EASC-2:38

1	UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF OHIO		
2	NORTHERN DISTRICT OF OHIO WESTERN DIVISION		
3			
4	UNITED STATES OF AMERICA	Docket No. 3:06-CR-712	
5	Plaintiff,	- Toledo, Ohio	
6	V.	- October 19, 2007 - Trial	
7	DAVID GEISEN, et al.,	- -	
8	Defendant.	- -	
9			
10		VOLUME 11 OF 15 TRANSCRIPT OF TRIAL	
11		HE HONORABLE DAVID A. KATZ D STATES DISTRICT JUDGE.	
12	APPEARANCES:		
13	For the Plaintiffs:	Richard A. Poole	
L 4		U.S. Department of Justice 3rd Floor	
15		1400 New York Avenue, NW Washington, DC 20005	
16	•	202-514-0838	
17		Thomas T. Ballantine U.S. Department of Justice	
18		P.O. Box 23984 Washington, DC 20026	
19		202-514-2956	
20	For the Defendant Geisen:	Miller & Chevalier	
21		By: Andrew T. Wise Richard A. Hibey	
22		Suite 900 655 Fifteenth Street, NW	
23		Washington, DC 20005 202-626-5801	
24			

1	For the Defendant Cook:	Gordon & Ermer By: Denis F. Gordon		
2		John F. Conroy Suite 640		
3		1828 L Street, NW Washington, DC 20036		
4		202-833-3400		
5	Court Reporter:	Tracy L. Spore, RMR, CRR 1716 Spielbusch Avenue		
6		Toledo, Ohio 43624 (419) 243-3607		
7		(415) 243 3007		
8				
9	Proceedings recorded by produced by notereading.	mechanical stenography, transcript		
10	produced by notereading.			
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				

```
1
                           (Commenced at 9:04 a.m.)
         2
09:04:28
09:04:28
                           DAVID GEISEN, CONTINUED DIRECT EXAMINATION
         4
             BY MR. WISE:
09:04:28
         5
                     Good morning, Mr. Geisen. When we stopped yesterday, we
                Q.
         6
             were talking about the late September or early October
             timeframe. Can you tell the jury again the day that you first
         8
             had an interaction with the NRC regarding bulletin 2001-01?
         9
                Α.
                     October 3, 2001.
        10
                     You had also described a role in the greensheet review
        11
             2731, correct?
                     That's correct.
        12
                Α.
        13
                     How many times did you sign that greensheet?
08:34:58
                Q.
        14
                    Twice.
                Α.
        15
                     And in what capacities?
                Q.
        16
                Α.
                     As a Design Basis engineering manager, and then for my
        17
             boss, Steve Moffitt.
        18
                     When you signed it as the Design Basis Manager, what
        19
             would you have been looking for?
        20
                     I would have gone through the document looking for those
        21
             pertinent sections that deal with the design of the plant and
08:35:21
        22
             make sure that they sounded right to me as well as verify that
08:35:25
        23
             the appropriate people from my staff were involved with the
08:35:29
        24
             reviews and also signed off on it.
08:35:34
        25
                Q. Can you speak up just a little bit?
```

- 08:35:40 1 In your review as the Design Basis Manager, would
 - 2 you have paid any special attention to information about past
- 08:35:48 3 inspections?
 - 4 A. No.
- 08:35:50 5 Q. When you signed off on it for Mr. Moffitt, what would
- 08:35:54 6 that review have entailed?
- 08:35:56 7 A. I would have looked to verify that the people that were
- 08:36:02 8 reporting to him would have signed off on it, which would have
 - 9 been obviously myself and probably Dave Eschelman, who was the
 - 10 Plant Engineering Manager, that he had already completed his
 - 11 review at that time.
- 08:36:15 12 Q. Now let's go forward to October 3. What happened on
 - 13 October 3?
- 08:36:21 14 A. We had a teleconference -- "we" being there's a group of
 - 15 people at the plant had a teleconference with a group of people
 - 16 at NRC headquarters in Washington.
 - 17 Q. And do you recall preparing for that phone call?
- 08:36:38 18 A. Yes. I mean, I think the phone call was, like, on a
- 08:36:42 19 Wednesday, and we had prepped on that Monday, Tuesday. And I
- 08:36:48 20 don't recall a lot of details about the prep, but I have had a
 - 21 chance to review Mr. Miller's notes. I didn't personally have
- 08:36:56 22 any notes of the meeting myself. So I know we have a prep
- 08:37:00 23 meeting and a teleconference with Framatome on the 2nd.
- 08:37:07 24 Q. As you think back to the October 3rd call, can you tell
 - 25 the jury approximately how many people were involved from the

- 1 Davis-Besse side?
- 08:37:16 2 A. It's hard to say. We were in a -- I think it was Steve
- 08:37:24 3 Moffitt's office. It was either Steve Moffitt's or Dave
- 08:37:30 4 Lockwood's office. I don't remember for sure, but both offices
 - 5 are set up pretty much the same. We have a conference table.
 - 6 So we probably had, I don't know, six to eight people in there,
 - 7 maybe.
- 08:37:41 8 Q. I'm going to put up on the screen what has been
- 08:37:51 9 previously admitted as Government's Exhibit 78.
- 08:38:07 10 MR. WISE: Can we switch that so the jury can see
 - 11 it as well?
 - 12 BY MR. WISE:
- 08:38:19 13 Q. Mr. Geisen, do you recognize what Government's Exhibit
- 08:38:22 14 78 is?
 - 15 A. Yes, I do.
 - 16 Q. What do you recognize that to be?
 - 17 A. These are Dale Miller's notes of the October 3rd
- 08:38:31 18 teleconference with the NRC.
- 08:38:33 19 Q. Do you have a specific -- do you have a recollection
 - 20 aside from Mr. Miller's notes of what it is that you discussed
- 08:38:44 21 during this call?
 - 22 A. No, I don't.
- 08:38:46 23 Q. Do you have any reason to believe that Mr. Miller's
- 08:38:49 24 notes are inaccurate?
- 08:38:50 25 A. No.

- 08:38:51 1 Q. And so if you would, focus with me on this section.
- 08:38:58 2 A. Okay.
 - 3 Q. Which has the initials D.C.G. Do we assume that those
 - 4 are your initials?
 - 5 A. I would assume that that was me, yes.
 - 6 Q. Assuming that you spoke the information that's contained
 - 7 in Mr. Miller's notes, is it fair to say that you were speaking
 - 8 on the topic of past inspections of the head?
 - 9 A. That's correct.
 - 10 Q. How would you have gone about gathering information
 - 11 about the past inspections that had been done of the head?
- 08:39:28 12 A. Well, preparation for the meeting, I had reviewed our
 - 13 response to 2731. And I know that we had conversations about
 - 14 it with Framatome the day before on the 2nd. I can't say each
- 08:39:46 15 piece/part, where it came from. I also had conversations with
- 08:39:50 16 people like Bob McIntyre's supervisor in Systems over the
- 08:39:55 17 mechanical group. Their group is always responsible for -- I
 - 18 shouldn't say always; most of the time they were responsible for
 - 19 the inspections of the head.
- 08:40:03 20 Q. Why would you have gone to Mr. McIntyre to gain that
 - 21 information?
- 08:40:08 22 A. He was the supervisor of the group.
- Q. Would you have gone to the actual engineers that did the
- 08:40:13 24 inspections?
- 08:40:14 25 A. Not normally. Out of practice I wouldn't have done that

- 1 because I try to go with the supervisors so that they know that
- 08:40:24 2 -- I mean, it just wasn't my practice to bypass the supervisors.
- 08:40:29 3 Q. Do you have any recollection of whether you spoke with
- 08:40:32 4 Andrew Siemaszko before the October 3rd phone call about past
- 08:40:36 5 inspections?
 - 6 A. I don't recall. I might have.
- 08:40:38 7 Q. Did you, yourself, review videos of the past inspections
 - 8 before the October 3rd phone call?
 - 9 A. No.
- 08:40:56 10 Q. Based upon what you see in Mr. Miller's notes, can you
- 08:41:02 11 tell the jury what you likely said about the last inspection?
- 08:41:10 12 A. Yeah. It looks like I said that we did an inspection
 - 13 of the whole head and that there were some areas that were
- 08:41:19 14 precluded from being inspected because of nozzle or CRDM --
 - 15 flange leakage that had pooled around, boron had pooled around
 - 16 the nozzles. And we had signs of -- it says there were
- 08:41:36 17 definite signs of boron flow from leakage. That would be
- 08:41:41 18 referring to the streams that would have been evident on the
- 08:41:44 19 flanges, coming down the tubes.
- 08:41:46 20 I also went on. I talked about the tapes that
 - 21 were reviewed, also talked about the cleaning a little further
 - 22 down.
 - 23 And then further down towards the bottom I talked
 - 24 about the 80 percent confidence. I'm not sure where that came
 - 25 from other than the fact that looking at Mr. Miller's notes from

- 1 the previous day, I believe that that was probably from
- 08:42:15 2 conversations with Framatome.
- 08:42:16 3 Q. All the information you presented during this call,
- 08:42:22 4 assuming that you presented what Mr. Miller's notes show, did
 - 5 you have any question about the accuracy of that information?
- 08:42:29 6 A. No.
 - 7 Q. Or the reliability of your sources?
- 08:42:32 8 A. No.
- 08:42:43 9 Q. After the October 3rd phone call concluded, what
 - 10 happened next within the Davis-Besse team?
- 08:42:50 11 A. I'm sure we discussed -- I'm sure we sat around and
- 08:42:56 12 discussed the results of the phone call, and I know we came up
 - 13 with an action plan. There were -- Steve Moffitt had given me
 - 14 basically two tasks to manage or coordinate, one being the
- 08:43:08 15 development of a crack growth rate model, and the other one was
 - 16 the nozzle-by-nozzle table that Mr. Hiser had requested.
- 08:43:25 17 Q. Let's talk about the nozzle-by-nozzle table. What was
- 08:43:31 18 the nozzle-by-nozzle table to present information about?
- 08:43:35 19 A. Well, the intent was instead of -- I guess what we had
- 08:43:40 20 previously done was a videotape review. I say we; it would have
 - 21 been the guys -- Andrew, who provided the information to the
- 08:43:49 22 bulletin, had -- all he had done is review videotapes at that
 - 23 point. And what we were looking for was a specific, let's
- 08:44:00 24 create a table with each nozzle location and a definitive result
 - 25 for each nozzle at each location for each outage.

- 08:44:11 1 Q. By each outage, what do you mean?
 - 2 A. Initially we were doing two outages because the bulletin
 - 3 called for it to go back --
 - 4 O. Which two?
 - 5 A. I'm sorry, the 2000 and 1998 bulletin had you go back
 - 6 for four years.
- 08:44:27 7 Q. At that point, we're talking October 3rd. Had you had
 - 8 any prior experience doing head inspections?
- 08:44:35 9 A. No.
 - 10 Q. Why was Mr. Siemaszko chosen to construct the
 - 11 nozzle-by-nozzle table?
 - 12 A. He's the one that had done the previous inspection and
- 08:44:45 13 owned the system. I mean, the reactor head was part of the
 - 14 reactor coolant system. He was the system engineer for that.
 - 15 So he was the logical choice as to who to put that together.
- 08:44:58 16 Additionally, he had participated in the Arkansas '01 inspection
- 08:45:06 17 in the spring. What we felt we were doing was taking these
- 08:45:11 18 tapes and putting a calibrated eyeball on it.
- 08:45:19 19 If I'm going too fast, let me know. I was killing
 - 20 Angela yesterday.
 - We would put a calibrated eyeball on these tapes,
 - 22 the original intent of the tapes was not to view -- was not to
 - 23 look specifically for nozzle leakage as much as the general
- 08:45:36 24 condition of the head. So we were basically looking at the
 - 25 tapes with a different set of criteria, different set of

- 08:45:42 1 eyeballs; that's what we were putting Andrew on for.
 - Q. What direction did you give Andrew as he started to
 - 3 compile the table?
- 08:45:52 4 A. I don't know that I provided him any direction other
 - 5 than we needed a nozzle-by-nozzle, and I can't even say whether
- 08:45:59 6 I provided that to him directly or went through Glenn McIntyre.
- 08:46:05 7 Actually, it would have been John Cunnings by that time. But I
 - 8 don't know. You know, I mean, as far as -- I don't know how
 - 9 that communication was done. I was trying to remember it, but
- 08:46:18 10 in essence we had asked him to do -- whether it came from me
 - 11 directly or from plant engineering through their man chain, the
- 08:46:28 12 message was we needed the nozzle-by-nozzle inspection.
- 08:46:32 13 Q. Did there come a time that you had a discussion with
 - 14 Andrew about how he was doing this work?
 - 15 A. Yes. It would have been -- I don't know, maybe a week
- 08:46:44 16 or two later. He was in the process of doing the
- 08:46:50 17 nozzle-by-nozzle.
- 08:46:52 18 Q. Okay. Let's break this down a little bit. Where did
- 08:46:56 19 you have the meeting with him?
 - 20 A. I just stopped by his cubicle.
- 08:47:01 21 Q. How long did you meet with him?
 - 22 A. Probably about an hour.
 - 23 Q. And can you describe what it is that he told you about
 - 24 how he was doing his work?
- 08:47:11 25 A. Yeah. I just stopped by and asked him how it was

- 1 going, just checking up. I had been in the building anyways
- 2 for the morning manager's meeting, so it's just one floor up, so
- 3 I stopped by and asked him how he was making his calls. And
- 4 he -- I'm sorry.
- 5 Q. Where was he sitting at the time?
- 6 A. At his desk.
- 7 Q. Did he have his computer in front of him?
- 8 A. Sure. He was using his computer.
- 9 Q. Did he show you portions of the past inspection tapes?
- 08:47:44 10 A. Not the tapes but, I mean, the video clips.
- 08:47:49 11 Q. When you say not the tapes but the video clips, explain
 - 12 to the jury what you mean.
 - 13 A. Well, he had already -- I think Mr. McLaughlin testified
 - 14 that he helped facilitate it, but they already converted the VHS
 - 15 tapes over to digital format on CDs.
 - 16 Q. And why was that done?
- 08:48:10 17 A. Andrew had said that when he tried to do the pause and,
 - 18 you know, fast-forward pause -- with the VHS when you pause, you
 - 19 don't get a nice, crisp, clear picture, and the ability to
- 08:48:25 20 stop-it-on-a-dime type thing. It was very difficult. So the
- 08:48:30 21 plan was by putting it into a digital format, you could just
- 08:48:35 22 put, like, the space forward on the keyboard, and it would go
 - 23 actually one digital frame at a time, and you could step through
 - 24 it. So that's what he was doing when I walked up.
 - Q. And during the meeting that you had with him, did he

- 1 show you frames from the videos?
- 2 A. Yes. Right about where he was at the time he just
- 3 started explaining how he did it.
- 4 Q. Do you recall which year he was looking at as you were
- 08:49:02 5 having this conversation with him?
 - 6 A. No.
- 08:49:04 7 Q. What did he explain to you about how he was making
- 08:49:08 8 judgments on a particular nozzle that he showed you on his
- 08:49:12 9 screen?
 - 10 A. Well, he was explaining how he was looking for the
- - 12 the most and that he was looking specifically for this
 - 13 popcorn-type of boron deposit on that downhill intersection. He
- 08:49:33 14 indicated that he was also at the same time looking for leakage
 - 15 from or signs of leakage from above, such as the streaking down
 - 16 the tubes. He said that.
- 08:49:44 17 Q. Why did you understand that he was looking for streaking
- 08:49:49 18 from above?
 - 19 A. He was trying to see if there were signs of boric acid,
 - 20 boron deposited from the possible flange leakage from above.
 - 21 Q. In the frames that he showed you were there frames that
 - 22 showed boric acid around nozzles?
 - 23 A. Yeah, I think there was in the background and stuff.
- 08:50:09 24 Q. Were there any nozzles that he showed you where there
 - 25 was boron on the upside side of the nozzles?

- 1 A. Yes.
- Q. What did he explain to you about why that nozzle could
- 3 be -- if it was, why that nozzle could be considered acceptable?
- 08:50:22 4 A. Well, he was saying that, okay, the downhill side radius
 - 5 or where that intersection was was relatively clean. So he was
- 08:50:34 6 looking at that area. And he would look on the uphill side,
 - 7 and it would indicate what looked like you've got this boron
 - 8 that tumbled down and just came to rest on the uphill side of
 - 9 the tube, almost like a snowdrift versus, like, a crystal-like
- 08:50:54 10 deposit type of thing. And he was doing that. In some cases
 - 11 he said he had to go in different mouse holes at multiple angles
 - 12 to get a good correlation on a particular drive, to have a good
- 08:51:08 13 view from one side. So he'd have to, like, combine the two for
 - 14 two different sides.
 - 15 Q. Based upon your conversation with him, did you have a
- 08:51:17 16 degree of comfort with how he was doing his job?
 - 17 A. Yeah, I thought he was doing a pretty thorough job.
 - 18 Q. Did he appear to be using a methodology that made sense
 - 19 to you?
- 08:51:30 20 A. Yes.
- 08:51:31 21 Q. As you sat with him that day at his cubicle, was there
 - 22 any discussion of the e-mails that you and I walked through
 - 23 yesterday about Oconee having a clean head or a pristine head?
 - A. No, we were focused just on the video inspection he was
 - 25 doing.

- 08:51:51 1 Q. After that conversation with Mr. Siemaszko, did there
 - 2 come a time that you had a conversation with Steve Moffitt about
 - 3 Andrew's work?
- 08:52:04 4 A. I think -- I can't tell you exactly when, but I know
 - 5 that Steve and I had talked about how the inspection was being
 - 6 done, and I pretty much reiterated exactly what I discussed with
 - 7 Andrew and how it was done.
 - 8 Q. Do you recall if your conversation with Mr. Moffitt
- 08:52:22 9 occurred before or after the October 11th meeting with the
- 08:52:26 10 technical assistants?
 - 11 A. I can't say for sure.
- 08:52:29 12 Q. Let's turn to that October 11th meeting for a second,
 - 13 and then we'll come back to this topic. Do you recall a
- 08:52:36 14 meeting on the 11th with technical assistants?
 - 15 A. Yes, I do.
- 08:52:41 16 Q. Were you present at that meeting?
 - 17 A. Yes, I was.
 - Q. Did you present slides at that meeting?
- 08:52:45 19 A. Yes, I did.
- 08:52:46 20 Q. Can you tell the jury a little bit about how those
 - 21 slides were made?
 - 22 A. We made them the night before. We were -- when I say
 - 23 "we", there was a group of us, not only the presenters, but I
 - 24 think a couple other support personnel who came along. We went
 - 25 out to Washington, D.C., and then I think we were staying at the

- 1 Doubletree Hotel there in Rockville, and we had a conference
- 2 room that we were in there, and as kind of like a team
- 08:53:18 3 collaborative effort we put together these slides as a
- 08:53:21 4 PowerPoint. They were speaking points for the meeting the next
 - 5 day.
 - 6 Q. Was Andrew Siemaszko at either the prep session or the
- 08:53:27 7 meeting?
 - 8 A. No, he wasn't.
 - 9 Q. Had you set the meeting for the 11th?
 - 10 A. I think it was set by Dave Lockwood and Doug Pickett.
- 08:53:36 11 Q. I'm going to show you a page from Government's Exhibit
 - 12 87, which is in evidence.
 - Do you recognize this slide?
- 08:53:43 14 A. Yes, I do.
- 08:53:44 15 Q. What do you recognize this slide to be?
 - 16 A. This is one of the slides that I presented to -- the
- 08:53:51 17 PowerPoint we presented to the tech assistants.
- 08:53:54 18 Q. Will you look at the first flag under the word "Facts"?
 - 19 A. Okay.
 - 20 Q. Do you recall presenting that information?
 - 21 A. Yes.
 - 22 Q. Can you tell the jury what that information was based
- 08:54:07 23 upon?
- 08:54:08 24 A. It was based upon the very work that Andrew was doing
 - 25 that we went back and looked at these video clips and were

- 1 verifying them to be free of popcorn-type boron.
- Q. At the point that you were presenting at this meeting on
- 08:54:25 3 the 11th, had Mr. Siemaszko finished his nozzle-by-nozzle table?
- 08:54:30 4 A. I don't think so.
- 08:54:33 5 Q. The word "or" between 11 RFO and 12 RFO, can you tell
 - 6 the jury how that word got into this slide?
- 08:54:44 7 A. Well, I know we changed it. We originally -- we typed
 - 8 it up, and it said "and." And I indicated that that -- during
- 08:54:57 9 our discussion, that wasn't going to be accurate.
- 08:55:00 10 Q. Why not?
- 08:55:01 11 A. Because "and" implies that -- what we were doing is we
- 08:55:07 12 were compiling two inspections to try to get an overall picture.
- 08:55:13 13 And the "and" would imply that each inspection could stand
- 08:55:18 14 alone, by itself would allow you to see all the CRDMs, and we
 - 15 knew that wasn't the case for the 12th refueling outage because
 - 16 we had had five flanges that worked.
- 08:55:31 17 Q. When you presented this slide to the technical
- 08:55:33 18 assistants, did you have any question about whether it was
- 08:55:37 19 accurate?
 - 20 A. No.
 - 21 Q. Would you have presented this information if you
 - 22 believed it was inaccurate?
- 08:55:41 23 A. No.
 - Q. Take a look at the third flag on this slide for me.
 - 25 A. Plant specific finite one?

- 1 Q. What is that flag talking about?
- 08:55:52 2 A. The finite element analysis was the work that structural
- 08:55:56 3 integrity associates had done to show that the gaps would open
- 08:56:00 4 up. So what we were saying with that is that essentially four
 - 5 of the 69 drives were not going to have sufficient gaps open up
 - 6 that you could take credit for them for a visual inspection.
 - 7 Q. Who was working with Structural Integrity Associates to
 - 8 gather this information?
 - 9 A. Mark McLaughlin.
- 08:56:27 10 Q. Did there come a time after the October 11th meeting
 - 11 that you learned that some of the information you had presented
 - 12 that day was not accurate?
- 08:56:36 13 A. Yes. I think it was within the week afterwards.
- 08:56:43 14 Andrew had completed his table at that point. And there was
 - 15 clearly -- there were drives that we could not take credit for
- 08:56:54 16 inspecting in the 11th refueling outage for 1998. So that's
 - 17 when I went to Steve Moffitt.
- 08:57:08 18 Q. When Andrew brought you that information, did that cause
- 08:57:11 19 you to question his credibility?
- 08:57:14 20 A. No, because he was -- he was doing exactly what we asked
 - 21 him to do, which was to create a nozzle-by-nozzle table. I
- 08:57:22 22 mean, I guess I expected that if you're going to go and ask for
- 08:57:27 23 a lot more detail on an inspection, you can't be surprised if
 - 24 you get results that are different than what you initially
- 08:57:34 25 intended.

- 1 Q. And you said you went to Mr. Moffitt with this
- 2 information?
- 3 A. That's correct.
- 4 Q. Why did you do that?
- 5 A. Well, he's my boss.
- 6 Q. And what was the purpose of going to your boss with the
- 7 information?
- 8 A. Well, because I think we had conveyed inaccurate
- 08:57:47 9 information during our meeting and during the previous submittal
- 08:57:51 10 for the 2731.
- 08:57:54 11 Q. And what was the decision about what to do to rectify
- 08:57:59 12 that?
 - 13 A. Well, I had indicated -- as soon as Andrew had told me
 - 14 this information, since I was also working on the -- with Ken
- 08:58:09 15 Byrd on the crack growth rate model, and we needed the
- 08:58:13 16 inspection information as the starting point for our crack
- 08:58:17 17 growth rate, so I had told Andrew, well, let's expand that table
 - 18 and go to add in 1996 if you have that. He indicated he had
 - 19 the tapes for that, so he indicated he would start down that
- 08:58:32 20 path.
 - So I told Mr. Moffitt the same thing, that we would
- 08:58:35 22 need to correct the information. And we went to Dave Lockwood
 - 23 to ask, what's the -- I think Roy Leslie was involved as well,
- 08:58:44 24 but it was to basically ask the question: Well, how do we do
- 08:58:48 25 this; How do we go and revise what we've already told the NRC?

- 1 Q. Who is Mr. Lockwood?
- A. Mr. Lockwood was the Regulatory Affairs manager.
- 08:59:05 3 Q. Do you recall when the next submission was made to the
 - 4 NRC?
- 08:59:10 5 A. It was later that month, the 2735.
 - 6 Q. Does October 17th sound about right?
 - 7 A. Yes.
 - 8 Q. What did 2735 include that had not been previously
 - 9 provided to NRC?
 - 10 A. Well, it gave a breakdown of -- in the verbiage, the
 - 11 description, we actually talked about how many drives we
 - 12 couldn't take credit for in 2000, how many we couldn't take
 - 13 credit for in 1998. And then we had the '96 data in there as
 - 14 well.
 - Q. Was this Andrew's nozzle-by-nozzle table?
- 08:59:43 16 A. That was an attachment. We added the description in the
 - 17 actual body, then we had the attachment. Then we also had
 - 18 those maps, head maps that were developed by Mr. McLaughlin in
 - 19 there as well.
 - Q. The conversation that you and I discussed very briefly
- 09:00:03 21 before that you had with Mr. Moffitt about Mr. Siemaszko --
 - 22 about the reliability of Mr. Siemaszko's work, did that
- 09:00:11 23 conversation occur before 2735 was filed?
- 09:00:15 24 A. Yes.
- 09:00:16 25 Q. Do you recall the substance of your conversation with

- 09:00:22 1 Mr. Moffitt?
- 09:00:23 2 A. Just to describe how he was doing it.
- 09:00:27 3 Q. Did you tell Mr. Moffitt that you could verify Andrew
 - 4 Siemaszko's work?
- 09:00:33 5 A. I don't think I used the word verify. I think I said
 - 6 that I thought Andrew was doing a good job.
- 09:00:40 7 Q. Did you tell Mr. Moffitt that you had confidence in
- 09:00:43 8 Andrew's results?
 - 9 A. Yes, I did.
 - 10 Q. Did you tell him your feelings about Mr. Siemaszko's
- 09:00:51 11 care in doing his work?
- 09:00:54 12 A. I don't know that we really talked that much about that
 - 13 as much as we did how he was making the calls.
- 09:01:01 14 Q. Did you assure Mr. Moffitt that you believed Andrew's
 - 15 work was correct?
- 09:01:06 16 A. I might have.
 - 17 Q. At that point when you're talking with Steve Moffitt,
 - 18 did you have any question about the reliability of Andrew's
 - 19 work?
- 09:01:14 20 A. No.
- 09:01:18 21 Q. Do you recall after 2735 was filed another meeting with
 - 22 the NRC, specifically on October 24th?
 - 23 A. Yes.
 - Q. What was the purpose of that meeting, if you recall?
- 09:01:30 25 A. The purpose was to meet with the staff. We had made

- 1 a -- an agreement or commitment on the 3rd of October to have a
- 09:01:42 2 follow-up meeting with them. And so we met with the staff to
- 09:01:46 3 convey this information to them.
- 09:01:48 4 Q. I'm going to show you a page from Government's Exhibit
- 09:01:52 5 108, which is in evidence. Do you recognize this slide?
- 09:01:58 6 A. Yes, but I'd have to look at the whole package to say
- 09:02:03 7 which one it is because we ended up using the same PowerPoint a
- 09:02:08 8 lot.
- 09:02:08 9 Q. Let me show you the front page to Exhibit 108.
 - 10 A. Okay.
- 09:02:18 11 Q. If you look at the first paragraph of text, can you tell
- 09:02:23 12 from the first paragraph of text what the accompanying slides
- 09:02:28 13 relate to?
 - 14 A. Yes. This is where we talk about the purpose, and it's
 - 15 to present our information about the bulletin response,
- 09:02:36 16 circumferential cracking of the nozzles.
 - Q. And the date of that meeting?
- 09:02:40 18 A. That was the 24th of October.
 - 19 Q. I'm going to turn your attention to one of the slides
 - 20 that follows in Government's Exhibit 108. Did you present this
 - 21 slide?
- 09:02:51 22 A. I think I did.
- 09:02:53 23 Q. Was Mr. Siemaszko at this meeting?
 - 24 A. No.
- 09:02:56 25 Q. What was the basis of your information that you were

- 09:02:59 1 presenting in this slide?
- 09:03:01 2 A. This was from our -- my conversations with Andrew.
 - 3 Q. And if you look at the first two paragraphs in this
- 09:03:10 4 slide, can you tell the jury what information you were relating
 - 5 to the NRC on this day?
- 09:03:15 6 A. Well, that information is right out of what our 2735
- 09:03:24 7 response was.
- 09:03:25 8 Q. Did you have any question about the accuracy of this
 - 9 information when you provided it on the 24th?
 - 10 A. No.
- 09:03:31 11 Q. Would you have provided it if you had had questions
 - 12 about it?
 - 13 A. No.
- 09:03:41 14 Q. This is a slide two pages later from the same
 - 15 presentation. Do you believe you presented this slide as well?
 - 16 A. I believe so.
- 09:03:48 17 Q. Can you tell the jury the difference between the text in
 - 18 this slide as opposed to the similar slide that you presented on
 - 19 October 11th?
 - 20 A. Yeah. Well, the 11th one, if you recall, a few minutes
- 09:04:06 21 ago we had -- it said the first sentence was identical to the
- 09:04:11 22 last part where it said it was from 11 RFO and 12 RFO -- 11 RFO
 - 23 or 12 RFO, whereas now we're putting in there 10 as well.
- 09:04:22 24 Q. I'm going to put below this this slide from Government's
- 09:04:26 25 Exhibit 87.

- 09:04:31 1 A. I think we may have changed the font on facts, and
 - 2 that's about it. But the rest of it was just a verbiage
- 09:04:39 3 change. And then we -- because of the 10 RFO video, the
 - 4 results relied upon actually some interviews that Andrew had had
 - 5 with the engineers that performed inspections, we added the
 - 6 bullets that were underneath that you have covered up right now.
 - 7 Q. What was your basis for believing that the results were
- 09:05:02 8 based on interviews that Andrew had had?
- 09:05:04 9 A. That's what he had indicated to me.
- 09:05:13 10 Q. Do you recall a request on the 24th from the NRC
- - 12 A. I don't recall specifically that they requested that at
 - 13 that meeting. I know they had requested photos through Dave
- ·09:05:32 14 Lockwood; and Dave Lockwood committed to sending them some, I
 - 15 guess. That's what caused us to generate the 2744, I think it
 - 16 is.
 - Q. 2744. Do you remember when that was filed with the
 - 18 NRC?
 - 19 A. The end of the month. I think it was the 30th, 31st.
- 09:05:52 20 Q. Can you describe to the jury what 2744 was?
 - 21 A. It was a -- they wanted -- the NRC wanted a sampling or
 - 22 a representative -- or photos, I guess, of the nozzles. And so
 - 23 what we had asked Andrew to do, since he had all the digital
- 09:06:16 24 files, AVI files, whatever, to go ahead and provide
- 09:06:22 25 representative snapshots so that we could docket it with the

- 1 NRC.
- 09:06:26 2 Q. Let me back you up. You said we asked Andrew. Who's
 - 3 "we"?
- 09:06:31 4 A. I may have. I think I asked him to actually provide a
- 09:06:36 5 representative sample of the photos he was looking at.
 - 6 Q. Were you involved in preparing 2744?
 - 7 A. Yes, I was.
 - 8 Q. Were you involved in drafting the captions for 2744?
 - 9 A. Yes, I was.
 - 10 Q. Were you involved in the process of compiling
- 09:06:51 11 photographs?
 - 12 A. The photos were compiled by Andrew, but I put the
- 09:06:55 13 captions on it.
 - Q. And what direction did you give Andrew about what
 - 15 photographs you wanted? What did you tell him?
- 09:07:01 16 A. I asked him to give me a representative sample of all
- 09:07:05 17 three outages.
- 09:07:06 18 Q. When you wrote the captions, did you have conversations
- 09:07:09 19 with Andrew about what the photographs were that he had provided
- 09:07:12 20 to you?
 - 21 A. I'm sorry; I missed part of that. Could you restate
- 09:07:17 22 it?
 - Q. Do you mean repeat all seven parts of that question?
 - When you talked with Andrew -- when you were
- 09:07:24 25 writing the captions, what were the captions based on?

