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IN THE MATTER OF:

THREE MILE ISLAND SPECIAL
INQUIRY DEPOSITION

POOR ORIGINAL

DEPOSITION OF MICHAEL A. JANOUSKI

Place - Middletown, Pa.

Date - September 19, 1979

Pages 1 - 127

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P R O C E E D I N G S

MICHAEL A. JANOUSKI

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2
3 was called as a witness and, having been first duly sworn
4 by Oliver D. T. Lynch, was examined and testified as
5 follows:

6 BY MR. DIENELT:

7 Q Would you state your name and business address?

8 A My name is Michael A. Janouski. I am a
9 senior radiation protection technician for Metropolitan
10 Edison Company at Three Mile Island.

11 Q I will show you a document that has been
12 previously marked as Exhibit 3021. Have you had an
13 opportunity before this deposition to review a copy of that
14 document?

15 A Yes, I have.

16 Q Do you understand it?

17 A Yes, I do.

18 Q The answers to the questions you give today
19 are the same as if you were testifying in a court. You
20 will have an opportunity to review the transcript of the
21 deposition after it has been concluded and to make any
22 changes in it that you feel are necessary.

23 It is important to understand the questions
24 and to try to give full and complete answers to the
25 questions. Because if you make changes in the deposition

1 later that are of a substantial or substantive nature
2 as opposed to a change of spelling it could be viewed
3 as affecting your credibility. So, if a question is
4 asked that you don't fully understand, please let me know.
5 We will try to clarify it.

6 Also, I would appreciate it if you would allow
7 me to finish asking the question even if you know what
8 the thrust of the question is and are prepared to answer it.
9 That will assist the court reporter in getting an easy-to-
10 read sequence of what we have to say today.

11 I would also like to note for the record that
12 Mr. Janouski is accompanied by a union representative. His
13 name is Mr. Cody.

14 MR. CODY: Union, non-counsel.

15 MR. DIENELT: Would you mark these as 3028 and
16 3029.

17 (Whereupon, an interview of Michael A. Janouski
18 taken on May 2, 1979, was marked as Exhibit 3028; and an
19 interview of Michael A. Janouski typed on June 28, 1979,
20 as Exhibit 3029.)

21 BY MR. DIENELT:

22 Q Do you recall being interviewed by members of the
23 I&E Branch of the Nuclear Regulatory Commission?

24 A Yes, I do.

25 Q I am going to show you 2 documents that have been

1 marked Exhibit 3028 and 3029.

2 Have you had an opportunity to review the
3 interview that you gave to I&E?

4 A No, I haven't.

5 Q Exhibit 3028 and 3029 are transcripts of the
6 interviews. Am I correct that you have not received and
7 had an opportunity to review those transcripts?

8 A I have in my possession tapes with these. I have
9 not had the opportunity to listen to those tapes because I
10 do not have a cassette recorder of my own. So ...

11 Q To the best of your recollection were the answers
12 that you gave to the questions that were asked of you by
13 the I&E investigators full and complete and accurate?

14 A Accuracy-wise I would say that there was --
15 there could be a question in time spans. As I could
16 recollect the sequence of events are as accurate as I
17 could remember them at the time because both interviews
18 that I had given were, you know, in periods of time quite
19 later. The effects of the accident and the response through
20 the accident, you know, things became very vague. And,
21 you know, it was as best that I could recollect, yes.

22 Q Is there anything that stands out in your mind
23 at this point as a statement or an answer that you gave
24 during those interviews which you now believe was not
25 completely accurate or should be elaborated upon?

1 A No.

2 Q Have you been deposed as an individual by the
3 staff of the President's Commission?

4 A As an individual, no.

5 Q Have you been deposed or interviewed or given
6 testimony as a member of a group?

7 A Yes, I have.

8 Q Can you tell me briefly the circumstances of
9 that testimony?

10 A The testimony was with the President's Commission
11 and involved 6 union representatives, union officers of
12 IBW Local 563 which is the RIBEW affiliate here at Three
13 Mile, and Mr. Bob Dietrich, the international representative
14 of our district and Mr. Joe Parks who is our U-9 system
15 counsel president.

