And then Emails went out to
8 Sam, and I think he was talked to about this.

9 Q Now, asked you just a minute ago if you
10 ever went to employee concerns.

11 A I didn't -- I did not go to employee
12 concerns. I could have talked to them; but if so, it
13 was referred by human resources or someone else. I
14 never went to employee concerns. I stopped with Ben
15 Easley.

16 Q Okay.

17 A Now, that's not to say they didn't call me
18 and I discussed it with them. But it's hard -- it's
19 just really hard to remember. But I did not go to
20 them.

21 Q Okay. Were you ever interviewed by TVA
22 OIG?

23 A Seems like I received a phone call one
24 time, and it seems to me like Ben Easley might have
25 been on the phone, and I think that's why I'm having

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1 a hard time relating them from him.

2 Q Okay. I have a copy of the TVA OIG record
3 of interview of Tresha A. Landers from September 25th,
4 1996.

5 A So, see, that was way after I went back to
6 my other group.

7 Q Okay. Why don't we go off the record for
8 a minute. Oh, one second. Go ahead and read this
9 while we're off the record, and familiarize yourself
10 with it. Now we'll go off the record.

11 (Off the record.)

12 Q Back on the record.

13 Did you have the opportunity to review the
14 TVA OIG statement?

15 MR. MARQUAND: For the record, it's not a
16 statement, it is a record of interview.

17 MS. EUCHNER: Interview.

18 MR. MARQUAND: These are notes taken by
19 the IG agent. There -- it's not a statement.

20 BY MS. EUCHNER:

21 Q Were you ever shown these notes after the
22 interview?

23 A Yes.

24 Q Now that you've read them, do you recall
25 the interview?

1 A No. That's the weird thing. As I said,
2 Ben Easley must have had some relation or some -- some
3 part of this, or either the -- well, let me go back.

4 Blake Daniel sounds familiar. But it
5 seems like either Ben Easley called me and told me
6 he'd be calling, or was on the conference call, or
7 something. I can't get Ben out of my head. But I do
8 remember a Blake Daniel. But I don't remember this;
9 no. But it's all true. I -- I haven't...

10 Q Okay. You have a number of statements
11 about Harvey's behavior in here, some of which was
12 directed at you and some of which was directed at
13 other individuals.

14 A Yeah.

15 Q And I'd like to, for the record, go
16 through them.

17 A Okay.

18 Q Starting with the first one. And if you
19 can go ahead and read that into the record.

20 A "Harvey would come to my cubicle, expel
21 gas, and belch."

22 Q Okay. And did that behavior start in 1993
23 and go throughout, or was that a more recent behavior?

24 A Okay, he used to do it from a distance.
25 And then, for some reason, he got moved closer to me,

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1 which made him walk by my cube more often. And that's
2 when it really became a nuisance to me.

3 Q Okay. The second bullet, if you'd go
4 ahead and read that into the record.

5 A "Harvey told Landers she was just a co-op,
6 she did not have a chance of getting hired at TVA, and
7 she should do what he tells her to do." That's
8 correct.

9 Q Okay.

10 A He was always good to tell us that.

11 Q Did he say that more than once throughout
12 your time as a co-op?

13 A Oh, periodically. Periodically. That was
14 not...

15 Q To your knowledge, did he say it to just
16 you or to the other co-ops?

17 A See, I don't know.

18 Q Okay.

19 A "Harvey told Landers that she made less
20 money than he did. His job was more significant. And
21 he instructed her to make copies of reference material
22 for him." That's true.

23 Q Okay. And again, did that happen
24 throughout your interactions with him?

25 A Yes. Yes. Yes.

1 Q Do you know whether he treated the other
2 co-ops the same way?

3 A Yes.

4 Q All right. The next bullet?

5 A "Ron Grover, Landers immediate supervisor,
6 instructed Landers to ask Harvey about the elevation
7 of some chemicals at Sequoyah Nuclear Plant. Landers
8 contacted Harvey and Sequoyah and he told her, 'I
9 don't have time to fool with you. This had better be
10 important.'" That is true. I remember that.

11 Q Do you recall approximately when that
12 happened?

13 A It was in the morning time, around 9:30,
14 because I had to do the chemical reports. They had to
15 be out around 11:00, and I hated them, so I always
16 tried to get them out really quick.

