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# Transcript of Proceedings

NUCLEAR REGULATORY COMMISSION

TMI SPECIAL INQUIRY GROUP

INTERVIEW OF WILLIAM CAVANAUGH PART I

(THIS TRANSCRIPT WAS PREPARED FROM A TAPE RECORDING)

PLACE: Little Rock, Arkansas

DATE: Tuesday, 27 November 1979

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TMI SPECIAL INQUIRY GROUP

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Little Rock, Arkansas

Tuesday, 27 November 1979

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NRCmte 1 Herr VOICE: Okay, we can get started.

2 Today is November 27, 1979. It is 9:06, and we  
3 are in the conference room on the eighth floor of the  
4 Arkansas Power & Light offices in Little Rock, Arkansas.

5 Present for this interview are Mr. William  
6 Cavanaugh, Vice President, Generation and Construction,  
7 Arkansas Power & Light, and Stephen Riggs, of House, Holmes,  
8 and Jewell, representing Arkansas Power & Light. Present  
9 from the Special Inquiry Group are James Creswell and  
10 Frederick Hurr.

11 Mr. Cavanaugh, we have given you a copy of a  
12 document entitled "NRC Special Inquiry Group Witness  
13 Notification." Have you read the document?

14 Cavanaugh VOICE: Yes, I have.

15 Herr VOICE: Do you understand the information  
16 contained in it?

17 Cavanaugh VOICE: Yes.

18 Herr VOICE: Okay. Mr. Cavanaugh, we could start with  
19 -- maybe you could give us a brief history of your  
20 nuclear-related education and experience up to the present  
21 time.

22 Cavanaugh VOICE: Well, let's see. Related to nuclear, my  
23 experience goes back to 1962, I believe it was, when I was  
24 selected to -- while in the Navy as a naval officer, I was  
25 selected to go into the Naval Nuclear Power Program.

NRCmte 1 Basically, from that point until 1969 I was in the naval  
2 nuclear program, qualified as a chief engineer on the S5W  
3 naval nuclear plant. And 1969 to the present I have been  
4 with -- I have been with Arkansas Power & Light and involved  
5 with its nuclear program in various capacities.

6 Creswell VOICE: This is Jim Creswell speaking.

7 Mr. Cavanaugh, I believe you told us that you are  
8 presently Vice President, Generation and Construction. How  
9 long have you served in that capacity?

10 Cavanaugh VOICE: Since January of this year.

11 Creswell VOICE: Jim Creswell again.

12 What are your responsibilities in that position?

13 Cavanaugh VOICE: Well, my responsibilities in generation  
14 and construction are basically over six departments. We  
15 have a generation operations department which has in it both  
16 the fossil and the nuclear operations, as well as the  
17 maintenance.

18 The next department is the project management  
19 department, which has responsibility at the present time for  
20 three of our fossil projects.

21 The next department is the generation engineering,  
22 which has the various disciplines in it responsible for  
23 providing the various engineering support for both the  
24 operating plants as well as the projects.

25 We have a (Inau'ible) environmental services

NRCmte 1 department, which has in it quality assurance, nuclear fuel  
2 management, licensing, and technical analysis, which is  
3 basically chemistry and the environmental support.

4 A generation technology department, that has in it  
5 availability engineering, plant performance evaluation, and  
6 generation research and development.

7 The last department is administrative services and  
8 project support, which provides contract administration,  
9 administrative services, planning and scheduling, cost  
10 control and training, generation training.

11 Creswell VOICE: Jim Creswell again.

12 In your present position, how do you interface  
13 with the vendor for your Arkansas Nuclear Plant Unit 1, B&W,  
14 Babcock & Wilcox?

15 Cavanaugh VOICE: Well, I am not the key interface with  
16 Babcock & Wilcox. We have interfaces with B&W through our  
17 licensing section, through our nuclear operations section,  
18 of course Arkansas Nuclear 1 itself. And there may be an  
19 occasional interface -- well, the fuel management section  
20 would have interface. And then there may be occasional  
21 interface with the other groups.

22 Creswell VOICE: Mr. Cavanaugh -- Jim Creswell speaking --  
23 who do you report to in the Arkansas Power & Light  
24 organization?

25 Cavanaugh VOICE: I report to the president and chief

NRCmte 1 executive officer, Mr. Gerry Malden.