16 Q What does U-9 stand for?

17 A It is the bargaining -- it is the group of 5 locals
18 under Metropolitan Edison Company who are the arbitrating
19 group for our contracts with Metropolitan Edison Company.

20 Q Do you recall when the testimony before the
21 President's Commission took place?

22 A I don't remember the exact date.

23 Q Do you remember the month?

24 A It was last month.

25 MR. CODY: I think it was the 21st.

1 THE WITNESS: I am pretty sure it was the 21st.

2 BY MR. DIENELT:

3 Q To your knowledge was that testimony transcribed
4 in some form?

5 A Yes, it was. I think they were taping the
6 conversations.

7 Q Apart from your interviews with I&E and the
8 group testimony before the President's Commission do you
9 recall giving any deposition or interview which was
10 recorded in some form in which you discussed the accident
11 that began on March 28, 1979, at Three Mile Island?

12 A No, I don't.

13 Q What is your current position?

14 A I am a radiation chemistry technician, nuclear.

15 Q Will you summarize what your responsibilities in
16 that position are?

17 A I am a senior tech for my shift. I handle
18 whichever department I am assigned to at the time, either
19 chemistry or HP. I am responsible for all the shift
20 duties that the work, you know, that the work associated
21 to that department is completed. We handle all the signing
22 of RWP's, liquid and gas releases, really routine -- the
23 routine, everyday duties of our department we are in charge
24 of really.

25 Q Was your position the same during the period

1 beginning on March 28?

2 A Yes, it was.

3 Q The responsibilities were the same?

4 A My responsibility that night was senior HP
5 in charge of health physics in Unit 1 and 2.

6 Q Do you have with you a resume?

7 A No, I don't.

8 Q How long have you held the position you currently
9 hold?

10 A Approximately 5 years.

11 Q Were you employed by Met-Ed prior to that time?

12 A Yes, I was.

13 Q What position did you hold?

14 A I was an analyst junior.

15 Q What does an analyst junior do?

16 A All we did was handle all the secondary chemistry
17 water sampling for the site. That was prior to Unit 1
18 startup.

19 Q How long did you hold that position?

20 A Approximately 2 years.

21 Q Had you been employed by Met-Ed prior to that?

22 A Yes, I was.

23 Q What position did you hold?

24 A I was a -- I was an auxiliary operator A at
25 Crawford Station.

1 Q Where is Crawford Station?

2 A It is the coal-fired plant in Middletown that
3 belongs to Metropolitan Edison Company.

4 Q How long did you hold that position?

5 A 2 weeks.

6 Q Is there any particular reason why your
7 tenure was so short?

8 A I bid the job for here.

9 Q Had you been employed by Met-Ed prior to
10 Crawford Station?

11 A Yes.

12 Q What position and for how long?

13 A I was a utility B worker at Crawford Station.

14 Q For how long?

15 A 2 weeks. Auxiliary A is actually an auxiliary B
16 operator. It really isn't an A classification.

17 Q How long total were you employed at Crawford
18 Station?

19 A One month.

20 Q Prior to your employment at Crawford Station
21 were you employed by Met-Ed?

22 A No. I wasn't.

23 Q Did you have any employment prior to the time
24 you came to Met-Ed?

25 A Yes, I did.

1 Q Tell me about that?

2 A Oh, boy.

3 Q You can summarize it generally?

4 A I worked for Bell Telephone as a janitor for
5 3 months prior to that. Prior to that I worked for the
6 United States Government for approximately a year. And it
7 was just a labor-type position. And prior to that I worked
8 for Thompson-Woolridge Company of Harrisburg as a
9 production expediter for 5 years.

10 Q Prior to that employment did you have any
11 full-time employment?

12 A Yes. I worked for the Bethlehem Steel Company.
13 That was -- it was full-time. That was summer-type
14 employment carried into when I was going to college.