- 09:07:29 1 A. Based upon my -- well, some of them were talking about
- 09:07:33 2 the methodology that we were using, so that was from previous
 - 3 conversations with Andrew where I was looking over his shoulder
 - 4 and he was telling me how he was doing it. Others were based
 - 5 on other conversations we had with regard to the various -- his
- 09:07:52 6 conversations with other engineers. I didn't talk with him
- 09:08:02 7 about the captions; these were just captions that I created out
 - 8 of previous conversations I had had.
- 09:08:11 9 Q. Did you write the captions that said these photographs
- 09:08:14 10 are representative of the condition of the head in X outage?
- 09:08:18 11 A. Yes, I did.
 - 12 Q. What did you base that on?
 - 13 A. Because I had asked him to give me photos that were
- 09:08:26 14 representative.
 - Q. Did you write the caption that said that the boron in
 - 16 this picture was found to be dry; therefore, not active?
 - 17 A. Yes, I did.
 - 18 Q. And what was that based on?
 - 19 A. That was based upon -- I believe that was based upon a
 - 20 conversation I had had with Andrew that he was reflecting back
- 09:08:44 21 on a conversation he had with somebody else.
 - Q. Had you personally spoken with any of the people that
 - 23 had done the past inspections before you wrote the captions?
- 09:08:53 24 A. No, I hadn't.
 - Q. Did you have a sense when you submitted or participated

```
1 in submitting 2744 to the NRC that it was inaccurate?
```

- 09:09:03 2 A. No.
 - 3 Q. Misleading?
 - 4 A. No.
- 09:09:06 5 Q. Vaque?
- 09:09:07 6 A. No.
 - 7 Q. What was the purpose of providing those photographs?
- 09:09:11 8 A. My understanding at the time was that we weren't allowed
 - 9 to docket just film. You had to have something that could be
- 09:09:21 10 microfiched. So we were printing out pictures so that we could
- 09:09:25 11 send those to the NRC as a formal submittal.
 - 12 Q. Did you look at the pictures as you compiled the
- 09:09:33 13 documents?
- 09:09:34 14 A. Yes.
- 09:09:40 15 Q. What did you notice about 2000 versus '98 versus '96 as
 - 16 you looked at the photographs?
 - 17 A. Well, you could definitely tell the difference between
- 09:09:49 18 them. I don't know if it was because -- I think we used
- 09:09:52 19 different equipment. The 1998 and the 1996 pictures appeared
- 09:10:00 20 to be black and white. And whereas the 2000 appeared to be --
- 09:10:05 21 we must have used a color camera. The focus, the quality of
 - 22 the optics was -- the best was probably 1996, the clearest
- 09:10:17 23 picture. Everything seemed to be the most in focus, the least
 - 24 amount of light glare bouncing off of surfaces. The next
- 09:10:26 25 one -- next would have been the '98. 2000 was the worse of the

- 09:10:31 1 three.
 - 2 Q. Was the quality of the photographs or the quality of the
- 09:10:37 3 images in 2000, was that captured in one of the captions?
- 09:10:41 4 A. I'd have to look at the submittal. I'm sorry.
- 09:10:45 5 MR. WISE: Your Honor, could I have a second?
- 09:10:47 6 THE COURT: Of course.
- 09:10:47 7 BY MR. WISE:
- 09:11:36 8
- 09:11:36 9 Q. I'm going to show you a page from Government's Exhibit
 - 10 113 which has been admitted.
- 09:11:45 11 Do you recognize that as a page of the submission?
- 09:11:48 12 A. Yes.
 - 13 Q. Taking a look at the second paragraph, does that refresh
 - 14 your recollection about whether there was a caption about the
- 09:11:58 15 lighting and video quality?
 - 16 A. Right. There is.
 - 17 Q. Do you recall what your sense was of the difference
 - 18 between 2000 and the earlier tapes in terms of quality and
- 09:12:10 19 clarity?
 - 20 A. Yeah. Like I had mentioned, I think the 2000 there was
- 09:12:15 21 -- because it was in color, there was a lot of hue changes, and
- 09:12:23 22 the focus did not seem to be nearly as good.
- 09:12:29 23 MR. WISE: Your Honor, just for the record, so I
 - 24 don't leave a misimpression with the jury, the photos of the
 - 25 images are worse in this than the original. So the photos are

- 1 not this bad. I just wanted to show it to Mr. Geisen for the
- 2 caption.
- 3 THE COURT: Fine.
- 09:12:56 4 BY MR. WISE:
- 09:12:56 5 Q. Did there come a time, Mr. Geisen, that you presented
- 09:13:00 6 the videotapes to the NRC?
- 09:13:02 7 A. Yes.
- 09:13:03 8 Q. Do you recall the date?
 - 9 A. November 8th of 2001.
 - 10 Q. Did you go to Washington, D.C., specifically to present
 - 11 the videos to the NRC on November 8?
- 09:13:14 12 A. No, I didn't.
- 09:13:15 13 Q. Why did you go to Washington at that time?
 - 14 A. Well, we had a series of meetings that were scheduled.
 - 15 There was one that was a public meeting on the 8th. I was just
- 09:13:26 16 going to be a witness -- or in the audience; I wasn't actually
- 09:13:31 17 presenting. Then there were two meetings on the 9th that I was
- 09:13:35 18 participating in.
- 09:13:36 19 Q. Did you travel to Washington, D.C., with the rest of the
 - 20 Davis-Besse team?
 - 21 A. No. The team travelled out on the 7th. Historically
 - 22 we'd always travel the day before, do a last-minute brief the
 - 23 night before to make sure we had everybody prepped and the
 - 24 appropriate number of copies and everything we were going to
 - 25 hand out for handouts and that sort of stuff. Usually we would

- 09:14:01 1 send somebody down to Kinko's to make last-minute copies or
- 09:14:05 2 something. And I don't remember what it was, but I had a
 - 3 personal engagement that I had to take care of on the night of
- 09:14:12 4 the 7th, so I requested permission from Mr. Moffitt to fly out
- 09:14:16 5 late. So I flew out the next morning on the 8th. I got to
 - 6 the NRC building about 10:00, 10:30.
 - 7 Q. When did you learn that you were going to present
- 09:14:27 8 videotapes to the NRC on the evening of the 8th?
 - 9 A. After I got there on the 8th, Dave Lockwood and Steve
 - 10 Moffitt came up to me, and they basically said, you were
- 09:14:39 11 selected to present these. It was one of these things I wasn't
 - 12 there the night before, so...
 - 13 Q. Had you brought the videotapes with you?
 - 14 A. No, I think Dave Lockwood did.
- 09:14:51 15 Q. Was Mr. Siemaszko part of the team that was out there at
 - 16 this time?
 - 17 A. No, he wasn't.
- 09:14:57 18 Q. What time was the meeting set that you were going to
 - 19 show the tapes?
 - 20 A. 5:30 that night.
 - Q. And you said you learned at what time that you were
- 09:15:05 22 going to be doing the presentation?
 - 23 A. Probably around 10:00, 10:30.
 - Q. After you learned you were going to present the tapes,
 - 25 did you sit down and watch the tapes before the meeting?

- 1 A. No. We had meetings scheduled the rest of the day.
- Q. As you went to the meeting at the NRC at 5:30, had you
- 3 ever reviewed the tapes kind of from start to finish running the
- 4 tapes through?
- 5 A. No, actually I hadn't even looked at these tapes at all
- 6 because the only thing I had seen up to that point was portions
- 7 of the digital video that -- when I was looking over Andrew's
- 8 shoulder. So I actually hadn't looked at the VHS at all.
- 09:15:45 9 Q. When you got to the meeting, can you describe for the
 - 10 jury just kind of what the room looked like that the meeting was
- 09:15:51 11 held in?
 - 12 A. Nothing fancy. It was probably an 18-by-20 foot square
- 09:15:59 13 meeting room. Desks and stuff around it or long tables and
 - 14 chairs type of thing. And we had a TV monitor on top of one of
 - 15 those metal push-around carts that had a metal shelf and a VCR
- 09:16:18 16 deck underneath it.
- 09:16:19 17 Q. You said you had actual VHS tapes?
 - 18 A. That's correct.
- 09:16:23 19 Q. Do you recall how many people from the NRC were at this
- 09:16:27 20 meeting?
 - 21 A. It seemed like a lot. But I was by myself, so probably
 - 22 about eight to 12. I don't know. Something like that. We
- 09:16:36 23 were kind of huddled around the cart that had the TV on it.
 - Q. Mr. Hiser testified, I believe on the second day of this
- 09:16:44 25 trial, that you controlled the remote during this meeting. Do

- 09:16:47 1 you recall, first of all, whether there was a remote control?
 - 2 A. I don't remember a remote. I remember we were huddled
 - 3 around this TV cart and I was operating the VCR.
 - 4 Q. By pushing the buttons on the VCR?
 - 5 A. I think it was push buttons, but I was operating the
- 09:17:05 6 VCR.
 - 7 Q. Which tape was shown first by you?
 - 8 A. I believe it was 1996.
 - 9 Q. Why did you put in 1996?
- 09:17:12 10 A. I just picked one. We had -- I think I even asked the
 - 11 staff where they wanted to start. No one really had a
- 09:17:24 12 preference, so I just picked the earliest one.
- 09:17:27 13 Q. And then I take it you put the machine in the tape?
 - 14 A. No, I put the tape in the machine. It works better
 - 15 that way.
- 09:17:36 16 Q. I guess it's good that you were there and not me.
- 09:17:39 17 You put the tape in the machine. Then what did
 - 18 you do?
 - 19 A. I pushed play, and we just watched the tape.
- 09:17:49 20 Q. Did there come a time that you either paused the tape,
- 09:17:53 21 fast-forwarded the tape, or rewound the tape?
 - 22 A. There were times where I would fast forward and let that
 - 23 slow/fast forward so you can scan it.
 - Q. Why would you do that?
 - A. Well, there are times where you're pulling -- like, the

- 1 video camera is coming out of one mouse hole, going to another.
- 09:18:12 2 It didn't appear to be anything worthwhile during that. And I
 - 3 felt that we wanted to get through as many of the tapes as we
 - 4 could. And just -- the staff was okay with that, and they
- 09:18:25 5 would tell me if they wanted me to stop and look at something; I
 - 6 would stop and rewind.
 - 7 Q. When you fast-forwarded or rewound the tape, did the
 - 8 picture remain up on the screen?
 - 9 A. Yes.
 - 10 Q. Was there ever a time -- you know, the little --
- 09:18:40 11 A. You know, it had the little lines across it because
 - 12 you're going at a faster speed.
 - 13 Q. Was there ever a time when you were fast forwarding or
- 09:18:49 14 rewinding the tape that the screen went blank?
 - 15 A. Not that I recall.
 - 16 Q. Was there ever a time when a staff member asked you to
 - 17 either pause or to rewind or to fast forward the tape that you
 - 18 refused to do so?
 - 19 A. No.
- 09:19:01 20 Q. Was there any conversation going on during the showing
 - 21 of the 1996 tape?
 - 22 A. Yeah. I think there was -- I was getting asked
 - 23 questions about, well, how did you classify that drive? How did
 - 24 you -- you know, how did you call that drive and various drives
 - 25 and stuff.

- 09:19:23 1 I'm not the person that did the inspection. I can
 - 2 tell you how we did it, but I wasn't the actual person that
 - 3 actually did it.
 - 4 Q. What did you tell the staff when they asked how you did
 - 5 it, how --
- 09:19:35 6 A. I explained how we were looking at that downhill
- 09:19:39 7 intersection between the nozzle tube and the head, and we were
- 09:19:44 8 looking for popcorn-type boron deposits.
- 09:19:48 9 Q. When you say they were asking you about specific
 - 10 nozzles, what kind of questions were you getting?
 - 11 A. They would point to a specific nozzle that was on tape
 - 12 and say, you know, how did you call that one? And I couldn't
 - 13 even tell you at the time what the nozzle number was much less
 - 14 how we called it. So I simply said: I'm not the one that made
 - 15 the calls. I think even at that point I said: We'd be happy
- 09:20:15 16 to bring the guy out here that did.
- 09:20:17 17 Q. Is there any sense that the staff was frustrated with
 - 18 your inability to answer those questions?
 - 19 A. I think they were extremely frustrated in my ability
 - 20 because I think they expected to talk to somebody that actually
 - 21 did the inspection.
- 09:20:29 22 Q. How much of the 1996 tape did you play?
 - 23 A. We went through whole thing.
 - Q. Did you make any effort while you were showing the '96
- 09:20:36 25 tape to prevent the NRC from seeing any parts of that tape?

- 1 A. No.
- 09:20:40 2 Q. Did you know what was on that videotape before you put
 - 3 it in the machine?
 - A. Other than it was supposed to be the '96 inspection. I
 - 5 don't think I follow your question.
 - Q. Were there any parts of the tape that you were worried
- 09:20:53 7 about them seeing?
- 09:20:54 8 A. Oh, no.
- 09:20:55 9 Q. What tape did you put in after the '96 tape?
 - 10 A. I think it was the '98.
 - 11 Q. And tell the jury a little bit about how -- what
- 09:21:04 12 happened when you put that tape in?
 - 13 A. Same type of thing. I was playing it and we would fast
 - 14 forward through portions of it. Some of the NRC staff that were
 - 15 there commented on the quality of that video, saying that --
 - 16 because I think when we paused, they would say, there's not --
 - 17 you can't tell; it's too blurry; you can't get a good view;
- 09:21:35 18 there seems to be a lot of light reflection because the drives
 - 19 were shiny, so you'd get a lot of glare, and I don't see how you
 - 20 can make these calls. Once again, I said: Well, I'm not the
 - 21 guy that made the calls.
 - 22 Q. Do you recall seeing more boron on the head in the '98
 - 23 tape than had been on the '96 tape?
- 09:21:54 24 A. Yes, I think there was.
 - Q. Did that surprise you?

- 1 A. No, because we had already made a submittal that
- 2 indicated that there was, like, a progression of more boron
- 09:22:05 3 from -- in 1998, then to even more in 2000.
- 09:22:09 4 Q. Did you show the entire '98 tape?
 - 5 A. I don't think so. I think we only showed a portion of
 - 6 it.
 - 7 Q. Is it your decision -- was it your decision alone to not
- 09:22:20 8 show the rest of the '98 tape?
 - 9 A. No, I think it was pretty much a consensus in the room.
 - 10 Q. Did you put in the 2000 tape?
 - 11 A. I offered to, but I also know -- was criticized for
 - 12 saying comments along the line of that: If you thought '98 was
- 09:22:39 13 bad, 2000 is even worse because --
 - 14 Q. What were you speaking to when you said that?
 - 15 A. Well, I mean the focus, the coloring and the glare of
 - 16 everything, the optics were much worse on 2000. That is what
- 09:22:52 17 we had said in our 2744 document.
 - Q. Were you concerned about showing the NRC what was on the
 - 19 2000 tape?
- 09:23:02 20 A. No
 - 21 Q. Had you watched the 2000 tape?
 - 22 A. No. But I knew the coloration and the optics was not
- 09:23:11 23 good of the pictures we had sent on 2744.
 - Q. When you left the NRC that night, did you leave the
- 09:23:18 25 tapes with them or did you take them with you?

- 1 A. No, I took them back.
- 09:23:21 2 Q. Did anyone from the NRC ask you to leave the tapes
- 09:23:24 3 behind?
 - 4 A. No, they didn't.
 - 5 Q. If they had asked you that question, would you have left
 - 6 them?
 - 7 A. I probably would have. I probably would have asked Mr.
 - 8 Lockwood first because I didn't know if, number one, that was
 - 9 our only copy, and whether there was some sort of paperwork I
 - 10 had to fill out to transmit it to them.
 - 11 Q. Were you making any effort on November 8th to hide
- 09:23:47 12 anything from the staff of the NRC?
 - 13 A. No, I wasn't.
 - Q. Can you describe for the jury briefly what your feelings
- 09:23:54 15 were coming out of that meeting?
 - 16 A. I was extremely frustrated because I couldn't answer the
- 09:24:04 17 questions. I felt like -- well, I mean, I felt stupid. I
 - 18 mean, I couldn't answer the questions that they were asking.
- 09:24:14 19 And I was kind of angry at my teammates that had given me these
 - 20 tapes and sent me off to do that because I felt I wasn't
 - 21 prepared to actually go into that situation.
 - Q. Did you ever describe the tapes as worthless?
- 09:24:31 23 A. I think I used the phrase "garbage" the next day.
 - Q. When you used the phrase "garbage", what did you mean by
 - 25 that?

- 1 A. Well, the next morning we had a presentation. It was
- 2 to talk about the crack growth rate model. And I think it was
- 09:24:47 3 Mr. Bateman from the NRC that kept wanting to go back to: How
 - 4 could you make these calls; those tapes were all blurry and
- 09:24:56 5 everything? And I got frustrated. And I was, you know,
- 09:25:00 6 trying to make a presentation on this, and I keep getting
 - 7 sidetracked on this, and I got frustrated. At one point I
 - 8 said: Hey, I'll admit the quality of those tapes is garbage.
 - 9 Or something along that phrase. That would have been on the
 - 10 morning of the 9th.
 - 11 Q. Did you have a belief at that point about whether the
- 09:25:18 12 quality of the digital images that Mr. Siemaszko had used were
- 09:25:23 13 better than the videos?
 - 14 A. Well, I'm sure they were better. Not necessarily from
 - 15 a -- I mean, you're using the same camera, so, I mean, from an
- 09:25:35 16 optics standpoint, you could say that it's coming from the same
- 09:25:38 17 source, but I think the ability to stop it digitally, you didn't
 - 18 get as much distortion as you did when you paused the VHS tape.
 - 19 Q. Do you recall at any point during the meeting on the 8th
 - 20 or the next day on the 9th where anyone from the NRC said to
 - 21 you: What we saw on those videotapes showed so much boron that
 - 22 we can't give you credit for past inspections?
 - 23 A. No.
- 09:26:11 24 Q. Was there a decision made by the Davis-Besse team about
- 09:26:16 25 sending out Mr. Siemaszko to NRC?

- 09:26:20 1 A. Yes. I -- when I got done presenting the videotapes,
 - 2 went back to the hotel, and the rest of the team had already
- 09:26:31 3 gathered in our conference room, and I told them that it didn't
 - 4 go well and that they really needed to speak to the person
- 09:26:39 5 that -- the questions they had were for the person that did the
- 09:26:42 6 inspection. I told them that I had told the NRC that, hey, we
 - 7 can bring out the guy that did the inspection, Andrew. And --
 - 8 Q. Did that happen?
 - 9 A. Yes, it did. We had discussions on it. We brought him
 - 10 out, I think, the 14th.
 - 11 Q. Do you recall whether there was discussion about
- 09:27:00 12 concerns about whether Andrew should be sent?
 - 13 A. Yeah. There was. Because I think his supervisor was
- 09:27:07 14 concerned about his ability to command the English language.
- 09:27:12 15 Andrew's got a very strong accent, and sometimes he's not easy
 - 16 to understand.
 - 17 Q. Was there any concern about his reliability or his
- 09:27:20 18 honesty?
 - 19 A. No. That's why we brought him out.
 - Q. Do you recall when Mr. McLaughlin was testifying, an
 - 21 e-mail on November 15th from Structural Integrity Associates
 - 22 showing that they now believed that all the gaps would open up?
- 09:27:40 23 A. Yes, I remember that.
 - Q. Who was running that communication with SIA during
 - 25 November?

- 1 A. Mark McLaughlin.
- Q. Do you have any recollection of the e-mail exchange
- 09:27:51 3 between yourself and Mr. McLaughlin and Mr. Lockwood about that
 - 4 result?
- 09:27:56 5 A. No, I don't. But I don't think it would have mattered
 - 6 from the standpoint we were already in our PRA model; we weren't
 - 7 taking credit for those.
 - 8 Q. Would the fact that the gaps would open up have changed
- 09:28:12 9 or altered the validity of the PRA in your understanding?
- 09:28:17 10 A. No, because I think we had already said that because of
- 09:28:21 11 boron, there was some boron on top of the head in 2000 -- or
- 09:28:25 12 excuse me, in the 10 RFO, 1996. And we had already said that,
 - 13 well, those same drives that would not open up, which now would
- 09:28:39 14 open up, were precluded from being inspected anyway. So we
 - 15 weren't taking credit for them either way.
- 09:28:46 16 Q. Was it your understanding that the November 15th e-mail
 - 17 was SIA's last word on whether the gaps would or would not open
 - 18 up?

.

- 09:28:56 19 A. I'm not sure on that. I had thought at some point they
- 09:28:59 20 had changed, but based on what I heard Mr. McLaughlin say the
 - 21 other day, he was the expert on it, so I'd say I was probably in
- 09:29:07 22 error saying they revised it again.
- 09:29:09 23 Q. Do you recall making a presentation to the company
- 09:29:12 24 Nuclear Review Board on November 29th?
 - 25 A. I've reviewed the information since then.

- 09:29:17 1 Q. Are you aware during that presentation the meeting
 - 2 minutes reflect that you told the CNRB that four of the gaps
 - 3 would not open up?
 - 4 A. That's correct.
 - 5 Q. Would you have provided that information to the CNRB if
 - 6 you believed it to be untrue?
 - 7 A. No, that's what I believed was the truth at the time.
- 09:29:35 8 Q. Let me ask you about a meeting with the NRC on November
- 09:29:39 9 28th. Do you recall that meeting?
- 09:29:41 10 A. Yes.
- 09:29:44 11 Q. I want to show you a slide from Government's Exhibit
- 09:29:57 12 118.
- 09:29:58 13 Do you recognize that as a slide from the November
- 09:30:01 14 28th presentation?
- 09:30:03 15 A. It's a similar slide we made in several presentations.
 - 16 So I -- unless I saw the whole package again, I wouldn't be able
- 09:30:12 17 to say it's specifically from that meeting.
 - Q. Let me show you the cover sheet of this exhibit.
 - 19 A. Okay. I see the date of the meeting.
- 09:30:22 20 Q. Let me make sure I get the exhibit number in there.
 - 21 This is 118. You see the date of the meeting in the box?
 - 22 A. Correct. 11-28.
- 09:30:33 23 Q. Did you present this slide?
- 09:30:36 24 A. I believe I did.
- 09:30:38 25 Q. Did it reflect accurate information to the best of your

- 1 knowledge when you presented it?
- 2 A. Yes.
- 09:30:45 3 Q. Do you recall anyone from the NRC's side interrupting
- 09:30:50 4 during the presentation to say, why do you keep on telling us
 - 5 this information about '96, '98 and 2000 because we've told you
 - 6 that we are not crediting those inspections based on the
- 09:31:06 7 videotapes?
 - 8 A. No.
- 09:31:16 9 Q. Mr. Geisen, at any point during the time we've been
 - 10 talking about when you were involved in the bulletin responses,
 - 11 did anyone at Davis-Besse tell you to lie or mislead the NRC?
- 09:31:28 12 A. No, they didn't.
 - Q. What would you have done if you had been given that
 - 14 instruction?
 - 15 A. I would have denied it. I probably would have been
- 09:31:38 16 very, I don't know, indignatious (sic) about it because of
- 09:31:43 17 the -- I mean, they would be questioning my integrity. I
 - 18 wouldn't want to work there.
- 09:31:50 19 Q. Have you ever worked at an operation or a plant where
- 09:31:53 20 you were told by your superiors to lie or falsify information?
 - 21 A. No.
 - Q. Can you imagine what you would have done in that
 - 23 circumstance?
 - A. I probably would have left. I mean, our whole industry
 - 25 is based upon truth and integrity.

- 2 A. About 25 miles.
- 3 Q. How often did you come to work at the plant?
- 09:32:18 4 A. Daily.
- 09:32:20 5 Q. If you would have had concerns about the safety of the
 - 6 plant, would you have covered those up?
 - 7 A. No.
- 09:32:27 8 Q. Do you have any regrets as you sit here today and as you
 - 9 look back to your performance in the fall of 2001 with the job
 - 10 that you did?
- 09:32:35 11 A. I don't think you could be in my position right now on
 - 12 this stand and not say that you've got a lot of regrets. I
 - 13 regret that I didn't take a more -- I mean, this was a
- 09:32:48 14 life-changing event for me, but it was also a huge event for the
 - 15 industry. I mean, the industry that -- I've spent 20 years in
- 09:32:56 16 nuclear power, and we've had our -- we, as an industry, have had
 - 17 our setbacks. I mean, you've got Three Mile Island; you had
- 09:33:07 18 Chernobyl; now you have the hole in the head at Davis-Besse,
 - 19 also an incident at Davis-Besse in '85. And so, you know, so I
 - 20 feel a lot of remorse or regret over the fact that I didn't --
- 09:33:25 21 couldn't avert this.
- 09:33:26 22 Q. What do you wish you would have done different?
- 09:33:29 23 A. Well, I wish I had spent a lot more time reviewing past
 - 24 inspection data and possibly putting a second engineer to
- 09:33:37 25 double-check everything that Mr. Siemaszko was doing and try to

- 09:33:41 1 come up with more of a consensus answer instead of just a single
- 09:33:46 2 engineer's answer.
 - 3 Q. In the fall of 2001 did you believe that was necessary?
- 09:33:50 4 A. No, I didn't.
 - 5 Q. Did you doubt the information you were getting?
- 09:33:54 6 A. No.
 - 7 Q. Did you ever lie to the NRC?
 - 8 A. No.
 - 9 Q. Did you knowingly make any false statements to the NRC?
 - 10 A. No.
- 09:34:04 11 MR. WISE: That's all I have, Your Honor. Thank
 - 12 you.
- 09:34:10 13 THE COURT: Cross-examination, Mr. Poole.
- 09:34:13 14 MR. POOLE: We will have some questions.
- 09:34:27 15 - -
- 09:34:27 16 DAVID GEISEN, CROSS-EXAMINATION
- 09:34:28 17 BY MR. POOLE:
- 09:34:28 18 Q. Good morning, Mr. Geisen.
 - 19 A. Good morning.
- 09:37:08 20 Q. Why don't we start with the 12th refueling outage. I
 - 21 think you probably recall testifying that you were involved in
- 09:37:20 22 outage central; isn't that right?
 - 23 A. That's correct.
- 09:37:24 24 Q. And you were at that time a new manager?
- 09:37:27 25 A. That's correct.

- 09:37:34 1 Q. And in your role at outage central, you had occasion to
- 09:37:41 2 review the Condition Reports that were produced?
- 09:37:44 3 A. That's correct. As each one was written, I would review
 - 4 the previous day's worth of Condition Reports. All the managers
 - 5 did.
- 09:37:55 6 MR. POOLE: And I would like to display, Your
- 09:38:02 7 Honor, a photograph from Government's Exhibit 12.
- 09:38:07 8 THE COURT: Which has been previously admitted?
- 09:38:10 9 MR. POOLE: Previously admitted.
 - 10 BY MR. POOLE:
 - 11 Q. You testified among other things you saw a picture
 - 12 that's come to be known as the red photo?
 - 13 A. That's correct.
- 09:38:19 14 Q. And at the time you assumed taking care of whatever
- 09:38:27 15 issues that raised was somebody else's responsibility?
 - 16 A. That's correct.
- 09:38:32 17 Q. You also were involved in the discussion about head
 - 18 cleaning?
- 09:38:38 19 A. That's correct.
- 09:38:41 20 Q. And I forget if you characterized it this way, but there
- 09:38:47 21 was a debate over whether it was appropriate to use steam and
- 09:38:52 22 water to clean the boron off the head?
- 09:38:55 23 A. Yeah. It wasn't steam, but it was -- it's a --
- 09:39:01 24 Hotsy-Totsy is the brand name of the steam cleaning equipment,
 - 25 but it's not actually steam; it's 140 degrees hot water. It's

- 09:39:09 1 a pressure washer.
- 09:39:10 2 Q. A hot water pressure washer?
 - 3 A. That's correct.
- 09:39:16 4 Q. Specifically there was another Condition Report, CR
- 09:39:26 5 2000-1037, that covered the cleaning effort?
 - 6 A. That's correct.
- 09:39:33 7 Q. And you were actually involved in that Condition Report,
- 09:39:37 8 weren't you?
 - 9 A. Yes, I removed that Condition Report from the mode
- 09:39:41 10 restraint list.
- 09:39:49 11 MR. POOLE: I'd like to display a page of
 - 12 Government's Exhibit 15 previously admitted.
 - 13 THE COURT: Yes. That's fine.
 - 14 BY MR. POOLE:
 - 15 Q. Is this the last page of that Condition Report?
 - 16 A. Yes, it is.
- 09:40:01 17 Q. And signed by you?
 - 18 A. That's correct.
- 09:40:04 19 Q. And it removes the mode restraint which would have
- 09:40:12 20 prevented the plant from starting up before the cleaning was
- 09:40:17 21 done?
- 09:40:17 22 A. It removed the mode restraint of this CR because there
 - 23 was already a work order generated to clean the head. The
 - 24 reason the CR is on the mode restraint list is because when you
 - 25 want the CR to be reviewed, you want to make sure that review

- 09:40:36 1 happens before there's a mode change so that if there's any work
 - 2 that needs to be generated, or any corrective work that needs to
 - 3 be done as a result of that Condition Report, that it gets
 - 4 scheduled. So my basis for removing this from the mode
 - 5 restraint list is we had a work order that had been identified
 - 6 as a corrective action that was on the mode restraint list.
- 09:41:00 7 Q. Now, does generating paper count as a corrective action
 - 8 in a nuclear power plant?
- 09:41:07 9 A. No, it counts as putting together an evaluation.
- 09:41:20 10 Q. Say in the Navy if you had a condition adverse to
 - 11 quality that was documented, would generating paper about it be
 - 12 considered a solution to the problem?
- 09:41:34 13 A. It depends on the problem. If the problem is perhaps a
 - 14 design related, and you go in and generate a calculation that
- 09:41:45 15 addresses the issue, then I guess the answer would be yes. I'm
- 09:41:49 16 not sure that answers your question, though. Is that what
- 09:41:53 17 you're getting at?
 - 18 Q. I'll take a different approach. If the cleaning had
 - 19 remained on the mode restraint list, could the plant have
 - 20 started up while it was still there?
- 09:42:13 21 A. If it -- well, it wouldn't have unless someone had
 - 22 consciously removed that as a mode restraint.
- 09:42:22 23 Q. And that's the purpose of the mode restraint, isn't it?
- 09:42:25 24 A. That's correct.
- 09:42:26 25 Q. And later on it became apparent that not completing the

- 1 cleaning was a problem, didn't it?
- 09:42:38 2 A. Much later on we felt that -- I found out that the
- 09:42:43 3 cleaning had not been as thorough as it was intended to be,
 - 4 that's correct.
- 09:42:47 5 Q. And it was a problem, wasn't it?
- 09:42:49 6 A. I'm not sure I understand what you're getting at, but
 - 7 it's a problem.
 - 8 Q. Well --
- 09:42:56 9 A. I mean, it did create an issue for potential -- in 13
- 09:43:02 10 RFO not being able to do -- you know, you didn't have a baseline
 - 11 for 13 RFO.
- 09:43:09 12 Q. And by "baseline", what we're talking about is you
 - 13 didn't have the kind of pristine head you'd need to do a visual
- 09:43:17 14 examination?
 - 15 A. That's a true statement.
- 09:43:20 16 Q. And when you found out that the cleaning hadn't been
- 09:43:25 17 completed, you knew that Davis-Besse did not have the kind of
 - 18 pristine head that would be required for a qualified visual
- 09:43:35 19 examination?
- 09:43:37 20 A. I've got to be careful how I answer that question
 - 21 because at the time I was visualizing a qualified visual
 - 22 inspection as you either go do a visual inspection, but if you
- 09:43:49 23 can't, you would then follow it up with an NDE. I realize
- 09:43:54 24 today that's probably not a very realistic viewpoint. And
 - 25 so -- but back at that point, if you had asked me that question

- 1 back in 2001, I would have said, yes, we can do a qualified
- 09:44:08 2 visual inspection because we would immediately go into NDE if we
- 09:44:12 3 couldn't.
- 09:44:16 4 Q. Just to remind the jurors, NDE is nondestructive --
- 09:44:20 5 A. Nondestructive examination.
- 09:44:23 6 Q. So that would be dye penetrant, ultrasonic testing?
 - 7 A. Yeah, even doing radiographs. All that falls into NDE.
 - 8 Anything that does an inspection that doesn't damage the
 - 9 equipment is pretty much called NDE.
- 09:44:40 10 Q. And visual inspection is usually not considered an NDE
- 09:44:45 11 technique; isn't that right?
 - 12 A. It's usually considered just visual, right.
- 09:44:50 13 Q. So the effect of lifting this mode restraint was to make
 - 14 a visual examination at the 13th refueling outage impossible, at
- 09:45:07 15 least for the parts of the head that were not cleaned?
 - 16 A. Which mode restraint are we talking, this CR mode
- 09:45:13 17 restraint?
 - 18 Q. The one we're looking at here.
 - 19 A. I didn't view it that way. I viewed it as we were
 - 20 doing an inspection or that the -- I'm sorry, we were doing a
 - 21 head cleaning. So yeah, I guess you could say that. I didn't
 - 22 -- when I wrote this, I didn't anticipate that the head would
 - 23 not be cleaned completely.
 - Q. Sure, at the time you wrote this, the cracking problem
 - 25 was not as apparent as it was later; is that a true statement?

- A. We hadn't had any circumferential cracking, yeah.
- 09:45:50 2 Q. The cracks at Oconee had not yet occurred?
 - 3 A. That's correct.
 - 4 Q. The Bulletin 2001-01 had not yet been written?
 - 5 A. That's correct.
 - 6 Q. So at the time this was just about cleaning?
 - 7 A. That's correct.
- 09:46:29 8 Q. When you were involved in the discussions about
- 09:46:33 9 cleaning, did you know who the person was who was responsible
 - 10 for doing the cleaning?
 - 11 A. I believe it was Andrew Siemaszko, but I've got to be
- 09:46:41 12 honest, I know that for a fact now, and I can't say for sure
- 09:46:47 13 seven years ago if I knew that at the time, but I believe I did.
- 09:46:53 14 Q. All right. By the fall of 2001 when you were doing the
 - 15 bulletin responses -- well, it was during the fall of 2001 that
- 09:47:02 16 you learned that the head had not been cleaned?
 - 17 A. That's correct.
- 09:47:08 18 Q. And at that point, if not earlier, you knew that the
 - 19 person who was responsible for doing it was Andrew Siemaszko?
- 09:47:14 20 A. For doing the head cleaning --
 - 21 Q. Yes.
- 09:47:17 22 A. -- or the inspection?
 - Q. Head cleaning and an inspection.
 - A. Okay. Head cleaning, I probably knew that was Andrew.
 - Q. All right. Let's look at some of the e-mails -- well,

- 1 before I do that, do you recall being a member of the Project
- 2 Review Group at Davis-Besse?
- 09:47:52 3 A. Yes. I became a member of the Project Review Group
 - 4 when I became a manager in 2000.
- 09:48:04 5 Q. Do you remember that Project Review Group meeting at
 - 6 which -- well, do you remember any Project Review Group meetings
 - 7 at which there was a discussion of the proposal to cut access
- 09:48:16 8 ports into the service structure on the reactor vessel head?
- 09:48:20 9 A. I know that having -- in preparation for this trial I
- 09:48:27 10 reviewed the project review committee meeting minutes; I think
 - 11 it was from July or August of 2001, it might have been 2000. I
 - 12 think it was 2000 where it was rescheduled from a budgetary
 - 13 standpoint from, I think, 13 RFO to 14 RFO.
 - 14 Q. All right. Let's take a look at that exhibit.
 - MR. POOLE: I believe it's in evidence, Your Honor.
 - 16 It's Exhibit 21.
- 09:49:03 17 THE COURT: Yes.
- 09:49:15 18 MR. HIBEY: Excuse me, Your Honor. Is the mike on
 - 19 at the podium?
- 09:49:23 20 THE COURT: Yes.
- 09:49:25 21 MR. POOLE: Should I speak louder?
- 09:49:43 22 BY MR. POOLE:
 - Q. We're looking now at the cover page of Exhibit 21. And
- 09:49:50 24 I've enlarged the heading Project Review Group Meeting Minutes,
- 09:49:54 25 September 7th, 2000.