17 And, but the weird thing about this
18 statement was, is I got to thinking back. Somebody
19 else used to do this, and we didn't use to have to
20 contact him. And after I complained -- after I
21 started complaining or maybe said something to Ron
22 maybe one time, then I had to go back, and then it
23 suddenly became my responsibility to beep him every
24 morning and try to hunt him down to find out this
25 information.

1 And, of course, I would just make a
2 beeline to Ron's office and say, "He was nasty and
3 rude to me and wouldn't give me the information, so
4 therefore the chemical report can't be done for the
5 day."

6 Q Okay.

7 A "Harvey asked Dana L. Eckert, a former co-
8 op student, to feed his pets during the summer of '93.
9 Landers could not provide any specific information
10 about the circumstances surrounding the situation,
11 other than she believed that Eckert thought that
12 feeding Harvey's pets was not part of her job."
13 That's true, she did feed his pets.

14 MR. MARQUAND: You just read and said it
15 was...

16 THE WITNESS: Well, she was...

17 MR. MARQUAND: ...she thought it was
18 not...

19 THE WITNESS: ...was -- okay, "was part of
20 her job." I'm sorry.

21 BY MS. EUCHNER:

22 Q Okay.

23 A Dana was -- just whatever you asked her to
24 do, Dana would do. And she wouldn't complain about
25 much.

1 Q Where did you get your information about
2 this?

3 A From Dana.

4 Q From Dana?

5 A Uh-huh (affirmative).

6 Q Okay. And did that only happen in the
7 summer of '93, to your knowledge?

8 A No. Periodically. Sam had these -- he
9 had these ferrets. And when he traveled, you know,
10 ferrets used litter boxes and various things. And he
11 was always trying to hunt somebody he didn't have to
12 pay, to go and scoop his ferret box and feed them
13 grapes and other types of vegetables.

14 And so what would happen is, is I lived an
15 hour out. And he -- he didn't bother me with it, but
16 Kyle and Dana and another girl, Stephanie -- started
17 with an "H." Hollingsworth.

18 Q Hollingsworth.

19 A I'm pretty sure. Now, I know Dana did,
20 because she was just a -- really an animal person.
21 She hated to see them starve. And he'd put this story
22 about how they were going to lose so many ounces if
23 they didn't eat.

24 Well, and then, if I remember correctly,
25 even old Chandra fell victim to going and throwing

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1 some grapes through the door when he was gone.

2 Q Okay. The next bullet?

3 A "Kyle R. Cunningham, a former co-op
4 student, told Landers that Harvey made a comment to
5 him about the body of another co-op student, Stephanie
6 G. Hollingsworth. Landers neither heard the comment,
7 nor did Cunningham repeat the comment to her. Landers
8 believed Hollingsworth could provide additional
9 information regarding Harvey's treatment of her and
10 other co-op students."

11 Stephanie was a very pretty girl. She --
12 very quiet. Her mother had died not too long before
13 that, and she was just trying to find her identity.
14 And she was also a chem ed, Auburn. I'm pretty sure
15 it was Auburn. He -- he was pretty ratty to her
16 mostly. She would sit at her cube for hours at a time
17 and not even say a word to anybody, and he'd keep
18 giving her stuff to do and he'd hang over there and --
19 and talk to her. And she was just disgusted by it.

20 I do remember telling this to Ben Easley,
21 but I don't think that Stephanie validated any of it,
22 because she thought that it would end up being a
23 problem for her down the road trying to get
24 employment.

25 Q Did you ever hear him say anything

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1 inappropriate to her or about her?

2 A No. No. Not -- not to me. He wouldn't
3 have said anything like that to me. But Kyle
4 Cunningham -- Kyle was -- he wanted to be a Catholic
5 priest in addition to a chem-E. So he was very
6 religious. Very religious. And he would not repeat
7 anything like that at all.

8 Q Okay. The next bullet?

9 A "In 1993, Cunningham told Landers he could
10 not locate some computer stuff that had been purchased
11 with a TVA credit card. Harvey was the acting
12 chemistry manager at the time, and he authorized a
13 credit card use. Landers had no specific knowledge
14 that Harvey took the TVA purchases for his personal
15 use. Landers could not provide any additional
16 information regarding this manner -- matter. Landers
17 suggested contacting Cunningham for additional
18 information."

