

BCE
8/30

To: Human Factors Group

FROM: George Frampton *G*

Burns & Roe will make Messrs. Gottila and Nardone available for deposition Wednesday, September 12. They prefer that if it's going to be done "formally," it be done with a court reporter rather than a tape recorder.

Both gentlemen were deposed by the Pres. Commission. Gottilla's Deposition is about 250 pages long. Nardone, the project manager, gave a much shorter deposition. He knows little about details of how the CR was designed or whether human factors engineering was applied. Our interview will be primarily with Gottila; they will have Nardone available.

I think it is essential that we do this interview only once. Therefore, we do not want to limit ourselves to the question of whether human factors engineering was brought into play, yes or no. We want to find out everything we can about how this CR was designed, what role various companies and individuals played, the extent to which the utility's desire to have the design look like Unit 1, or like fossil fuel boards, or like something else, came into play, to what extent B&R or Met Ed simply wanted to copy or rely upon ~~previous~~ prior designs, etc. Therefore, people from our group should accompany the Essex people and participate in the interview.

We should have the Gottila and Nardone transcripts next Tuesday; these should be meticulously reviewed immediately by everybody who is going to have an input into this interview; also, the Stevens (B&W) and Williams (GPU) depositions *Costanes (B&W)* which we already have, should be thoroughly digested as a basis for the Gottila interview.

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My thought is that this interview should be done on the record (with a court reporter) by the Essex and Human Factors Group, but without an attorney.