- 1 A. Correct.
- Q. Is that the document you reviewed to prepare for your
- 09:49:59 3 testimony?
 - 4 A. Correct.
- 09:50:08 5 Q. And does it show you on distribution?
 - 6 A. Yes, it does.
- 09:50:32 7 Q. All right. I'm going to display page 8 of that exhibit
- 09:50:36 8 to the jury. And at the bottom there is a mention of
- 09:50:40 9 installing service structure opening.
- 09:50:42 10 A. That's correct.
- 09:50:44 11 Q. And it's deferred to the 14th refueling outage; is that
 - 12 right?
 - 13 A. That's correct.
- 09:50:51 14 Q. For financial reasons?
- 09:50:53 15 A. That's correct.
- 09:50:54 16 Q. You were part of the committee that decided to defer
 - 17 that --
- 09:50:58 18 A. That's correct.
 - 19 Q. -- service structural opening?
 - Do you recall the discussion?
 - 21 A. Not a lot of detail.
 - Q. Well, tell the jury what detail you remember.
 - A. Okay. Well, what I know is from what's in here is that
 - 24 there was obviously a discussion. Normally we would have --
- 09:51:16 25 anytime we had a discussion along a particular model, we usually

- 1 bring the MOD sponsor in. So I would assume, but I don't
- 2 remember for sure, that in the response -- it might have been
- 3 Prasoon that sponsored it initially or initiated it, would have
- 4 spoke to it, or it would have been Plant Engineering that spoke
- 5 it to.
- 09:51:44 6 Q. And in retrospect the decision to defer that service
 - 7 structure opening, year after year as it was, turned out to be a
- 09:51:54 8 mistake?
 - 9 A. That's correct.
- 09:52:15 10 Q. Counsel asked you about a series of e-mails that
- 09:52:20 11 preceded the first submission to the Nuclear Regulatory
- 09:52:27 12 Commission, and you addressed each in turn. I'd like to ask
 - 13 you some questions about some of those.
 - 14 The first one is the e-mail, Government's Exhibit
- 09:52:38 15 22, from Prasoon Goyal on December 13, 2001.
- 09:52:48 16 MR. POOLE: Your Honor, that's in evidence.
- 09:52:56 17 A. December 13, 2000.
- 09:53:00 18 BY MR. POOLE:
- 09:53:00 19 Q. Did I misstate the date?
- 09:53:03 20 A. I thought you said 2001.
 - Q. Okay. December 13, 2000. It's an e-mail from Prasoon
 - 22 Goyal to Andrew Siemaszko, you, and others?
- 09:53:14 23 A. Correct.
- 09:53:16 24 Q. It's about the lessons learned from Oconee 1. Among the
 - 25 lessons learned are that the small -- the amount of boric acid

- 09:53:41 1 observed in the visual inspection at Oconee was very small and
 - 2 that it is important to have a clean head for a good visual
- 09:53:51 3 inspection. If the head is not clean, the chances of finding
- 09:53:54 4 boric acid such as that observed at Oconee 1 are not very good.
- 09:53:59 5 I think your testimony about that exhibit is it
 - 6 really didn't tell you anything new.
 - 7 A. That's correct. We had already been briefed by the Duke
- 09:54:08 8 representative on the Steering Committee about the Oconee 1
- 09:54:12 9 inspection.
- 09:54:25 10 Q. So you know the amount of boric acid that you can expect
 - 11 to find for an inspection for nozzle cracking is a very small
 - 12 amount?
 - 13 A. That's correct.
 - 14 Q. You knew that it was important to have a clean head?
- 09:54:50 15 A. That's correct.
- 09:54:53 16 Q. And you knew that if the head was not clean, the chances
 - 17 of finding boric acid deposits like those at Oconee were not
- 09:55:04 18 good?
 - 19 A. That certainly makes it much harder.
- 09:55:09 20 Q. And since you already knew those things, there was no
- 09:55:13 21 action you were required to take as a result of this e-mail?
- 09:55:17 22 A. No. This was just an FYI.
- 09:55:32 23 Q. The next document was a trip report by Mr. Goyal.
- 09:55:57 24 Again, it's lessons learned from Oconee 1. I'm going to
- 09:56:03 25 enlarge the first bullet for the jury. They were able to find

- 1 a leak because their CRDM flanges do not leak and the head was
- 2 in pristine condition. This is just another FYI?
- 3 A. This was the trip report. I think it was actually from
- 4 the same conversations he had had.
- 09:56:25 5 Q. Now, there's an element of a warning in this, isn't
 - 6 there?
- 09:56:33 7 A. You could say that.
- 09:56:35 8 Q. Because you knew that there was a problem with leaking
 - 9 flanges at Davis-Besse?
- 09:56:40 10 A. Yes.
- 09:56:41 11 Q. And it was a design problem? It was the flange that
 - 12 they built the reactor with, isn't that right -- I'm sorry, the
 - 13 gasket that was allowing the leaking was the one that the plant
 - 14 was built with?
- 09:56:55 15 A. Could you rephrase the whole thing because I think you
 - 16 started saying it was not a design problem? I don't want to --
 - 17 Q. I'm sorry. I probably mumbled.
 - 18 A. I think there was a design problem.
 - 19 Q. It was a design problem?
 - 20 A. Yes.
 - 21 Q. It was a problem in the original design of the plant
 - 22 that they used flanges --
 - 23 A. Gaskets.
- 09:57:17 24 Q. -- gaskets in the flanges that allowed leakage?
 - 25 A. It think it was a combination of the gasket and the

- 09:57:24 1 bolting because when we modified, went to a different style, we
- 09:57:27 2 actually used different flanges -- I'm doing the same thing --
- 09:57:32 3 different gaskets and different bolting.
- 09:57:35 4 Q. And you knew that Davis-Besse's flanges had a history of
- 09:57:45 5 leaking?
 - 6 A. That's correct.
 - 7 Q. Which caused boron to appear on the head?
 - 8 A. That's correct.
 - 9 Q. Which would then not be pristine?
- 09:57:52 10 A. That's true.
 - 11 Q. And then not allow detection of nozzle leakage if it was
- 09:57:57 12 occurring?
 - 13 A. Wherever the boron was, that is true.
- 09:58:03 14 Q. But you didn't act on this warning, did you?
- 09:58:06 15 A. No.
- 09:58:08 16 Q. But you were Manager of Design Engineering?
- 09:58:11 17 A. That's correct.
- 09:58:27 18 Q. All right. I think -- well, the next exhibit that Mr.
- 09:58:34 19 Wise covered with you was a March 26, 2001 e-mail from Prasoon
- 09:58:45 20 Goyal, Government's Exhibit 25.
- 09:58:47 21 MR. POOLE: Previously admitted, Your Honor, and
 - 22 I'm going to display it.
- 09:58:53 23 A. Okay.
 - 24 BY MR. POOLE:
 - 25 Q. That's the e-mail about the heats, isn't it?

- 1 A. That's correct.
- 09:58:58 2 Q. And Davis-Besse nozzles 1, 2, 3, 4, and 5 are the same
 - 3 heat as nine different nozzles that had already cracked at
- 09:59:14 4 Oconee 3?
 - 5 A. That's correct.
- 09:59:17 6 Q. You said at the time you didn't pay much attention to
 - 7 this.
 - 8 A. Well, this was information I already knew from the
 - 9 Steering Committee, that 60 of the 69 nozzles at Oconee 3 were
 - 10 the same heat as the five at Davis-Besse.
- 09:59:34 11 Q. Coincidentally, those were the top five nozzles on the
 - 12 reactor vessel head, weren't they?
 - 13 A. That's correct.
 - 14 Q. And those are the same nozzles that at the time you
 - 15 thought were incapable of showing a gap?
 - 16 A. That's true, or four of those five anyway.
- 09:59:52 17 Q. So is it fair to say that since nine nozzles in this
 - 18 heat had already been found to have cracks at Oconee 3, this
 - 19 e-mail is a warning that these nozzles at Davis-Besse come from
 - 20 a heat that is susceptible to cracking?
- 10:00:16 21 A. Yeah. I wish I put a lot more emphasis on this issue
- 10:00:21 22 back then.
- 10:00:29 23 Q. And, in fact, one of those nozzles is the nozzle that
- 10:00:34 24 cracked with the really significant consequences that we've
- 10:00:39 25 already talked about, Nozzle 3?

- 10:00:41 1 A. Right. Yeah. Actually, two of the nozzles that we
 - 2 had cracking on nozzle 2 and 3 are the same heat.
- 10:01:04 3 Q. Mr. Wise asked you about the document that has often
 - 4 been called a JCO or Justification of Continued Operation. And
- 10:01:19 5 you differed with that nomenclature, but do you recall
- 10:01:23 6 discussing that document?
- 10:01:24 7 A. Yes. The recommendation for doing inspection if we
- 10:01:31 8 were to trip and go to Mode 5.
- 10:01:37 9 Q. Just to recap your testimony, if there were an event
 - 10 that caused the plant to go down such as a tornado, go down to
 - 11 Mode 5 where it's offline, it's cool, and it's depressurized,
 - 12 the question is then, would Davis-Besse have to inspect the
 - 13 reactor vessel head?
 - 14 A. Correct.
- 10:02:00 15 Q. And the justification -- I'm trying to not call it its a
 - 16 JCO -- a justification was written to make it restart under
 - 17 those circumstances without such an inspection?
 - 18 A. Correct. If you're more comfortable you can call it a
 - 19 recommendation.
- 10:02:17 20 Q. And you signed off on that?
 - 21 A. That's correct.
- 10:02:20 22 Q. Now, at the time you signed off, you knew that you
- 10:02:25 23 had -- or you'd been warned that an effective inspection
 - 24 requires conditions that didn't exist on the reactor vessel head
 - 25 at Davis-Besse?

- 10:02:38 1 A. I'm sorry; I'm not following your question.
 - Q. Well, we've already talked about the lessons from
 - 3 Oconee, the lessons that without a clean head, you can't inspect
- 10:02:52 4 the head visually to determine if you have nozzle cracking?
 - 5 A. Correct.
- 10:02:57 6 Q. And without a pristine head, a visual inspection isn't
- 10:03:06 7 going to work?
- 10:03:08 8 A. Correct.
- 10:03:11 9 Q. You knew that Davis-Besse had a flange leakage problem
- 10:03:15 10 which made the head not pristine?
- 10:03:20 11 A. That's correct.
- 10:03:22 12 Q. And then you signed off on a justification to not
- 10:03:29 13 inspect the head if the plant tripped and went down?
 - 14 A. That's correct.
- 10:03:34 15 Q. Now, I mean, let's just think through that scenario. A
- 10:03:39 16 tornado comes along, the plant trips, it goes to Mode 5. You
- 10:03:45 17 have to do a head inspection. They go in, attempt to visually
- 10:03:52 18 inspect, and discover lots of boron. What happens next?
- 10:03:57 19 A. Where the boron would be located, if it would obscure
 - 20 some drives, at that point we would have had to go in and pull
 - 21 those drives off and actually do an inspection then. That
 - 22 would probably have necessitated actually removing the reactor
- 10:04:17 23 head from the reactor, putting it on service structure work
 - 24 stand so you could actually start pulling off those drives, and
- 10:04:26 25 then do an NDE of those nozzles.

- 10:04:30 1 Q. And what would an NDE consist of? Can you just
 - 2 describe for the jury how that would have been conducted at the
 - 3 time?
- 10:04:38 4 A. That's why I said you'd pull the drives off, because the
 - 5 drive mechanism would then -- by pulling it off, would allow you
- 10:04:45 6 to have access to the diameter of the nozzle and you'd be able
- 10:04:50 7 to run a probe down through that and look for cracking.
- 10:04:55 8 Q. Okay. A probe. At the time do you know which
- 10:04:59 9 technology would have been used?
 - 10 A. I think we were using eddy current, but I'm not 100
- 10:05:05 11 percent positive.
- 10:05:09 12 Q. Would all of that have been time consuming?
- 10:05:13 13 A. Oh, absolutely.
 - 14 Q. And expensive?
 - 15 A. Absolutely.
- 10:05:17 16 Q. And that's why this recommendation was written?
- 10:05:22 17 A. The recommendation was to ask the question, yes, to see
- 10:05:27 18 -- I wouldn't say it's because it was time consuming. It was
- 10:05:31 19 asking the question, should we do the inspection?
- 10:05:33 20 Q. To ask the question whether we should do the inspection;
 - 21 and to answer it: No, we shouldn't?
- 10:05:39 22 A. Well, that's what the answer was in the recommendation,
 - 23 that's correct.
- 10:06:29 24 MR. POOLE: Government's Exhibit 28 was another one
 - 25 Counsel asked you about, previously admitted. I'm going to

- 10:06:38 1 display a page of that exhibit, Your Honor.
- 10:06:38 2 BY MR. POOLE:
 - 3 Q. It's another trip report, isn't it?
 - 4 A. Yes.
 - 5 Q. From Prasoon Goyal?
- 10:06:53 6 A. That's correct.
 - 7 Q. It says: We need service structure access to clean and
 - 8 inspect the head. (Note: Davis-Besse does not have service
 - 9 structure holes.)
- 10:07:13 10 I believe your testimony was that you already knew
- 10:07:15 11 that Davis-Besse needed access ports.
- 10:07:18 12 A. That's correct.
- 10:07:20 13 Q. But --
- 10:07:21 14 A. I'm sorry, the actual statement is Davis-Besse does not
 - 15 have them. I knew that.
- 10:07:28 16 Q. Does not have them. All right. My recollection --
 - 17 A. That's what you asked me, right?
- 10:07:35 18 Q. No, my question is about the testimony you gave
 - 19 yesterday.
- 10:07:38 20 A. Okay.
 - Q. My recollection of your testimony, correct me if I'm
 - 22 wrong, is that you said that you already knew that Davis-Besse
- 10:07:46 23 needed these openings, these access ports.
 - 24 A. That's correct. I was well aware we did not have
- 10:07:54 25 openings.

- 1 Q. And that they were needed?
- 10:07:57 2 A. We had a modification out for them, yes.
 - 3 Q. That's the same modification that was postponed to the
 - 4 14th refueling outage?
 - 5 A. That's correct.
- 10:08:09 6 Q. There's an element of warning in this, isn't there? We
- 10:08:15 7 need access to clean and inspect the head and we don't have
 - 8 service structure holes. Wouldn't you call that a warning?
 - 9 A. Today I would. But at the time I didn't take it that
 - 10 way.
- 10:08:26 11 Q. It wasn't the first warning that Prasoon Goyal sent, was
- 10:08:31 12 it?
 - 13 A. No. Prasoon was a very strong advocate for cutting the
 - 14 holes in the head -- I'm sorry, in the service structure apron.
- 10:08:39 15 Q. I take it nobody was in favor of cutting holes in the
- 10:08:43 16 head?
 - 17 A. Not until we found the hole and we wanted to cut it out.
 - 18 Q. Yes. And he goes on with some other information that
- 10:08:53 19 you had already seen in previous e-mails and messages, leaking
- 10:08:58 20 nozzle may produce very little boric acid; the head needs to be
- 10:09:03 21 clean; the inspection needs a procedure, we don't have one.
 - 22 Now, this whole service structure thing, the lack of access,
- 10:09:11 23 that's a design issue, isn't it?
- 10:09:13 24 A. That's correct. The actual installation of the holes
 - 25 would be a modification that would have to be approved through

- 10:09:21 1 design.
- 10:09:23 2 Q. And the limitation on access to the reactor vessel head
- 10:09:29 3 was a result of the original design?
- 10:09:33 4 A. That's correct.
- 10:09:35 5 Q. So this is a design issue, isn't it?
- 10:09:40 6 A. I think you could put it that way, but I would also
- 10:09:44 7 think that it's a plant issue as well. I think there was more
- 10:09:49 8 people than design that were concerned about being able to do a
 - 9 good job.
 - 10 Q. Sure. The people who did the inspections were
 - 11 concerned about it, weren't they?
 - 12 A. Absolutely.
- 10:10:00 13 Q. So you, as design manager, read this warning, but did
 - 14 not act on it?
 - 15 A. That's correct.
- 10:10:31 16 Q. All right. Moving to Government's Exhibit 36.
- 10:10:36 17 MR. POOLE: Previously admitted, Your Honor. I'll
- 10:10:39 18 display it to the jury.
- 10:10:44 19 BY MR. POOLE:
- 10:10:44 20 Q. In an August 11, 2001 e-mail from Prasoon Goyal about
 - 21 the response to Bulletin 2001-01 -- do you recognize that?
 - 22 A. Correct.
- 10:11:15 23 Q. I've enlarged the third paragraph which says: It was
- 10:11:19 24 pointed out that we cannot clean our head through the mouse
- 10:11:22 25 holes.

- 10:11:23 1 Again, this is as a result of a design of the
 - 2 reactor vessel head; is it not?
 - 3 A. Correct.
- 10:11:31 4 Q. It's another warning; is it not?
- 10:11:34 5 A. Yes.
- 10:11:36 6 Q. And now it's a warning in the context of Bulletin
- 10:11:42 7 2001-01; isn't that true?
- 10:11:43 8 A. Yes.
- 10:11:44 9 Q. Bulletin 2001-01 required Davis-Besse to report on
- 10:11:50 10 inspections that had been done?
 - 11 A. That's correct.
- 10:11:53 12 Q. They wanted to know that the plant was safe to operate?
- 10:11:59 13 A. I think that's the general intent of the bulletin, yes.
- 10:12:03 14 Q. In order to know if a plant was safe to operate, they
- 10:12:07 15 needed to know whether inspections had been done?
 - 16 A. Correct.
- 10:12:12 17 Q. They needed to know whether the inspections that had
- 10:12:15 18 been done were capable of finding boric acid indicative of a
 - 19 nozzle leak?
 - 20 A. Correct.
- 10:12:26 21 Q. And here's a warning: We cannot clean our head through
 - 22 mouse holes.
- 10:12:36 23 But you didn't act on that?
 - 24 A. No.
- 10:13:04 25 MR. POOLE: Next, Government's Exhibit 40,

- 1 previously admitted, Your Honor. And we'll display it for the
- 2 jury.
- 10:13:11 3 THE COURT: Yes.
- 10:13:15 4 BY MR. POOLE:
- 10:13:15 5 Q. Another e-mail from Prasoon Goyal?
- 10:13:19 6 A. That's correct.
- 10:13:27 7 Q. This one says: Is it possible to go back to '98; that
 - 8 is when a good head exam was done with no nozzle leakage
 - 9 (meaning not taking any credit for 2000 inspection).
- 10:13:45 10 And this e-mail went to you, didn't it?
 - 11 A. I think it was actually to Mr. Fyfitch at Framatome. I
 - 12 was CCed on it.
 - 13 Q. It was copied to you?
- 10:14:03 14 A. That's correct.
- 10:14:08 15 Q. Now, we're talking about not crediting the 2000
- 10:14:11 16 inspection because it wasn't a good inspection?
 - 17 A. Correct.
- 10:14:20 18 Q. This was August 17, 2001?
 - 19 A. I believe that's correct. I only have the one section,
- 10:14:27 20 though.
- 10:14:35 21 Q. I'll give you the page back.
 - 22 A. Yes, the 17th.
- 10:14:38 23 Q. So that's two or three weeks before the first bulletin
- 10:14:41 24 was signed off on by you and submitted to the Nuclear Regulatory
- 10:14:47 25 Commission?

- 10:14:47 1 A. That's correct.
- 10:14:49 2 Q. I'd call that a warning, wouldn't you?
- 10:14:53 3 A. You could call it a warning. I didn't view that at the
 - 4 time. I wish I had.
 - 5 Q. Certainly a clear indication that the 2000 inspection
 - 6 was not a reliable inspection?
- 10:15:05 7 A. Right. We knew that because of the five leaking flanges
 - 8 that we repaired.
- 10:15:23 9 Q. 2731 did not state that it wasn't a reliable inspection?
 - 10 A. No, it didn't.
- 10:15:33 11 Q. In fact, it took credit for that inspection?
 - 12 A. Portions of it, yes.
- 10:15:47 13 Q. But your statement yesterday when you were asked about
 - 14 this is you didn't think there was a problem with the 2000
- 10:15:53 15 inspection?
- 10:15:56 16 A. I don't recall that.
- 10:15:59 17 Q. So anyway, your testimony here today is that you knew
- 10:16:03 18 the 2000 inspection wasn't a thorough, 100 percent inspection
 - 19 because you knew there was flange leakage?
- 10:16:11 20 A. That's correct.
 - Q. And you knew it already in mid August of 2001?
- 10:16:16 22 A. That's correct.
- MR. POOLE: Your Honor, may I suggest this is an
- 10:16:23 24 appropriate time for a break?
- 10:16:26 25 THE COURT: All right. Ladies and gentlemen,

- 1 we'll now take our mid-morning break, 15 minutes, until
- 10:16:46 2 approximately 10:30. Please remember my previous admonitions
 - 3 not to discuss this case among yourselves nor with anyone else
- 10:16:54 4 nor permit anyone to discuss it with you. And do not make up
- 10:16:57 5 your minds on the ultimate issues you will be asked to decide at
- 10:17:01 6 the end of the case. Enjoy your break.
- 10:17:35 7 (Recess taken.)
- 10:36:38 8 THE COURT: Please continue, Mr. Poole.
- 10:36:45 9 BY MR. POOLE:
- 10:36:46 10 Q. Mr. Geisen, when we left off, I think we began
- 10:36:51 11 discussing --
 - 12 THE COURT: Mr. Poole, I have to interrupt you
- 10:36:54 13 again. I apologize.
- 10:39:08 14 (A short break is taken.)
- 10:39:20 15 THE COURT: Thank you. Sorry for the
- 10:39:23 16 interruption.
- 10:39:24 17 MR. POOLE: Not a problem.
- 10:39:26 18 BY MR. POOLE:
 - 19 Q. Mr. Geisen, before we took our break, we discussed a
 - 20 series of e-mails and trip reports that were sent to you before
- 10:39:40 21 the response to Bulletin 2001-01 was sent to the NRC. Do you
 - 22 remember that?
 - 23 A. Yes.
- 10:39:51 24 Q. Now, you were one of the signers of the greensheet, the
- 10:40:02 25 review and approval report, were you not?

- 10:40:05 1 A. Yes.
- 10:40:07 2 MR. POOLE: And that's Government's Exhibit 59.
 - 3 And, Your Honor, we'll display a page of that to the jury if the
 - 4 Court permits.
- 10:40:19 5 THE COURT: Very good.
- 10:40:45 6 MR. POOLE: Does the Court and the witness and the
- 10:40:47 7 jurors have that exhibit up?
 - 8 THE COURT: I believe so.
- 10:40:52 9 THE WITNESS: 40?
- 10:40:54 10 MR. POOLE: That's the one we were at before the
- 10:41:00 12 Exhibit 59.
- 10:41:00 13 BY MR. POOLE:
- 10:41:03 14 Q. Now, is that the page you signed off on the greensheet
 - for the first response to Bulletin 2001-01?
- 10:41:11 16 A. Yes, it is.
 - 17 Q. It contains your initials next to Design Engineering
 - 18 Manager?
 - 19 A. That's correct.
- 10:41:21 20 Q. I'll enlarge block 14 for the jury.
 - 21 And are those your initials also next to S. P.
- 10:41:39 22 Moffitt?
 - A. That's correct, D.C.G. for S.P.M.
- 10:41:45 24 Q. So you signed on behalf of the Director of Technical
 - 25 Services?

- 1 A. That's correct.
- 10:42:01 2 Q. Your testimony yesterday when asked about signing it,
- 10:42:05 3 you thought it was your responsibility to make sure the right
 - 4 people reviewed it?
 - 5 A. Correct.
 - 6 Q. People with knowledge. And today you added something
- 10:42:18 7 to that, you said you reviewed it to see if it sounds right to
 - 8 me?
- 10:42:25 9 A. That's correct.
- 10:42:30 10 Q. Sounds right. Have you ever reviewed the instructions
- 10:42:37 11 on the back of the greensheet?
 - 12 A. Yes, I have.
- 10:42:43 13 Q. Let's take a look at those now. Let's see, we were
 - 14 looking at your signature in Block 14.
 - 15 A. Correct.
- 10:42:54 16 Q. Do you recognize this as the instructions on the back of
- 10:42:58 17 the greensheet?
- 10:42:59 18 A. Correct.
- 10:43:01 19 Q. I'll enlarge the instructions for Block 14. It says:
- 10:43:07 20 Review and approval. Is that correct?
- 10:43:09 21 A. Correct.
 - Q. Initiator checks and/or enters the desired viewer(s).
 - 23 The technical accuracy of a response to the NRC is the
 - 24 responsibility of the director and management individual
 - 25 assigned the action.

- 10:43:33 1 So somebody has responsibility for technical
 - 2 accuracy?
 - 3 A. Correct.
 - Q. That's the thrust of this. Now, you signed as Design
- 10:43:45 5 Engineering Manager. Were you the responsible person?
- 10:43:49 6 A. Yes. I was part of management.
 - 7 Q. So you were responsible for technical accuracy?
 - 8 A. Yes.
- 10:43:57 9 Q. Now, if you're responsible for technical accuracy, is
- 10:44:06 10 "sounds right to me" the standard?
- 10:44:13 11 A. No.
 - 12 Q. You have an obligation to satisfy yourself that it's
- 10:44:18 13 accurate?
 - 14 A. That's correct.
- 10:44:20 15 Q. Did you do that for 2731?
 - 16 A. Yes, I did.
- 10:44:31 17 Q. All right. I'm going to hand you Government's Exhibit
- 10:44:45 18 60, which is 2731.
- 10:44:51 19 MR. POOLE: Previously admitted, Your Honor.
- 10:44:51 20 BY MR. POOLE:
 - Q. And do you recognize that as the bulletin that you
- 10:44:56 22 signed off on?
- 10:45:01 23 A. Yes.
- 10:45:03 24 Q. Now, I've tabbed the page that includes 1D, which is the
- 10:45:12 25 question that the bulletin posed about past inspections. Do you

- 1 see that?
- 2 A. Uh-huh.
- 10:45:18 3 Q. It asks for a description of impediments?
- 10:45:26 4 A. Correct.
- 10:45:27 5 Q. Now --
 - A. I'm sorry; I didn't realize that was a question.
 - 7 Q. Pardon?
- 10:45:33 8 A. I'm sorry for the pause. I didn't realize that was a
 - 9 question.
 - 10 Q. So do you see anything in there that discusses the fact
 - 11 that boric acid from flanges is an impediment to inspection?
 - 12 A. No.
- 10:45:53 13 Q. Do you see any discussion in there about the proposal to
 - 14 cut access holes in the service structure to permit better
- 10:46:05 15 inspections?
 - 16 A. No.
- 10:46:07 17 Q. Is there anything in there that says that the difficult
- 10:46:14 18 access through the weep holes is an impediment to inspection?
 - 19 A. No.
- 10:46:20 20 Q. You knew all those things; you've already said that, and
 - 21 you signed off on the greensheet, didn't you?
- 10:46:29 22 A. I signed -- yes, I signed off on the greensheet. I'm
- 10:46:34 23 sorry; it was a multiple-part question there.
 - Q. I'll break it up. So you signed off on the greensheet.
 - 25 And you knew that boric acid from flanges was an impediment to

- 1 inspection, and it doesn't say that there?
- 10:46:51 2 A. That's correct.
- 10:46:52 3 Q. You knew that the limited access available through the
 - 4 mouse holes was an impediment, and 2731 does not say that?
 - 5 A. That's correct; it does not say that, only limited
 - 6 access.
 - 7 Q. And there's no discussion at all about the proposal to
- 10:47:17 8 cut access ports into the service structure?
 - 9 A. No, it doesn't.
- 10:47:53 10 Q. I'm going to hand you a document that has not been
- 10:47:56 11 previously admitted. It's Government's Exhibit 69. Take a
 - 12 minute to read over it. Then I'm going to ask you some
- 10:48:12 13 questions.
- Without stating what the contents are, would you
 - 15 tell the Court what that document is?
 - 10:48:43 16 A. It appears to be an e-mail from Dale Miller to --
- 10:48:52 17 Q. To a bunch of people?
 - 18 A. A lot of people.
 - 19 Q. One of which is you?
- 10:48:56 20 A. Yeah. It looks like, two to a line, is probably a
 - 21 little over a dozen people representing several different
 - 22 plants, maybe a dozen or dozen and a half plants.
- 10:49:09 23 Q. Let me help you out.
 - A. Then CCed to myself and probably, it looks like, about
 - 25 10 other people.

- 1 Q. And the subject is CRD Nozzle Bulletin 2001-01 Recent
- 10:49:26 2 Developments-Urgent.
- 10:49:30 3 MR. POOLE: Your Honor, we move that document into
- 10:49:32 4 evidence.
- 10:49:33 5 MR. WISE: No objection.
- THE COURT: It will be admitted. It may be
 - 7 displayed to the jury.
 - 10:49:58 8 BY MR. POOLE:
 - 10:49:58 9 Q. Mr. Geisen, do you recognize this e-mail?
 - 10 A. I can't say that I do, but it was obviously -- I was
 - 11 obviously CCed on it.
 - 12 Q. Do you remember the events at that time? This e-mail
 - 13 says: This morning the CNO of FENOC was contacted by Brian
 - 14 Sheron.
 - Do you recall the contact with Brian Sheron?
 - 10:50:20 16 A. Yes. This is regarding that phone call that Bob
 - 10:50:24 17 Saunders got from Brian Sheron on the 28th of September.
 - 10:50:29 18 Q. And it says: The caller -- that's Brian Sheron -- was
 - 19 strongly suggesting that Davis-Besse reconsider our response to
 - 20 the bulletin and consider shutting down by the end of the year
 - 21 and perform an inspection of the reactor vessel head CRD
 - 22 nozzles.
 - 10:50:46 23 A. Correct. That's what it says.
 - 10:50:50 24 Q. And this e-mail, this urgent e-mail that went out to
 - 10:50:58 25 people, everybody at the plant expressed concern about that

- 10:51:06 1 development, didn't they?
- 10:51:08 2 A. Yeah. I don't think anyone expected to get the phone
 - 3 call from Dr. Sheron.
- 10:51:17 4 Q. Now, the consequence of shutting down by the end of the
 - 5 year, if Davis-Besse was to do that, would be pretty
- 10:51:28 6 significant; is that a fair statement?
- 10:51:30 7 A. Yes.
- 10:51:31 8 Q. For one thing, to shut down and inspect we'd have to go
 - 9 through the steps that you and I were discussing a minute ago;
 - 10 isn't that right?
 - 11 A. Yes, extensive disassembly of the head.
 - 12 Q. Shut down the plant, depressurize, cool it off, remove
- 10:51:48 13 the reactor vessel head, put it on a stand?
 - 14 A. Correct.
- 10:51:52 15 Q. Do a visual inspection, which you knew would be impeded
- 10:51:57 16 by boron on the head, necessitating further inspection by NDE
- 10:52:04 17 methods. Is that all accurate?
- 10:52:09 18 A. Fairly accurate, yes.
- 10:52:17 19 Q. When a nuclear power plant shuts down and goes offline
- 10:52:21 20 and isn't generating electricity, what happens to the consumer?
 - 21 Do they still get electricity?
 - 22 A. Yes, but it -- it just depends on what time of the year
 - 23 they're coming off. Most of the nuclear plants come offline in
 - 24 the spring and fall when demand is at the lowest because you
 - 25 don't have high air-conditioning loads in the summer or high

- 10:52:48 1 heating loads in the winter. If there is a demand, they end up
 - 2 starting peaker units to provide enough power for the grid.
 - 3 The consumer usually doesn't see a problem.
- 10:53:06 4 Q. Is that because they buy electricity from other people?
 - 5 A. Either buy electricity or they may start, like I say,
 - 6 start peaker units. That's really left up to what they call
 - 7 load dispatchers that work the grid because it may be cheaper
 - 8 for them to buy it than it is for us to make it if it's, like, a
- 10:53:27 9 gas turbine unit or something like that.
 - 10 Q. Can you tell us what a peaker unit is?
 - 11 A. I'm sorry. A peaker unit is units that generate
- 10:53:39 12 electricity. They may be gas turbine; it could be coal-fired;
- 10:53:43 13 could be oil-fired. It could even be hydroelectric, but
- 10:53:48 14 usually hydroelectric is base loaded, and we don't have any of
 - 15 that up here anyways. But the reason they're considered peaker
- 10:53:55 16 units is because they're not as efficient as other units;
 - 17 they're more costly to run; their cost per megawatt generated is
 - 18 a lot higher. So they don't run them except for when you've got
- 10:54:07 19 a peak demand, then you put it on then.
- 10:54:10 20 Q. So then while the plant is down, FENOC is either buying
- 10:54:17 21 electricity from somewhere else or running expensive peaker
- 10:54:23 22 units to replace this electricity that's not being generated at
 - 23 Davis-Besse?
- A. Correct. Usually that's the case. Unless, like I've
- 10:54:31 25 said, you've got a low demand period.