15 Q Did you graduate from college?

16 A No, I didn't.

17 Q How many years did you attend?

18 A One year. One complete year.

19 Q Where?

20 A Harrisburg Area Community College.

21 Q How old are you?

22 A 32.

23 Q Had you any experience in the health physics
24 field in which you now work prior to the time when you
25 became a Rad Chem Tech?

1 A No.

2 Q All of your training in that field came through
3 Met-Ed?

4 A That's correct.

5 Q During the period beginning on March 28 did you
6 maintain a log or diary or any notes of the activities
7 in which you engaged?

8 A No, I didn't.

9 Q Have you since March 28th prepared any
10 memorandum or other documents summarizing the activities
11 in which you engaged?

12 A Other than general discussions with my shift
13 partners and that sort of thing, one of which I have with
14 me here, it is just really to go over a sequence of events
15 to try and regroup my memory a little bit on what occurred
16 during that period. It is not really a documented-type
17 thing. It is really just a matter of discussion and notes.

18 Q The notes that you have with you today were
19 prepared when?

20 A These were just prepared in the last day.

21 Q With whom did you discuss the chronology of events?

22 A Mr. Pat Donnachie who was the other HP on shift
23 with me at the time and Mr. David Zeiter and Mr. Tiny Davis.
24 It is Thomas Davis. I am sorry.

25 Tiny and Dave were the HP's who were working in

1 chemistry the night of the accident. Dave is the other
2 senior on my shift.

3 Q You were senior to Mr. Donnachie?

4 A Pat has seniority time on me. But since I was
5 the senior shift person I received that responsibility.

6 Q Did you discuss the sequence of events or any
7 other aspect of the incident with anybody other than these
8 3 in preparing that set of notes?

9 A No.

10 Q What was your shift on the evening of the 27th
11 and the morning of the 28th?

12 A The hours of work?

13 Q Yes, sir.

14 A That was the 11 to 7 shift.

15 Q When did you become aware of the transient that
16 began?

17 A The first indication that I had was that right
18 after 4:00 o'clock the notification over the page system
19 of the turbine trip. And then shortly within seconds after
20 that or minutes after that the announcement of the reactor
21 trip.

22 Q At this point were you the senior health physics
23 person, not in terms of seniority, but --

24 A On-site?

25 Q On-site.

1 A Yes, I was.

2 Q What did you do after you heard the announcements
3 of the turbine and reactor trips?

4 A I went -- Well, Pat and I started our routine
5 trip procedure that we use. It is not really a procedure
6 as such, but we have a sequence of responsibilities that
7 we have to do after a trip. And we started getting ready
8 to perform those sequences. I went and made sure that
9 Pat and Dave -- or, I am sorry, Tiny and Dave knew to put
10 the reactor coolant, and that's Unit 2, on recirc for their
11 dose equivalent iodine sampling.

12 Q The procedures that you began to implement were
13 standard procedures?

14 A Right, for sequence of things that we perform
15 after turbine trip.

16 Q They were in a written form?

17 A They are by procedure in a written form, yes. They
18 are not in a sequence of events in a procedure form.

19 Q In carrying them out did you consult any
20 written document or did you know them well enough that you
21 just began to do them?

22 A I know them well enough to just go into them.

23 Q How long were you the senior person on-site?

24 A Till approximately -- To my knowledge I was the
25 senior person on-site until just about 6:00 o'clock.

1 Q What happened then?

2 A Dick Dubiel came in.

3 Q Who is he?

4 A He is the Radiation Protection Chemistry's
5 Supervisor.

6 Q Had you called him?

7 A No, I hadn't.

8 Q Was that his normal time to arrive?

9 A No, it wasn't.

10 Q Did he tell you why he had come?

11 A No, he did not exactly. Not until much later.

12 Q He is your boss at normal times?

13 A He is my second-level foreman or supervisor, yes.

14 Q Second level meaning there is a level inbetween?

15 A Right.

16 Q Who is the level inbetween?

17 A The Radiation Protection's foreman.

18 Q Who would that be?

19 A It could be any number of people. It could be
20 Peter Velez, Joseph Deman. At that time a Mr. Fred Huwe,
21 and he was the Unit 2 HP foreman.