2 Creswell VOICE: I see. Now, I believe you said in January  
3 1978 you started serving in your present capacity.

4 Cavanaugh VOICE: January '79.

5 Creswell VOICE: January '79. Excuse me.

6 Prior to that time, what was your position with  
7 the company?

8 Cavanaugh VOICE: Prior to that time, I was executive  
9 director of generation construction, having been appointed  
10 to that position in August of '77.

11 Creswell VOICE: In the time period of approximately August  
12 of 1974 until May of 1975, what would your position have  
13 been with Arkansas Power & Light?

14 Cavanaugh VOICE: Manager of nuclear services, primarily --  
15 at that time, the organization that was set up to support  
16 the operating plant, as well as continue the support and  
17 management of the Arkansas Unit 2, Arkansas Nuclear 1, Unit  
18 2 Project.

19 Creswell VOICE: Okay. What were your primary  
20 responsibilities in your position at that time as manager of  
21 nuclear operations?

22 Cavanaugh VOICE: Well, at that time I had the  
23 responsibility for the technical support of Arkansas Nuclear  
24 1, Unit 1 and 2. I had under me a licensing group, fuel  
25 management group. In the project group, we had the

NRCmte 1 mechanical and electrical groups that were supporting  
2 primarily Unit 1 and Unit 2. Let's see.

3 I believe that those were the key elements of that  
4 organization at that time.

5 Creswell VOICE: What responsibilities did you have for  
6 interfacing with Babcock & Wilcox Company at that point in  
7 time?

8 Cavanaugh VOICE: Well, at that time I was -- I was one of  
9 the key interfaces with B&W on items related to the support  
10 -- at that time, let's see, '74? Unit 1 was still in  
11 startup testing, and so as a result I was a key interface  
12 with B&W on the project that was still in effect at that  
13 time. And of course, Unit 1 went commercial December '74,  
14 and we then continued -- I continued my involvement as an  
15 interface with B&W through -- you said May of '75?

16 Creswell VOICE: Yes.

17 Cavanaugh VOICE: Through that time. Where I was the key  
18 contact. Of course, there were other contacts with B&W from  
19 our company.

20 Creswell VOICE: Would it be a fair characterization that,  
21 regarding technical issues that developed during startup  
22 testing of Unit 1, that you would have been the primary  
23 interface with Babcock & Wilcox Company?

24 Cavanaugh VOICE: No, not necessarily. B&W had on site a  
25 startup support group, and really the key interface

NRCmte 1 related to the test program was between the plant staff and  
2 the B&W support group on site.

3 Creswell VOICE: Was that centralized in any one  
4 individual, that contact with B&W?

5 Cavanaugh VOICE: AP&L's contact?

6 Creswell VOICE: Yes.

7 Cavanaugh VOICE: Well, of course, the plant -- I guess we  
8 would call him the plant superintendent at that time would  
9 have been the contact. But of course, he also, for  
10 instance, had representatives. We had a test working  
11 group. There were AP&L and B&W people on that, as well as  
12 probably Bechtel.

13 Creswell VOICE: Well, I still don't quite understand. Is  
14 it a picture of anyone on the staff contacting B&W regarding  
15 issues that would develop, or was there a management control  
16 over it?

17 Cavanaugh VOICE: Well, of course, it all funneled. On the  
18 plant staff, it funneled to the plant superintendent. He  
19 was then -- of course, he delegated various responsibilities  
20 to members of his staff. And of course, he was the key  
21 individual.

22 Creswell VOICE: At what point would you have become  
23 involved in these communications?

24 Cavanaugh VOICE: I would become involved if there was,  
25 let's say, an item that could not be resolved, an item that



NRCmte 1 I had to have interface through the Little Rock support  
2 group to B&W.

3 Creswell VOICE: Okay. If I understand what you're saying,  
4 if there was an issue that arose during the testing program  
5 at ANO-1 that the plant superintendent could not resolve in  
6 discussions with site B&W personnel, that issue would be  
7 followed -- would be forwarded to you for further  
8 resolution?

9 Cavanaugh VOICE: That's correct.

10 Creswell VOICE: Okay. Who did you report to?

11 Cavanaugh VOICE: At that time I reported to the director of  
12 power production.

13 Creswell VOICE: When I say report to at that time, that is  
14 from approximately August of 1974 to May of 1975. And your  
15 --

16 Cavanaugh VOICE: Director of power production.

17 Creswell VOICE: Who was he?

18 Cavanaugh VOICE: Mr. James H. Woodward.

19 Creswell VOICE: Mr. Woodward.

20 (Pause.)