- 1 Q. All right. Would December and January of 2001 be low
- 10:54:40 2 demand periods in Ohio?
 - 3 A. No, in northwest Ohio that's considered very high demand
 - 4 because we historically have a lot of electrical heating loads;
- 10:54:51 5 there's a lot of homes that have electric heat.
- 10:54:54 6 Q. So it's an expensive time to shut down?
 - 7 A. Yes.
- 10:55:06 8 Q. By that time there was an -- it was an established fact
 - 9 in the industry that plants like Davis-Besse that were doing
- 10:55:16 10 inspections were finding cracks; is that a fair statement?
- 10:55:22 11 A. At the time we got this bulletin there had been four
- 10:55:30 12 similar plants; three at Oconee and the Arkansas plant. All of
 - 13 those had found leaks from axial cracks, that's correct.
 - 14 Q. We saw that Oconee, which had many nozzles -- I think
- 10:55:44 15 you said 60 from the same heat as the top five at Davis-Besse,
 - 16 they had nine cracked nozzles on a single head?
- 10:55:53 17 A. That's correct.
- 10:56:02 18 Q. So people at Davis-Besse knew when they shut down there
 - 19 was a pretty good chance they were going to find cracks?
 - 20 A. I don't know that everyone was thinking that way, but
 - 21 you could draw that conclusion. I don't want to put -- you
 - 22 asked me what people at Davis-Besse were thinking, and I don't
- 10:56:19 23 want to answer for everybody.
 - Q. Okay. Well, you certainly knew because you were
- 10:56:23 25 involved on the industry committees and received trip reports

- 10:56:28 1 and e-mails from Prasoon Goyal, who was knowledgeable; you
 - 2 certainly knew that?
- 10:56:34 3 A. I certainly knew we were susceptible to cracking,
- 10:56:38 4 absolutely.
 - 5 Q. Susceptible to cracking. So the plant shuts down,
- 10:56:46 6 disassembles the head, does an inspection, and now they find a
 - 7 crack. What does the plant do about it when they find a crack?
 - A. Well, at that time the accepted repair mechanism or
- 10:57:00 9 methodology was to machine out the drive and start at the bottom
 - 10 machining out until you got above where the crack was, which was
- - 12 weld, you wouldn't do any repair it to; you'd just monitor it.
- 10:57:19 13 But if it was a crack in the J weld area, then you would grind
 - 14 that out and/or machine it out, then you end up going back in
 - 15 and rewelding it, essentially a new J weld. And then there was
 - 16 a stress relaxation process called the temper bead relaxation
- 10:57:41 17 process.
- 10:57:42 18 Q. Okay.
- 10:57:43 19 A. That's the stuff that the Steering Committee was working
 - 20 on.
- 10:57:48 21 Q. Let's just show the jury where this occurred.
- 10:57:52 22 Government's Exhibit 125 is the sort of 3D cross-sectional model
- 10:58:00 23 of the reactor vessel head. Where would the repair activity
 - 24 occur?
- 10:58:04 25 A. Okay. What you'd end up -- I'll yell. What you'd end

- 1 up doing is you actually put a rig underneath that would machine
- 2 out this metal, and it would keep machining it out until it got
- 10:58:23 3 above the crack, and then you would reweld this in a circular --
 - 4 you'd reweld this using a weld rig that would just give passes
 - 5 to basically reestablish the J weld. You don't completely
- 10:58:44 6 reestablish the drive all the way down; you just now, instead of
 - 7 having something sticking out, it would be flush with the bottom
 - 8 of the head, inside the head.
 - 9 Q. Now, what's -- the reactor vessel head is taken off the
- 10:59:07 10 reactor and put on the stand. And at that point it's cool; is
 - 11 that correct? It's not 600 degrees?
 - 12 A. No, you have to have a cool-down before you can even
- 10:59:21 13 work on it to remove the studs that hold it together.
 - 14 Q. What's the environment like under the reactor head?
- 10:59:30 15 A. With it installed or -- under what condition? I'm
- 10:59:35 16 sorry.
 - Q. When it's on the stand and cooled.
 - 18 A. When it's on the stand and cooled, it's inhospitable
- 10:59:43 19 because it's been exposed to so much radiation for so long that
 - 20 it's a very high dose area. It's an exclusionary. There's no
 - 21 one allowed underneath there.
- 10:59:55 22 Q. So you can't put a human being underneath the reactor
- 10:59:59 23 vessel head?
 - A. Not without taking extraordinary measures.
 - 25 Q. You described the rig that was used to do machining and

- 11:00:07 1 welding.
 - 2 A. That's what the Steering Committee was actually
 - 3 designing in the spring of 2001 because when Oconee 3 had to do
 - 4 their repairs, they actually had to put a person underneath
 - 5 there, and they had to put them in a lead box to shield them.
 - 6 Then they had to do it manually. That's why they ended up with
- 11:00:29 7 such an extensive dose expenditure for that outage.
- 11:00:33 8 Q. If Davis-Besse had shut down in the fall of 2001, found
 - 9 cracks, and then sought to repair them, what technology would
 - 10 then have been available?
- 11:00:47 11 A. By then they -- robotics had been developed. I think
- 11:00:52 12 they were available by mid summer. Framatome was the
- 11:00:55 13 fabricator.
- 11:00:59 14 Q. And that robotic equipment was in pretty high demand,
 - 15 was it not?
- 11:01:06 16 A. Well, it was built by or funded by the Steering
- 11:01:11 17 Committee. So it was only to be used by B&W plants.
- 11:01:16 18 Q. Right.
 - 19 A. Right.
 - Q. But wasn't it the case during the fall of 2001 that if
- 11:01:22 21 you wanted to use that equipment, you had to stand in line, or
 - 22 you had to schedule it at a time that it was available?
 - 23 A. We would have had to schedule it. I can't sit here
 - 24 today and say that we would have been standing in line. I
- 11:01:34 25 don't know.

- 11:01:37 . 1 Q. But whether or not it was available at the moment you
 - 2 needed it, it is fair to say this is a time-consuming and
- 11:01:44 3 expensive process?
- 11:01:45 . 4 A. Absolutely.
- 11:01:52 5 Q. When this e-mail came out, Government's Exhibit 69, that
- 11:01:56 6 was the concern, wasn't it?
- 11:02:03 7 A. I didn't take that from the writing here. This was not
- 11:02:07 8 directed at just the B&W plants. This was, if you look at the
- 11:02:12 9 "to" line, it goes to a lot of non-B&W plants. The question
 - 10 was, we were trying to get -- I think Mr. Miller was trying to
 - 11 set up a teleconference to specifically talk to all of the high
- 11:02:27 12 susceptibility plants, which those are the plants per the MRP
 - 13 were within 5 EFPY of Oconee 3. So it would be incorrect for
 - 14 me to state that that was just the B&W plants. There were
 - 15 other plants in that category.
- 11:02:45 16 Q. That's a fair statement. But the concern -- were you
 - 17 concerned if the plant shut down prior to the end of the year
 - 18 that the plant would have these kind of problems?
- 11:03:02 19 A. I'm sorry, what problems? Tooling?
 - 20 Q. Undergoing the time and expense of inspection and
- 11:03:12 21 possibly repair of cracked nozzles at a time when it was
- 11:03:18 22 inexpensive -- expensive to be offline and necessitating
- 11:03:23 23 expensive work to be done?
- 11:03:26 24 A. If you have to do it, you have to do it.
- 11:03:37 25 Q. But, in fact, Davis-Besse's response was to try to

- 11:03:42 1 persuade the Nuclear Regulatory Commission that they shouldn't
 - 2 have to shut down by the end of the year?
- 11:03:48 3 A. That's correct. We thought we would have been safe to
- 11:03:51 4 operate until our scheduled outage, which was the first week in
 - 5 April of 2002.
- 11:04:09 6 Q. I'm going to show the witness Government's Exhibit 65,
- 11:04:13 7 which I believe was previously admitted.
- Do you recognize Government's Exhibit 65?
 - 9 A. Yeah, this is the Piedmont report for Mr. Gibbs that he
- 11:05:04 10 testified to earlier.
- MR. POOLE: Your Honor, we're going to display that
 - 12 to the jury.
- 11:05:27 13 BY MR. POOLE:
- 11:05:27 14 Q. Paragraph 1 of that letter discusses CRDM inspection and
 - 15 repair. Remind me, did you tell the jury when you received
 - 16 this document?
- 11:05:45 17 A. No, I didn't recall when I had gotten it.
- 11:05:50 18 Q. So is it your testimony sitting here today that you
 - 19 don't recall ever receiving this document?
 - 20 A. No, I know I received it; I just don't recall when.
 - Q. Okay. Did you receive it in the fall of 2001?
 - 22 A. Sometime in the fall of 2001, correct.
 - 23 Q. Is there any reason -- I mean you heard his testimony
 - 24 that he left it on your desk. Is there any reason to believe
 - 25 you didn't see it within a couple days of his having written it?

- 1 A. I probably did not as a function of what else I had
- 2 going on during that time frame since we were in the preps for
- 11:06:28 3 our INPO evaluation. It was probably not right, but it
- 11:06:36 4 probably did sit.
 - 5 Q. For how long? A week, two weeks?
 - 6 A. Probably quite a while.
- 11:06:49 7 Q. When you did read it, you saw that it said on completion
- of 12 RFO the reactor vessel head had boric acid deposits of
- 11:06:59 9 considerable depth?
- 11:07:03 10 A. Correct, I guess the tail end of that first paragraph.
- 11:07:14 11 Q. The next sentence, the first sentence in the next
 - 12 paragraph contains a warning, doesn't it? It tells you that
 - 13 that last bulletin response, the one that you signed off on, had
 - 14 incorrect information; is that fair?
 - 15 A. I certain --
 - MR. WISE: Objection.
 - 17 A. I certainly wish I had taken it that way, yes.
 - 18 BY MR. POOLE:
 - 19 Q. It said Davis-Besse stated in its response to Bulletin
 - 20 2001-01 that the top head visual inspections would not be
- 11:07:49 21 compromised due to any preexisting boric acid crystal deposits.
 - 22 It goes on: Given previous experience in removing boric acid
- 11:07:57 23 deposits from the head, the likely need to remove these deposits
 - 24 at the center top head by mechanical means, the severely
- 11:08:05 25 restricted access allowed by the service structure mouse holes

- 1 for mechanical cleaning, the industry experience of Duke Power
- 2 that clearly emphasizes the need for good access to the head for
- 3 cleaning and inspection, and the NRC commitments and inspection
- 11:08:23 4 requirements for the visual inspection, the most prudent course
 - 5 of action to avoid outage delays would be to access holes in the
 - 6 Reactor Service Structure as soon as possible in the 13th
- 11:08:37 7 refueling outage.
- 11:08:43 8 What did you do when you read that language?
 - 9 A. Nothing.
- 11:08:48 10 Q. And did it cause you concern that you had signed off on
- 11:09:03 12 accuracy you were responsible for, that contained inaccurate
 - 13 information about inspections -- future inspections not being
- 11:09:14 14 compromised?
 - 15 MR. WISE: Objection to the form of the question.
- 11:09:29 16 THE COURT: Overruled. You may answer if you can.
- 11:09:32 17 THE WITNESS: I'm going to have to have him restate
 - 18 the question.
- 11:09:39 19 BY MR. POOLE:
- 11:09:39 20 Q. All right. This -- I'll bring it up.
- 11:09:48 21 You said you signed off on the bulletin response,
- 11:09:53 22 right?
 - 23 A. That's correct.
 - Q. You said you were responsible for its technical
- 11:09:57 25 accuracy?

- 11:09:58 1 A. That's correct.
- 11:10:00 2 Q. This letter told you that there was a bunch of boric
 - 3 acid left on the head that would preclude, at least in those
- 11:10:10 4 areas, a visual inspection; is that correct?
- 11:10:15 5 A. That's correct.
- 11:10:22 6 Q. It points out that the bulletin response you signed off
 - 7 on said that inspections would not be compromised; is that
- 11:10:30 8 correct?
- 11:10:30 9 A. That's correct.
- 11:10:31 10 Q. And you did nothing to solve that problem?
- 11:10:35 11 A. Well, no, because we viewed it as, at the time, if we
 - 12 had boric acid or crystal deposits on something, we couldn't
 - 13 inspect it, like I mentioned earlier, we would immediately go
 - 14 into an NDE. So we viewed it as we wouldn't have trouble doing
 - 15 an inspection. Mr. Gibbs wrote this for 13 RFO.
 - Did that answer your question? I'm not certain.
 - 17 My answer is probably just as convoluted as the original
 - 18 question.
 - 19 Q. It was understandable.
 - 20 A. Okay.
- 11:11:16 21 Q. Are you familiar with the requirements of regulation
 - 22 50.9, the NRC regulation about accuracy and completeness?
- 11:11:28 23 A. Yes.
- 11:11:35 24 Q. You understand when a licensee makes a submittal to the
- . 11:11:39 25 NRC, it's required to be accurate and complete?

- 1 A. That's correct.
- 11:11:44 2 Q. When bulletin -- I'm sorry, when the response, 2731, was
- 11:11:51 3 sent to the NRC, it said the visual inspections would not be
- 11:11:58 4 compromised, didn't it?
 - 5 A. That's correct.
- 11:12:01 6 Q. And you thought that was okay because you could always
 - 7 back it up with another kind of inspection?
- 11:12:11 8 A. That's correct.
- 11:12:14 9 Q. Is that accurate and complete if it doesn't contain the
 - 10 information that you already knew?
- 11:12:19 11 A. Based on what I know today, no, I'd have to say no.
 - 12 Q. And you knew when you read this memo that visual
- 11:12:27 13 inspection alone was not going to be sufficient?
- 11:12:31 14 A. Correct.
- 11:13:46 15 MR. POOLE: At this time we would like to display
 - 16 to the jury Government's Exhibit 78, Mr. Miller's notes which
 - 17 have been admitted.
 - THE COURT: They have, and you may.
- 11:14:06 19 BY MR. POOLE:
- 11:14:06 20 Q. Do you recall Mr. Wise had asked you some questions
 - 21 about these notes?
 - 22 A. Yes, I do.
- 11:14:15 23 Q. I've enlarged the first part that says, D.C.G. 100
- 11:14:21 24 percent inspection of head, some areas precluded from inspection
 - 25 due to flange leakage, definite signs of boron flow from

- 11:14:34 leakage. I'll stop there for now.
- 11:14:38 2 You said that you made these statements based on
 - 3 information that you got from Andrew Siemaszko?
- MR. WISE: Objection. That's not what he said.
 - 5 BY MR. POOLE:
 - 6 Q. Correct me if that's not what you said.
 - 7 A. I believe I said I wasn't sure where I got that
 - 8 information from, but that it probably came from Plant
- 11:15:02 9 Engineering and possibly Andrew Siemaszko. I really don't -- I
- 11:15:11 10 didn't take personal notes of the meeting, so I have to go off
 - 11 of Mr. Miller's notes as to what was said.
- 11:15:21 12 Q. And it says videotapes-reviewed 12, 11, 10 RFO videos.
- 11:15:32 13 Now, that sounds like there's been a video
- 11:15:36 14 inspection already on that date. Is that what happened?
 - 15 A. My understanding is yes, we had reviewed the videotapes.
 - 16 When I say "we", that Plant Engineering had reviewed the
 - 17 videotapes in writing up their response to 2731.
- 11:15:57 18 Q. Okay. And 2731, in fact, represented that there had
 - 19 been a view of the '98 and 2000 videotape, didn't it?
 - 20 A. That's correct.
- 11:16:16 21 Q. It was on this phone call that Allen Hiser asked for a
- 11:16:22 22 nozzle-by-nozzle summary of the inspections?
- 11:16:25 23 A. I believe that's correct.
- 11:16:27 24 Q. Well, that's the next item in the outline, isn't it?
 - A. Correct. And that's why I say that. It's got --

- 11:16:37 1 A.I.H. I'm assuming is Mr. Hiser.
 - Q. And you recall that you testified that that became an
- 11:16:43 3 item that you were responsible for?
 - 4 . A. Correct.
- 11:16:47 5 Q. The nozzle-by-nozzle summary?
- 11:16:49 6 A. I was responsible for coordinating, putting that
 - 7 together, yes, that's correct.
 - 8 Q. That's right. You've already testified that Andrew
 - 9 Siemaszko prepared a nozzle-by-nozzle summary and you reviewed
 - 10 his work?
- 11:17:05 11 A. I reviewed how -- his methodology is really what I
 - 12 believe what I testified to. It would be -- it would be an
- 11:17:17 13 exaggeration for me at this point to say that I did a
 - 14 nożzle-by-nozzle review of his work.
- 11:17:24 15 Q. Right. That wasn't the question I asked.
- 11:17:27 16 A. Okay. I just wanted to clarify.
- 11:18:12 17 Q. All right. You testified about a meeting with the
- 11:18:15 18 technical assistants at -- of the commissioners at the Nuclear
 - 19 Regulatory Commission.
 - 20 A. That's correct.
- 11:18:49 21 MR. POOLE: Your Honor, Government's Exhibit 87 has
 - 22 been admitted, and we'd like to display a page for the jury.
- THE COURT: Yes, that's fine. You did say 87?
- 11:19:05 24 MR. POOLE: 87.
- 11:19:07 25 THE COURT: Very good.

- 11:19:10 1 BY MR. POOLE:
 - 2 Q. Do you recall being questioned about this exhibit by Mr.
 - 3 Wise?
 - 4 A. Yes.
 - 5 Q. And you testified that when you talked about CRDM
- 11:19:21 6 penetrations being verified, verified to be free from
 - 7 popcorn-type boron deposits using video recordings, that you
 - 8 were relying on others?
 - 9 A. That's correct.
- 11:19:33 10 Q. And who, again, were you relying on at that point?
 - 11 A. Andrew Siemaszko.
- 11:19:45 12 Q. And so he's the one that told you that he verified that
 - 13 all penetrations were free from popcorn in one video or the
 - 14 other?
- 11:19:59 15 A. I don't know if those were the exact words he used, but
- 11:20:04 16 that's the essence, yes.
- 11:20:09 17 Q. Now, for an engineer, words are important, aren't they?
 - 18 A. I think so. I think words are important to everybody.
- 11:20:16 19 Q. If you say that you verified a fact to be true, is that
 - 20 a strong claim or a weak claim?
 - 21 A. I think it's fairly strong.
- 11:20:28 22 Q. And you made the representation that the penetrations
 - 23 were verified to be free from popcorn on the date of this
 - 24 presentation, which was October 11, 2001?
- 11:20:49 25 A. That's correct.

- 11:20:51 1 Q. But you told the jury when Mr. Wise was questioning you
- 11:20:57 2 that at the time you made this representation, Andrew Siemaszko
 - 3 hadn't finished his nozzle-by-nozzle review of the tapes?
 - 4 A. That's correct.
- 11:21:08 5 Q. But you went right ahead with this strong claim that the
 - 6 head had been verified to be free from popcorn deposit, didn't
 - 7 you?
- 11:21:18 8 A. That's correct.
- 11:21:25 9 Q. Now, you described a time that came after this technical
- 11:21:34 10 assistants briefing -- let me back up. I have another question
 - 11 on this one.
- 11:22:04 12 No, I don't. I was wrong.
 - So you described in your testimony that there came
 - 14 a time when you find out -- found out that those inspections in
 - 15 '98 and 2000 weren't as good as you thought they were?
 - 16 A. That's correct.
- 11:22:30 17 Q. In fact, the exact words you used were those inspections
- 11:22:35 18 were not what you originally intended?
 - 19 A. I may have used those words.
- 11:22:44 20 Q. And what you were told at that time was that a
- 11:22:51 21 substantial number, more than a handful, of nozzles were not
- 11:22:57 22 viewed in 2000 and in '98?
- 11:23:01 23 A. That's correct.
- 11:23:04 24 Q. And you told that to Mr. Moffitt?
 - 25 A. That's correct.

- 11:23:11 1 Q. And there was a concern about correcting the information
 - 2 that had been sent to the Nuclear Regulatory Commission?
- 11:23:19 3 A. Yes.
- 11:23:30 4 Q. You said you didn't question the results Andrew
- 11:23:33 5 Siemaszko had provided to you in the past?
- 11:23:37 6 A. No.
- 11:23:43 7 Q. And this -- despite the fact that there had been a
- 11:23:49 8 previous review of videotapes prior to 2731 being sent out?
 - 9 A. Correct.
- 11:23:56 10 Q. You say this despite the fact that Andrew Siemaszko is
 - 11 the individual responsible for the cleaning who didn't complete
 - 12 it?
- 11:24:06 13 A. Okay.
- 11:24:09 14 Q. Is this a person whose representations to you were the
 - 15 sort of representations that you, as a manager at a nuclear
 - 16 power plant, should rely on?
 - 17 A. At the time I had complete faith in Andrew.
- 11:24:57 18 Q. All right. Let's talk about the October 24th meeting.
 - 19 That was the meeting with the Nuclear Regulatory Commission
- 11:25:13 20 staff persons; is that right?
- 11:25:15 21 A. I believe that's correct, in D.C.
- 11:25:20 22 MR. POOLE: Your Honor, we're going to want to
- 11:25:22 23 display some pages from Government's Exhibit 108, which is the
- 11:25:27 24 slides from the meeting on the 24th and previously admitted.
- 11:25:40 25 THE COURT: Yes. That's fine.

- 11:26:06 1 BY MR. POOLE:
- 11:26:06 2 Q. Here's a page from that presentation. Do you recognize
 - 3 it?
- 11:26:12 4 A. Yes, I believe that's the one we just talked about a
 - 5 minute ago.
- 11:26:24 6 Q. Among other things it makes the representation that all
- 11:26:27 7 but four nozzle penetrations were inspected in 1996?
 - 8 A. That's correct.
 - 9 Q. How did you know that?
 - 10 A. That was based upon the work that Andrew was doing.
- 11:26:39 11 Q. Did he tell you that 65 out of 69 nozzle penetrations
 - were inspected in 1996?
 - 13 A. I don't think he directly told me. That's the
 - 14 information he provided in the 2735 response. But I can't say
 - 15 that we actually spoke face-to-face regarding that.
- 11:27:03 16 Q. We've seen a succession of e-mails from Prasoon Goyal
- 11:27:09 17 stating that the limited access to the head created by
- 11:27:17 18 inspection through the mouse holes was an impediment to
- 11:27:21 19 inspection. Isn't that what we just looked at?
- 11:27:27 20 A. Yes. Before the break?
 - 21 Q. Yes.
 - 22 A. Yes.
 - Q. E-mails that you received before the first bulletin
 - 24 response was sent to the NRC?
 - 25 A. That's correct.

- 11:27:38 1 Q. And, in fact, you knew that first he and then Andrew
 - 2 Siemaszko said that it was necessary to cut access ports in the
 - 3 reactor vessel head to permit inspection and cleaning?
- 11:27:56 4 A. I think that would be an over-characterization of what
 - 5 they were asking for.
- 11:28:03 6 Q. Did we not just look at an e-mail that said we need
- 11:28:07 7 access ports?
 - 8 A. Correct. But to say that it would -- just to merely
 - 9 permit it; we had done inspections in the past. What they were
 - 10 asking for was to make it easier to do that. I'm not trying to
- 11:28:24 11 be nitpicky. I just -- because to answer that question one way
 - 12 would say we can't do any inspections ever, which wouldn't --
- 11:28:34 13 would question how they would get tapes in the first place.
 - Q. So what you're trying to explain is why you were willing
- 11:28:40 15 to accept the representation 65 out of 69 were inspected in
 - 16 1996?
- 11:28:45 17 A. That came from the tape, correct.
- 11:28:48 18 Q. And, in fact, using the technology available at the
- 11:28:54 19 time, inspection of 65 out of 69 was impossible?
- 11:29:00 20 A. I didn't believe that to be the case.
- 11:29:05 21 Q. All right. Now -- all right. We'll move on.
- 11:29:31 22 MR. POOLE: Your Honor, I'm going to display
- 11:29:33 23 another page.
 - 24 BY MR. POOLE:
 - 25 Q. This is a page that Mr. Wise asked you about, and you

- 1 pointed out that in the first paragraph we've had added another
- 2 inspection, the 10th refueling outage?
- 3 A. Correct.
- 4 Q. That's the one where you've said 65 out of 69 were
- 11:29:54 5 inspected?
 - 6 A. Correct.
- 11:29:57 7 Q. Now, the company's position was we can't do a -- well,
 - 8 the position taken in 2735 was we couldn't do a nozzle-by-nozzle
- 11:30:09 9 inspection on the '96 tape because there was no orientation
- 11:30:14 10 information. Do you remember that?
- 11:30:15 11 A. Correct. That was my understanding.
- 11:30:17 12 Q. And so what was that based on, the '96 review? Was
 - 13 it -- if you couldn't do a nozzle-by-nozzle with the videotape,
 - 14 how could you be sure that you were reviewing the entire head?
- 11:30:32 15 A. You're asking me a question of how the inspection was
 - 16 done, and I'm not the person that did the inspection. But my
- 11:30:44 17 understanding of it was that you had video of the drives; you
 - 18 just couldn't go to say that specific drive is drive 56, and so
- 11:30:57 19 if you've got video of it, you can do some sort of assessment.
- 11:31:03 20 And my understanding is Andrew took that information and spoke
 - 21 with people involved with that inspection to come up with the
 - 22 information that he put on the table and in the submittal.
 - Q. Well, let me use an analogy. Suppose you're wandering
 - 24 around in a forest with a video camera. You've been wandering
- 11:31:27 25 around for a while. And later on you want to answer the

- 1 question, have we seen all the trees? How can you answer that
- 11:31:35 2 question without knowing where you were when the video was
 - 3 taken?
- 11:31:40 4 A. I'm not sure I could answer that analogy that you're
- 11:31:44 5 giving me.
- 11:31:45 6 Q. All right. We'll move on. What this says in this
 - 7 slide here is a review of visual recordings as well as
- 11:31:54 8 eyewitness accounts served as the means of the inspection.
- 9 Wasn't that intended to explain in part how the '96 inspection
- 11:32:02 10 was done?
 - 11 A. I believe that's correct.
- 11:32:05 12 Q. And you were in court here the day that Prasoon Goyal --
 - 13 days that Prasoon Goyal testified, weren't you?
 - 14 A. Yes, I was.
 - Q. And he did that inspection?
- 11:32:14 16 A. That's my understanding.
- 11:32:16 17 Q. Did you ever ask him if he'd done a 100 percent
- 11:32:20 18 inspection?
 - 19 A. No, I did not.
 - Q. And, in fact, you know now that he believed he saw 50 to
- 11:32:27 21 60 percent of the nozzles?
- 11:32:29 22 A. That's correct.
- 11:32:33 23 Q. So this is not a true statement, is it, that all
- 11:32:36 24 penetrations were verified to be free from popcorn deposits
 - 25 using 10, 11, and 12 RFO?

- 11:32:43 1 A. Not based on what I've heard from Prasoon Goyal, I'd
- 11:32:47 2 have to say no, that's not a true statement.
- 11:32:56 3 Q. Let's talk about 2735. That was submitted to the NRC on
 - 4. October 17, 2001?
- 11:33:39 5 A. I believe that's correct.
- 11:33:45 6 Q. You signed off on it?
 - 7 A. That's correct.
 - 8 Q. You signed the greensheet?
 - 9 A. That's correct. That's what I signed off on.
- MR. POOLE: I'm going to display Government's
- 11:34:01 11 Exhibit 104 to the jury, Your Honor; previously admitted.
- 11:34:06 12 THE COURT: You may do so.
- 11:34:13 13 BY MR. POOLE:
- 11:34:13 14 Q. Is that the greensheet you signed off on?
- 11:34:17 15 A. I believe it is.
- 11:34:19 16 Q. And responsible manager, D.B.E., Design Basis
- 11:34:25 17 Engineering, D. Geisen, then your initials?
 - 18 A. That's correct.
- 11:34:29 19 Q. Did you sign for anybody else on that one?
- 11:34:32 20 A. No, I didn't.
 - 21 Q. Just yourself?
 - 22 A. That's correct.
 - Q. And you were the person who was responsible for the
 - 24 technical accuracy of the information in that submission; is
 - 25 that a fair statement?

- 11:34:45 1 A. Yeah, I was one of them.
 - Q. One of the people?
 - 3 A. Right. I think the way the greensheet reads, everyone
 - 4 · that signs that agrees they're agreeing with the technical
 - 5 information. So I don't want to make it sound like I'm pompous
 - 6 and they had no role.
- 11:35:10 7 Q. Let's take a look at the instructions because they're a
 - 8 little more specific. I won't suggest that you're pompous, but
 - 9 it does say the technical accuracy of a response to the NRC is
 - 10 the responsibility of the director and management individual
- 11:35:29 11 assigned to the action?
 - 12 A. Correct.
- 11:35:31 13 Q. And you were a management individual assigned to the
 - 14 action?
 - 15 A. Correct.
 - Q. And, in fact, as to the video review, you were
- 11:35:40 17 specifically tasked with coordinating them?
 - 18 A. That's correct.
- 11:35:44 19 Q. So you had both the responsibility and direct
- 11:35:49 20 involvement?
- 11:35:51 21 A. Correct.
- 11:36:42 22 Q. Do you recall testimony about the issue of whether the
- 11:36:49 23 gap in the anulus around the nozzle at the top of the reactor
 - vessel head was capable of opening at full temperature?
 - 25 A. Yes.

- 11:37:04 1 Q. And the issue there is, and correct me if I'm wrong, if
- 11:37:11 2 the gap doesn't open, the nozzle could crack, and the crack
 - 3 could grow, and there would be no visual indication on the
- 11:37:22 4 surface of the reactor vessel head. Is that the concern?
 - 5 A. That's correct.
- 11:37:29 6 Q. And there was, during the fall of 2001, a concern that
- 11:37:40 7 four or five nozzles at the top of the reactor vessel head would
 - 8 not open?
- 11:37:49 9 A. That's true.
- 11:37:51 10 Q. Which makes them uninspectable by visual means?
 - 11 A. That's correct.
- 11:38:00 12 Q. And therefore capable of having an undetected crack?
 - 13 · A. Correct.
- 11:38:11 14 Q. Later in the fall of 2001 it was discovered that through
- 11:38:16 15 analysis by a company called SAI, I believe, and correct me if
 - 16 I'm wrong on that, that the gaps would open up?
 - 17 A. I believe one of their revisions indicated that all the
 - 18 cracks would open up.
- 11:38:36 19 Q. And you provided that information to the CNRB?
- 11:38:42 20 A. That the cracks would open up?
 - 21 Q. Would open up.
 - 22 A. No, I believe -- I don't think that's correct.
- MR. POOLE: We're going to show the witness
 - 24 Government's Exhibit 119. I believe that's previously
- 11:39:27 25 admitted, October 3rd. We'll display a page to the jury.

- 1 THE COURT: That's correct. You may display it.
- 11:40:11 2 BY MR. POOLE:
- 11:40:11 3 Q. I'm going to show you Government's Exhibit 119, which on
- 11:40:17 4 the first page says: Subject approved CNRB meeting minutes.
 - 5 And I've tabbed the relevant page. I'd like you to take a look
 - 6 at it, then I'll ask you some questions.
- 11:40:40 7 A. Okay.
- 11:40:50 8 Q. Do these minutes of the CNRB reflect that you told them
- 11:40:56 9 that it had been discovered that the gaps wouldn't open up?
 - 10 A. Yes. I was mistaken there in my previous comment.
- 11:41:06 11 Q. So you knew and the company Nuclear Review Board knew
 - 12 that the gaps could open up?
- 11:41:16 13 A. Correct.
- 11:41:23 14 Q. Did you give that information to the Nuclear Regulatory
 - 15 Commission?
 - 16 A. I don't believe we did.
 - 17 Q. All right. Do you recall Mr. -- I believe it was Mr.
- 11:41:31 18 Moffitt's testimony that there was a discussion -- maybe it was
- 11:41:36 19 McLaughlin -- there was a discussion about whether that
 - 20 information should be provided to the NRC, even though the
- 11:41:47 21 decision was made that it would not be?
 - 22 A. Yes, I believe it was Mr. McLaughlin that spoke to that
 - 23 yesterday.
 - Q. And you were a part of that meeting, weren't you?
 - A. I believe it was myself and Mr. Lockwood.

- 11:42:03 1 Q. Now, do you consider the information that was provided
 - 2 to the Nuclear Regulatory Commission on that subject accurate
 - 3 and complete?
- 11:42:12 4 A. If we didn't change it, probably not, no.
- 11:42:25 5 Q. You testified about being involved in serial 2744.
 - 6 That was the letter that went to the NRC with all the pictures
- 11:42:35 7 of the reactor vessel head?
 - 8 A. That's correct.
- MR. POOLE: Your Honor, that's Government's Exhibit
 - 10 113.
- 11:42:56 11 THE COURT: That was admitted previously?
 - MR. POOLE: Yes.
- 11:43:05 13 BY MR. POOLE:
- 11:43:05 14 Q. You said on that Serial Letter, you were furnished
- 11:43:11 15 photographs by Andrew Siemaszko.
- 11:43:13 16 A. Correct.
- 11:43:15 17 Q. And you supplied captions for the photographs; is that
- 11:43:22 18 correct?
- 11:43:22 19 A. That's correct.
- 11:43:25 20 Q. And you said some of the information that you put into
 - 21 the captions came from Mr. Siemaszko; is that correct?
 - 22 A. Correct.
 - 23 Q. Some from your own observations about his techniques?
 - A. Correct.
- 11:43:40 25 Q. Some from other people?

- 11:43:44 1 A. I don't know specifically where the other information
 - 2 would come from.
 - 3 Q. So you -- your own knowledge and Andrew Siemaszko?
 - 4 A. Right.
- 11:44:41 5 Q. All right. I'm going to show you now and the jury a
 - 6 picture -- well, a page from 2744; it's one that you testified
 - 7 about on direct. There it is. And you recall that picture
- 11:45:01 8 being a picture from the '96 inspection?
- 11:45:07 9 A. That's what I would take from this, yes.
- 11:45:12 10 Q. I'd like to focus on the language at the bottom. Some
 - 11 boron piles were observed at the top of the head in the vicinity
- 11:45:23 12 of previous leaking flanges. Because of its location, it could
- 11:45:28 13 not be removed by mechanical cleaning but was verified not to be
- 11:45:32 14 active or wet and therefore did not pose a threat to the head
 - 15 from a corrosion standpoint.
- 11:45:39 16 We'll get back to that sentence, but for our
 - 17 purposes now, the sentence I want to ask you about is this one:
- 11:45:45 18 Additionally, since these drives are not credited with leaking,
 - 19 that further ratifies that the boron is from previous flange
- 11:45:55 20 leakage.
- 11:45:56 21 All right. So this is one of those drives that
- 11:45:59 22 was believed to have a gap that wouldn't open up?
- 11:46:02 23 A. Correct.
- 11:46:04 24 Q. The statement that you've made here is: Since we know
- 11:46:11 25 that these drives won't open up and leak, that shows us that the

- 11:46:19 1 boron we're looking at in the picture is the from previous
- 11:46:24 2 flange leakage?
- 11:46:26 3 A. That was one of the indications, plus the screening and
- 11:46:31 4 stuff.
 - 5 Q. I just want to ask about that sentence.
 - 6 A. Okay.
 - 7 Q. Now, later on you learned that those drives would open
 - 8 up and would leak?
- 11:46:43 9 A. Correct.
- 11:46:45 10 Q. So the confidence that you got from knowing that they
- 11:46:52 11 wouldn't open up, I mean, that proves there must be flange
 - 12 leakage was misplaced, wasn't it?
- 11:46:59 13 A. Yeah, potentially. But the other thing, this was in a
- 11:47:06 14 completely different time frame than when I wrote this. We had
- 11:47:11 15 the report from SIA that said that they would not open up.
 - Q. Sure. At the time you believed it to be true that the
- 11:47:19 17 gap wouldn't open up?
 - 18 A. Correct.
 - 19 Q. Later on you found out that it would?
- 11:47:24 20 A. Correct. One of the revisions said that it would.
 - 21 Q. And you participated in a meeting where you discussed,
 - 22 should we reveal this to the NRC or not? And it was decided
- 11:47:38 23 we're not going to provide that information to the NRC. Don't
 - 24 you think that would have made a difference to the
- 11:47:46 25 representation you made here?