22 Q Was there a foreman assigned to the shift you
23 were working?

24 A There was a foreman on call.

25 Q Which one was it?

1 A I don't know. I think it was Mr. Velez.
2 But I'm not -- I couldn't swear to that.

3 Q Where does Mr. Mulleavy fit into the chain of
4 command?

5 A Mr. Mulleavy is at that time I guess -- I guess
6 you could say that Mr. Dubiel is really the third person,
7 I stand corrected, okay. Mr. Mulleavy sort of fits inbetween
8 there above the foreman and Mr. Dubiel at the time. But
9 what his real responsibilities were is more like a foreman
10 than they are a supervisor-type person, I guess. I don't
11 really know what his job title is or was at that time.

12 Q Would it be fair to say that when Mr. Dubiel
13 arrived he replaced you as the person who was in charge?

14 A Yes, it is.

15 Q Did he give you any instructions as to what you
16 should do after he took over?

17 A Yes, he did.

18 Q What did he tell you to do?

19 A He informed me first of all to draw another
20 sample of HPR 227 which is the reactor building monitor
21 in Unit 2. He also informed me just later on that we were
22 going to make an entry into the Unit 2 Reactor Building
23 to check the ruptured disc on the reactor coolant drain
24 tank and to bring 8 or 10 Scott Air Packs to the Unit
25 2 control pump. They were the distinct orders that I

1 remember him giving me.

2 Q Did you draw the HPR 227 sample?

3 A I attempted to draw it.

4 Q Did you do that before he gave you the
5 instruction to prepare to enter the Unit 2 Reactor Building?

6 A I started to do it before that, yes. That's
7 the HPR 227 sample had been drawn earlier in the night.
8 It was drawn somewhere between 3:00 and 3:30 which is a
9 routine sample that we draw normally everynight on the
10 11:00 to 7:00 shift. It is a, you know, it is a standard
11 practice that we have of drawing that sample prior to the
12 daylight shift. That sample had been drawn earlier in the
13 shift and he requested a second sample drawn off of it.

14 Q Did he tell you why he needed the second sample?

15 A He had said that there was -- they thought that
16 there was a problem in the building and that because of
17 the blowing of the ruptured disc in the RC drain tank that
18 he wanted to see what was in the building prior to the entry
19 that we made, that we were going to make.

20 Q You stated that you attempted to take the sample?

21 A Yes.

22 Q Did you not succeed in doing that?

23 A No, I did not.

24 Q Why is that?

25 A Because the monitor was filled with water.

1 Q In preparing to take the sample what
2 preparation did you do?

3 A Really none except getting the replacement
4 filters and a Marinelli beaker which is a glass beaker,
5 to the monitor itself and setting that up and ready to line
6 the monitor up. Other than that, there was no specific-
7 type things that I did. Now, I didn't refer to a procedure
8 to draw the sample or anything like that.

9 Q When you had taken the sample or when the sample
10 had been taken earlier in the evening, were any
11 protectionary devices used by you in drawing that?

12 A No.

13 Q That was the normal practice?

14 A Right.

15 Q Did you bring the Scott Air Packs to the Unit
16 2 Reactor Building?

17 A Yes, we did.

18 Q Scott Air Pack is a respiratory aid?

19 A That's correct.

20 Q Approximately when did you do that?

21 A That was between 6:30 and 6:45.

22 Q Did you enter the Reactor Building?

23 A No, we did not.

24 Q Why not?

25 A Because of what I saw HPR 227.

1 Q What is the relationship there?

2 A Well, I went to draw the particulate and
3 charcoal samples off of HPR 227. I had not looked at the
4 regulator guages on the monitor prior to cracking the
5 valves or cracking the wingnuts on the sample holder. And
6 I caught the sample holder -- it blew out of the monitor
7 and I caught it about 18 inches from the monitor, 12 to
8 18 inches away from the monitor. It just flew out in my
9 hand. And I just slammed it back into the monitor and
10 tightened it back up. And I looked at the guages and they
11 were filled with water. And just common sense told me
12 that there was something wrong in that building. And I
13 wasn't going in that building.