21 Creswell VOICE: Mr. Cavanaugh, now I'd like for you to, if  
22 you would, describe any pressurizer level problems that  
23 you're aware of that occurred at Arkansas Nuclear One,  
24 starting as far back as you knew it could be a problem.

25 Cavanaugh VOICE: Well, I think the one that became

NRCmte 1 evident and caused us to have extensive discussions with B&W  
2 occurred in, I believe, in the fall of '74, subsequent to  
3 some reactor trips, where we lost pressurizer level  
4 indication for a short period of time. And of course, we,  
5 as a follow-up to that, had extensive discussions with B&W  
6 related to why, of course, we were losing level, what was  
7 different about Arkansas Nuclear One than previous -- I say  
8 "previous"; previous B&W plants that had gone into  
9 commercial operation; and was in fact there an unreviewed  
10 safety question involved here.

11           These I believe first occurred in the fall of  
12 '74.

13 Creswell    VOICE: How was the problem resolved?

14 Cavanaugh   VOICE: Well, the problem was finally resolved  
15 with some basic operating -- to the best of my recollection,  
16 it was resolved primarily with, one, to establish that there  
17 was not a safety, unreviewed safety question, and this was  
18 demonstrated at a point in time in these discussions by  
19 B&W, who had done some extensive analyses and comparisons to  
20 other plants and similar trips and plant characteristics  
21 after the trip.

22           It was also resolved from the standpoint of  
23 maintaining pressurizer level indication within the  
24 indicating bend by changes basically in our operation and in  
25 our control systems.

NRCmte 1 Q VOICE: Okay. Was this issue resolved to your  
2 satisfaction?

3 Cavanaugh VOICE: Yes, it was resolved to our satisfaction  
4 and it took a while to be resolved, but yes, it was resolved  
5 to our satisfaction.

6 Creswell VOICE: This is Jim Creswell speaking again.

7 Mr. Cavanaugh, I'm going to show you a document  
8 here. This document is a memorandum to a Mr. Oles with the  
9 Babcock & Wilcox Corporation, who was a senior project  
10 manager at that time. The subject is Arkansas Nuclear Unit  
11 1, pressurizer level set point. And this memo was  
12 apparently from you to Mr. Oles. Would you take a look at  
13 it to refresh your memory?

14 (Pause.)

15 Cavanaugh VOICE: Yes, sir.

16 Creswell VOICE: In this memorandum, you note that in  
17 another letter -- this was a letter of J. Kaylin to  
18 J. Anderson, dated September 26th, 1974 -- that a request  
19 had been made that the operating procedures at ANO-1 be  
20 modified to increase the normal operating pressurizer level  
21 from 180 inches to 210 inches.

22 You point out that if this change is made, that  
23 some operating experience at TMI-1 has shown that, with the  
24 level increases being experienced during a transient there,  
25 that you might lose pressurizer level indication high. You

NRCmte 1 further state that you cannot implement the change until  
2 further justification and resolution of the following  
3 comments is provided. Those comments are:

4 That no analysis has been provided to AP&L to  
5 verify that this change will not cause the pressurizer to  
6 fill solid, resulting in loss of level indication  
7 (Inaudible) without reactor trip;

8 Two, no analysis results have been provided which  
9 indicate the accident analysis contained in the FSAR would  
10 not be affected;

11 Three, by basing the recommendation on a transient  
12 including one turbine bypass valve partially open, it is not  
13 valid since the turbine bypass system is not (Inaudible) and  
14 more than one valve may stick open, resulting in a more  
15 severe transient;

16 And four, explain the reason for the difference in  
17 the location of the level tap at ANO versus TMI-1 and (Inaudible)  
18 1, 2 and 3.

19 Were you ever provided with an analysis by B&W to  
20 justify that level increase?

21 Cavanaugh VOICE: I believe, to the best of my recollection,  
22 that after subsequent discussions with B&W, that they  
23 changed their recommendation on changing that particular  
24 level change.

25 Creswell VOICE: To your knowledge, did B&W ever do an

NRCmte 1 analysis before making the recommendation to justify the  
2 increased level?

3 Cavanaugh VOICE: I don't know that.

4 Q VOICE: Were you ever provided an analysis  
5 regarding more than one turbine bypass valve malfunctioning?

6 Cavanaugh VOICE: I can't recall at this time whether we did  
7 or not.

8 Q VOICE: Were you ever provided an explanation for  
9 the reason for the difference in the location of the level  
10 tap at ANO versus TMI-1 and Oconee 1, 2 and 3?