- 11:47:51 1 A. I can see where that conclusion would be made, yes.
- 11:47:55 2 Q. Well, let's talk about the rest of that caption.
- 11:48:07 3 There's that statement about boron, because of its location
 - 4 could not be removed by mechanical cleaning, but it was verified
- 11:48:18 5 not to be active or wet.
- 11:48:20 6 Now, do you remember being asked about that by the
- 11:48:25 7 investigators in this case?
- 11:48:27 8 A. Vaguely.
- 11:48:30 9 Q. And when they asked you, how did you verify it not to be
- 11:48:35 10 active or wet; do you remember what you said?
- 11:48:47 12 wasn't sure.
- 11:48:48 13 Q. Do you remember what Mr. Chimahusky said on the stand?
- 11:48:51 14 A. Yes, I do.
 - 15 Q. He said you didn't get that information from him?
 - 16 A. That's correct.
- 11:48:59 17 Q. And, in fact, sitting here today, can you tell the jury
 - 18 where you got that information?
 - 19 A. No, I can't. I mean, in 2002 when the Office of
- 11:49:12 20 Investigation asked me, I thought it was potentially from Ed
 - 21 Chimahusky, but I wasn't sure at that time. I can't tell you
 - 22 today.
- 11:49:28 23 Q. Do you know who did the inspection in '96?
 - 24 A. I understand that was Mr. Goyal.
- 11:49:35 25 Q. And do you recall that he was asked whether he verified

- 11:49:39 1 that that boron was not active or wet?
 - 2 A. I don't recall that question, but he may very well have
 - 3 been.
- 11:49:49. 4 Q. Would it surprise you to learn that nobody asked him
- 11:49:54 5 that question?
- 11:49:57 6 A. At this point in the investigation, yes, I would be very
- 11:50:01 7 surprised if no one asked him that question. Or are you
- 11:50:04 8 referring to way back then?
- 11:50:06 9 Q. Well, the fact of the matter is -- if the jury's
 - 10 recollection is different, so be it -- didn't Prasoon Goyal say
 - 11 on the stand that he never verified that that boron was not
- 11:50:22 12 active or wet?
 - 13 A. I'm not sure. I'd have to -- I'm sorry, I don't recall
 - 14 every single thing he said on the stand. So I'm sorry.
 - 15 Q. But who else could have verified that other than the man
 - 16 who did the inspection?
- 11:50:39 17 A. That would make sense that it would be the person that
 - 18 did the inspection.
- 11:51:55 19 Q. Do you recall, getting back to the phone call from Brian
 - 20 Sheron, I think you said you were busy on September 28th when
- 11:52:11 21 that phone call occurred, busy with the INPO inspection?
 - 22 A. Correct. That was a Friday.
- 11:52:19 23 Q. And that was the phone call in which Sheron said that
- 11:52:24 24 the utility should -- or licensee, I think that's the sort of
 - 25 language they used -- should reconsider its bulletin response

- 11:52:33 1 and shut down and inspect by the end of the year?
- 11:52:36 2 A. I'm assuming that's what he said. I wasn't on the
- 11:52:40 3 phone call, but that's what I've been told.
- 11:52:46 4 Q. Do you recall that Mr. Moffitt, Steve Moffitt, pulled
- 11:52:52 5 you out of the INPO inspection at the time of that phone call?
 - 6 A. It actually was Guy Campbell.
- 11:53:00 7 Q. What was the purpose of that?
- 11:53:02 8 A. Guy Campbell grabbed several of us managers to discuss
 - 9 the fact that he was somewhat agitated as he had just gotten a
 - 10 phone call from his boss, Mr. Saunders, that said: Hey, I just
 - 11 got a phone call about your plant, and I don't hear about
 - 12 anything from you. So he was a little annoyed and he called us
 - 13 out. And I can't tell you exactly what all the meetings and
- 11:53:32 14 everything were about or what the discussion was about after
 - 15 that, but I think Mr. Lockwood took pretty much the lead at that
- 11:53:40 16 point to start establishing some sort of line of communication
 - 17 with the NRC.
- 11:53:45 18 Q. So that was discussions amongst some pretty high-level
- 11:53:50 19 people at FirstEnergy?
- 11:53:52 20 A. The discussion that I participated in -- which
 - 21 discussion?
 - Q. What's Mr. Saunders' title?
 - 23 A. He's the Chief Nuclear Officer, or was at that time.
- 11:54:06 24 Q. Mr. Campbell?
- 11:54:07 25 A. He is the site vice-president.

- 11:54:09 1 Q. And they were concerned?
- 11:54:12 2 A. I can't speak to what Mr. Saunders' feelings were
- 11:54:18 3 because I didn't communicate with him. That was a
 - 4 communication that happened between Mr. Campbell and Mr.
- 11:54:23 5 Saunders. So I really can't --
- 11:54:25 6 Q. You mean Mr. Campbell? Mr. Campbell, was he concerned?
 - 7 A. Yes, he was.
- 11:55:25 8 Q. Do you recall when you first started your direct
 - 9 testimony yesterday that Mr. Wise asked you a series of
- 11:55:32 10 questions about did you ever lie to the NRC, did anybody ever
 - 11 direct you to do that? Do you remember those questions?
 - 12 A. Yes, I do.
- 11:55:42 13 Q. One of those questions was: Did you ever conceal from
 - 14 the Nuclear Regulatory Commission any safety-related
- 11:55:55 15 information?
 - And your answer to that was: No?
 - 17 A. Correct.
- 11:56:00 18 Q. But we've talked about a number of things, pieces of
- 11:56:06 19 information that you had that were not revealed to the NRC,
 - 20 haven't we?
- 11:56:14 21 A. You talk about pieces. The only one I'm aware of is
- 11:56:20 22 the gap information. Is that what we're talking about?
 - Q. Well, then there are the impediments to inspection that
- 11:56:26 24 were missing from the first bulletin response. There was the
 - 25 information about this failure to correct the language that you

- 11:56:45 1 personally put in the caption from the photograph; you never
 - 2 corrected that, did you?
 - 3 A. No, we never sent any new photos.
- 11:56:57 4 Q. And throughout this process, it's basically been your
 - 5 position that either you viewed the responsibility for providing
 - 6 correct information -- you viewed it as somebody else's
 - 7 responsibility?
- 11:57:19 8 MR. WISE: Objection.
- 11:57:24 9 THE COURT: Why don't we ask the question.
 - 10 BY MR. POOLE:
 - 11 Q. Isn't that so?
- 11:57:29 12 A. I'm sorry. You're going to have to put it in a
- 11:57:34 13 question.
- 11:57:38 14 THE COURT: I'm supposed to say that.
- 11:57:41 15 THE WITNESS: I didn't understand the question.
 - 16 I'm sorry.
- 11:57:44 17 MR. POOLE: Your Honor, I think we'll quit there.
 - 18 I think we've asked our questions.
- 11:57:51 19 THE COURT: Redirect?
- 11:57:53 20 MR. WISE: I'll be brief. Thank you.
- 11:57:53 21
- 11:57:53 22 - -
- 11:57:53 23 DAVID GEISEN, REDIRECT EXAMINATION
- 11:58:06 24 BY MR. WISE:
- 11:58:06 25 Q. David, let me ask you this. Mr. Poole started by

- 1 asking you about e-mails and trip reports in January and March
- 2 of '01 that he categorized as warnings to you. Did you take
- 3 those e-mails and trip reports as warnings in January and March
- 4 of 2001?
- 11:58:25 5 A. No. I wish I had.
- 11:58:27 6 Q. Did Prasoon Goyal ever come to you and say: We have a
 - 7 problem; this is a warning?
- 11:58:32 8 A. No, he did not.
 - 9 Q. Did Theo Swim ever come to you and say: We have a
 - 10 problem; this is a warning?
 - 11 A. No, he didn't.
 - 12 Q. Did any of the e-mails that you were shown by Mr. Poole
- 11:58:42 13 have a heading that said: Warning, urgent, anything like that?
- 11:58:48 14 A. No. There was one e-mail that he introduced that said
- 11:58:56 15 urgent in the heading, I think.
 - Q. That was Mr. Miller's e-mail about the September 28th
 - 17 phone call?
- 11:59:02 18 A. That's correct.
 - Q. Did any of the e-mails that Mr. Goyal sent to you and
- 11:59:08 20 others about lessons learned at Oconee or any others bear a
 - 21 heading that said these were urgent?
 - 22 A. No.
 - Q. As you looked at them in early 2001 through mid 2001,
- 11:59:20 24 did you have a sense that what Mr. Goyal was telling you was
 - 25 that the plant had a problem?

- 11:59:28 1 A. No. I think he was asking for in many of those was it
 - 2 would be easier to do these inspections if we had inspection
- 11:59:39 3 ports.
 - 4 Q. As you look back at those e-mails now, do you see things
 - 5 differently as you saw them then?
- 11:59:45 6 A. Absolutely.
- 11:59:46 7 Q. As you looked at the questions that you were interacting
 - 8 with the NRC about in October and November of 2001, were you
- 11:59:53 9 thinking back to the e-mails that Mr. Poole has just shown you
 - 10 from the early part of that year?
 - 11 A. No.
- 12:00:11 12 Q. I'm going to show you the first page of Mr. Gibbs'
 - 13 report that is Government's Exhibit 65. And I believe that Mr.
 - 14 Poole suggested to you that this letter told you that Bulletin
 - 15 2001-01 was inaccurate.
 - 16 First of all, who is this letter addressed to?
 - 17 A. Mark McLaughlin.
- 12:00:43 18 Q. As you look at the page that's up on the screen, do you
 - 19 see the word "inaccurate" in that text?
 - 20 A. No.
 - Q. Do you see the word "false" in that text?
 - 22 A. No.
 - 23 Q. Do you see the word "misleading" in that text?
 - 24 A. No.
- 12:00:58 25 Q. Did you ever speak to Mr. Gibbs about this letter?

- 1 A. No, I didn't.
- Q. Did you speak to Mr. McLaughlin about his conversations
- 3 with Mr. Gibbs?
- 12:01:06 4 A. No, I didn't.
- 12:01:07 5 Q. To your knowledge did Mr. Gibbs ever tell anyone at
 - 6 Davis-Besse that what he was reporting was that there were
 - 7 false, misleading, or inaccurate statements in bulletin response
- 12:01:17 8 2731?
- 12:01:18 9 A. I think Mr. Gibbs, if he had felt that way, would have
 - 10 gone directly to the vice-president.
- 12:01:28 11 Q. Mr. Poole was asking you about 2731 and how that
 - 12 document did not say that the limited access was an impediment.
 - 13 Do you remember those questions?
 - 14 A. That's correct.
 - Q. What did you believe about the ability of the station to
 - 16 clean the head in 2000 as you were doing the greensheet review
- 12:01:51 17 in August of 2001?
- 12:01:52 18 A. Well, for 2731 I thought we were very successful in
- 12:01:58 19 getting the head clean with the hot water. And as far as being
 - 20 able to do inspections, although it's not ideal, you could do
- 12:02:06 21 inspections through a mouse hole.
- 12:02:08 22 Q. Did you believe the lack of holes had prevented a
 - 23 successful cleaning in 2000?
 - 24 A. No.
- 12:02:14 25 Q. Were you aware that the people involved in doing the

- 12:02:17 1 inspections had been involved in the drafting of 2731?
 - 2 A. Yes.
- 12:02:22 3 Q. Do you have any reason to believe that 2731 was not
 - 4 technically accurate when you did the greensheet review?
- 12:02:29 5 A. No.
 - 6 Q. You talked with Mr. Poole about the captions in 2744,
 - 7 the photograph; do you recall that?
 - 8 A. Correct.
 - 9 Q. Do you recall the question about whether you had spoken
 - 10 with Mr. Chimahusky?
- 12:02:40 11 A. Yes.
 - 12 Q. When you were compiling information preparing the
- 12:02:47 13 captions, what was that based on?
- 12:02:51 14 A. It was based on the sum total of knowledge I had
- 12:02:56 15 acquired from talking to Andrew, my knowledge of the plant,
 - 16 talking to the other individuals. I can't say that this
 - 17 statement came from this person at this point.
- 12:03:10 18 Q. Did you believe that Andrew had spoken with others?
- 12:03:13 19 A. Yes.
 - 20 Q. When you were writing the language about verified not to
 - 21 be active and wet, you said you can't recall specifically who
 - 22 that came from?
- 12:03:22 23 A. No, I can't. But I know that that phrase had been used
 - 24 before.
 - 25 Q. Do you think that you just made it up without believing

- 1 that it was true?
- 2 A. No.
- 12:03:30 3 Q. The discussion about the gap analysis in the November
- 12;03:35 4 15th e-mail.
 - 5 A. Correct.
- 12:03:37 6 Q. At the time that you were presenting the probabilistic
- 12:03:43 7 risk assessment that Mr. Byrd was doing, what was your
- 12:03:47 8 understanding about whether you were taking credit for the top
- 12:03:50 9 four nozzles in the 1996 inspection?
- 12:03:53 10 A. We weren't taking credit for them.
- 12:03:55 11 Q. If the gaps opened up, would that potentially allow you
 - 12 to, in fact, take credit for those nozzles?
 - 13 A. No, because we already knew that there was boron up
 - 14 there near those drives, so that we, from an inspection
- 12:04:10 15 standpoint, still would not have been able to take credit for
 - 16 it. So when we did our -- I'm going to stop using the word
- 12:04:18 17 "we" because that gets me in trouble.
 - 18 When Ken Byrd reran his most -- the final version
- 12:04:26 19 of his probabilistic risk assessment, he ran it not taking
 - 20 credit for that, I think actually at one point ran it not taking
 - 21 credit for any inspections.
 - 22 Q. Did you make the final call to provide the revised SAI
- 12:04:43 23 information to the NRC?
 - A. No, I did not.
 - Q. Do you believe that the decision not to -- if that was,

- 12:04:47 1 in fact, the final decision -- was done to try to keep bad
 - 2 information from the NRC?
- 12:04:52 3 A. No. I think Mark captured it accurately, that it was
- 12:04:57 4 because it was less conservative.
 - 5 Q. Mr. Poole asked you a series of questions about the
 - 6 expense that Davis-Besse would have incurred had they had to
- 12:05:09 7 shut down early.
 - 8 Do you remember those questions?
 - 9 A. Yes.
- 12:05:13 10 Q. Would any of that expense have come out of your pocket?
 - 11 A. No.
 - 12 Q. Would you have sacrificed your career to save
- 12:05:20 13 Davis-Besse money?
- 12:05:21 14 A. No.
- 12:05:24 15 MR. WISE: That's all I have. Thank you.
- 12:05:48 16 THE COURT: You may step down.
- 12:05:54 17 Ladies and gentlemen, we'll now take roughly an
 - 18 hour and 15 minutes, somewhere around 20 after 1:00 for our
 - 19 lunch break.
 - 20 Please remember my previous instructions and
- 12:06:09 21 admonitions not to discuss this case among yourselves or with
 - 22 anyone else, nor to permit anyone else to discuss it with you.
- 12:06:18 23 Do not read, listen to, or watch anything touching on this case.
 - 24 And do not make up your mind on the ultimate issues you will
 - 25 decide at the end of the case when it is submitted to you for

	1	your verdict.
12:06:35	2	Enjoy your lunch. We'll see you at approximately
	3	20 after the hour.
	4	(Recess taken.)
	5	
	6	
	7	
	8	CERTIFICATE
	9	
	10	I certify that the foregoing is a correct transcript from the
	11	record of proceedings in the above-entitled matter.
	12	
	13	
	14	Tracy L. Spore, RMR, CRR Date
	15	
	16	
	17	
	18	
	19	
	20	
	21	
	22	
	23	
	24 25	
	25	

.

	,	
1	INDEX	
2		
	DAVID GEISEN, CONTINUED DIRECT EXAMINATION	1905
4	RY MR WISE.	
5	DAVID GEISEN, CROSS-EXAMINATION	1945
6	BY MR. POOLE:	
7	DAVID GEISEN, REDIRECT EXAMINATION	2007
8	BY MR. WISE:	
9		
10		
11		
12		
13		
14		
. 15		
16		
17		
18		
19		
20		
21		
. 22		
23		
24		
25		
		·

		2md 1003:14 1006:24	1072:6 1072:0 1002:05
. i		3rd - 1903:14, 1906:24,	1973:6, 1973:8, 1983:25,
1 '	2	1907:17, 1909:4, 1909:8,	1984:2, 1984:5, 1992:17,
		1910:9, 1911:7, 1923:1,	1993:2, 1993:7, 2010:12
'01 - 1911:16, 2008:2	2 - 1958:2, 1959:2	1998:25	accompanying - 1923:12
'85 - 1944:19	20 - 1944:15, 2013:18,		accounts - 1995:8
'96 - 1921:13, 1928:15,	2014:3	4	accuracy - 1910:5, 1924:8,
1935:24, 1936:4, 1936:9,	2000 - 1911:5, 1921:12,	-7	1970:23, 1971:2, 1971:7,
1936:23, 1943:5, 1994:9,	1928:15, 1928:20, 1928:25,	4 - 1958:2	1971:9, 1984:12, 1984:25,
1994:12, 1995:9, 2001:8,	1929:3, 1929:18, 1929:20,	40 - 1965:25, 1969:9	1985:22, 1996:24, 1997:9
2003:23	1937:3, 1937:10, 1937:13,	419 - 1904:6	accurate - 1918:9,
'98 - 1928:15, 1928:25,	1937:16, 1937:19, 1937:21,	43624 - 1904:6	1918:19, 1919:12, 1942:25,
		43024 - 1904.0	
1936:10, 1936:22, 1937:4,	1941:11, 1943:5, 1952:4,		1971:13, 1975:17, 1975:18,
1937:8, 1937:12, 1943:5,	1952:11, 1952:12, 1952:25,	5	1985:25, 1986:9, 2000:2,
1966:7, 1987:19, 1990:15,	1954:17, 1954:21, 1966:9,		2011:4
1990:22	1966:15, 1967:5, 1967:14,	5 - 1958:2, 1959:8,	accurately - 2013:3
	. 1967:18, 1987:19, 1990:15,	1959:11, 1960:16, 1981:13	acid - 1914:19, 1914:22,
1	1990:22, 2010:16, 2010:23	50 - 1995:20	1954:25, 1955:4, 1955:10,
	2000-1037 - 1947:5	50.9 - 1985:22	1955:17, 1963:20, 1965:18,
1 - 1954:24, 1955:4,	20005 - 1903:15, 1903:22	56 - 1994:18	1972:11, 1972:25, 1983:8,
1955:8, 1955:24, 1958:2,	2001 - 1905:9, 1930:9,	59 - 1969:2, 1969:12	1983:21, 1983:22, 1985:3,
1982:14	1944:9, 1945:3, 1950:1,	5:30 - 1931:20, 1932:2	1985:12
10 - 1924:23, 1925:3,	1951:14, 1951:15, 1952:11,		acquired - 2011:15
1941:12, 1973:25, 1987:12,	1954:15, 1954:20, 1957:19,	C	act - 1957:14, 1964:14,
1995:25	1964:20, 1966:18, 1967:21,	6	1965:23
100 - 1961:10, 1967:18,	1977:1, 1980:3, 1980:8,	60 1059:0 1071:10	
		60 - 1958:9, 1971:18,	action - 1910:13, 1948:6,
1986:23, 1995:17	1980:20, 1982:21, 1982:22,	1977:15, 1995:21	1948:7, 1955:21, 1970:25,
104 - 1996:11	1989:24, 1996:4, 1998:6,	600 - 1979:11	1984:5, 1997:11, 1997:14
108 - 1923:5, 1923:9,	1998:14, 2008:4, 2008:23,	640 - 1904:2	active - 1927:16, 2001:14,
1923:20, 1991:23	2009:8, 2010:17	65 - 1982:6, 1982:8,	2003:5, 2003:10, 2004:1,
10:00 - 1931:6, 1931:23	2001-01 - 1905:8, 1951:4,	1992:11, 1993:15, 1993:19,	2004:12, 2011:21
10:30 - 1931:6, 1931:23,	1964:21, 1965:7, 1965:9,	1994:4, 2009:13	activity - 1978:23
1968:2	1968:21, 1969:15, 1974:1,	655 - 1903:22	actual - 1908:23, 1921:17,
10th - 1994:2	1983:20, 2009:15	69 - 1919:5, 1958:9,	1932:17, 1935:2, 1962:14,
11 - 1903:9, 1918:5,	2002 - 1982:5, 2003:19	1973:11, 1981:5, 1992:11,	1963:24
1924:22, 1964:20, 1987:12,	20026 - 1903:18	1993:15, 1993:19, 1994:4	add - 1920:18
1989:24, 1995:25	20036 - 1904:3		added - 1921:16, 1925:5,
11-28 - 1942:22	2007 - 1903:5, 2015:7	7	1970:6, 1994:1
113 - 1929:10, 2000:10	202-514-0838 - 1903:15		Additionally - 1911:16,
118 - 1942:12, 1942:21	202-514-2956 - 1903:18	78 - 1907:9, 1907:14,	2001:18
119 - 1998:24, 1999:3	202-626-5801 - 1903:23	1986:16	addressed - 1954:12,
11th - 1916:9, 1916:12,	202-833-3400 - 1904:4	7th - 1930:21, 1931:4,	2009:16
1916:14, 1917:9, 1918:3,	21 - 1952:16, 1952:23	1952:25	addresses - 1948:15
1919:10, 1919:16, 1924:19,	22 - 1952.16, 1952.25	1932.23	
			admit - 1939:8
1924:20	23984 - 1903:17	8	admitted - 1907:9,
12 - 1918:5, 1924:22,	243-360 7 - 1904:6	2 4000 44 4050 7	1929:10, 1946:8, 1946:9,
1924:23, 1932:22, 1946:7,	24th - 1922:22, 1923:18,	8 - 1930:11, 1953:7	1947:12, 1957:21, 1961:25,
1983:8, 1987:12, 1995:25	1924:9, 1925:10, 1991:18,	' 80 - 1909:24	1964:17, 1966:1, 1971:19,
125 - 1978:22	1991:24	87 - 1917:12, 1924:25,	1973:11, 1974:6, 1982:7,
12th - 1918:15, 1945:20	25 - 1944:2, 1957:20	1988:21, 1988:23, 1988:24	1986:17, 1988:22, 1991:24,
13 - 1949:9, 1949:11,	26 - 1957:19	8th - 1930:9, 1930:15,	1996:11, 1998:25, 2000:11
1952:13, 1954:15, 1954:17,	2731 - 1905:11, 1 908:13,	1931:5, 1931:8, 1931:9,	admonitions - 1968:2,
1954:21, 1985:15	1920:10, 1967:9, 1971:15,	1938:11, 1939:19	2013:21
13th - 1950:14, 1984:6	1971:18, 1973:4, 1986:2,		adverse - 1948:10
14 - 1952:13, 1969:20,	1987:17, 1987:18, 1991:8,	9	advocate - 1963:13
1970:14, 1970:19	2010:8, 2010:11, 2010:18,		Affairs - 1921:2
140 - 1946:25	2011:1, 2011:3	900 - 1903:21	afterwards - 1919:13
1400 - 1903:14	2735 - 1921:5, 1921:8,	9:04 - 1905:1	agitated - 2005:9
14th - 1940:10, 1953:11,	1921:23, 1922:21, 1924:6,	9th - 1930:17, 1939:10,	ago - 1924:21, 1951:13,
1963:4	1992:14, 1994:8, 1996:3	1939:20	1975:9, 1992:5
15 - 1903:9, 1947:12,	2744 - 1925:15, 1925:17,	.555.25	agreeing - 1997:4
1968:1, 2013:18	1925:20, 1926:6, 1926:8,		agreement - 1997:4
	1928:1, 1937:17, 1937:23,	Α	
15th - 1940:21, 1941:16,		philips 4049:40 4095:40	agrees - 1997:4
2012:4	2000:5, 2001:6, 2011:6	ability - 1913:19, 1935:19,	ahead - 1925:24, 1990:5
17 - 1966:18, 1996:4	28 - 1961:24	1939:17, 1940:14, 2010:15	Aih - 1988:1
1716 ~ 1904:5	28th - 1942:9, 1942:14,	able - 1942:16, 1949:10,	air - 1975:25
17th - 1921:6, 1966:22	1974:17, 2004:20, 2008:16	1955:25, 1961:6, 1964:8,	air-conditioning - 1975:25
18-by-20 - 1932:12	29th - 1941:24	2010:20, 2012:15	al - 1903:7
1828 - 1904:3	2nd - 1906:23, 1908:14	above-entitled - 2014:11	Allen - 1987:21
19 - 1903:5		absolutely - 1961:13,	allow - 1918:14, 1957:11,
1905 - 2015:3	3	1978.4	1961:5, 2012:11
1945 - 2015:5	·· · · · · · · · · · · · · · · · · · ·	Absolutely- 1961:15,	allowed - 1928:8, 1956:24,
1996 - 1920:18, 1928:19,	3 - 1905:9, 1906:12,	1964:12, 1981:4, 2009:6	1979:21, 1983:25
1928:22, 1933:8, 1933:9,	1906:13, 1958:2, 1958:4,	accent - 1940:15	allowing - 1956:13
1934:21, 1935:22, 1941:12,	1958:9, 1958:18, 1958:25,	accept - 1993:15	almost - 1915:9
1992:7, 1992:12, 1993:16,	1959:2, 1980:3, 1981:13	acceptable - 1915:3	alone - 1918:14, 1937:7,
2012:9	30th - 1925:19	accepted - 1978:8	1986:13
1998 - 1911:5, 1919:16,	31st - 1925:19	access - 1952:7, 1961:6,	altered - 1941:9
1921:13, 1928:19, 1937:3	36 - 1964:16	1962:7, 1962:11, 1962:23,	America - 1903:4
1:00 - 2013:18	3:06-cr-712 - 1903:4	1963:7, 1963:22, 1964:2,	amount - 1928:24,
1d - 1971:24	3d - 1978:22	1972:14, 1972:18, 1973:3,	1954:25, 1955:10, 1955:12

analogy - 1994:23, 1995:4 analysis - 1919:2, 1998:15, 2012:3 1998:15, 2012:3
Andrew - 1903:20, 1909:4, 1910:21, 1912:1, 1912:2, 1912:14, 1913:17, 1916:7, 1917:6, 1917:24, 1919:14, 1919:18, 1920:13, 1920:17, 1922:3, 1922:6, 1924:2, 1925:4, 1925:8, 1925:23, 1926:2, 1926:12, 1926:14, 1926:19, 1926:24, 1927:3, 1927:20, 1940:7, 1940:12, 1951:11, 1951:19, 1951:24, 1954:22, 1987:3, 1987:9, 1954:22, 1987:3, 1987:9, 1988:8, 1989:11, 1990:2, 1991:4, 1991:10, 1991:17, 1992:10, 1993:1, 1994:20, 2000:15, 2001:3, 2011:15, 2011:18 Andrew's - 1916:3 1921:15, 1922:8, 1922:14, 1922:18, 1932:7, 1940:15 Angela - 1911:20 angles - 1915:11 angry - 1938:19 annoyed - 2005:12 answer - 1935:18, 1938:16, 1938:18, 1945:1, 1945:1, 1948:15, 1949:20, 1961:21, 1961:22, 1977:23, 1984:16, 1985:16, 1985:17, 1993:11, 1994:25, 1995:1, 1995:4, 2006:16 answers - 1948:16 anticipate - 1950:22 anulus - 1997:23 anvtime - 1953:25 anyway - 1941:14, 1958:16, 1967:17 anyways - 1913:1, 1976:15 apologize - 1968:13 apparent - 1948:25, appear - 1915:18, 1934:2, Appearances - 1903:12 appeared - 1928:19, 1928:20 approach - 1948:18 appropriate - 1905:23, 1930:24, 1946:21, 1967:24 approval - 1968:25, 1970:20 approved - 1963:25. 1999:4 April - 1982:5 apron - 1963:14 area - 1915:6, 1978:13, 1979:20 areas - 1909:13, 1985:4, 1986:24 Arkansas - 1911:16, 1977:12 aside - 1907:20 assessment - 1994:19, 2012:7, 2012:19 assigned - 1970:25, 1997:11, 1997:13 assistants - 1916:10, 1916:14, 1917:17, 1918:18, 1988:18, 1990:10 associates - 1919:3 Associates - 1919:7, 1940:21 assume - 1908:3, 1908:5, assumed - 1946:14 assuming - 1910:4

1988:1, 2005:2 Assuming - 1908:6 assure - 1922:14 attachment - 1921:16, 1921:17 attempt - 1960:17 attention - 1906:2, 1923:19, 1958:6 audience - 1930:16 August - 1952:11, 1964:20, 1966:18, 1967:21, available - 1973:3 1980:10, 1980:12, 1980:22, 1981:1, 1993:18 Avenue - 1903:14, 1904:5 avert - 1944:21 Avi - 1925:24 avoid - 1984:5 aware - 1942:1, 1962:24, 2006:21, 2010:25 axial - 1977:13 В

B&w - 1980:17, 1981:8, 1981:14 **b&w** - 1981:9 background - 1914:23 bad - 1930:1, 1937:13, 2013:1 Ballantine - 1903:16 base - 1927:12, 1976:14 based - 1917:22, 1917:24, 1925:8, 1926:25, 1927:4, 1927:18, 1927:19, 1941:20, 1943:6, 1943:25, 1987:2, 1992:10, 1994:12, 1996:1, 2011:13, 2011:14

Based - 1909:10, 1915:15, 1927:1. 1986:11 baseline - 1949:10. 1949:12 basis - 1923:25, 1925:7, 1948:4 Basis - 1905:16, 1905:18, 906:1, 1996:16 Bateman - 1939:3 bead - 1978:16 bear - 2008:20 **became** - 1948:25, 1952:3, 1952:4, 1988:2 began - 1968:10 behalf - 1969:24 behind - 1938:3 belief - 1939:11 below - 1924:24, 1978:11 besse - 1907:1, 1910:10, 1930:20, 1939:24, 1943:11, 1944:1, 1944:18, 1944:19, 1949:17, 1952:2, 1956:9, 1958:2, 1958:10, 1958:19, 1959:12, 1959:25, 1960:9, 1962:8, 1962:11, 1962:14, 1962:22, 1965:9, 1974:19, 1975:5, 1976:23, 1977:9, 1977:15, 1977:18, 1977:22, 1980:8, 1983:19, 2010:6, 2013:6, 2013:13 besse's - 1957:4, 1981:25 best - 1928:22, 1942:25 better - 1933:14, 1939:13, 1939:14, 1972:14 between - 1918:5 1924:17, 1928:17, 1929:18, 1935:7, 1941:3, 2006:4 **bit** - 1905:25, 1912:18, 1916:20, 1936:11

black - 1928:20

blank - 1934:14

block - 1969:20 Block - 1970:14, 1970:19 blurry - 1936:17, 1939:4 Board - 1941:24, 1999:11 Bob - 1908:16, 1974:16 body - 1921:17 body - 1921:17 bolting - 1957:1, 1957:3 boric - 1914:19, 1914:22, 1954:25, 1955:4, 1955:10, 1955:17, 1963:20, 1965:18, 1972:11, 1972:25, 1983:8, 1983:21, 1983:22, 1985:2, 1985:12 boron - 1909:15, 1909:17, 1914:13, 1914:20, 1914:25, 1915:7, 1918:1, 1927:15, 1935:8, 1936:22, 1937:2, 1939:21, 1941:11, 1946:22, 1957:7 1957:7, 1957:13, 1960:18, 1960:19, 1975:16, 1986:25, 1989:7, 2001:11, 2001:19, 2002:1, 2003:3, 2004:1, 2004:13 **boss** - 1905:17, 1920:5, 1920:6, 2005:10 **bottom** - 1909:23, 1953:8, 1978:9, 1979:7, 2001:10 bouncing - 1928:24 Box - 1903:17 box - 1942:21, 1980:5 brand - 1946:24 break - 1912:18, 1967:24, 1968:1, 1968:6, 1968:14, 1968.19, 1969.11, 1972.24, 1992:20, 2013:19 breakdown - 1921:10 Brian - 1974:13, 1974:15, 1974:17, 1974:18, 2004:19 brief - 1930:22, 2007:20 briefed - 1955:7 briefing - 1990:10 briefily - 1921:20, 1938:14 bring - 1935:16, 1940:7, 1954:1, 1984:20 brought - 1919:18, 1931:13, 1940:9, 1940:19 budgetary - 1952:12 building - 1913:1, 1931:6 built - 1956:12, 1956:14, 1980:16 bullet - 1955:25 Bulletin - 1951:4, 1964:21, 1965:6, 1965:9, 1968:21, 1969:15, 1974:1, 1983:19, 2009:14 bulletin - 1905:8, 1910:22, 1911:2, 1911:5, 1923:15, 1943:10, 1951:15, 1965:13, 1966:23, 1971:21, 1971:25, 1974:20, 1977:11, 1983:13, 1984:21, 1985:6, 1986:2, 1992:23, 2004:25, 2006:24. bullets - 1925:6 bunch - 1973:17, 1985:2 busy - 2004:20, 2004:21 buttons - 1933:4, 1933:5 buy - 1976:4, 1976:5, 1976:8 buying - 1976:20 bypass - 1909:2 Byrd - 1920:15, 2012:7, 2012:18

C

calculation - 1948:14 calibrated - 1911:18, 1911:21 caller - 1974:18

camera - 1928:21, 1934:1, 939:15, 1994:24 Campbell - 2005:6, 2005:8, 2005:24, 2006:4, 2006:6 cannot - 1964:24, 1965:21 capable - 1965:18, 1997:24, 1998:12 capacities - 1905:15 caption - 1927:15, 1929:14, 1930:2, 2003:2, 2007:1 captions - 1926:8, 1926:13, 1926:18, 1926:25, 1927:7, 1927:9, 1927:23, 1929:3, 2000:17, 2000:21, 2011:6, 2011:13 captured - 1929:3, 2013:3 care - 1922:11, 1931:3, 1946:14 career - 2013:12 careful - 1949:20 cart - 1932:23, 1933:3 carts - 1932:15 case - 1938:15, 1968:3, 1968:6, 1976:24, 1980:20, 1993:20, 2003:7, 2013:21, 2013:23, 2013:25 cases - 1915:10 categorized - 2008:2 category - 1981:15 caused - 1925:15, 1957:7, 1959:10 Cced - 1966:12, 1973:24, 1974:11 Cds-1913:15 center - 1983:24 central - 1945:22, 1946:1 certain - 1983:15, 1985:16 certainly - 1955:19, 1977:24, 1978:2, 1978:3, 1983:17 Certainly - 1967:5 certify - 2014:10 chain - 1912:11 chairs - 1932:14 chance - 1906:21, 1977:19 chances - 1955:3, 1955:16 change - 1925:3, 1948:1, 2000:4 changed - 1918:7, 1925:1, 1941:8, 1941:20 changes - 1929:21 changing - 1944:14 characterization - 1993:4 characterized - 1946:20 cheaper - 1976:7 check - 1944:25 checking - 1913:1 checks - 1970:22 Chernobyl - 1944:18 Chevalier - 1903:20 Chief - 2005:23 Chimahusky - 2003:11, 2003:13, 2003:21, 2011:10 choice - 1911:15 chosen - 1911:10 circular - 1979:3 circumferential - 1923:16, 1951:1 circumstance - 1943:23 circumstances - 1959:17 claim - 1989:20, 1990:5 claim - 1989:20, 1990:5 clarify - 1988:16 clarify - 1929:19 classify - 1934:23 clean - 1915:5, 1915:23, 1946:22, 1947:23, 1955:2, 1955:3, 1955:14, 1955:16, 1960:3, 1962:7, 1963:7, 1963:21, 1964:24, 1965:21,