14 Q Did you tell this to Mr. Dubiel?

15 A Yes, I did.

16 Q He agreed with you that it was not desirable
17 to go into the Reactor Building?

18 A Yes, he did.

19 Q This took place before the site emergency was
20 declared?

21 A Yes.

22 Q When the site emergency was declared what did you
23 do?

24 A I -- The very first thing I did was -- are you
25 talking about the actual declaring of the site emergency?

1 In other words, I informed the control room of the rad
2 levels so that they did declare the emergency.

3 Q Why don't you elaborate on that if you will?

4 A Okay, approximately between 6:45 and 7:00 o'clock
5 I had been -- Pat and myself had been in Unit 2. We had
6 taken the Scott Air Packs to the control point in Unit 2.
7 And we were on our way back to Unit 1. This was after
8 HPR 227 had scared the daylights out of us. We were on
9 our way back from Unit 1 -- or from Unit 2 to Unit 1
10 through the auxiliary building and the model room and the
11 Unit 1 fuel-handling bank. We got to the Unit 1 fuel-
12 handling bank and there is a security guard sitting at
13 what we know as the hot machine shop. It is actually the
14 hot machine shop directly outside of the Unit 1 control
15 point.

16 In that hot machine shop is a monitor. It is
17 RMG-4. It is hanging on the wall. The machine shop is
18 normally a low rad area. And I say low rad, I say less
19 than one MR general area.

20 We were walking through the fuel-handling bank
21 going back to Unit 1. And there was a lock on that door,
22 on the hot machine shop door. The security guard was
23 sitting in front of the door. G-4 went off. It alarmed.

24 Q As you were walking by?

25 A Just as we were walking up to it.

1 Q Were you walking up to check it?

2 A No, we were just walking by. At that time
3 we didn't have any dose rate instruments with us or
4 anything. It is just, you know, there was really no
5 reason, no indication -- really, we had not been
6 notified HP-wise that we were having a problem, even up
7 to that point. We had no idea of the problems in the
8 control room, the transit problems or anything.

9 G-4 alarmed. Pat and Dick Dubiel and myself
10 were standing -- were right in that area. And I informed
11 the security guard to leave the area. It was just, you know,
12 just instinct I guess told me to tell him to leave
13 especially after a trip. I mean, it just wasn't right that
14 G-4 should go off. We thought at first there was a
15 problem in the Unit 1 Reactor Building or the Unit 1
16 area. We logically -- we couldn't understand why G-4 went
17 off. We couldn't find the key to the hot machine shop
18 because we normally don't have a key in the HP area for
19 that room. There was a pair of bolt cutters in the
20 decon room in Unit 1. I ran to the decon room, got the
21 bolt cutters, told Pat to go to the HP lab and get a
22 dose rate instrument. By that time I came out with the
23 bolt cutters, Dick and I cut the lock off the door. We
24 swung the door open. We checked the dose rate levels at
25 that time. I will be honest with you, I can't specifically

1 remember the dose rates. I know they were high at that
2 time. They were somewhere like 500 MR, maybe 2 MR. They
3 were exceptionally high. And so, Pat had an R02 which is
4 a dose rate instrument. It is nonchamber. I ran and got
5 another ion chamber. We were trying to figure out where it
6 was coming from. We had no idea exactly, you know, where
7 this level of dose could be coming from at, you know, in
8 that area. At the time there was no logical reason what
9 it was.

10 What we did was we went into the hot machine
11 shop. We were feeling around, checking the area, trying
12 to figure out where this dose was coming from. It seemed
13 awfully odd that whenever we walked underneath a certain
14 area the dose would go up. When we walked out from under
15 the area it would go down. We did this back through the
16 fuel-handling bank until it finally occurred to us that
17 it was something in the Unit 2 sampling lines. The sample
18 lines are exposed coming through that area going into the
19 nuc sample room, Unit 1.

20 Then it occurred to us that there was a problem.
21 The first thing that popped to our heads at that time was
22 failed fuel. You know, there was a problem in Unit 2.
23 I mean, it was right there.