11 Cavanaugh VOICE: I know that we had discussions with B&W  
12 about that. In my understanding, it had something to do, I  
13 believe, with the manufacturing. But I don't recall the  
14 exact B&W reason for the change.

15 Creswell VOICE: Mr. Cavanaugh -- Jim Creswell speaking  
16 again -- I'm going to show you a copy of a figure out of the  
17 FSAR for ANO-1. It's entitled "Pressurizer Outline," and  
18 the figure number is 4-6. Would you take a look at that,  
19 please, sir.

20 (Pause.)

21 Creswell VOICE: In your opinion and your professional  
22 judgment, is that tap shown properly located on that  
23 drawing?

24 Cavanaugh VOICE: I don't know that I could make that  
25 determination right now. I would say that the level

NRCmte 1 sensing nozzle says typical of three, and I guess I'd have  
2 to go back to the point in time -- I assume that this was in  
3 the original -- well, I'm not sure whether it was in the  
4 PSAR or FSAR. Did you say what the --

5 Creswell VOICE: I believe that's the FSAR.

6 Cavanaugh VOICE: I guess I'd have to go back and compare it  
7 to the as-built drawings.

8 Creswell VOICE: Would you say that that drawing shows the  
9 tap to be located at the tangent line between the  
10 cylindrical body and the hemispherical lower head of the  
11 pressurizer?

12 Cavanaugh VOICE: Yes, it shows it to be in that region. Of  
13 course, it says "typical." I'm not sure that that's meant  
14 to indicate an exact location, seeing as how there are no  
15 dimensions on this outline.

16 Creswell VOICE: Okay.

17 Next I'm going to show you a copy of Table 7-11,  
18 which is entitled "Information Readouts Available to the  
19 Operator for Monitoring Conditions in the Reactor, Reactor  
20 Coolant System, and in the Containment." This is on page  
21 7-56 of the FSAR and it's Amendment No. 36 dated April 6th,  
22 1973.

23 Would you take a look at that, please?

24 (Pause.)

25 Cavanaugh VOICE: I couldn't verify that this is from our

NRCmte 1 FSAR without looking at it.

2 Creswell VOICE: Sure.

3 (Pause.)

4 Creswell VOICE: As an item in this table, a major  
5 parameter, pressurizer level is indicated, and the  
6 indication range or indicator range is specified as zero to  
7 400 inches. To your knowledge, is that information correct?

8 Cavanaugh VOICE: I don't know that I could say right now.  
9 I would assume that it was deemed to be correct when we put  
10 it in the FSAR.

11 Creswell VOICE: To your knowledge, has it ever been  
12 reviewed or changed?

13 Cavanaugh VOICE: I can't say that. I don't know. I don't  
14 remember, since it was some time ago. That was 1973.

15 Creswell VOICE: Okay. Let me ask you this. Could I ask  
16 you to review your FSAR, the copy that you have here, the  
17 control copy, and see if it has been changed?

18 Cavanaugh VOICE: Yes, I could do that.

19 Q VOICE: Why don't we go off the record, then.

20 Cavanaugh VOICE: Okay.

21 (Discussion off the record.)

22 Cavanaugh VOICE: These are the same table and figure that's  
23 in there, my FSAR.

24 Creswell VOICE: Is your FSAR a control copy?

25 Cavanaugh VOICE: Yes.

NRCmte 1 Q VOICE: It is? So that from that I would assume,  
2 unless there is an error in your control FSAR document, that  
3 these would be the latest up to date information?

4 Cavanaugh VOICE: To my knowledge.

5 Creswell VOICE: Okay. Next I'm going to show you a  
6 document here which is a piece of correspondence from the  
7 Babcock & Wilcox Company directed to you, dated November  
8 18th, 1974, from Mr. Bowes, the senior project manager --  
9 but the memo was sent out, was signed by H.A. Baker, the  
10 project manager. The subject of this memorandum is Arkansas  
11 Nuclear One pressurizer level set point, B&W reference  
12 NSS-8.

13 I'd like for you to take a look at this  
14 memorandum.

15 (Pause.)

16 Creswell VOICE: In reading this memorandum, I note that  
17 the recommendation for increasing the pressurizer level from  
18 180 to 210 inches was discussed. Basically, if I understand  
19 the memo correctly -- and if I'm wrong, would you correct me  
20 -- that they were withdrawing the recommendation.