2010:16, 2010:19 cleaned - 1950:15, 1950:23, 1951:16 cleaning - 1909:21 1946:18, 1946:24, 1947:5, 1947:20, 1948:18, 1949:1, 1949:3, 1949:16, 1950:21, 1951:6, 1951:9, 1951:10, 1951:20, 1951:23, 1951:24, 1984:1, 1984:3, 1991:11, 1993:3, 2001:13, 2003:4, 2010:23 clear - 1913:19, 1967:5 clearest - 1928:22 clearly - 1919:15, 1984:2 clips - 1913:10, 1913:11, 1917:25 Cno - 1974:13 Cnrb - 1942:2, 1942:5, 1998:19, 1999:4, 1999:8 coal - 1976:12 coal-fired - 1976:12 Coincidentally - 1958:11 collaborative - 1917:3 color - 1928:21, 1929:21 coloration - 1937:22 coloring - 1937:15 combination - 1956:25 combine - 1915:13 comfort - 1915:16 comfortable - 1959:18 coming - 1909:19, 1934:1, 1938:15, 1939:16, 1975:23 command - 1940:14 Commenced - 1905:1 comment - 1999:10 commented - 1936:15 comments - 1937:12 Commission - 1954:12 1966:25, 1982:1, 1984:11, 1988:19, 1991:2, 1991:19, 1999:15, 2000:2, 2006:14 commissioners - 1988:18 commitment - 1923:1 commitments - 1984:3 committed - 1925:14 Committee - 1955:8, 1958:9, 1978:19, 1980:2, 1980:17 committee - 1952:10, 1953:16 committees - 1977;25 communicate - 2006:3 communication - 1912:9, 1940:24, 2005:16, 2006:4 company - 1941:23, 1998:15, 1999:11 company's - 1994:7 compile - 1912:3 compiled - 1926:12. 1928:12 compiling - 1918:12, 1926:10, 2011:12 complete - 1985:25, 1986:9, 1991:11, 1991:17, 2000:3 completed - 1906:10, 1919:14, 1949:17 completely - 1950:23, 1979:5, 2002:14 completeness - 1985:22 completing - 1948:25 completion - 1983:7 compromised - 1983:21, 1984:14, 1985:7, 1986:4 computer - 1913:7, 1913:8 conceal - 2006:13 concern - 1940:17 1974:25, 1981:6, 1981:16, 1984:10, 1991:1, 1998:4,

concerned - 1937:18. 1940:14, 1964:8, 1964:11, 1981:17, 2006:1, 2006:6 concerns - 1940:12, 1944:5 **concluded** - 1910:9 conclusion - 1977:21, 2003:1 condition - 1911:24 1927:10, 1948:10, 1956:2, 1979:15 Condition - 1946:2 1946:4, 1947:4, 1947:7, 1947:9, 1947:15, 1948:3 conditioning - 1975:25 conditions - 1959:24 conducted - 1961:2 conference - 1907:5, 1917:1, 1940:3 confidence - 1909:24, 1922:7, 2002:10 Conroy - 1904:2 consciously - 1948:22 consensus - 1937:9, 1945:1 consequence - 1975:4 consequences - 1958:24 conservative - 2013:4 consider - 1974:20. 2000:1 considerable - 1983:9 considered - 1915:3, 1948:12, 1950:10, 1950:12, 1976:15, 1977:3 consist - 1961:1 construct - 1911:10 consumer - 1975:20, 1976:3 consuming - 1961:12, 1961:18, 1981:2 contact - 1974:15 contacted - 1974:13 contain - 1986:9 contained - 1908:6. 1984:12 contains - 1969:17, 1983:12 contents - 1973:14 context - 1965:6 continue - 1968:8 Continued - 1905:3, 1959:4, 2015:3 control - 1933:1 controlled - 1932:25 conversation - 1914:5 1915:15, 1916:1, 1916:2, 1916:8, 1921:20, 1921:23, 1921:25, 1927:20, 1927:21, 1934:20 conversations - 1908:13, 1908:15, 1910:2, 1924:2, 1926:18, 1927:3, 1927:5, 1927:6, 1927:8, 1956:4, 2010:2 2010:2 converted - 1913:14 convey - 1923:3 conveyed - 1920:8 convoluted - 1985:17 Cook - 1904:1 cool - 1959:11, 1975:12, 1979:10, 1979:12 cool-down - 1979:12 coolant - 1911:14 cooled - 1979:17, 1979:18 coordinate - 1910:14 coordinating - 1988:6, 1997:17 copied - 1966:13

copies - 1930:24, 1931:1

copy - 1938:9 correct - 1905:11, 1905:12, 1908:9, 1920:3, 1920:22, 1922:15, 1932:18, 1942:4, 1945:23, 1945:25, 1946:3, 1946:13, 1946:16, 1946:19, 1947:3, 1947:6, 1947:18, 1948:24, 1949:4, 1951:3, 1951:5, 1951:7, 1951:17, 1953:10, 1953:13, 1951:17, 1953:10, 1953:13, 1953:15, 1953:18, 1954:9, 1955:7, 1955:13, 1955:15, 1957:6, 1957:8, 1957:17, 1958:1, 1958:5, 1958:13, 1959:21, 1960:11, 1960:14, 1961:23, 1962:6, 1962:12, 1962:24, 1963:5, 1963:24, 1964:4, 1964:15, 1965:11, 1966:6, 1966:14, 1966:19, 1967:1, 1967:20, 1967:22, 1969:19, 1969:23, 1970:1, 1970:9, 1970:20, 1970:1, 1970:9, 1970:20, 1971:14, 1973:2, 1973:5, 1977:13, 1977:17, 1979:11, 1982:3, 1982:22, 1984:23, 1985:1, 1985:4, 1985:5, 1985:8, 1985:9, 1986:1, 1986:5, 1986:8, 1987:20, 1987:23, 1988:7, 1988:20, 1987:23, 1988:7, 1988:20, 1989:9, 1989:25, 1990:4, 1990:8, 1990:16, 1990:23, 1990:25, 1991:21, 1992:8, 1992:25, 1993:17, 1995:11, 1995:22, 1996:5, 1996:7, 1996:9, 1996:18, 1996:22, 1996:14, 1908:5 1997:18, 1998:1, 1998:5, 1998:11, 1998:15, 1998:22, 1999:1, 2000:8, 2000:18, 2000:19, 2000:21, 2003:16, 2006:25, 2007:6, 2008:18, 2010:14, 2014:10 Correct - 1942:22, 1953:1, 1953:4, 1954:23, 1959:14, 1959:18, 1960:5, 1960:8, 1964:22, 1965:3, 1965:16, 1965:20, 1966:17, 1970:5, 1970:15, 1970:18, 1970:21, 1971:3, 1972:4, 1974:23, 1975:14, 1976:24, 1983:10, 1986:14, 1987:6, 1987:25, 1988:4, 1991:9, 1993:8, 1994:3, 1994:6, 1994:11, 1997:12, 1997:15, 1997:21, 1998:13, 1999:13, 2000:16, 2000:22, 2000:24, 2001:23, 2002:9, 2002:18, 2002:20, 2004:22, 2006:17, 2011:8, 2012:5 corrected - 2007:2 correcting - 1991:1 corrective - 1948:2, 1948:6, 1948:7 correlation - 1915:12 corrosion - 2001:15 cost - 1976:17 costly - 1976:17 Counsel - 1954:10, 1961:25 count - 1948:7 counts - 1948:9 couple - 1916:24, 1982:25 course - 1929:6, 1984:4 Course - 1928.0, 1804.5, 1929:6, 1930:3, 1945:13, 1946:8, 1947:13, 1952:17, 1952:20, 1966:3, 1967:25, 1968:8, 1968:12, 1968:15, 1968:8, 1968:15, 1968:15, 1969:4, 1969:5, 1969:6, 1969:8, 1973:15, 1974:6, 1984:16, 1986:18, 1988:23

1988:25, 1991:25, 1996:12, 1999:1, 2000:11, 2007:9, 2007:14, 2007:19, 2013:16 court - 1995:12 cover - 1942:18, 1952:23 covered - 1925:6, 1944:6, 1947:5, 1957:19 1947:5, 1957:19
Cr- 1947:4, 1947:22,
1947:24, 1947:25, 1950:16
crack - 1910:15, 1920:15,
1920:16, 1939:2, 1978:7,
1978:10, 1978:11, 1978:13,
1979:3, 1998:2, 1998:12 cracked - 1958:3, 1958:24, 1977:16, 1981:21 1977:10, 1961:21 cracking - 1923:16, 1950:24, 1951:1, 1955:11, 1958:20, 1959:2, 1960:4, 1961:7, 1978:3, 1978:5 cracks - 1951:2, 1958:18, 1977:10, 1977:13, 1977:19, 1980:9, 1998:18, 1998:20 Crd - 1974:1, 1974:21 Crdm - 1909:14, 1956:1, 1982:14, 1989:5 Crdms - 1918:14 create - 1910:24, 1919:21, 1949.9 created - 1927:7, 1992:17 credibility - 1919:19 credib-1919:6, 1919:15, 1921:12, 1921:13, 1939:22, 1941:7, 1941:15, 1966:9, 1967:11, 2012:8, 2012:10, 2012:12, 2012:15, 2012:20, 2012:21 credited - 2001:18 crediting - 1943:6, 1966:15 crisp - 1913:19 criteria - 1911.25 criticized - 1937:11 cross - 1978:22 Cross-1945:13, 1945:16, 2015:5 Cross-examination 1945:13, 1945:16, 2015:5 cross-sectional - 1978:22 Crr - 1904:5, 2014:14 crystal - 1915:9, 1983:21, 1985:12 crystal-like - 1915:9 cubicle - 1912:20, 1915:21 Cunnings - 1912:7 current - 1961:10 cut - 1952:7, 1963:17, 1972:14, 1973:8, 1993:2 cutting - 1963:13, 1963:15

ח

Daily - 1944:4
Dale - 1907:17, 1973:16
damage - 1950:8
data - 1921:13, 1944:24
date - 1923:17, 1930:8,
1942:19, 1942:21, 1954:19,
1987:14, 1989:23
Date - 2014:14
Dave - 1906:9, 1907:3,
1917:10, 1920:22, 1925:13,
1925:14, 1931:9, 1931:14
David - 1903:7, 1933:10,
1905:3, 1945:16, 2007:23,
2007:25, 2015:3, 2015:5,
2015:7
Davis - 1907:1, 1910:10,
1930:20, 1939:24, 1943:11,
1944:1, 1944:18, 1944:19,
1949:17, 1952:2, 1956:9,

1957:4, 1958:2, 1958:10 1958:19, 1959:12, 1959:25, 1960:9, 1962:8, 1962:11 1962:14, 1962:22, 1965:9, 1974:19, 1975:5, 1976:23, 1977:9, 1977:15, 1977:18, 1977:22, 1980:8, 1981:25, 1983:19, 2010:6, 2013:6, 2013:13 Davis-besse - 1907:1 1910:10, 1930:20, 1939:24, 1943:11, 1944:1, 1944:18, 1944:19, 1949:17, 1952:2, 1956:9, 1958:2, 1958:10. 1958:19, 1959:12, 1959:25, 1960:9, 1962:8, 1962:11, 1962:14, 1962:22, 1965:9, 1974:19, 1975:5, 1976:23, 1977:9, 1977:15, 1977:18, 1977:22, 1980:8, 1983:19, 2010:6, 2013:6, 2013:13 Davis-besse's - 1957:4. 1981:25 day's - 1946:4 days - 1982:25, 1995:13 Dbe - 1996:16 Dc - 1903:15, 1903:18, 1903:22, 1904:3, 1916:25 1930:10, 1930:19, 1991:21 Dcg - 1908:3, 1969:23, 1986:23 deal - 1905:21 debate - 1946:21 December - 1954:15, 1954:17, 1954:21, 1977:1 decide - 1968:5, 2013:25 decided -) 1953:16, 2002:22 decision - 1920:11, 1937:7, 1939:24, 1954:6, 1999:21, 2012:25, 2013:1 deck - 1932:16 Defendant - 1903:8. 1903:19, 1904:1 defer - 1953:16, 1954:6 deferred - 1953:11 definite - 1909:17, 1986:25 definitely - 1928:17 definitive - 1910:24 degree - 1915:16 degrees - 1946:25, 1979:11 delays - 1984:5 demand - 1975:24 1976:1, 1976:19, 1976:25, 1977:2, 1977:3, 1980:14 denied - 1943:15 Denis - 1904:1 Department - 1903:13. deposit - 1914:13, 1915:10, 1990:6 deposited - 1914:20 deposits - 1935:8, 1955:17, 1983:8, 1983:21, 1983:23, 1985:12, 1989:7, 1995:24 depressurize - 1975:12 depressurized - 1959:11 depth - 1983:9 describe - 1912:23 1922:2, 1925:20, 1932:9, 1938:14, 1938:22, 1961:2 described - 1905:10, 1979:25, 1990:9, 1990:13 description - 1921:11, 1921:16, 1972:3 design - 1905:21, 1948:14, 1956:11, 1956:16, 1956:18,

1956:19, 1956:21, 1963:23, 1964:1, 1964:3, 1964:5, 1964:8, 1964:13, 1965:1 **Design** - 1905:16, 1905:18, 1906:1, 1957:16, 1969:17, 1971:4, 1996:16 designing - 1980:3 desired - 1970:22 desk - 1913:6, 1982:24 Desks - 1932:13 despite - 1991:7, 1991:10 detail - 1919:23, 1953:21, 1953:22 details - 1906:20 detection - 1957:11 determine - 1960:4 developed - 1921:18, 1980:11 development - 1910:15, Developments - 1974:2 Developments-urgent -1974.2 diameter - 1961:6 differed - 1959:5 difference - 1924:17 1928:17, 1929:17, 2002:24 different - 1911:25, 1915:11, 1915:14, 1919:24, 1928:19, 1944:22, 1948:18, 1957:1, 1957:2, 1957:3, 1958:3, 1973:21, 2002:14, 2004:10 differently - 2009:5 difficult - 1913:20, 1972:17 digital - 1913:15, 1913:21, 1913:23, 1925:23, 1932:7, 1939-12 digitally - 1939:17 dime - 1913:20 Direct - 1905:3, 2015:3 direct - 1997:19, 2001:7, 2006:8, 2006:11 directed - 1981:8 direction - 1912:2, 1912:4, 1926:14 directly - 1912:6, 1912:11, 1992:13, 2010:10 director - 1970:24, 1997:10 Director - 1969:24 disassembles - 1978:6 disassembly - 1975:11 discover - 1960:18 discovered - 1998:14, 1999:9 discuss - 1968:3, 1968:4, 2005:8, 2013:21, 2013:22 discussed - 1907:20. 1910:11, 1910:12, 1916:6, 1921:20, 1968:19, 2002:21 discusses - 1972:10, 1982:14 discussing - 1959:6, 1968:11, 1975:9 discussion - 1912:13 1915:22, 1918:9, 1940:11, 1946:17, 1952:7, 1953:20, 1953:24, 1953:25, 1972:13, 1973:7, 1999:18, 1999:19, 2005:14, 2005:20, 2005:21, 2012:3

discussions - 1940:9.

dispatchers - 1976:7

display - 1946:6, 1947:11, 1953:7, 1957:22, 1962:1, 1964:18, 1966:1, 1969:3, 1969:11, 1982:11, 1986:15,

1951:8, 2005:18

1988:22, 1991:23, 1993:22, 1996:10, 1998:25, 1999:1 displayed - 1974:7 distortion - 1939:18 distribution - 1953:5 District - 1903:1, 1903:11 **Division - 1903:2** docket - 1925:25, 1928:9 Docket - 1903:4 document - 1905:20 1937:17, 1953:2, 1955:23, 1959:3, 1959:6, 1973:10, 1973:15, 1974:3, 1982:16, 1982:19, 2010:12 documented - 1948:11 documents - 1928:13 done - 1908:11, 1908:25, 1910:20, 1910:22, 1911:12, 1912:9, 1913:16, 1916:6, 1916:7, 1919:3, 1927:23, 1940:1, 1943:13, 1943:22 1944:22, 1947:21, 1948:3, 1965:10, 1965:15, 1965:18, 1966:8, 1981:23, 1993:9, 1994:16, 1995:10, 1995:17, 2013:1 dose - 1979:20, 1980:7 double - 1944:25 double-check - 1944:25 Doubletree - 1917:1 doubt - 1945:5 Doug - 1917:10 down - 1909:19, 1909:22, 1909:23, 1912:18, 1914:15, 1915:8, 1920:19, 1931:1, 1931:25, 1959:10, 1960:13, 1961:7, 1974:20, 1975:4, 1975:8, 1975:12, 1975:19 1976:20, 1977:6, 1977:18, 1978:5, 1979:6, 1979:12, 1980:8, 1981:17, 1982:2, 2005:1, 2013:7, 2013:16 downhill - 1914:11. 1914:13, 1915:4, 1935:6 dozen - 1973:21, 1973:22 Dr - 1975:3 drafting - 1926:8, 2011:1 draw - 1977:21 drive - 1915:12, 1934:23, 1934:24, 1961:5, 1978:9, 1979:6, 1994:18 drives - 1919:5, 1919:15 1921:11, 1934:24, 1936:18, 1941:13, 1960:20, 1960:21, 1960:24, 1961:4, 1994:17, 2001:18, 2001:21, 2001:25, 2002:7, 2012:14 dry - 1927:16 due - 1983:21, 1986:25 Duke - 1955:7, 1984:1 during - 1907:21, 1910:3, 1913:25, 1918:8, 1920:9, 1932:25, 1934:2, 1934:20, 1939:19, 1940:24, 1942:1, 1943:4, 1943:9, 1951:15, 1980:20, 1983.2, 1998.6 dye - 1950:6

e-mail - 1940:21, 1941:2, 1941:16, 1954:14, 1954:21, 1955:21, 1957:19, 1957:25, 1958:19, 1964:20, 1966:5, 1966:10, 1973:16, 1974:9, 1974:12, 1974:24, 1981:5, 1993:6, 2008:14, 2008:16, E-mails - 1992:23 e-mails - 1915:22

1951:25, 1954:10, 1963:19, 1968:20, 1978:1, 1992:16, 2008:1, 2008:3, 2008:12, 2008:19, 2009:4, 2009:9 earliest - 1933:12 early - 1905:6, 2008:23, 2009:10, 2013:7 easier - 1993:10, 2009:2 easy - 1940:15 Ed - 2003:11, 2003:20 eddy - 1961:10 effect - 1950:13 effective - 1959:23 efficient - 1976:16 effort - 1917:3, 1935:24, 1938:11, 1947:5 Efpy - 1981:13 eight - 1907:6, 1932:22 Either - 1976:5 either - 1907:3, 1917:6, 1933:20, 1934:17, 1941:15, 1949:22, 1976:20, 2007:5 electric - 1977:5 electrical - 1977:4 electricity - 1975:20, 1975:21, 1976:4, 1976:5, 1976:12, 1976:21, 1976:22 element - 1919:2, 1956:5, emphasis - 1958:21 emphasizes - 1984:2 end - 1925:19, 1968:6, 1974:20, 1975:4, 1976:1, 1978:14, 1978:25, 1981:17, 1982:2, 1983:10, 2005:1, 2013:25 ended - 1923:7, 1980:6 engagement - 1931:3 engineer - 1911:14, 1944:24, 1989:17 engineer's - 1945:2 Engineering - 1906:10, 1954:4, 1957:16, 1969:17, 1971:5, 1987:9, 1987:16, 1996:17 engineering - 1905:16, engineers - 1908:23, 1925:5, 1927:6 English - 1940:14 Enjoy - 1968:6, 2014:2 enlarge - 1955:25, 1969:20, 1970:19 enlarged - 1952:24, 1964:23, 1986:23 entailed - 1906:6 enters - 1970:22 entire - 1937:4, 1994:14 entitled - 2014:11 environment - 1979:14 equipment - 1928:19, 1946:24, 1950:9, 1980:14. 1980:21 Ermer - 1904:1 error - 1941:22 Eschelman - 1906:9 essence - 1912:10, 1989:16 essentially - 1919:4, 1978:15 established - 1977:8 establishing - 2005:16 et - 1903:7 evaluation - 1948:9. 1983:3 evening - 1931:8 event - 1944:14, 1959:9 events - 1974:12

evidence - 1917:12, 1923:5, 1952:15, 1954:16

evident - 1909:18 exact - 1989:15, 1990:17 exactly - 1916:4, 1916:6, 1919:20, 2005:13 exaggeration - 1988:13 exam - 1966:8 Examination - 1905:3, 2007:23, 2015:3, 2015:7 examination - 1945:13 1945:16, 1949:14, 1949:19, 1950:5, 1950:14, 2015:5 except - 1976:18 exchange - 1941:2 exchange - 1941.2 exclusionary - 1979:20 Excuse - 1952:18 excuse - 1941:12 exhibit - 1942:18, 1942:20, 1952:14, 1953:7, 1955:5, 1957:18, 1962:1, 1969:7, 1989:2 Exhibit - 1907:9, 1907:13, 1917:11, 1923:4, 1923:9, 1923:20, 1924:25, 1929:9, 1942:11, 1946:7, 1947:12, 1952:16, 1952:23, 1954:14, 1957:20, 1961:24, 1964:16, 1965:25, 1969:2, 1969:12, 1971:17, 1973:11, 1978:22, 1981:5, 1982:6, 1982:8, 1986:16, 1988:21, 1991:23, 1996:11, 1998:24, 1999:3, 2000:9, 2009:13 exist - 1959:24 expand - 1920:17 expect - 1955:10 expect - 1933:10 expected - 1919:22, 1935:20, 1975:2 expenditure - 1980:7 expense - 1981:20, 2013:6, 2013:10 expensive - 1961:14, 1976:21, 1977:6, 1981:3, 1981:22, 1981:23 experience - 1911:8, 1983:22, 1984:1 expert - 1941:21 explain - 1913:11, 1914:7. 1915:2, 1993:14, 1995:9 explained - 1935:6 explaining - 1914:3, 1914:10 exposed - 1979:19 expressed - 1974:25 extensive - 1975:11, extraordinary - 1979:24 extremely - 1935:19, 1938:16 eyeball - 1911:18, 1911:21 eyeballs - 1912:1 eyewitness - 1995:8

F

fabricator - 1980:13 face - 1992:15 face-to-face - 1992:15 facilitate - 1913:14 fact - 1909:25, 1941:8, 1944:20, 1951:12, 1958:23, 1967:11, 1972:10, 1977:8, 1981:25, 1987:18, 1989:19, 1990:17, 1991:7, 1991:10, 1993:1, 1993:18, 1995:20, 1997:16, 2003:17, 2004:9, 2005:9, 2012:12, 2013:1 Facts - 1917:18 facts - 1925:1

failure - 2006:25

fair - 1908:7, 1958:17, 1975:6, 1977:10, 1981:2, 1981:16, 1983:14, 1996:25 Fairly - 1975:18 fairly - 1989:21 faith - 1991:17 fall - 1991: 17 fall - 1944:9, 1945:3, 1951:14, 1951:15, 1975:24, 1980:8, 1980:20, 1982:21, 1982:22, 1998:6, 1998:14 falls - 1950:7 false - 1945:9, 2009:21, falsify - 1943:20 familiar - 1985:21 familiar - 1985:21 family - 1944:1 fancy - 1932:12 far - 1912:8, 1944:1, 2010:19 fast - 1911:19, 1913:18, 1933:21, 1933:22, 1934:7, 1934:13, 1934:17, 1936:13 fast-forward - 1913:18 fast-forwarded - 1933:21, faster - 1934:12 favor - 1963:15 feelings - 1922:10, 1938:14, 2006:2 felt - 1911:17, 1934:3, 1938:17, 1938:20, 1949:2, 2010:9 Fenoc- 1974:13, 1976:20 few - 1924:20 Fifteenth- 1903:22 filed - 1921:23, 1922:21, 1925:17 files - 1925:24 fill - 1938:10 film - 1928:9 final - 2012:18, 2012:22, 2013:1 fine - 1947:13, 1988:23, 1991:25 financial - 1953:14 Fine- 1930:3 finish - 1932:3 finished - 1918:3, 1990:3 finite - 1918:25, 1919:2 fired - 1976:12, 1976:13 first - 1905:7, 1917:18, 1923:11, 1923:12, 1924:3, 1924:21, 1933:1, 1933:7, 1934:21, 1933:1, 1933:7, 1938:8, 1954:11, 1954:14, 1955:25, 1963:11, 1966:23, 1969:15, 1982:4, 1983:10, 1983:11, 1986:23, 1992:23, 1993:1, 1993:13, 1994:1, 1999:4, 2006:8, 2006:24, 2006:24, 2006:24 2009:12 First- 2009:16 First- 2009: 16 Firstenergy- 2005:19 five - 1918:16; 1958:10, 1958:11, 1958:16, 1967:7, 1977:15, 1998:7 flag - 1917:18, 1918:24, flange - 1909:15, 1914:20, 1956:11, 1960:9, 1967:19, 1986:25, 2001:19, 2002:2, 2002:11 12002.11 flanges - 1909:19, 1918:16, 1956:1, 1956:9, 1956:22, 1956:24, 1957:2, 1957:4, 1967:7, 1972:11, 1972:25, 2001:12

flew - 1931:5

floor - 1913:2

Floor- 1903:14 flow - 1909:17, 1986:25

flush - 1979:7 fly - 1931:4 focus - 1908:1, 1928:21, 1928:23, 1929:22, 1937:15, 2001:10 focused - 1915:24 follow - 1923:2, 1936:5, 1949:23 follow-up - 1923:2 following - 1960:1 follows - 1923:20 font - 1925:1 foot - 1932:12 foregoing - 2014:10 forest - 1994:24 forget - 1946:20 form - 1984:15 formal - 1928:11 format - 1913:15, 1913:21 forward - 1906:12, 1913:18, 1913:22, 1933:22, 1933:23, 1934:17, 1936:14 forwarded - 1933:21, forwarding - 1934:13 four - 1911:6, 1919:4, 1942:2, 1958:16, 1977:11, 1992:7, 1998:7, 2012:9 Framatome- 1906:23, 1908:14, 1910:2, 1966:11, 1980:12 frame - 1913:23, 1983:2, 2002:14 frames - 1914:1, 1914:21 free - 1918:1, 1989:6, 1989:13, 1989:23, 1990:6, 1995:24 Friday- 2004:22 front - 1913:7, 1923:9 frustrated - 1935:17, 1935:19, 1938:16, 1939:5, 1939:7 full - 1997:24 function - 1983:1 funded - 1980:16 furnished - 2000:14 future - 1984:13 Fyfitch- 1966:11 Fyi- 1955:22, 1956:2 G

gain - 1908:20 gap - 1958:15;41997:23, 1998:2, 2001:22, 2002:17, 2006:22, 2012:3 gaps - 1914:11, 1919:3, 1919:5, 1940:22, 1941:8, 1941:17, 1942:2, 1998:16, 1999:9, 1999:12, 2012:11 garbage - 1938:23, 1938:24, 1939:8 gas - 1976:9, 1976:12 gasket - 1956:13, 1956:25 Gaskets - 1956:24, 1957:3 gather - 1919:8 gathered - 1940:3 gathering - 1908:10 Geisen - 1903:7, 1903:20, 1905:3, 1905:5, 1907:13, 1930:1, 1930:5, 1943:9, 1945:16, 1945:18, 1968:10, 1968:19, 1974:9, 1996:17, 2007:23, 2015:3, 2015:5,

general - 1911:23, 1965:13 generate - 1925:15, 1948:14, 1976:11

generated - 1947:23, 1948:2, 1976:17, 1976:22 generating - 1948:7, 1948:11, 1975:20 gentlemen - 1967:25, Gibbs - 1982:9, 1985:15, 2009:25, 2010:3, 2010:5, 2010:9 Gibbs' - 2009:12 Given - 1983:22 given - 1910:13, 1938:19, 1943:13 glare - 1928:24, 1936:19, 1937:15 Glenn - 1912:6 Gordon - 1904:1 Government's - 1907:9, 1907:13, 1917:11, 1923:4, 1923:20, 1924:24, 1929:9, 1942:11, 1946:7, 1947:12, 1954:14, 1957:20, 1961:24, 1964:16, 1965:25, 1969:2, 1969:11, 1971:17, 1973:11, 1978:22, 1981:5, 1982:6, 1982:8, 1986:16, 1988:21, 1991:23, 1996:10, 1998:24, 1999.3, 2000:9, 2009:13 Goyal - 1954:15, 1954:22, 1955:23, 1957:20, 1962:5, 1963:11, 1964:20, 1966:5, 1978:1, 1992:16, 1995:12, 1995:13, 1996:1, 2003:24, 2004:10, 2008:6, 2008:19, 2008:24 2008:24 grabbed - 2005:8 greensheet - 1905:10, 1905:13, 1968:24, 1969:14, 1970:11, 1970:17, 1972:21, 1972:22, 1972:24, 1996:8, 1996:14, 1997:3, 2010:16, 2011:4 grid - 1976:2, 1976:7 grind - 1978:13 Group - 1976:13 1952:5, 1952:2, 1952:3, 1952:5, 1952:6, 1952:24 group - 1906:14, 1906:15, 1908:17, 1908:22, 1916:23 grow - 1998:3 growth - 1910:15, 1920:15, 1920:17, 1939:2 guess - 1910:19, 1919:22, 1925:15, 1925:22, 1933:16, 1948:15, 1950:21, 1983:10 guy - 1935:16, 1936:21, 1940:7 Guy - 2005:6, 2005:8 guys - 1910:21

Н

half - 1973:22 hand - 1930:25, 1971:17, 1973:10 handful - 1990:21 handouts - 1930:25 happy - 1935:15 hard - 1907:2 harder - 1955:19 head - 1908:8, 1908:11, 1908:19, 1909:13, 1911:8, 1911:13, 1911:24, 1915:23, 1921:18, 1927:10, 1935:7, 1936:22, 1941:11, 1944:18, 1946:17, 1946:22, 1947:23, 1949:13, 1949:18, 1950:15, 1950:21, 1950:22, 1951:16, 1951:20, 1952:8, 1955:2, 1955:3, 1955:14, 1955:16,

1959:13, 1959:24, 1960:3, 1960:4, 1960:6, 1960:10 1960:13, 1960:17, 1960:23, 1962:8, 1963:7, 1963:14, 1962:8, 1963:7, 1963:14, 1963:16, 1963:20, 1964:2, 1964:24, 1965:2, 1965:21, 1966:8, 1974:21, 1975:11, 1975:13, 1975:16, 1977:16, 1978:6, 1978:23, 1979:9, 1979:9, 1979:14, 1979:23, 1983:8, 1983:20, 1983:23, 1983:24, 1984:2, 1985:3, 1986:24, 1990:6, 1992:17, 1993:3, 1994:14, 1997:24 1993:3, 1994:14, 1997:24, 1998:4, 1998:7, 2000:7, 2001:11, 2001:14, 2010:16, 2010:19 Head - 1951:23, 1951:24 heading - 1952:24, 2008:13, 2008:15, 2008:21 headquarters - 1906:16 hear - 2005:11 heard - 1941:20, 1982:23, 1996:1 heat - 1958:3, 1958:10. 1958:18, 1958:20, 1959:2, 1977:5, 1977:15 heating - 1976:1, 1977:4 heats - 1957:25 held - 1932:11 help - 1973:23 helped - 1913:14 Hibey - 1903:21, 1952:18 hide - 1938:11 high - 1975:25, 1977:3, 1979:20, 1980:14, 1981:11, 2005:18 high-level - 2005:18 higher - 1976:18 Hiser - 1910:16, 1932:24, 1987:21, 1988:1 historically - 1977:4 Historically - 1930:21 history - 1957:4 hold - 1979:13 hole - 1934:1, 1944:18, 1963:17, 2010:21 holes - 1915:11, 1962:9, 1963:8, 1963:14, 1963:15, 1963:24, 1964:25, 1965:22, 1972:14, 1972:18, 1973:4, 1983:25, 1984:5, 1992:18, 2010:22 homes - 1977:5 honest - 1951:12 honesty - 1940:18 Honor - 1929:5, 1929:23, 1945:11, 1946:7, 1952:15, 1952:18, 1954:16, 1957:21, 1962:1, 1964:17, 1966:1, 1967:23, 1969:3, 1971:19, 1974:3, 1982:11, 1988:21, 1991:22, 1993:22, 1996:11, 2000:9, 2007:17 Honorable - 1903:10 hot - 1946:25, 1947:2, 2010:19 hotel - 1940:2 Hotel - 1917:1 Hotsy - 1946:24 Hotsy-totsy - 1946:24 hour - 1912:22, 2013:18, huddled - 1932:23, 1933:2 hue - 1929:21 huge - 1944:14 human - 1979:22 hydroelectric - 1976:13,