19 I do remember this incident. There were
20 six or seven hardware programs -- software programs
21 that we ordered. And they just disappeared from the
22 office. None of us got them. They -- they were gone.

23 Q Okay. But you didn't have any specific
24 knowledge that Harvey took them?

25 A No. But he did go ahead and approve the

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1 credit card Visa to be paid. And no -- and he didn't
2 want them reported stolen. He wouldn't let Kyle or I
3 do that.

4 Q Okay.

5 A "In December 1995, Harvey told Landers he
6 was leaving work and going out of town. Instructed
7 her to empty his trash can before he returned to work
8 on Monday." That's correct. Now, that was, in his
9 opinion, something that I needed to do quite often,
10 and which I never did.

11 Q Okay. And the last bullet?

12 A "In July 1996, Landers and her group, and
13 included Harvey, moved to a new location. During the
14 move, she took down a shelving rack and moved it to
15 her new cubicle. The following day she discovered the
16 rack had been removed from her cubicle. She -- she
17 looked around and found the rack installed in Harvey's
18 cubicle. When she confronted Harvey about the rack,
19 he lied and said he had not taken the rack from her
20 cubicle, that she found it in another -- that he had
21 found it in another cubicle."

22 I think -- I think I'd already talked to
23 Ben Easley of this. I think this was the last straw
24 before I actually went back to my group. Because he
25 was an old thief. He would go around to everybody's

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1 cube and just get what he wanted, instead of making
2 his own cube, because that's required effort. Sam was
3 lazy when it come to getting up and walking around.
4 So he just stole whatever he wanted out of ours.

5 Q Okay. Now, you said you went to Ben
6 Easley. Why -- why did you go to Ben?

7 A Because he was the HR person.

8 Q Okay. And were you interested in filing
9 a complaint against Harvey?

10 A In the -- in the beginning, yes.
11 Intimidation and harassment. Yes.

12 Q Okay. Did you ultimately file a
13 complaint?

14 A I -- I filed something. I think I just
15 filed a complaint, although I didn't go -- follow
16 through with it. I dropped it. But I did file a
17 complaint with Ben, I'm pretty sure, because he filled
18 out paperwork.

19 Q Okay. What made you decide to drop it?

20 A Well, after this went on, Ben went and
21 talked to Ron Grover, and they all talked with Sam.
22 Wilson was involved.

23 Q Let's go off the record.

24 (Off the record.)

25 BY MS. EUCHNER:

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1 Q I believe you were in the middle of
2 providing a response about a meeting between Easley
3 and Ron Grover where they talked to Sam. If you
4 could...

5 A Yeah. And I believe Wilson was involved
6 in that meeting, also. And basically this went on,
7 and I went down and talked with Ron -- I mean, talked
8 with Ben Easley about this. And Ron had asked me if
9 I was sure it wasn't sexual harassment. And -- and
10 basically, I felt like I was being lured into filing
11 sexual harassment charges.

12 But I -- I said no. At, you know, my
13 definition of sexual harassment and him just being
14 nasty are two different things. I -- I did not -- I
15 would not do that. And I told him. Wilson McArthur
16 asked me the same thing. And, as I say, Gary Fiser
17 had asked me, and so had Easley. I said no to all of
18 them.

19 Week or two later I -- Ben called me down.
20 I was talking to him, and he said, "What are we going
21 to do with this? We need to either act on it or what-
22 not." And if I remember correctly, he had told me
23 that there were some other complaints about Sam's
24 behavior from Sequoyah.

25 Well, I asked him, I said, "Well,

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1 basically on situations like this I don't know what to
2 do." I said -- number one, I don't want to jeopardize
3 my employment at TVA. It's very clear to me that my
4 importance here -- I'm more expendable than these
5 people. They're tenured; I'm not. I'm the only
6 female up there now. You know, what does this hold
7 for me, future-wise. Because I was very concerned,
8 because there's always been this thing at TVA if you
9 go to filing grievances and stuff like that, it's a --
10 it's like a stigma that's associated with you wherever
11 you go. And being, you know, new in the career, I
12 didn't want to do that.

13 So he told me, he said, "This is what I
14 think." He said, "I would recommend us basically
15 trying to make Sam stay away from you, you have no
16 contact with him. You don't work with him. He'd have
17 to take sensitivity training and whatever, some more
18 recommendations Ron had. And you drop the case.
19 Because," he said, "if this goes to court," he said,
20 "most likely it's not going to go anywhere because you
21 claim it's not sexual harassment."