21 Cavanaugh VOICE: Yes, that's correct.

22 Creswell VOICE: They further suggested that your operators  
23 be instructed to secure letdown flow and increase makeup  
24 flow immediately following a reactor trip, to help maintain  
25 pressurizer level.



NRCmte 1                   What did you do with this information that B&W  
2 sent to you?

3 Cavanaugh VOICE: That was then forwarded on to the plant  
4 for their evaluation. I believe also that this situation  
5 was presented to continue the review by the plant safety  
6 committee and also the safety review, the corporate safety  
7 review committee.

8                   I can't recollect about the letdown flow, but I  
9 can -- I do remember the fact that in fact we were manually  
10 initiating high pressure injection in order to maintain the  
11 level.

12                   VOICE: Approximately when did you start that?

13 Cavanaugh VOICE: I don't recall the exact time. It may  
14 have been before that letter.

15 Q                VOICE: Would you have initiated that change  
16 without a B&W recommendation? Would you have initiated it  
17 on your own? By "your own," I'm saying the management  
18 structure of Arkansas Power & Light.

19 Cavanaugh VOICE: Which change?

20 Q                VOICE: That is, to decrease or stop letdown flow  
21 and increase charging flow, starting --

22 Cavanaugh VOICE: Well, that would work, that would be a  
23 change to a procedure. It would be reviewed by the plant  
24 safety committee, and then if they felt that it presented an  
25 unreviewed safety question or felt that they wanted the

NRCmte 1 safety review committee to review it, then it would be sent  
2 to the safety review committee for their review.

3 Q VOICE: But to your recollection, was the decision  
4 that was made to do this based upon this B&W recommendation  
5 at this point of time?

6 Cavanaugh VOICE: I can't say that.

7 Q VOICE: Was that ultimately the corrective action  
8 taken regarding the pressurizer level problem, that is, an  
9 operator action?

10 Cavanaugh VOICE: I don't believe that was the ultimate, the  
11 ultimate correction. The ultimate correction, I believe,  
12 involved some changes in the control systems so that we  
13 would not lose level indication. We had a concern, as I  
14 recall, about getting too many cycles on the high pressure  
15 injection nozzles, and we wanted to get into a mode, I  
16 believe, where we did not have to do that.

17 Q VOICE: And that was done primarily by changes to  
18 control systems?

19 Cavanaugh VOICE: Right. When I say control systems, I mean  
20 I believe that we made, for instance, a change in the  
21 integrated control system. The basic goal was to reduce the  
22 pressurizer level decrease and those things that would cause  
23 it, for instance, excessive blowback on the steam dump and  
24 bypass system and steam safety valves.

25 Creswell VOICE: Next I'm going to show you a document

NRCmte 1 dated December 6th, 1974, from William Cavanaugh to  
2 G.M. Bowles, senior project manager at B&W. The subject is  
3 "Arkansas Nuclear One, Unit 1, pressurizer level set point."  
4 Would you take a look at that to refresh your memory?

5 (Pause.)

6 Creswell VOICE: In reviewing the text of this memorandum,  
7 you state that previous correspondence had not addressed the  
8 fact that the ANO lower level tap is 40 inches above the tap  
9 on Oconee and Three Mile Island. You further stated that  
10 you had problems with this arrangement, and:

11 Item one, the FSAR Figure 4.6 shows the lower taps  
12 located below the heater bundles, near the bottom of the  
13 pressurizer, which is in conflict with the actual location.

14 Now, I've previously shown you Figure 4.6. In  
15 reading your statement here, it would tend to indicate that  
16 you did have a problem with the way that tap was illustrated  
17 on the figure.

18 Cavanaugh VOICE: Well, I do not remember the specific  
19 reference about that being above or below the heater  
20 bundle. I do recall that, of course, that we did note that  
21 our lower level sensing nozzle was in fact 40 inches above  
22 the -- what was, I guess, on TMI-1 and on Oconee; and we  
23 wanted further explanation of that.

24 Creswell VOICE: I'm going to jump ahead in time a little.  
25 There was a telephone call apparently on the 12th of

NRQnte 1 December, 1974, between yourself and Mr. Baker, who I assume  
2 was with Babcock & Wilcox, and Mr. Ruiter, R-u-i-t-e-r. Do  
3 you recall what the substance of that telephone conversation  
4 was?

5 Cavanaugh VOICE: Not right offhand, no, I don't.

6 Creswell VOICE: Do you recall whether or not the location  
7 of the lower taps on the pressurizer were discussed during  
8 that conversation?