1976:14

ideal - 2010:20 identical - 1924:21 identified - 1948:5 images - 1929:3, 1929:25, 1939:12 imagine - 1943:22 immediately - 1950:2, impeded - 1975:15 impediment - 1972:11, 1972:18, 1972:25, 1973:4, 1992:18, 2010:12 impediments - 1972:3, implies - 1918:11 imply - 1918:13 important - 1955:2 1955:14, 1989:17, 1989:18 impossible - 1950:14, 1993-19 inability - 1935:18 inaccurate - 1907:24, 1918:22, 1920:8, 1928:1, 1984:12, 2009:15, 2009:19, incapable - 1958:15 incident - 1944:19 include - 1921:8 includes - 1971:24 incorrect - 1981:13, 1983:14 incurred - 2013:6 indicate - 1915:7 indicated - 1914:14 1918:8, 1920:13, 1920:18, 1920:19, 1925:9, 1937:2, 1998:17 indication - 1967:5, 1998:3 indications - 2002:3 indicative - 1965:18 indignatious - 1943:16 individual - 1970:24, 1991:11, 1997:10, 1997:13 individuals - 2011:16 industry - 1943:24, 1944:15, 1944:16, 1977:9, 1977:25, 1984:1 inexpensive - 1981:22 information - 1906:2, 1908:6, 1908:10, 1908:21, 1908:6, 1908:10, 1908:21, 1910:3, 1910:5, 1910:18, 1910:21, 1917:20, 1917:22, 1918:21, 1919:8, 1919:11, 1919:18, 1920:2, 1920:7, 199:16, 1920:2, 1920:16, 1920:9, 1920:14, 1920:16, 1920:22, 1923:3, 1923:15, 1923:25, 1924:4, 1924:6, 1924:9, 1941:25, 1942:5, 1942:25, 1943:5, 1943:20, 1945:5, 1958:8, 1963:18, 1983:14, 1984:13, 1986:10, 1987:3, 1987:8, 1991:1, 1987:3, 1987:8, 1991:1, 1992:14, 1994:10, 1994:20, 1994:22, 1996:24, 1997:5, 1998:19, 1999:14, 1999:20, 2000:1, 2000:23, 2003:11, 2003:15, 2003:18, 2006:15, 2006:19, 2006:22, 2006:25, 2007:6, 2011:12, 2012:23, 2013:2 inhospitable - 1979:18 inhospitable - 1979:18 initials - 1908:3, 1908:4, 1969:17, 1969:21, 1996:17 initiated - 1954:3

Initiator - 1970:22

Inpo - 1983:3, 2004:21

inspect - 1959:12, 1960:3, 1960:13, 1960:18, 1962:8, 1963:7, 1975:8, 1985:13, 2005:1 inspected - 1909:14 1941:14, 1992:7, 1992:12, 1993:15, 1994:5 inspecting - 1919:16 inspection - 1909:11 1909:12, 1911:12, 1911:16, 1912:12, 1918:13, 1919:6, 1919:23, 1920:16, 1935:1, 1935:21, 1936:4, 1940:6, 1940:7, 1944:24, 1949:22, 1950:2, 1950:8, 1950:10, 1950:20, 1951:22, 1951:23, 1955:1, 1955:3, 1955:9, 1955:11, 1959:7, 1959:17 1959:23, 1960:6, 1960:17 1960:21, 1961:19, 1961:20, 1963:21, 1966:9, 1966:16, 1967:5, 1967:6, 1967:18, 1967:11, 1967:15, 1967:18, 1967:11, 1967:18, 1967:1 1972:11, 1972:18, 1973:1, 1974:21, 1975:15, 1975:16, 1974:21, 1975:15, 1975:16, 1978:16, 1981:20, 1982:14, 1984:3, 1984:4, 1985:4, 1985:15, 1986:7, 1986:13, 1986:24, 1987:14, 1992:18, 1992:19, 1993:3, 1993:19, 1994:2, 1994:9, 1994:15, 1994:16, 1994:21, 1995:8, 1995:9, 1995:15, 1995:18, 2001:8, 2003:23, 2004:16, 2004:18, 2004:21, 2005:5, 2006:23, 2009:2, 2012:9, 2012:14 2012:14
inspections - 1906:3,
1908:8, 1908:11, 1908:19,
1908:24, 1909:5, 1909:7,
1911:8, 1918:12, 1925:5,
1927:23, 1939:22, 1943:6,
1964:10, 1965:10, 1965:15,
1965:17, 1971:25, 1972:15,
1977:10, 1983:20, 1984:13,
1985:7, 1986:3, 1987:22 1985:7, 1986:3, 1987:22, 1990:14, 1990:17, 1993:9, 1993:12, 2009:2, 2010:20, 2010:21, 2011:1, 2012:21 installation - 1963:24 installed - 1979:15 installing - 1953:9 instead - 1910:19, 1945:1, 1979:6 instruction - 1943:14 instructions - 1970:10, 1970:16, 1970:19, 1997:7. 2013:20 integrity - 1919:3, 1943:17, 1943:25 Integrity - 1919:7, 1940:21 intended - 1919:25. 1949:3, 1990:18, 1995:9 intent - 1910:19, 1911:22, 1965:13 interacting - 2009:7 interaction - 1905:8 interrupt - 1968:12 interrupting - 1943:3 interruption - 1968:16 intersection - 1914:13, 1915:5, 1935:7 interviews - 1925:4, introduced - 2008:14 Investigation - 2003:20 investigation - 2004:6

2005:5

inside - 1979:8

investigators - 2003:7 involved - 1905:23, 1906:25, 1920:23, 1926:6, 1926:8, 1926:10, 1943:10, 1945:21, 1946:17, 1947:7, 1951:8, 1977:25, 1994:21, 2000:5, 2010:25, 2011:1 involvement - 1997:20 Island - 1944:17 issue - 1948:15, 1949:9, 1958:21, 1963:23, 1964:5, 1964:7, 1997:22, 1998:1 issues - 1946:15, 1968:5, 2013:24 item - 1987:24, 1988:3 itself - 1918:14

J

January- 1977:1, 2008:1, 2008:3 Jco- 1959:4, 1959:16 job - 1915:16, 1915:17, 1922:6, 1944:9, 1964:9 John- 1904:2, 1912:7 Judge- 1903:11 judgments - 1914:8 July- 1952:11 jurors - 1950:4, 1969:7 jury - 1905:7, 1906:25, 1907:10, 1909:11, 1913:12, 1916:20, 1917:22, 1918:6, 1924:4, 1924:17, 1925:20, 1929:24, 1932:10, 1936:11, 1938:14, 1953:8, 1953:22, 1955:25, 1961:2, 1964:18, 1966:2, 1969:3, 1969:20, 1974:7, 1978:21, 1982:12, 1982:15, 1986:16, 1988:22, 1990:1, 1996:11, 1998:25, 2001:5, 2003:17 jury's - 2004:9 Justice- 1903:13, 1903:17 justification - 1959:15, 1959:16, 1960:12 Justification- 1959:4

Κ

Katz- 1903:10
keep - 1939:6, 1943:4, 1979:2, 2013:1
Ken- 1920:14, 2012:18
kept - 1939:3
keyboard - 1913:22
killing - 1911:19
kind - 1917:2, 1932:3, 1932:10, 1932:23, 1935:10, 1938:19, 1949:17, 1981:18, 1986:7
Kinko's - 1931:1
knowing - 1995:2, 2002:10
knowingly - 1945:9
knowledge - 1943:1, 1970:6, 2001:3, 2010:5, 2011:14, 2011:15
knowledgeable - 1978:1
known - 1946:12

I

lack - 1963:22, 2010:22 Ladies- 1967:25, 2013:17 language - 1940:14, 1984:8, 2001:10, 2004:25, 2006:25, 2011:20 last - 1909:11, 1924:22, 1930:22, 1931:1, 1941:17, 1947:15, 1983:13

last-minute - 1930:22, 931-1 late - 1905:6, 1931:5 lead - 1980:5, 2005:15 leak - 1956:1, 1965:19, 2001:25, 2002:8 leakage - 1909:15 1909:17, 1911:23, 1914:14, 1909:17, 1911:23, 1914:14, 1914:15, 1914:20, 1956:24, 1957:11, 1960:9, 1966:8, 1967:19, 1986:25, 1987:1, 2001:20, 2002:2, 2002:12 leaking - 1956:8, 1956:13, 1957:5, 1963:19, 1967:7, 2001:12, 2001:18 leaks - 1977:13 learn - 1931:7, 2004:4 learned - 1919:11, 1931:21, 1931:24, 1951:16, 1954:24, 1954:25, 1955:24, 2002:7, 2008:20 least - 1928:23, 1950:15, leave - 1929:24, 1937:24, 1938:2 left - 1937:24, 1938:5, 1943:24, 1968:10, 1976:6, 1982:24, 1985:3 Leslie- 1920:23 less - 1935:13, 2013:4 lessons - 1954:24, 1954:25, 1955:24, 1960:2, 1960:3, 2008:20 Letter- 2000:14 **letter** - 1982:14, 1984:11, 1985:2, 2000:6, 2009:14, 2009:16, 2009:25 level - 2005:18 licensee - 1985:24, 2004:24 lie - 1943:11, 1943:20, 1945:7, 2006:10 life - 1944:14 life-changing - 1944:14 lifting - 1950:13 light - 1928:24, 1936:18 lighting - 1929:15 likely - 1909:11, 1983:23 limitation - 1964:2 limited - 1973:3, 1973:5, 1992:17, 2010:12 line - 1937:12, 1973:20. 1980:21, 1980:24, 1981:9, 2005:16 lines - 1934:11 list - 1947:10, 1947:24, 1948:5, 1948:6, 1948:19 listen - 2013:23 live - 1944:1 load - 1976:7 loaded - 1976:14 loads - 1975:25, 1976:1, located - 1960:19 location - 1910:24, 1910:25, 2001:12, 2003:3 Lockwood-1917:10, 1920:22, 1921:1, 1921:2, 1925:14, 1931:9, 1931:14, 1938:8, 1941:3, 1999:25, Lockwood's- 1907:4 logical - 1911:15 look - 1911:23, 1915:6, 1917:18, 1918:24, 1923:6, 1923:11, 1924:3, 1928:12, 1929:4, 1929:13, 1934:5, 1944:9, 1951:25, 1952:14, 1961:7, 1970:13, 1981:8, 1993:6, 1997:7, 1999:5,

2009:4, 2009:18
looked - 1906:7, 1915:7,
1917:25, 1928:16, 1932:5,
1932:8, 1932:10, 1992:19,
2008:23, 2009:7
looking - 1905:19,
1905:20, 1909:25, 1910:23,
1911:24, 1914:14, 1914:10,
1914:12, 1914:14, 1914:17,
1915:6, 1926:5, 1927:3,
1932:7, 1935:6, 1935:8,
1950:18, 1952:23, 1970:14,
2002:1
looks - 1909:12, 1973:20,
1973:24
louder - 1952:21
low - 1976:25, 1977:1
lowest - 1975:24
lunch - 2013:19, 2014:2

1998:10

measures - 1979:24

mechanicai - 1904:9

1908:17, 1983:24, 1984:1, 2001:13, 2003:4

mechanism - 1961:5.

machine - 1933:13. 1933:14, 1933:17, 1936:3, 1978:9, 1978:14, 1979:1 machining - 1978:10, 1979:2, 1979:25 mail - 1940:21, 1941:2 1941:16, 1954:14, 1954:21, 1955:21, 1957:19, 1957:25, 1958:19, 1964:20, 1966:5, 1966:10, 1973:16, 1974:9, 1974:12, 1974:24, 1981:5, 1993:6, 2008:14, 2008:16, 2012:4 mails - 1915:22, 1951:25, 1954:10, 1963:19, 1968:20, 1978:1, 1992:16, 1992:23, 2008:1, 2008:3, 2008:12, 2008:19, 2009:4, 2009:9 man - 1912:11, 2004:15 manage - 1910:14 management - 1970:24. 1971:6, 1997:10, 1997:13 manager - 1905:16, 1921:2, 1945:24, 1952:4, 1964:13, 1991:15, 1996:16 **Manager** - 1905:18, 1906:1, 1906:10, 1957:16, 1969:18, 1971:5 manager's - 1913:2 managers - 1946:4, 2005:8 manually - 1980:6 maps - 1921:18 March - 1957:19, 2008:1, 2008:3 Mark - 1919:9, 1941:1, 2009:17, 2013:3 matter - 2004:9, 2014:11 mattered - 1941:5 Mcintyre - 1908:20, Mcintyre's - 1908:16 Mclaughlin - 1913:13 1919:9, 1921:18, 1940:20, 1941:1, 1941:3, 1941:20, 1999:19, 1999:22, 2009:17, 2010:2 mean - 1906:18, 1909:2, mean - 1906:18, 1909:2, 1911:1, 1911:13, 1912:8, 1913:10, 1913:12, 1919:22, 1926:23, 1937:15, 1938:17, 1938:18, 1938:24, 1939:15, 1943:17, 1943:24, 1944:13, 1944:15, 1944:17, 1949:9, 1960:15, 1982:23, 2002:11 1960:15, 1982:23, 2002:11, 2003:19, 2006:6 meaning - 1966:9

means - 1983:24, 1995:8

1978:8 meet - 1912:21, 1922:25
Meeting - 1952:24
meeting - 1906:22,
1906:23, 1908:12, 1912:19,
1913:2, 1913:25, 1916:9,
1916:12, 1916:14, 1916:16,
1916:18, 1917:4, 1917:7,
1917:9, 1918:2, 1919:10,
1920:9, 1922:21, 1922:24,
1923:2, 1923:17, 1923:23,
1925:13, 1930:15, 1931:18,
1931:25, 1932:2, 1932:20,
1932:25, 1938:15, 1939:19, meet - 1912:21, 1922:25 1932:10, 1932:13, 1932:20, 1932:25, 1938:15, 1939:19, 1942:1, 1942:8, 1942:9, 1942:17, 1942:19, 1942:21, 1952:5, 1952:10, 1987:10, 1988:17, 1991:18, 1991:19, 1991:24, 1999:4, 1999:24, 2002:21 meetings - 1930:14 1930:17, 1932:1, 1952:6, 2005:13 megawatt - 1976:17 member - 1934:16, 1952:1, 1952:3 memo - 1986:12 mention - 1953:8 mentioned - 1929:20, 1985:13 merely - 1993:8 message - 1912:12 messages - 1963:19 met - 1923:2 metal - 1932:15, 1979:2 methodology - 1915:18, 1927:2, 1978:9, 1988:11 methods - 1975:17 microfiched - 1928:10 mid - 1967:21, 1968:1, 1980:12, 2008:23 mid-morning - 1968:1 might - 1909:6, 1922:16, 1952:11, 1954:2 mike - 1952:18 Mile - 1944:17 miles - 1944:2 Miller - 1903:20, 1973:16, 1981:10 Miller's - 1906:21 1907:17, 1907:20, 1907:23, 1908:7, 1909:10, 1909:25, 1910:4, 1986:16, 1987:11, 2008:16 mind - 2013:24 minds - 1968:5 minute - 1930:22, 1931:1, 1973:12, 1975:9, 1992:5 minutes - 1924:20, 1942:2, 1952:10, 1968:1, 1999:4, 1999:8, 2013:18 Minutes - 1952:24 misimpression - 1929:24 mislead - 1943:11 misleading - 2009:23, 2010:7 Misleading - 1928:3 misplaced - 2002:12 missed - 1926:21 missing - 2006:24 misstate - 1954:19 mistake - 1954:8 mistaken - 1999:10

Mod - 1954:1 Mode - 1959:8, 1959:11, 1960:16 mode - 1947:9, 1947:19, 1947:22, 1947:24, 1948:1, 1948:4, 1948:6, 1948:19, 1948:22, 1948:23, 1950:13, 1950:16 model - 1910:15, 1920:15, 1939:2, 1941:6, 1953:25, 1978:22 modification - 1963:2, 1963:3, 1963:25 modified - 1957:1 Moffitt - 1905:17, 1906:5, 1910:13, 1916:2, 1916:8, 1919:17, 1920:1, 1920:21, 1921:21, 1922:3, 1922:7, 1922:14, 1922:17, 1931:4, 1931:10, 1969:22 1990:24, 2005:4 Moffitt's - 1907:3, 1999:18 moment - 1981:1 Monday - 1906:19 money - 2013:13 monitor - 1932:14, 1978:12 month - 1921:5, 1925:19 morning - 1905:5, 1913:2, 1931:5, 1939:10, 1945:18, 1945:19, 1968:1, 1974:13 Most - 1975:23 most - 1908:18, 1914:12, 1928:23, 1984:4, 2012:18 mouse - 1915:11, 1934:1, 1964:24, 1965:22, 1973:4, 1983:25, 1992:18, 2010:21 move - 1974:3, 1993:21, 1995:6 Moving - 1964:16 Mrp - 1981:12 multiple - 1915:11, 1972.23 multiple-part - 1972:23 mumbled - 1956:17 must - 1928:21, 2002:11

$\overline{}$

name - 1946:24 Navy - 1948:10 Nde - 1949:23, 1950:2, 1950:4, 1950:7, 1950:9, 1950:10, 1960:25, 1961:1, 1975:16, 1985:14 near - 2012:14 nearly - 1929:22 necessarily - 1939:14 necessary - 1945:3, necessitated - 1960:22 necessitating - 1975:16, need - 1920:22, 1949:13, 1962:7, 1963:7, 1983:23, 1984:2, 1993:6 needed - 1912:5, 1912:12, 1920:15, 1940:4, 1962:11, 1962:23, 1963:1, 1965:15, 1965:17, 1981:2 needs - 1948:2, 1963:20, 1963:21 never - 2004:11, 2007:1, 2007:3 New - 1903:14 new - 1945:24, 1955:6, 1978:15, 2007:3 Next - 1965:25 next - 1910:10, 1917:4

1921:3, 1928:24, 1928:25, 1931:5, 1938:23, 1939:1, 1939:20, 1955:23, 1957:18, 1960:18, 1969:17, 1969:21, 1983:11, 1987:24 nice - 1913:19 night - 1916:22, 1930:23, 1931:3, 1931:12, 1931:20, nine - 1958:3, 1958:17, 1977:16 nitpicky - 1993:11 nobody - 1963:15, 2004:4 nomenclature - 1959:5 non - 1981:9 non-b&w - 1981:9 nondestructive - 1950:4 Nondestructive - 1950:5 Normally - 1953:24 normally - 1908:25 Northern - 1903:1 northwest - 1977:3 Note - 1962:8 notereading - 1904:9 notes - 1906:21, 1906:22, 1907:17, 1907:20, 1907:24, 1908:7, 1909:10, 1909:25, 1910:4, 1986:16, 1986:21, 1987:10, 1987:11 Nothing - 1932:12, 1984:9 nothing - 1985:10 notice - 1928:15 November - 1930:9 1930:11, 1938:11, 1940:21, 1940:25, 1941:16, 1941:24, 1942:8, 1942:13, 2009:8, 2012:3 2012:3 nozzle - 1909:14, 1910:16, 1910:17, 1910:18, 1910:24, 1910:25, 1911:11, 1911:23, 1912:5, 1912:12, 1912:17, 1914:8, 1915:2, 1915:3, 1918:3, 1919:21, 1921:15, 1935:7, 1935:71, 1935:13, 1965:14, 1967:14, 1967:22 1955:11, 1957:11, 1958:23, 1959:2, 1960:4, 1961:6, 1963:20, 1965:19, 1966:8, 1987:22, 1988:5, 1988:9, 1988:14, 1990:3, 1992:7, 1992:11, 1994:8, 1994:13, 1997:23, 1998:2 Nozzle - 1958:25, 1974:1 Nozzle - 1998:29, 1974:1 nozzle-by-nozzle -1910:16, 1910:17, 1910:18, 1911:11, 1912:5, 1912:12, 1912:17, 1918:3, 1919:21, 1921:15, 1987:22, 1988:5, 1988:9, 1988:14, 1990:3, 1994:8, 1994:13 nozzies - 1909:16 1914:22, 1914:24, 1914:25, 1923:16, 1925:22, 1935:10, 1958:2, 1958:3, 1958:9, 1958:11, 1958:14, 1958:17, 1958:19, 1958:23, 1959:1, 1960:25, 1974:22, 1977:14, 1977:16, 1981:21, 1990:21, 1995:21, 1998:7, 2012:9, 2012:12 Nrc - 1905:8, 1906:16, 1907:18, 1920:25, 1921:4, 1921:9, 1922:22, 1924:5, 1925:10, 1925:18, 1925:21, 1926:1, 1928:1, 1928:11, 1930:6, 1930:11, 1931:6, 1931:8, 1932:2, 1932:19, 1935:25, 1936:14, 1937:18, 1937:24, 1938:2, 1938:12, 1939:3, 1939:20, 1939:25, 1940:6, 1942:8, 1943:11,

1945:7, 1945:9, 1968:21, 1970:23, 1984:3, 1985:22, 1985:25, 1986:3, 1992:24, 1996:3, 1997:9, 1999:20, 2000:6, 2002:22, 2002:23, 2005:17, 2006:10, 2006:19, 2009:8, 2012:23, 2013:2 Nrc's - 1943:3 Nuclear - 1941:24, 1984:11, 1988:18, 1991:2, 1991:19, 1999:11, 1999:14, 2000:2, 2005:23, 2006:14 nuclear - 1944:16, 1948:8, 1975:19, 1975:23, 1991:15 number - 1930:24, 1935:13, 1938:8, 1942:20, 1990:21, 2006:18 Nw - 1903:14, 1903:22, 1904:3

0

Objection - 1983:16

objection - 1974:5

1984:15, 1987:4, 2007:8

obligation - 1971:12 obscure - 1960:19 observations - 2000:23 observed - 1955:1, 1955:4, 2001:11 obviously - 1906:9, 1953:24, 1974:10, 1974:11 occasion - 1946:1 occur - 1921:23, 1978:24 occurred - 1916:9, 1951:2, 1978:21, 2004:21 occurring - 1957:12 Oconee - 1915:23, 1951:2, 1954:24, 1955:1, 1955:4, 1955:8, 1955:17, 1955:24, 1958:4, 1958:9, 1958:18, 1960:3, 1977:12, 1977:14, 1980:3, 1981:13, 2008:20 October - 1903:5, 1905:6, 1905:9, 1906:12, 1906:13 1906:24, 1907:17, 1909:4 1909:8, 1910:9, 1911:7, 1916:9, 1916:12, 1919:10, 1921:6, 1922:22, 1923:1, 1923:18, 1924:19, 1989:24, 1991:18, 1996:4, 1998:25, 2009:8 offered - 1937:11 office - 1907:3, 1907:4 Office - 2003:19 Officer - 2005:23 offices - 1907:4 offline - 1959:11, 1975:19, 1975:23, 1981:22 often - 1944:3, 1959:3 Ohio - 1903:1, 1903:5, 1904:6, 1977:2, 1977:3 oil - 1976:13 oil-fired - 1976:13 Once - 1936:20 One - 1973:19, 1997:2, 2002:20, 2006:13 2002:20, 2006:13
one - 1910:14, 1910:15,
1911:12, 1913:2, 1913:23,
1915:13, 1917:16, 1918:25,
1923:7, 1923:19, 1924:20,
1928:25, 1929:3, 1930:15,
1931:11, 1932:14, 1933:10,
1933:11, 1933:12, 1934:1,
1935:12, 1935:14, 1938:8,
1939:7, 1946:3, 1956:18, 1939:7, 1946:3, 1950:18, 1954:14, 1956:13, 1958:23, 1961:24, 1963:21, 1966:7 1966:19, 1968:24, 1969:1 1969:10

1975:8. 1979:21, 1983:13 1975.6, 1979.21, 1983.13, 1999:11, 1999:4, 1993:11, 1994:4, 1996:19, 1997:1, 1998:17, 2001:6, 2001:17, 2001:21, 2002:3, 2004:7, 2006:21, 2008:14, 2012:20 open - 1914:11, 1919:3, 1919:5, 1940:22, 1941:8, 1941:13, 1941:14, 1941:17, 1942:3, 1998:2, 1998:8, 1998:16, 1998:18, 1998:20, 1998:21, 1999:9, 1999:12, 2001:22, 2001:25, 2002:7, 2002:11, 2002:15, 2002:17 opened - 2012:11 opening - 1953:9, 1953:19, 1954:7, 1997:24 openings - 1962:23, 1962:25 operate - 1965:12, 1965:14, 1982:4 operating - 1933:3, 1933:5 Operation - 1959:4 operation - 1943:19 opposed - 1924:18 optics - 1928:22, 1937:16, 1937:22, 1939:16 order - 1947:23, 1948:5, 1965:14 orientation - 1994:9 original - 1911:22 1929:25, 1956:21, 1964:3, 1985:17 originally - 1918:7, 1990:18 outage - 1910:25, 1911:1, 1918:15, 1919:16, 1927:10, 1945:20, 1945:22, 1946:1, 1950:14, 1953:11, 1963:4, 1980:7, 1982:4, 1984:5, 1984:7, 1994:2 outages - 1911:2, 1926:17 outline - 1987:24 over-characterization -1993:4 overall - 1918:12 Overruled - 1984:16 own - 2000:23, 2001:3 owned - 1911:13

P

package - 1923:6, 1942:16
page - 1917:11, 1923:4,
1923:9, 1929:9, 1929:11,
1947:11, 1947:15, 1952:23,
1953:7, 1962:1, 1966:21,
1969:3, 1969:11, 1969:14,
1971:24, 1988:22, 1992:2,
1993:23, 1993:25, 1998:25,
1999:4, 1999:5, 2001:6,
2009:12, 2009:18
pages - 1924:14, 1991:23
paid - 1906:2
paper - 1948:7, 1948:11
paperwork - 1938:9
Paragraph - 1982:14,
1923:12, 1929:13, 1964:23,
1983:10, 1983:12, 1994:1
paragraphs - 1924:3
Pardon - 1972:7
part - 1911:13, 1924:22,
1926:21, 1931:15, 1953:16,
1971:6, 1972:23, 1986:23,
1995:9, 1999:24, 2009:10
participated - 1911:16,
1927:25, 2002:21, 2005:20
participating - 1930:18

particular - 1914:8, 1915:12, 1953:25 parts - 1926:23, 1935:25, 1936:6, 1950:15 passes - 1979:4 past - 1906:2, 1908:8, 1908:11, 1909:4, 1909:7, 1913:9, 1927:23, 1939:22, 1944:23, 1971:25, 1991:5, 1993:9 path - 1920:20 pause - 1913:17, 1913:18, 1934:17, 1972:8 paused - 1933:20, 1936:16, 1939:18 pay - 1958:6 peak - 1976:19 peaker - 1976:2, 1976:6, 1976:10, 1976:11, 1976:15, 1976:21 penetrant - 1950:6 penetrations - 1989:6 1989:13, 1989:22, 1992:7, 1992:11, 1995:24 people - 1905:23, 1906:7. 1906:15, 1906:25, 1907:6, 1908:16, 1927:22, 1932:19, 1964:8, 1964:10, 1970:4, 1973:17, 1973:18, 1973:21, 1973:25, 1974:25, 1976:4, 1977:18, 1977:22, 1994:21, 1997:2, 2000:25, 2005:19, 2010:25 People - 1970:6 per - 1976:17, 1981:12 percent - 1909:24, 1961:11, 1967:18, 1986:24, 1995:17, 1995:21 perform - 1974:21 performance - 1944:9 performed - 1925:5 perhaps - 1948:13 period - 1976:25 periods - 1977:2 permission - 1931:4 permit - 1968:4, 1972:14, 1993:3, 1993:9, 2013:22 permits - 1969:4 person - 1935:1, 1935:2, 1951:19, 1971:5, 1951:9, 1951:19, 1971:5, 1980:4, 1991:14, 1994:16, 1996:23, 2004:17, 2011:17 1940:4, 1940:5, 1951:9, personal - 1931:3. 1987:10 personally - 1906:21. 1927:22, 2007:1 personnel - 1916:24 persons - 1991:20 persuade - 1982:1 pertinent - 1905:21 phone - 1906:17, 1906:18, 1909:4, 1909:8, 1910:9, 1910:12, 1974:16, 1975:2, 1987:21, 2004:19, 2004:21, 2004:23, 2005:3, 2005:5 2005:10, 2005:11, 2008:17 • photo - 1946:12 photograph - 1946:7, 2007:1, 2011:7 photographs - 1925:11 1926:11, 1926:15, 1926:19, 1927:9, 1928:7, 1928:16, 1929:2, 2000:15, 2000:17 photos - 1925:13, 1925:22, 1926:5, 1926:12, 1927:13, 1929:24, 1929:25, phrase - 1938:23, 938:24, 1939:9, 2011:23

picked - 1933:10, 1933:12 Pickett - 1917:10 picture - 1913:19. 1918:12, 1927:16, 1928:23, 1934:8, 1946:11, 2001:6, 2001:7, 2001:8, 2002:1 pictures - 1928:10. 1928:12, 1928:19, 1937:23, piece/part - 1908:15 pieces - 2006:18, 2006:21 Piedmont - 1982:9 piles - 2001:11 place - 1993:13 Plaintiff - 1903:5 Plaintiffs - 1903:13 Plaintiffs - 1903: 13 plan - 1910:13, 1913:21 plant - 1905:21, 1906:15, 1912:11, 1943:19, 1944:3, 1944:6, 1947:20, 1948:8, 1948:19, 1956:13, 1956:21, 1959:10, 1960:13, 1960:16, 1964:7, 1965:12, 1965:14, 1974:25, 1975:12, 1975:19, 1976:20, 1977:12, 1978:5, 1978:7, 1981:17, 1981:18, 1991:16, 2005:11, 2008:25, 2011:15 Plant - 1906:10, 1918:25, 1954:4, 1987:8, 1987:16 plants - 1973:22, 1975:23, 1977:9, 1977:12, 1980:17, 1981:8, 1981:9, 1981:12, 1981:14, 1981:15 play - 1933:19, 1935:22 playing - 1936:13 plus - 2002:3 Po - 1903:17 pocket - 2013:10 podium - 1952:19 podium - 1952:19 point - 1910:23, 1911:7, 1918:2, 1919:14, 1920:16, 1922:17, 1932:6, 1935:11, 1935:15, 1939:7, 1939:11, 1939:19, 1941:19, 1943:9, 1949:25, 1951:18, 1960:20, 1979:10, 1988:13, 1989:10, 1900:6, 2005:16, 2011:17, 2004:6, 2005:16, 2011:17, 2012:20 pointed - 1964:24, 1994:1 points - 1917:4, 1985:6 pompous - 1997:5, 1997:8 pompous - 1997:5, 1997:8 Poole - 1903:13, 1945:13, 1945:14, 1945:17, 1946:6, 1946:9, 1946:10, 1947:11, 1947:14, 1952:15, 1952:21, 1952:22, 1954:16, 1954:18, 1957:21, 1957:24, 1961:24, 1962:2, 1964:17, 1964:19, 1965:25, 1966:4, 1967:23, 1968:8, 1968:9, 1968:12, 1968:17, 1968:18, 1969:2, 1969:6, 1969:10, 1969:13, 1971:19, 1971:20, 1974:3, 1974:8, 1982:11, 1982:13 1983:18, 1984:19, 1986:15, 1986:19, 1987:5, 1988:21, 1986:19, 1987:5, 1988:21, 1988:24, 1989:1, 1991:22, 1992:1, 1993:22, 1993:24, 1996:10, 1996:13, 1998:23, 1999:2, 2000:9, 2000:12, 2000:13, 2007:10, 2007:17, 2007:25, 2008:12, 2009:9, 2008:12, 2009:12, 2009:12, 2009:12, 2009:12, 2009:12, 2009:12, 2009:12, 2009:12, 2008:12, 2009:12, 2008:12, 2009:14, 2010:11, 2011:6, 2013:5, 2015:6 pooled - 1909:15 popcorn - 1914:13, 1918:1, 1935:8, 1989:7, 1989:13, 1989:23, 1990:6, 1995:24

popcorn-type - 1914:13, 1918:1, 1935:8, 1989:7 portion - 1937:5 Portions - 1967:12 portions - 1913:9, 1932:6, 1936:14 ports - 1952:8, 1962:11, 1962:23, 1973:8, 1993:2, 1993:7, 2009:3 pose - 2001:14 posed - 1971:25 position - 1944:11 1994:7, 1994:8, 2007:5 positive - 1961:11 possible - 1914:20. 1966:7, 1984:6 possibly - 1944:24, 1981:21, 1987:9 postponed - 1963:3 potential - 1949:9 potentially - 2002:13, 2003:20, 2012:11 Power - 1984:1 power - 1944:16, 1948:8, 1975:19, 1976:2, 1991:16 Powerpoint - 1917:4, 1917:17, 1923:7 Pra - 1941:6, 1941:9 practice - 1908:25, 1909:2 Prasoon - 1954:3, 1954:15, 1954:21, 1957:19, 1962:5, 1963:11, 1963:13, 1964:20, 1966:5, 1978:1, 1992:16, 1995:12, 1995:13, 1996:1, 2004:10, 2008:6 preceded - 1954:11 preclude - 1985:3 precluded - 1909:14. 1941:14, 1986:24 preexisting - 1983:21 preference - 1933:12 prep - 1906:20, 1906:22, preparation - 1908:12, prepare - 1953:2 prepared - 1938:21, 988:9 preparing - 1906:17, 1926:6; 2011:12 prepped - 1906:19, 1930:23 preps - 1983:2 present - 1910:18, 1916:16, 1916:18, 1923:15, 1923:20, 1930:10, 1931:7, 1931:11, 1931:24, 1942:23 presentation - 1924:15, 1931:22, 1939:1, 1939:6, 1941:23, 1942:1, 1942:14, 1943:4, 1989:24, 1992:2 presentations - 1942:15 presented - 1910:3, 1910:4, 1917:16, 1917:17, 1918:17, 1918:21, 1919:11, 1924:15, 1924:18, 1930:5, 1943:1 presenters - 1916:23 presenting - 1917:20, 1918:2, 1924:1, 1930:17, 1940:1, 2012:6 president - 2005:25. 2010:10 pressure - 1947:1, 1947:2 pretty - 1907:5, 1915:17, 1916:6, 1937:9, 1950:9, 1975:5, 1977:19, 1980:14, 2005:15, 2005:18 prevent - 1935:25

prevented - 1947:20.