22 And at that point he recommended that in
23 my best interest and my future employment at TVA, that
24 I might consider dropping it, provided that they keep
25 him away from me and -- and given those other

1 conditions. And I did.

2 Q Okay. And, to your knowledge, did they
3 ever discuss with Harvey staying away from you?

4 A Yes.

5 Q Taking the training?

6 A Yes. Yeah, he did. And then he went
7 out -- then he was -- seems to me like he -- there was
8 a job up at Sequoyah. There was a girl, Diedre Nida,
9 that was in the environmental department there. And
10 she was borderline of being axed out of that position.

11

12 Well, there was a position at Sequoyah
13 where she had come from. Well, Sam was wanting that
14 position. So she -- she had related to me at one
15 time, she says, "I'm concerned if I get axed here,
16 that I'm going to be out of a job. Because if
17 there -- there's a position in the chemistry lab and
18 Sam's trying to get it at Sequoyah." And I knew a
19 little bit of that, because he was wanting me to make
20 sure his PC got out there. Because he was wanting to
21 take his PC with all of his software on it out there.

22 And I was anxious for him to go, you know.
23 But, on the other hand, I was sad for her because that
24 meant she wouldn't have a job, basically. So, but I
25 had -- other than the PC deal, at that point I had

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1 little to do with him at all. I mean, you know, the
2 chemical reports were sent to Kyle. Kyle started
3 doing those chemical daily reports.

4 Additionally, he -- he went to Sequoyah at
5 that point. And I remember talking -- Debbie Bodine
6 called me. And he had relayed to Debbie -- somebody
7 said something out there about it. He had relayed to
8 Debbie that he had enough goods on me that I was
9 forced to drop the complaint. And that had I not
10 dropped it, he would have had me. And how much goods
11 can you get on a co-op. I mean, you know, and that --
12 and that kind of made me mad. And then I went back to
13 Easley and -- and McArthur and Wilson -- I mean, and
14 Ron, said I didn't appreciate him out there talking
15 about me, because Sequoyah may be the place I ended up
16 working.

17 And -- and then I don't know what happened
18 at that point. I went back to my group. And the way
19 this is dated, I got a call shortly after I went back
20 over there, asking me to validate some things. And
21 that was it. I hadn't -- hadn't laid eyes on the man
22 since.

23 Q Okay. Do you know whether, after his
24 statement to Debbie Bodine, that the reason you
25 dropped your complaint was that he had information on

1 you...

2 A No. No.

3 Q ...do you know of any information that he
4 may have had on you?

5 A No. No. I mean, that's what I'm saying.
6 Co-ops, they -- we do what we're told. And mine
7 consisted of freelance graphics and daily reports
8 and -- and, you know, sending faxes and checking Ron's
9 Emails. That's what I did for a year, you know. So
10 I don't know what he could have had, nor did I care.
11 Because at that point, had it been anything important,
12 he would have brought it out during all those meetings
13 when I had initially made the claim, anyway.

14 Q Do you know whether any further
15 disciplinary action was taken against him as a result
16 of those statements?

17 A No, I don't think there were. I've never
18 heard of anything at all.

19 Q Okay.

20 A He -- one crude thing he was always
21 talking about is he had a big old belly. And he
22 was -- he always said that was his toolshed. And that
23 was a statement he made at Sequoyah and everywhere he
24 went, he'd always pat his belly and say that was his
25 toolshed.

1 Q You indicated a little bit earlier that
2 some of the people at Sequoyah had problems with his
3 behavior.

4 A I don't know who those people were.
5 That's something that was not related to me. I -- I
6 was told by Ben Easley they were females. But I
7 don't -- I have no idea who it was. Because, see, you
8 have -- he had association with the chemistry
9 department, the rad con department, as well as the
10 environmental department. And there are several
11 females as technicians and chemists in all of those
12 areas.

13 Q Did you know any specifics about what
14 kinds of problems they were having with him?

15 A Same type of allegations, that he was, you
16 know, basically belittling them, telling them that,
17 you know, they were dumb, that they didn't know how to
18 use the -- the instruments, they couldn't calibrate
19 and standardize and what-not. And they were just
20 getting mad at him. But, again, no names were ever
21 mentioned to me.

