

AFFIDAVIT OF BROCKIE HALL

City of Glen Rose)
)
State of Texas) ss:

BROCKIE HALL, being duly sworn, deposes and says:

1. My name is Brockie Hall. I am an employee of Stone and Webster Engineering Corporation (SWEC). I have approximately 16 years of nuclear industry experience. Attached to this affidavit as Exhibit A is my resume.

2. The purpose of this affidavit is to describe the review of the NSRS perceptions in which I, and others in my group, participated at TVA's Watts Bar site in early 1986. I was not interviewed by the NRC on this subject.

3. In January, 1986, I spent several working days at the Watts Bar site, along with six other experienced SWEC employees, conducting a review to evaluate the validity of eleven so-called "perceptions" that had been formulated by TVA's Nuclear Safety Review Staff (NSRS). The members of our group, under the direction of Mr. Craig Lundin, had extensive experience in the particular areas of nuclear plant activity that were covered by the NSRS perceptions. I, for example, had had recent QC and NTOL experience on other NTOL projects.

4. Our group spent a short, but intensive, period of

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time at the Watts Bar site conducting an investigation to determine whether the information that had been provided by the NSRS supported its perceptions.

5. Our group worked both collectively and individually. I reviewed documentation, I interviewed TVA engineers and quality control staff, and I observed activities at the plant. At daily exit meetings with Mr. Lundin and throughout the day, the members of the group discussed the facts that we were finding. In some instances, I interfaced directly with the TVA line engineers. There was some overlap in the group's activities, as well, which was a useful source of information and resulted in substantial discussion of the issues. Throughout our review, we worked in close communication with each other. Although our effort was not formalized, the lack of formality in no way affected our attitude, our approach, or the results of our effort.

6. We were given a free hand to investigate whatever we felt was necessary, and there was absolutely no effort by Mr. Lundin or anyone else to influence the outcome of our effort.

7. Our group did not produce a report. Instead, each day we shared the information we had gathered with Craig

Lundin, and at the end of the review process, we participated in a final meeting with Mr. Lundin to discuss our work.

Brockie Hall
Brockie Hall

Subscribed and sworn to before me
this 17th day of November, 1988.

Karen E. Bullard
Notary Public

My Commission expires: 4-19-90

August 1988

HALL, BROCKIE R.

ASSISTANT SUPERINTENDENT
FIELD QUALITY CONTROL

EDUCATION

Albermarle High School - Diploma 1967
Charlottesville, Virginia

EXPERIENCE SUMMARY

Mr. Hall joined Stone & Webster Engineering Corporation (SWEC), North Anna Nuclear Power Station, Mineral, Virginia as a Field Quality Control Technician in September 1972, with responsibility for the inspection of mechanical equipment in storage. In September 1973, he was promoted to Field Quality Control Inspector and assigned responsibility for the Hydrolaser Cleaning Program, Valve Rework Control Program, and assisted with Hydrostatic Testing. He was promoted to Senior Field Quality Control Inspector in September 1975, and designated System Release Coordinator. In this capacity, he was responsible for coordinating Field Quality Control input to System Release and clearance of Construction Deficiency Reports applicable to System Releases. In addition, he was designated as Area Coordinator for the Turbine Structure and Service Water Pump House. In this capacity, he coordinated FQC work with that of the Construction Department. In September 1976, he was promoted to Field Quality Control Engineer with the same duties as above until September 1977, when he was placed in the Electrical Inspection Group with responsibility for supervising electrical equipment storage and installation inspections, heat tracing inspection, and electrical system release.

Mr. Hall was assigned to the River Bend Nuclear Power Station, St. Francisville, Louisiana in June 1979. He was promoted to Field Quality Control Senior Engineer with responsibilities of all FQC receiving activities, including warehouse control; for all ASME activities including material traceability, make-up of all weld data sheets and the review of control Isometric drawings; for the system release and turnover program, the calibration of all M&TE equipment and for the FQC Document Control Program including all Quality Assurance Site Files. In February 1981, Mr. Hall was assigned as Senior Site FQC Representative on weekends. In December, 1981 Mr. Hall was reassigned new responsibilities, including supervision of Installation and Welding of Structural Steel, Installation of HVAC Systems and Supports, surveillance of all Graver Energy activities and the calibration of all M&TE equipment. Also Mr. Hall was assigned responsibility for review and approval of N&Ds and E&DCRs for Quality Assurance. In November 1982, Mr. Hall was assigned to supervise all testing inspection performed during the Preliminary Testing Phase and Tracking and Closure of Nuclear Regulatory Commission Open Items. In January 1983, Mr. Hall was appointed Project Quality Test Supervisor. In this capacity, Mr. Hall was responsible for the inspection of work and testing under the Preliminary and Preoperational Testing Phases. A consolidated group of Quality personnel from Stone & Webster Engineering Corporation and Gulf States Utilities were assigned to the Project Quality Test Group to perform surveillance inspections relative to work being performed under these test phases.

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In May of 1984 Mr. Hall was promoted to the position of Assistant Superintendent of Field Quality Control.

Mr. Hall was seconded to Gulf States Utilities in October 1985. Acting as Plant Services Supervisor, Mr. Hall's responsibilities included directing the activities of the Plant Services Staff, maintenance of the station administration procedures, development of maintenance of the station compliance/open tracking system, and coordination and tracking of corrective action to quality assurance and NRC findings. Mr. Hall also was responsible for the development of the plant staff budget for fiscal year 1987.

In January 1986, Mr. Hall was temporarily assigned to the Watts Bar Nuclear Power Station as a Member of the Stone & Webster Engineering Team to review and evaluate the TVA Quality Assurance/Quality Control Program.

Mr. Hall returned to the River Bend Nuclear Power Station in May 1986 assuming the same responsibilities as assigned in October 1985.

In February 1987, Mr. Hall was assigned to the Comanche Peak Steam Electric Station. As Stone & Webster Engineering Corrective Action Program Unit 2 Coordinator on site, Mr. Hall was responsible for tracking and expediting Unit 2 priority items with the SWEC Engineering Services Group Corrective Action Program effort, daily interface with Texas Utilities Construction Manager and Project Manager, and challenged with supporting an active Unit 2 Project with a maximum of 55 SWEC Engineering personnel.

In February 1988, Mr. Hall was assigned as Assistant to the Assistant Project Engineering Manager at the Comanche Peak Steam Electric Station. Responsibilities included Administrator of the Engineering Quality Accountability Program, coordinating investigations of Employee and Safeteam concerns and responses to all audits and surveillances assigned to the Assistant Project Engineering Manager.