previous - 1910:1, 1911:12, 1920:9, 1927:2, 1927:8, 1946:4, 1963:19, 1968:2, 1983:22, 1991:8, 1999:10, 2001:12, 2001:19, 2002:1, 2013:20 Previously - 1946:9, 1957:21, 1964:17, 1971:19 previously - 1907:9, 1910:20, 1921:8, 1946:8, 1947:12, 1961:25, 1966:1, 1973:11, 1982:7, 1991:24, 1996:11, 1998:24, 2000:11 printing - 1928:10 pristine - 1915:23, 1949:13, 1949:18, 1956:2, 1957:9, 1960:6, 1960:10 probabilistic - 2012:6. 2012:19 probe - 1961:7, 1961:8 proble - 1961:7, 1961:8 problem - 1948:12, 1948:13, 1949:1, 1949:5, 1949:7, 1950:24, 1956:8, 1956:11, 1956:16, 1956:18, 1956:19, 1956:21, 1960:9, 1967:14, 1968:17, 1976:3, 1985:10, 2008:7, 2008:10, 2008:25 problems - 1981:18, 1981:19 procedure - 1963:21 Proceedings - 1904:9 proceedings - 2014:11 process - 1912:16, 1926:10, 1978:16, 1978:17, 1981:3, 2007:4 produce - 1963:20 produced - 1904:9, 1946:2 progression - 1937:2 Project - 1952:1, 1952:3, 1952:5, 1952:6, 1952:24 project - 1952:10 proposal - 1952:7, 1972:13, 1973:7 proves - 2002:11 provide - 1925:24, 1926:4, 1976:2, 2002:23, 2012:22 provided - 1910:21, 1912:4, 1912:6, 1921:9, 1924:9, 1924:11, 1926:19, 1942:5, 1991:5, 1992:14, 1998:19, 1999:20, 2000:1 providing - 1928:7, 2007:5 prudent - 1984:4 public - 1930:15 pull - 1960:20, 1961:4 pulled - 2005:4 pulling - 1933:25, 1960:24, 1961:5 purpose - 1920:6, 1922:24, 1922:25, 1923:14, 1928:7, 1948:23, 2005:7 purposes - 2001:17 push - 1932:15, 1933:5 push-around - 1932:15 pushed - 1933:19 pushing - 1933:4 put - 1907:8, 1911:15, 1911:21, 1913:22, 1917:3, 1924:24, 1926:12, 1933:9, 1933:13, 1933:14, 1933:17, 1936:2, 1936:9, 1936:12, 1937:10, 1958:21, 1964:6, 1975:13, 1976:19, 1977:21, 1979:1, 1979:10, 1979:22, 1980:4, 1980:5, 1994:22, 2000:20, 2007:1, 2007:12 putting - 1911:18, 1912:1, 1913:21, 1924:23, 1944:24,

2010:22

1948:9, 1960:23, 1988:6 Q qualified - 1949:18, qualified - 1949-16, 1949:21, 1950:1 quality - 1928:21, 1929:2, 1929:15, 1929:18, 1936:15, 1939:8, 1939:12, 1948:11 auestioned - 1989:2 questioning - 1943:17. questions - 1924:11 1934:23, 1935:10, 1935:18, 1938:17, 1938:18, 1940:5, 1945:14, 1954:13, 1973:13, 1986:20, 1999:6, 2006:10, 2006:11, 2006:13, 2007:18, 2009:7, 2010:13, 2013:5, 2013·8 quit - 2007:17 quite - 1983:6 R radiation - 1979:19 radiographs - 1950:7

radius - 1915:4 raised - 1946:15 ran - 2012:19, 2012:20 rate - 1910:15, 1920:15, 1920:17, 1939:2 ratifies - 2001:19 reactor - 1911:13 reactor - 1911:13, 1911:14, 1952:8, 1956:12, 1958:12, 1959:13, 1959:24, 1960:22, 1960:23, 1964:2, 1965:2, 1974:21, 1975:13, 1978:23, 1979:9, 1979:10, 1979:14, 1979:22, 1983:8, 1993:3, 1997:23, 1998:4, 1998:7, 2000:7 Reactor-1984:6 read - 1964:13, 1973:12, 1983:7, 1984:8, 1986:12, 2013:23 reads - 1997:3 realistic - 1949:24 realize - 1949:23, 1972:6, 1972:8 really - 1922:12, 1933:11, 1940:4, 1955:6, 1958:24, 1976:6, 1987:9, 1988:11, 2006:5 reason - 1907:23 1947:24, 1976:15, 1982:23, 1982:24, 2011:3 reasons - 1953:14 recap - 1959:9 receive - 1982:21 received - 1977:25 1982:15, 1982:20, 1992:23 receiving - 1982:19 Recent- 1974:1 Recess- 1968:7, 2014:4 recognize - 1907:13, 1907:16, 1917:13, 1917:15, 1923:5, 1929:11, 1942:13, 1964:21, 1970:16, 1971:21, 1974:9, 1982:8, 1992:2 recollection - 1907:19, 1909:3, 1929:14, 1941:2, 1962:16, 1962:21, 2004:10 recommendation -1959:7, 1959:19, 1961:16, 1961:17, 1961:22 reconsider - 1974:19, 2004:25 record - 1929:23, 2014:11 recorded - 1904:9

recordings - 1989:7, rectify - 1920:11 red - 1946:12 Redirect- 2007:19, 2007:23, 2015:7 reestablish - 1979:5. 1979:6 referring - 1909:18, 2004:8 reflect - 1942:2, 1942:25. 1999:8 reflecting - 1927:20 reflection - 1936:18 refresh - 1929:13 refueling - 1918:15, 1919:16, 1945:20, 1950:14, 1953:11, 1963:4, 1984:7, 1994:2 refused - 1934:18 regard - 1927:5 regard - 1927.3 regarding - 1905:8, 1974:16, 1992:15 regret - 1944:13, 1944:20 regrets - 1944:8, 1944:12 regulation - 1985:21, Regulatory- 1921:2 1954:11, 1966:24, 1982:1, 1984:11, 1988:19, 1991:2, 1991:19, 1999:14, 2000:2, reiterated - 1916:6 relate - 1923:13 related - 1948:14, 2006:14 relating - 1924:4 relatively - 1915:5 relaxation - 1978:16 relevant - 1999:5 reliability - 1910:7, 1921:22, 1922:18, 1940:17 reliable - 1967:6, 1967:9 relied - 1925:4 rely - 1991:16 relying - 1989:8, 1989:10 remain - 1934:8 remained - 1948:19 remember - 1907:4, remember - 1907:4, 1912:9, 1925:17, 1931:2, 1933:2, 1940:23, 1952:5, 1952:6, 1953:22, 1954:2, 1968:2, 1968:22, 1974:12, 1994:10, 2003:6, 2003:10, 2003:13, 2006:11, 2010:13, 2013:8, 2013:20 remind - 1950:4 Remind- 1982:15 remorse - 1944:20 remote - 1932:25, 1933:1, 1933.2 remove - 1975:12, 1979:13, 1983:23 removed - 1947:9 1947:22, 1948:22, 2001:13. 2003:4 removes - 1947:19 removing - 1948:4, 1960:22, 1983:22 repair - 1978:8, 1978:12, 1978:23, 1980:9, 1981:21, 1982:15 repaired - 1967:8 repairs - 1980:4 repeat - 1926:23 rephrase - 1956:15 replace - 1976:22 Report- 1947:4, 1947:7, 1947:9, 1947:15, 1948:3 report - 1955:23, 1956:3, 3, 1965:9, 1968:25

1982:9, 2002:15, 2009:13 Reporter- 1904:5 reporting - 1906:8, 2010:6 reports - 1968:20, 1977:25, 2008:1, 2008:3 Reports- 1946:2, 1946:4 representation - 1989:22, 1990:2, 1992:6, 1993:15, 2002-25 representations -1991:14, 1991:15 representative - 1925:22, 1925:25, 1926:5, 1926:16, 1927:10, 1927:14, 1955:8 represented - 1987:18 representing - 1973:21 request - 1925:10 requested - 1910:16, 1925:12, 1925:13, 1931:4 requesting - 1925:11 required - 1949:18, 1955:21, 1965:9, 1985:25 requirements - 1984:4, 1985-21 requires - 1959:24 reran - 2012:18 rescheduled - 1952:12 response - 1908:13. response - 1906113, 1923:15, 1924:7, 1954:2, 1964:21, 1968:21, 1969:15, 1970:23, 1974:19, 1981:25, 1983:13, 1983:19, 1984:21, 1985:6, 1986:2, 1987:17, 1992:14, 1992:24, 1997:9, 2004:25, 2006:24, 2010:7 responses - 1943:10, 1951:15 responsibility - 1946:15, 1970:3, 1970:24, 1971:1, 1997:10, 1997:19, 2007:5, 2007.7 responsible - 1908:17 responsible - 1906:17, 1908:18, 1951:9, 1951:19, 1971:5, 1971:7, 1971:9, 1984:12, 1984:24, 1988:3, 1988:6, 1991:11, 1996:16, 1996:23 rest - 1915:8, 1925:2 1930:19, 1932:1, 1937:8, 1940:2, 2003:2 restart - 1959:16 restate - 1926:21, 1984:17 restraint - 1947:10, 1947:19, 1947:22, 1947:24, 1948:5, 1948:6, 1948:19, 1948:22, 1948:23, 1950:13, 1950:16, 1950:17 restricted - 1983:25 result - 1910:24, 1941:4, 1948:3, 1955:21, 1964:3, 1965:1 results - 1910:12, 1919:24, 1922:8, 1925:4, 1925:7, 1991:4 retrospect - 1954:6 reveal - 2002:22 revealed - 2006:19 review - 1905:10, 1906:1, 1906:6, 1906:11, 1906:21, 1909:7, 1910:20, 1910:22, 1946:2, 1946:3, 1947:25, 1952:10, 1968:25, 1988:14, 1990:3, 1991:8, 1994:12, 1995:7, 1997:16, 2010:16, 2011:4 Review- 1941:24, 1952:2, 1952:3, 1952:5, 1952:6, 1952:24, 1970:20, 1999:11

reviewed - 1908:12, 1909:21, 1932:3, 1941:25

1947:25, 1952:10, 1953:2, 1970:4, 1970:7, 1970:10, 1987:12, 1987:15, 1987:16, 1988:9, 1988:11 reviewing - 1944:23, 1994:14 reviews - 1905:24 revise - 1920:25 revised - 1941:22, 2012:22 revisions - 1998:17. 2002:20 reweld - 1979:3, 1979:4 rewelding - 1978:15 rewind - 1934:6, 1934:17 rewinding - 1934:14 rewound - 1933:21, Rfo- 1918:5, 1924:22, 1924:23, 1925:3, 1941:12, 1949:10, 1949:11, 1952:13, 1983:8, 1985:15, 1987:12, 1995:25 Richard- 1903:13, 1903:21 rig - 1979:1, 1979:4, 1979:25 risk - 2012:7, 2012:19 Rmr- 1904:5, 2014:14 robotic - 1980:14 robotics - 1980:11 Rockville- 1917:1 role - 1905:10, 1946:1, 1997:6 room - 1917:2, 1932:10, 1932:13, 1937:9, 1940:3 roughly - 2013:17 Roy- 1920:23 run - 1961:7, 1976:17, 1976:18 running - 1932:3, 1940:24, 1976:21

safe - 1965:12, 1965:14, 1982:3 safety - 1944:5, 2006:14 safety-related - 2006:14 Sai - 1998:15, 2012:22 sample - 1926:5, 1926:16 sampling - 1925:21 sat - 1910:11, 1915:21 satisfy - 1971:12 **Saunders** - 1974:17, 2005:10, 2006:5 Saunders' - 2005:22, 2006:2 save - 2013:12 saw - 1939:21, 1942:16, 1946:11, 1977:14, 1983:7, 1995:20, 2009:5 scan - 1933:23 scenario - 1960:15 schedule - 1980:22, 1980:23 scheduled - 1930:14, 1932:1, 1948:4, 1982:4 screen - 1907:8, 1914:9, 1934:8, 1934:14, 2009:18 screening - 2002:3 second - 1916:12, 1929:5, 1929:13, 1932:24, 1944:24 section - 1908:1, 1966:19 sectional - 1978:22 sections - 1905:21 sections - 1905:21 see - 1907:10, 1909:10, 1914:19, 1918:14, 1936:19, 1942:19, 1942:21, 1961:17, 1970:7, 1970:13, 1972:1, 1972:10, 1972:13, 1976:3

sacrificed - 2013:12

1982:25, 2003:1, 2009:4, 2009:19, 2009:21, 2009:23, 2014:2 seeing - 1935:25, 1936:7, 1936:22 seem - 1929:22 selected - 1931:11 send - 1928:11, 1931:1 sending - 1925:14, 1939:25 sense - 1915:18, 1927:25, 1929:17, 1935:17, 2004:17, 2008:24 sent - 1937:23, 1938:20, 1940:12, 1963:11, 1968:20, 1968:21, 1986:3, 1991:2, 1991:8, 1992:24, 2007:3, 2008:19 sentence - 1924:21 1983:11, 2001:16, 2001:17, 2002:5 September - 1905:6, 1952:25, 1974:17, 2004:20, 2008:16 serial - 2000:5 **Serial** - 2000:14 **series** - 1930:14, 1954:10, 1968:20, 2006:9, 2013:5 served - 1995:8 service - 1952:8, 1953:9, 1953:19, 1953:19, 1954:6, 1960:23, 1962:7, 1962:8, 1963:8, 1963:14, 1963:22, 1972:14, 1973:8, 1983:25 Service - 1984:6 Services - 1969:25 session - 1917:6 set - 1907:5, 1911:25, 1917:9, 1917:10, 1931:18, 1981:11 setbacks - 1944:17 seven - 1926:23, 1951:13 several - 1942:15, 1973:21, 2005:8 severely - 1983:24 sheet - 1942:18 shelf - 1932:15 Sheron - 1974:14, 1974:15, 1974:17, 1974:18, 1975:3, 2004:20, 2004:23 shield - 1980:5 shiny - 1936:19 short - 1968:14 shoulder - 1927:3, 1932:8 show - 1910:4, 1913:9, 1914:1, 1917:11, 1919:3, 1923:4, 1923:9, 1929:9, 1930:1, 1931:19, 1937:4, 1937:8, 1942:11, 1942:18, 1953:5, 1978:21, 1982:6, 1998:23, 1999:3, 2001:5, 2009:12 showed - 1914:8, 1914:21. 1914:22, 1914:24, 1937:5, 1939:21 showing - 1934:20, 1935:24, 1937:18, 1940:22, 1958:15 shown - 1933:7, 2008:12, 2009:9 shows - 2001:25 shut - 1975:8, 1977:6, 1977:18, 1980:8, 1981:17, 1982:2, 2005:1, 2013:7 Shut - 1975:12 shuts - 1975:19, 1978:5 shutting - 1974:20, 1975:4 Sia - 1940:24, 2002:15 Sia's - 1941:17 sic - 1943:16

side - 1907:1, 1914:11, 1914:25, 1915:4, 1915:6, 1915:8, 1915:13, 1943:3 sides - 1915:14 sidetracked - 1939:7 Siemaszko - 1909:4, 1911:10, 1916:1, 1917:6 1911:10, 1916:1, 1917:6, 1918:3, 1921:21, 1923:23, 1931:15, 1939:12, 1939:25, 1944:25, 1951:11, 1951:19, 1954:22, 1987:3, 1987:9, 1988:9, 1989:11, 1990:2, 1991:5, 1991:10, 1993:2, 1991:5, 1991:10, 1993:2, 1991:5, 1991:10, 1993:2, 1991:5, 1991:10, 1993:2, 1991:5, 1991:10, 1993:2, 1991:5, 1991:10, 1993:2, 1991:5, 1991:10, 1993:2, 1991:5, 1991:10, 1993:2, 1991:5, 1991:10, 1993:2, 1991:5, 1991:10, 1993:2, 1991:5, 1991:10, 1993:2, 1991:10, 1993:2, 1991:10, 1993:2, 1991:10, 1993:2, 1991:10, 1993:2, 1991:10, 1993:2, 1991:10, 1993:2, 1991:10, 1993:2, 1991:10, 1993:2, 1991:10, 1993:2, 1991:10, 1993:2, 1991:10, 1993:2, 1991:10, 1993:2, 1991:10, 1993:2, 1991:10, 1993:2, 1991:10, 1 2000:15, 2000:21, 2001:3 Siemaszko's - 1921:22, 1922:4, 1922:10 sign - 1905:13, 1996:19 sign - 1905:13, 1996:19 signature - 1970:14 signed - 1905:18, 1905:24, 1906:5, 1906:8, 1947:17, 1959:20, 1959:22, 1960:12, 1966:24, 1969:14, 1969:24, 1971:4, 1971:22, 1972:21, 1972:22, 1972:24, 1983:13, 1984:10, 1984:21, 1985:6, 1996:6, 1996:8, 1996:9, 1996:14 signers - 1968:24 significant - 1958:24, signing - 1970:2 signs - 1909:16, 1909:17, 1914:15, 1914:19, 1986:25, 1997.4 similar - 1924:18, 1942:15, 1977:12 simply - 1935:14 single - 1945:1, 1977:16, 2004:14 sit - 1931:25, 1944:8, 1980:23, 1983:4 site - 2005:25 sitting - 1913:5, 1982:18, 2003:17 situation - 1938:21 six - 1907:6 slide - 1917:13, 1917:15, 1918:6, 1918:17, 1918:24, 1923:5, 1923:21, 1924:1, 1924:4, 1924:14, 1924:15, 1924:18, 1924:24, 1942:11 1942:13, 1942:15, 1942:23, 1995:7 slides - 1916:18, 1916:21, 1917:3, 1917:16, 1923:12, 1923:19, 1991:24 slow/fast - 1933:23 small - 1954:25, 1955:1, 1955:11 snapshots - 1925:25 snowdrift - 1915:9 solution - 1948:12 solve - 1985:10 someone - 1948:21 Sometime - 1982:22 sometimes - 1940:15 somewhat - 2005:9 somewhere - 1976:21. 2013:18 soon - 1920:13, 1984:6 sorry - 1911:5, 1913:4, 1926:21, 1929:4, 1950:20, 1956:12, 1956:17, 1960:1, 1962:14, 1963:14, 1972:6, 1972:8, 1972:23, 1976:11, 1979:16, 1981:19, 1986:2, 2004:13, 2004:14, 2007:12, 2007:16 Sorry - 1968:15 sort - 1930:25, 1938:9

1978:22, 1991:15, 1994:19, 2004:24, 2005:16 sought - 1980:9 sound - 1921:6, 1997:5 sounded - 1905:22 sounds - 1970:7, 1971:10, 1987:13 Sounds - 1970:10 source - 1939:17 sources - 1910:7 space - 1913:22 speaking - 1908:7, 1917:4, special - 1906:2 specific - 1907:19. 1910:23, 1918:25, 1935:9, 1935:11, 1994:18, 1997:8 1935:11, 1994:18, 1997:8 specifically - 1911:23, 1914:12, 1922:22, 1925:12, 1930:10, 1942:17, 1981:11, 1997:17, 2001:1, 2011:21 Specifically - 1947:4 speed - 1934:12 spent - 1944:15, 1944:23 Spielbusch - 1904:5 Spm - 1969:23 spoken - 1927:22, 2011:9, sponsor - 1954:1 sponsored - 1954:3 Spore - 1904:5, 2014:14 spring - 1911:17, 1975:24, 1980:3 square - 1932:12 staff - 1905:23, 1922:25, 1923:2, 1933:11, 1934:4, 1936:14, 1935:17, 1934:4, 1934:16, 1935:4, 1935:17, 1936:14, 1938:12, 1991:20 stand - 1918:13, 1944:12, 1960:24, 1975:13, 1979:10, 1979:17, 1979:18, 1980:21, 2003:13, 2004:11, 2004:14 standard - 1971:10 standing - 1980:24 standpoint - 1939:16, 1941:6, 1952:13, 2001:15, 2012:15 start - 1920:19, 1932:3, 1933:11, 1945:20, 1960:24, 1976:5, 1976:6, 1978:9, 2005:16 started - 1912:2, 1914:3, 1948:20, 1956:16, 2006:8, 2007:25 starting - 1920:16, 1947:20, 1976:2 state - 1967:9, 1981:14 statement - 1949:15. statement - 1949:115, 1950:25, 1962:14, 1967:13, 1975:6, 1977:10, 1981:16, 1995:23, 1996:2, 1996:25, 2001:24, 2003:3, 2011:17 **statements** - 1945:9, 1987:2, 2010:7 States - 1903:1, 1903:4, 1903:11 stating - 1973:14, 1992:17 station - 2010:15 staying - 1916:25 steam - 1946:21, 1946:23, 1946:24, 1946:25 Steering - 1955:8, 1958:9, 1978:19, 1980:2, 1980:16 stenography - 1904:9 step - 1913:23, 2013:16 steps - 1975:9 Steps - 1975:9 Steve - 1905:17, 1907:2, 1907:3, 1910:13, 1916:2, 1916:5, 1919:17, 1922:17, 1931:9, 2005:4

sticking - 1979:7 still - 1948:20, 1975:21, 2012:15 **stop** - 1913:20, 1934:5, 1934:6, 1939:17, 1987:1, 2012:16 stop-it-on-a-dime -1913:20 stopped - 1905:5, 1912:20, 1912:25, 1913:3 streaking - 1914:15, 1914:17 streams - 1909:18 Street - 1903:22, 1904:3 stress - 1978:16 strong - 1940:15, 1963:13, 1989:20, 1989:21, 1990:5 strongly - 1974:19 structural - 1919:2 1953:19 Structural - 1919:7. 1940:21 Structure - 1984:6 structure - 1952:8, 1953:9, 1954:7, 1960:23, 1962:7, 1962:9, 1963:8, 1963:14, 1963:22, 1972:14, 1973:8, 1983:25 studs - 1979:13 stuff - 1914:23, 1930:25, 1932:13, 1934:25, 1978:19, 2002:4 stupid - 1938:17 style - 1957:1 Subject - 1999:4 subject - 1974:1, 2000:2 submission - 1921:3, 1929:11, 1954:11, 1996:24 submittal - 1920:9, 1928:11, 1929:4, 1937:1, 1985:24, 1994:22 submitted - 1927:25 1966:24, 1996:3, 2013:25 submitting - 1928:1 substance - 1921:25 substantial - 1990:21 successful - 2010:18, 2010:23 **succession - 1992:16** sufficient - 1919:5, 1986:13 suggest - 1967:23, 1997:8 suggested - 2009:14 suggesting - 1974:19 Suite - 1903:21, 1904:2 sum - 2011:14 summary - 1987:22, 1988:5, 1988:9 summer - 1975:25. 1980:12 superiors - 1943:20 supervisor - 1908:16, 1908:22, 1940:13 supervisors - 1909:1, 1909:2 supplied - 2000:17 support - 1916:24 Suppose - 1994:23 supposed - 1936:4, 2007:14 surface - 1998:4 surfaces - 1928:24 surprise - 1936:25, 2004:4 surprised - 1919:23, 2004:7 susceptibility - 1981:12 Susceptible - 1978:5 susceptible - 1958:20, Swim - 2008:9

switch - 1907:10 system - 1911:13, 1911:14 Systems - 1908:16

T

tabbed - 1971:24, 1999:5 table - 1907:5, 1910:16, 1910:17, 1910:18, 1910:24, 1911:11, 1912:3, 1918:3, 1919:14, 1919:21, 1920:17, 1921:15, 1994:22 tables - 1932:13 tail - 1983:10 tape - 1933:7, 1933:13, 1933:14, 1933:17, 1933:19, 1933:20, 1933:21, 1934:7, 1934:14, 1934:17, 1934:21, 1935:21, 1935:25, 1935 1936:6, 1936:9, 1936:12, 1936:23, 1937:4, 1937:8, 1937:10, 1937:19, 1937:21, 1937:10, 1937:19, 1937:21, 1939:18, 1993:17, 1994:9 tapes - 1909:20, 1911:18, 1911:21, 1911:22, 1911:25, 1913:9, 1913:10, 1913:11, 1913:15, 1920:19, 1929:18, 1931:24, 1931:25, 1931:25, 1931:24, 1931:25, 1931:24, 1931:25 1931:19, 1931:24, 1931:26 1932:3, 1932:4, 1932:5, 1932:17, 1934:3, 1937:25, 1938:2, 1938:20, 1938:22, 1939:4, 1939:8, 1990:3, 1993:13 tasked - 1997:17 tasks - 1910:14 team - 1910:10, 1917:2, 1930:20, 1930:21, 1931:15, 1939:24, 1940:2 teammates - 1938:19 tech - 1917:17 Technical - 1969:24 technical - 1916:10, 1916:14, 1918:17, 1970:23, 1971:1, 1971:7, 1971:9, 1984:11, 1984:24, 1988:18, 1990:9, 1996:24, 1997:4, 1997:9 technically - 2011.4 technique - 1950:11 techniques - 2000:23 technology - 1961:9, 1980:9, 1993:18 teleconference - 1906:14, 1906:15, 1906:23, 1907:18, 1981:11 temper - 1978:16 temperature - 1997:24 terms - 1929:18 testified - 1913:13, 1932:24, 1946:11, 1982:10, 1988:2, 1988:8, 1988:12, 1988:17, 1989:5, 1995:13, 2000:5, 2001:6 testifying - 1940:20, 1945:21 testimony - 1953:3 1955:5, 1959:9, 1962:10, 1962:18, 1962:21, 1967:17, 1970:2, 1982:18, 1982:23, 1990:13, 1997:22, 1999:18, 2006:9 testing - 1950:6 text - 1923:11, 1923:12, 1924:17, 2009:19, 2009:21, 2009:23 Theo- 2008:9 therefore - 1927:16. 1998:12, 2001:14

thinking - 1977:20, 1977:22, 2009:9

third - 1918:24, 1964:23 Thomas- 1903:16 thorough - 1915:17, 1949:3, 1967:18 threat - 2001:14 Three-1944:17 three - 1926:17, 1929:1, 1966:23, 1977:12 throughout - 2007:4 thrust - 1971:4 time-consuming - 1981:2 timeframe - 1905:7 title - 2005:22 Today- 1963:9 today - 1944:8, 1949:24, 1967:17, 1970:6, 1980:24, 1982:18, 1986:11, 2003:17, 2003:22 together - 1911:15. 1917:3, 1948:9, 1979:13, 1988-7 Toledo- 1903:5, 1904:6 took - 1938:1, 1967:11, 1968:19, 1994:20, 2005:15 Tooling- 1981:19 **top** - 1932:14, 1941:11, 1958:11, 1977:15, 1983:20, 1983:24, 1997:23, 1998:7, 2001:11, 2012:8 topic - 1908:8, 1916:13 tornado - 1959:10, 1960:16 total - 2011:14 totsy - 1946:24 touching - 2013:23 towards - 1909:23 Tracy- 1904:5, 2014:14 Transcript- 1903:10 transcript - 1904:9, 2014:10 transmit - 1938:10 travel - 1930:19, 1930:22 travelled - 1930:21 trees - 1995:1 Trial- 1903:6, 1903:10 trial - 1932:25, 1952:9 tried - 1913:17 **trip** - 1955:23, 1956:3, 1959:8, 1962:3, 1968:20, 1977:25, 2008:1, 2008:3 tripped - 1960:13 trips - 1960:16 trouble - 1985:14, 2012:17 true - 1949:15, 1950:25, 1957:10, 1957:13, 1958:16, 1965:7, 1989:19, 1995:23, 1996:2, 1998:9, 2002:16, truth - 1942:7, 1943:25 try - 1909:1, 1918:12, 1944:25, 1981:25, 2013:1 trying - 1912:9, 1914:19, 1939:6, 1959:15, 1981:10, 1993:10, 1993:14 tube - 1915:9, 1935:7 tubes - 1909:19, 1914:16 Tuesday- 1906:19 tumbled - 1915:8 turbine - 1976:9, 1976:12 turn - 1916:12, 1923:19, 1954:12 turned - 1954:7 Tv- 1932:14, 1932:23, Twice- 1905:14 two - 1910:14, 1911:2, 1911:4, 1912:16, 1915:13, 1915:14, 1918:12, 1924:3, 1924:14, 1930:17, 1959:1, 1966:23, 1973:20, 1983:5

type - 1913:20, 1914:13, 1915:10, 1918:1, 1932:14, 1935:8, 1936:13, 1989:7 typed - 1918:7

u

ultimate - 1968:5, 2013:24 ultrasonic - 1950:6 under - 1917:18, 1959:16, 1979:14, 1979:15 Undergoing - 1981:20 underneath - 1925:6, 1932:16, 1979:1, 1979:21, 1979:22, 1980:4 understandable - 1985:19 undetected - 1998:12 uninspectable - 1998:10 unit - 1976:9, 1976:10, 1976:11 United - 1903:1, 1903:4. 1903:11 units - 1976:2, 1976:6, 1976:11, 1976:16, 1976:22 unless - 1942:16, 1948:21 Unless - 1976:24 untrue - 1942:6 up - 1905:25, 1907:5 1907:8, 1910:12, 1913:1, 1913:2, 1913:24, 1914:11, 1918:8, 1919:4, 1919:5, 1923:2, 1923:7, 1925:6, 1926:2, 1931:10, 1932:6, 1934:8, 1940:22, 1941:8, 1941:13, 1941:14, 1941:18, 1942:3, 1944:6, 1945:1, 1947:20, 1948:20, 1949:23, 1968:4, 1969:7, 1972:24, 1976:1, 1976:6, 1976:15, 1978:14, 1978:25, 1979:1, 1980:6, 1981:11, 1984:20, 1986:7, 1987:17, 1990:10, 1994:21, 1998:16, 1998:18 1998:20, 1998:21, 1999:9, 1999:12, 2001:22, 2001:25, 2002:8, 2002:11, 2002:15 2002:17, 2009:18, 2011:25 2012:11, 2012:13, 2013:24 uphill - 1915:6, 1915:8

V

upside - 1914:25 urgent - 1974:2, 1974:24, 2008:13, 2008:15, 2008:21

utility - 2004:24

Vague - 1928:5
Vaguely - 2003:8
validity - 1941:9
various - 1927:5, 1934:24
Vcr - 1932:15, 1933:3,
1933:4, 1933:6
verbiage - 1921:10,
1925:2
verdict - 2014:1
verified - 1989:6, 1989:12,
1989:19, 1989:23, 1990:6,
1995:24, 2001:13, 2003:4,
2003:25, 2004:11, 2004:15,
2011:20
verify - 1905:22, 1906:7,
1922:3, 1922:5, 2003:9
verifying - 1918:1
version - 2012:18
versus - 1915:9, 1928:15
vessel - 1952:8, 1958:12,
1959:13, 1959:24, 1964:2,
1965:2, 1974:21, 1975:13,
1978:23, 1979:9, 1979:23,
1983:8, 1993:3, 1997:24,

Vhs - 1913:14, 1913:18, 1932:8, 1932:17, 1939:18 vice - 2005:25, 2010:10 vice-president - 2005:25. 2010:10 vicinity - 2001:11 video - 1913:10, 1913:11, 1915:24, 1917:25, 1925:3, 1926:15, 1932:7, 1934:1, 1929:15, 1932:7, 1934:1, 1936:15, 1987:13, 1989:7, 1989:13, 1994:17, 1994:19, 1994:24, 1995:2, 1997:16 videos - 1909:7, 1914:1, 1930:11, 1939:13, 1987:12 videotape - 1910:20, 1936:2, 1987:19, 1994:13 videotapes - 1910:22 1925:11, 1930:6, 1931:8, 1931:13, 1939:21, 1940:1, 1943:7, 1987:12, 1987:15, 1987:17, 1991:8 videotapes-reviewed -1987:12 view - 1911:22, 1915:13, 1936:17, 1950:19, 1967:3, 1987:19 viewed - 1950:19, 1985:11, 1985:14, 1990:22, 2007:5, 2007:6 viewer(s - 1970:22 viewpoint - 1949:24 visual - 1919:6, 1949:13, 1949:18, 1949:21, 1949:22, 1950:2, 1950:10, 1950:12, 1950:2, 1950:10, 1950:12, 1950:14, 1955:1, 1955:2, 1960:6, 1975:15, 1983:20, 1984:4, 1985:4, 1986:3, 1986:12, 1995:7, 1998:3, 1998:10 visualizing - 1949:21 visually - 1960:4, 1960:17 Volume - 1903:9 W

1998:4, 1998:7, 2000:7

1994:24 warned - 1959:23 warning - 1956:5, 1957:14, 1958:19, 1963:6, 1963:8, 1963:11, 1964:13, 1965:4, 1965:6, 1965:21, 1967:2, 1967:3, 1983:12, 2008:7, 2008:10 Warning - 2008:13 warnings - 2008:2, 2008:3 washer - 1947:1, 1947:2 Washington - 1903:15, 1903:18, 1903:22, 1904:3, 1906:16, 1916:25, 1930:10, 1930:13, 1930:19 watch - 1931:25, 2013:23 watched - 1933:19, 1937:21 water - 1946:22, 1946:25, 1947:2, 2010:19 weak - 1989:20 Wednesday - 1906:19 week - 1912:15, 1919:13, 1982:4, 1983:5 weeks - 1966:23, 1983:5 weep - 1972:18 weld - 1978:11, 1978:12, 1978:13, 1978:15, 1979:4, 1979.5 welding - 1980:1 Western - 1903:2 wet - 2001:14, 2003:5

walked - 1913:24, 1915:22

wandering - 1994:23,

2003:10, 2004:1, 2004:12, 2011:21 whereas - 1924:23, 1928:20 white - 1928:20 whole - 1909:13, 1923:6, 1935:23, 1942:16, 1943:24, 1956:15, 1963:22 willing - 1993:14 winter - 1976:1 Wise- 1903:20, 1905:4, 1907:10, 1907:12, 1929:5, 1929:7, 1929:23, 1930:4, 1945:11, 1957:19, 1959:3, 1974:5, 1983:16, 1984:15, 1986:20, 1987:4, 1989:3, 1990:1, 1993:25, 2007:9, 20 2007:8, 2007:20, 2007:24, 2013:15, 2015:4, 2015:8 wish - 1944:22, 1944:23, 1958:21, 1967:4, 1983:17, 2008:5 witness - 1930:16, 1969:6. 1982:6, 1998:23 Witness - 1969:9, 1984:17, 2007:15 word - 1917:18, 1918:5, 1918:6, 1922:5, 1941:17, 2009:19, 2009:21, 2009:23, 2012:16 words - 1989:15, 1989:17, 1989:18, 1990:17, 1990:19 works - 1933:14 worried - 1936:6 worse - 1928:25, 1929:25, 1937:13, 1937:16 worth - 1946:4 worthless - 1938:22 worthwhile - 1934:2 write - 1927:9, 1927:15 writing - 1926:25, 1981:7, 1987:17, 2011:20 written - 1946:3, 1951:4, 1959:16, 1961:16, 1982:25 wrote - 1926:18, 1927:23, 1950:22, 1950:24, 1985:15, 2002:14

$\overline{\mathbf{v}}$

year - 1914:4, 1954:7, 1974:20, 1975:5, 1975:22, 1981:17, 1982:2, 2005:1, 2009:10 years - 1911:6, 1944:15, 1951:13 yell - 1978:25 yesterday - 1905:5, 1911:20, 1915:23, 1962:19, 1967:13, 1970:2, 1999:23, 2006:9 York - 1903:14 yourself - 1909:7, 1941:3, 1971:12, 1996:21 yourselves - 1968:3, 2013:21