22 MR. DAMBLY: What was the time frame that
23 Harvey was talking to you about going out to Sequoyah
24 and taking that job?

25 THE WITNESS: Within this same time frame.

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1 Let's see if there was a reference in here. It was
2 within this same time frame. It was in '96, because
3 all this other seemed like it was. It was in that
4 same time -- well -- well, they had some positions out
5 there. It was right before Diedre Nida actually lost
6 her job and -- and Lennon Ross took it over. It was
7 right -- right within a month there, is when that was.
8 Because he -- because he was wanting his PC out there,
9 because he was hoping he'd get that job in the
10 chemistry.

11 Q In the '96 time frame, were you doing both
12 chemistry and environmental work at all the sites?

13 A Well, in corporate, at that point, the
14 sites didn't want any environmental help. So
15 basically I was just working primarily doing projects,
16 like chemical traffic control, benchmarking and stuff
17 like that for Chandra and Ron's projects. Primarily
18 Chandra's projects at that point. Because you had
19 Chandra, Sam, and you had Gary Fiser. And Gary pretty
20 well did everything himself. Gary wasn't much one to
21 bother you on anything. So he'd do everything
22 himself.

23 Sam, I did lots of graphics, presentation
24 type stuff for him. So that monopolized a lot of my
25 time that past year, in addition to the -- the big

1 projects, like the chemical traffic control and -- and
2 a big project that TVA nuclear was trying to do was be
3 consistent with their buyers so they could get a
4 better price and they could get a kickback at the end
5 of the year on taxes and what-not. Because everybody
6 that had a Visa was just buying whatever they needed.

7
8 And so we were trying to figure out the
9 best way to use certain vendors to pull this together.
10 And it meant taking certain people's Visas, and them
11 having to get approval. And, so -- and I worked on
12 that for months and months. Because I evaluated
13 pretty much everything that we were buying.

14 Q You said that the sites didn't want any
15 environmental help from corporate.

16 A Right. Because corporate was asking them
17 to pay for it at that point. Used to it was a free
18 service. And they have environmental people there.
19 So -- and at that point, you know, Diedre, they had
20 axed her. And I was the only one there. And I was,
21 like, more experienced in chemical than I was
22 environmental, so I couldn't really provide much
23 support for them, other than helping them with their
24 permit needs and what-not.

25 Q Now, at that point Ron Grover was your

1 supervisor; correct?

2 A Yes.

3 Q And were Fiser, Harvey, and Chandra your
4 peers?

5 A Yes. Well, yeah, they were the PG-8s.
6 Yeah.

7 Q And were you the PG-7?

8 A No, no, no. That was Diedre Nida, was the
9 PG-7.

10 Q Diedre Nida was the PG-7.

11 A Yeah.

12 Q Okay. But you were no longer a co-op;
13 correct?

14 A No. I was a entry (sic) level engineer,
15 C-1. SC-1.

16 Q So there were basically five direct
17 reports to Ron Grover at that time; is that correct?

18 A Yes. Yes.

19 Q Were all five of you doing basically
20 chemistry work as opposed to environmental work?

21 A Sam and Gary and Chandra virtually did no
22 environmental work. Diedre -- environmental staff
23 went from about eight, down to Diedre, down to me.
24 Diedre was doing a little bit of environmental work,
25 but what -- what ended up happening, Diedre was a

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1 technician at Sequoyah. She didn't have a degree.
2 Ron brought her downtown -- well, David Sorrell
3 brought her downtown. Thirty (30) days after he got
4 there, Ron took over. David lost his job or took
5 another job and left. Diedre didn't have her degree,
6 so Diedre spent the next year going to school, mostly,
7 to get her degree. So she was there very little.

8 And at that point, I pretty well --
9 whatever we got in there in environmental, I'd send it
10 to the appropriate site or help them with regulations
11 or what-not. But very little. Most of it was just
12 old guru stuff for chemistry.

13 Q Okay. Does TVA typically provide
14 information or informs its employees when they have
15 lost a Department of Labor case?