9 Cavanaugh VOICE: No, I don't.

10 Creswell VOICE: In the two memorandum that I presented to  
11 you here today, the one dated December 6th and the one dated  
12 October 18th, you have asked questions or showed concern  
13 about the location of the lower level taps. I'd like to  
14 again ask you: Were you ever told by B&W or anyone why  
15 those taps were 40 inches higher?

16 Cavanaugh VOICE: I'm sure -- well, I'm sure we were. Our  
17 main concern was not that the tap was different; our main  
18 concern was to ensure that we did not have an unsafe  
19 condition. And the location of the tap was just part of the  
20 overall analysis and investigation that we were conducting  
21 at the time.

22 Creswell VOICE: Mr. Cavanaugh, I'm asking it from this  
23 perspective. Here you have a component installed in your  
24 plant where a design change has been made, a design change  
25 that has resulted in a concern, a significant -- a

NRCnte 1 significant concern, as indicated by these memoranda. Yet I  
2 don't quite understand -- well, I could understand why you  
3 would want to resolve the concern.

4 But it would seem to me to be of interest as to  
5 why the taps were changed.

6 Cavanaugh VOICE: I think it's more important as to the  
7 question of whether or not the condition of the plant on a  
8 subsequent trip -- it seems to me to be more important than  
9 where a tap was located. The location of the tap was just  
10 one item that was part of an overall big picture thing, the  
11 big picture being what happens to pressurizer level, what  
12 happens to the reactor coolant system from a trip at high  
13 power levels.

14 Creswell VOICE: Mr. Cavanaugh, do you have any  
15 documentation regarding that telephone conversation that was  
16 held on the 12th of December?

17 Cavanaugh VOICE: I don't know if we do or not.

18 Q VOICE: I'd like for you, if you would, to conduct  
19 a good faith search --

20 Cavanaugh VOICE: What was the date of that?

21 Q VOICE: December 12th, 1974.

22 A VOICE: 1974. A telecom between --

23 Q VOICE: The parties indicated here are Baker,  
24 Cavanaugh, and Ruitter.

25 A VOICE: Baker, B&W. Okay.

NRCmte 1 A VOICE: We'll check the files and see.

2 (Pause.)

3 Creswell VOICE: Getting back to the December 6th,  
4 1974, memoranda and your problems with the location of the  
5 level taps, item 2 states that, following a reactor trip  
6 from 75 percent full power level, indication was lost for 45  
7 seconds. This indicates that following trips from 100  
8 percent full power, the level indication could be lost in  
9 excess of one minute, which does not correspond with the  
10 "lost momentarily" statement in reference one -- reference  
11 one being the letter, Baker to Cavanaugh, dated November  
12 18th, 1974.

13 You further state in the ending of the memorandum:  
14 Please review the above to determine what actions can be  
15 taken to resolve these items and provide us with your  
16 recommendations and reasons for that level tap discrepancy  
17 by January 6th, 1975.

18 It would appear from reading this that you set a  
19 deadline for their response to this particular item, your  
20 concern about the location of the taps.

21 Cavanaugh VOICE: Well, I don't think it's the location of  
22 the taps, again. Again, it's the concern about pressurizer  
23 level indication, pressure, the plant's response after a  
24 trip; not the business of -- not the primary concern of  
25 where the tap is. No, that was not the primary concern.

NRCmte 1 Q VOICE: Well, I was -- let me read this sentence  
2 again: Please review the above to determine what actions  
3 can be taken to resolve these items and provide us with your  
4 recommendations and reasons for the level-tap discrepancy by  
5 January 6th, 1975.

6 You specifically address level-tap --

7 Cavanaugh VOICE: That's right, but that's --

8 Q VOICE: -- discrepancy.

9 Cavanaugh VOICE: -- that's "and the reasons." So I think  
10 you're taking just that part out of context. It was the  
11 overall big picture that we wanted additional information  
12 on.

13 Q VOICE: Now, obviously they didn't meet that --  
14 B&W didn't meet that deadline of January 6th.

15 Cavanaugh VOICE: I don't know that. I can't say that they  
16 didn't today. I'd have to go back and research all the  
17 files to say that they didn't. I can't make that  
18 statement.

19 Q VOICE: We'd like for you to conduct that search  
20 of your files and determine if that information was or was  
21 not provided to you.

22 A VOICE: That memo was what?

23 Q VOICE: This is December 6th, 1974.

24 A VOICE: December 6.

25 (Pause.)