16 A No.

17 Q Did you ever see anything about an NRC
18 violation or an order issued against TVA?

19 A Seems like I saw something in the paper.

20 Q Okay. In the newspaper?

21 A Yeah, in the newspaper. And then, about
22 three months ago, I got an Email from corporate
23 downtown, and basically it was a little writeup which
24 I -- it shocked me about Ron Grover being fired. And
25 I had no idea about anything. And I think that was in

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1 April of this year. And I just read the little blurb
2 out of the -- the *Christian Science Monitor* or
3 whatever it was. It was just a little -- couple of
4 little paragraphs that it was in some newspaper that
5 somebody had scanned and then sent out by Email.

6 Q Okay. You indicated you started in -- was
7 it November of '93? Is that about right?

8 A I think so. I think so. I think.
9 November, December of '93. It was the end of the
10 year.

11 Q Did you know Gary Fiser when you started?

12 A Yes. Yes. Yeah. Yeah, he was probably
13 one of the nicer ones from the very -- day one.

14 Q Were you aware, during that time frame,
15 that Gary had a Department of Labor complaint?

16 A No. No.

17 Q Do you know whether the people who worked
18 with Gary were aware of his Department of Labor
19 complaint?

20 A See, I don't know. The only thing that I
21 had known about Gary from that point was that he used
22 to be at Sequoyah, he wasn't anymore, and he was at
23 corporate, and he was mad. That is all that I had
24 really known. I was so overwhelmed with just
25 corporate, that I didn't get involved in any of that.

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1 MS. EUCHNER: Counselor, do you have any
2 questions?

3 MR. MARQUAND: A couple.

4 EXAMINATION

5 BY MR. MARQUAND:

6 Q Tresha, when we first started talking
7 about Sam Harvey, you said that after three or four
8 months, after you came in, you started having problems
9 with Harvey, and they got bigger.

10 A Uh-huh (affirmative).

11 Q You said he was bossy and non-respectful.
12 And then I heard -- I thought I heard you say he made
13 lude comments about chemical engineers. And I wasn't
14 sure if I heard you correctly when you said "lude" or
15 "rude."

16 A Lude.

17 Q All right. And when you say he made lude
18 comments, what did you mean?

19 A Chemical engineers are not as superior as
20 you all think you are. Although market is that
21 chemical engineers make more money, chemists are
22 actually the smarter people. TVA needs more chemistry
23 people, not chemical engineers. Chemical engineers
24 are useless. You think of it, he said it.

25 Q Those are the types of comments he made?

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1 A Yes. Yes.

2 Q They weren't -- what you've described, I
3 wouldn't characterize as sexual in nature.

4 A No. No. No.

5 Q They were not sexual in nature?

6 A No. No. See, the thing is, though, all
7 of us, with the exception of one, were chemical
8 engineers there. That's what they wanted to co-op
9 there. So we all were chem Es. And he acted like he
10 despised all of our degrees, and he even made comments
11 to the effect like, "Well, you're just a junior so you
12 probably won't pass," and -- and this. And, you know,
13 "You may not even make it."

14 Q Now, you said you talked to Sam's --
15 talked about Sam's behavior with Ron Grover...

16 A Yes.

17 Q ...and Ben Easley a couple of times?

18 A Yes.

19 Q Did you ever report it to Wilson McArthur?

20 A Not -- well, Wilson asked me about it one
21 afternoon, after Ben and all had -- Ben and Ron had
22 already discussed it with him. And basically he asked
23 me, he said, "What is all this mess?"

24 And I said, "Basically, Sam is harassing
25 me, and I don't appreciate it. And you all won't do

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1 anything about it."

2 He said, "Well, why didn't you come to me
3 prior to going to Ben Easley?"

4 I said, "Because you weren't my direct
5 supervisor." I said, "I went to Ron, and I thought he
6 should probably take it to you." And I said, "So, and
7 it kept on and on and on, and that's why I went to
8 human resources."

9 Q Was this in the summer -- early summer of
10 '96?

11 A Probably.

12 Q All right. What was your understanding of
13 Wilson's reporting relationship?

14 A Reporting?

15 Q Well, Ron's reporting relationship.

16 A Oh, I don't think they had a good
17 relationship at all.

18 Q No, I mean as -- did they have a
19 supervisory relationship between them?

20 A Well, I think that was the pecking order,
21 but I don't know that Ron took issues to him.

22 Q Do you think that Ron's pecking order was
23 to Wilson?

24 A Yes. Yes. That's -- that's from how I
25 remember it.

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1 Q After Sorrell left?

2 A Yes. Yes. And then you had some
3 character named McGrath. And then he was the -- the
4 one above Wilson. Wilson didn't seem to think it was
5 a real big problem. He just thought I was being
6 sensitive.

7 Q Now, was this -- when you talked to
8 Wilson, was that after that you said you thought that
9 Grover and Easley had talked to Sam?

10 A Yes. Yeah. Because Sam and Wilson were
11 friends.

12 Q Uh-huh (affirmative).

13 A Because they went -- they -- Sam joined
14 Wilson's church. And Wilson helped him to meet
15 poor -- his wife. So, yeah, Wilson didn't see it as
16 being significant at all.

17 Q But that -- in terms of time, that was
18 after you understand that...

19 A After Easley knew; yeah

20 Q ...Grover and Easley had talked to Sam?

21 A Yeah. Yeah. Sam was very concerned that
22 I was going to follow through -- go through with this
23 claim. He was -- I mean, from what I can understand
24 and remember, he was just somewhat sick about it.
25 Because he thought that I was going to carry this

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1 through.

2 Q All right. After Grover had his talk with
3 Sam, did Sam's misbehavior continue?

4 A Not for a couple of weeks.

5 Q Well, now, you said somewhere in there you
6 moved out of TVAN and went to engineering services.

7 A Well, I did, but I still sat in TVAN.

8 Q Okay. When did you leave TVAN? When did
9 you stop sitting in...

10 A Seemed to me like it was July or August of
11 '96. Because then I moved downtown. And at that
12 point, I didn't have any other communication with Sam.

13 Q You moved downtown?

14 A The Haney Building.

15 Q Oh, okay.

16 A Haney Building. Sorry.

17 Q It's a couple of blocks up?

18 A Yes. And at that point, that ended
19 everything. And I'm convinced -- I'm convinced the
20 reason that I was moved back to my group to do hydro
21 was because of these problems. I'm convinced of that.

22 Q Did anybody ever tell you that?

23 A No. No, no. But being the chemical
24 engineer that I am, I mean, I -- I just...

25 Q You're intuitive?

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1 A Yeah. I -- I just have always believed
2 that. It just seemed funny to me that I was still
3 down there and they had already paid for me to stay
4 there an entire year, and all of a sudden these get
5 heated up and everybody's asking questions, and then
6 I get a phone call from my supervisor, Kim Choate,
7 saying, "Oh, hey, Tresha, we've got some stuff we need
8 for you to do down here." Well, this stuff had been
9 there for a while.

10 Q You mentioned several times that Ben
11 Easley and Ron Grover had asked you if this was sexual
12 harassment.

13 A Yes.

14 Q And you confirmed that it wasn't.

15 A Yes.

16 Q That you felt you were being harassed, but
17 it wasn't harassment of a sexual nature?

18 A Yes.

19 Q Did they seem to take your concerns as
20 seriously after you told them that, well, you didn't
21 think it was sexual harassment?

22 A I don't really know how to answer that.
23 I felt I was being prodded to file sexual harassment
24 claims because, as most of you know, sexual harassment
25 claims carry a lot more significance than general

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1 harassment. I was told if I filed something like
2 that, that there -- there was a good possibility that
3 other women would follow along that was having these
4 same type problems with Sam.

5 But if you all know Sam and if you've ever
6 seen Sam and the way he acts and carries himself and
7 conducts himself, he's -- he's capable of just
8 harassment. I don't -- I don't really think it
9 matters what your gender is. He just has to be
10 important by making everybody else look bad in his
11 eyes. And -- and it had -- I still can't make myself
12 believe it had any -- because he did Kyle pretty bad,
13 too.

14 Q So you were saying -- you started to say
15 you can't believe what?

16 A That it was sexual harassment, that that
17 was his intent. I just cannot believe that.

18 Q He did it to everybody?

19 A Yes. Yes. It just got worse toward me
20 because I was more vocal about it. And, you know, I
21 mean, I kept a huge can of Lysol in my desk. Every
22 time he'd walk by I'd 'ZZZZ,' you know. I mean,
23 because I didn't know what he was going to release
24 from his body, so I just sprayed the area prior to
25 that.

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1 Q So he was a pest because he could jerk
2 your chain easier?

3 A I think that's exactly right. I think
4 that's exactly right.

5 Q No further questions.

6 (Whereupon, the deposition was concluded
7 at 11:10 a.m.)

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