24 We followed the sample lines back over into the
25 model room until we lost them in the ceilings.

1 Q You and Mr. Donnachie went into the hot machine
2 shop with instruments to measure the radiation level?

3 A That's correct. And I also went over into the
4 Unit 1 sample room at the time, too.

5 Q Did Mr. Dubiel accompany you?

6 A Mr. Dubiel was there at the time, yes. He was
7 in that -- He was walking around with us in that area,
8 yes.

9 Q Am I correct that prior to going in and taking
10 the measurements none of you put on any protective
11 clothing?

12 A That's correct.

13 Q Why not?

14 A I guess really not, you know, I can't say it's
15 habit. But, you know, we were so involved with the
16 situation at the time it really, you know, it hadn't really
17 occurred to us. We were trying to figure out what the
18 problem was. There was -- I guess for one reason I knew
19 that R make (phonetic) and 6 had not alarmed which are the
20 fuel-handling exhaust monitors and the auxiliary building
21 monitors, air monitors in Unit 1. They had not alarmed or
22 were not alarmed. And there was really no indication of
23 an airborne problem at that time, you know, sir, you know,
24 just out of standard practice I guess you would call it,
25 you know, we just didn't do any airborne-type equipment

1 or protective clothing.

2 Q Did you and the others discuss the possibility
3 of putting on protective clothing?

4 A No, we didn't.

5 Q It is your view that not putting the equipment
6 on in those circumstances was standard procedure as opposed
7 to an exceptional act?

8 A No, I wouldn't say that. It was just the --
9 really the thought never occurred to us.

10 Q Did you consider attempting to measure the level
11 of radiation at the door of the machine shop before you
12 opened it?

13 A We had a dose rate at that time, yes.

14 Q You did do that?

15 A Yes, oh, yes. The meter was on when Pat
16 -- as soon as Pat got the meter, you know, he was there
17 with -- in fact, he was there with the meter before we
18 even got the door unlocked or the bolt cut on the lock.
19 In fact, we had a problem cutting the bolt because it was
20 such a big lock. And it took 3 or 4 swipes at it just to
21 cut it. I mean, you know, we knew what the dose rate was
22 right there at that time. We were trying really to figure
23 out where it was coming from because the hot machine shop
24 was enclosed with a nontransparent plastic from the Unit 1
25 refueling outage because of work that they had been doing

1 in the machine shop and that sort of thing, you know.

2 Q During the time that you were in the machine
3 shop did you have with you or were you wearing any kind
4 of equipment that would measure your personal dose?

5 A Yes.

6 Q What were you wearing?

7 A Thermoluminescent dosimeter and a standard
8 pocket dosimeter.

9 Q Which is exactly what you have on now?

10 A Which is exactly what I have on now.

11 Q During the time that you were in the machine shop
12 did you look at the pocket dosimeter?

13 A Yes, I did.

14 Q What did you see?

15 A There was no apparent, you know, rise on my
16 dosimetry at the time.

17 Q You indicated that as the result of the
18 measurements that you took in the hot machine shop you
19 concluded there was a possibility there was failed fuel?

20 A That thought entered my mind later. But at that
21 distinct time it didn't hit me what it was. I really,
22 you know, had no inclination. I really didn't think what
23 it could be, you know. I knew something was wrong. But
24 I didn't know exactly, you know ...

25 Q Did you and the others at that time discuss the

1 possibility that there was failed fuel?

2 A At that --

3 Q Yes, sir.

4 A No, we did not.

5 Q Prior to the time that a site emergency was
6 declared did it occur to you that it was failed fuel?

7 A I would say sometime after 7:00 o'clock was when
8 the first statement was made that, you know, yes, there
9 was failed fuel.

10 Q Who made that statement?

11 A I couldn't tell you.

12 Q It wasn't you?

13 A It wasn't me, no. It may have even been Mr.
14 Dubiel for that matter.

15 Q As a result of the measurements that you took
16 am I correct that you or Mr. Dubiel contacted the Unit 2
17 control room?

18 A Unit 1 control room.

19 Q Unit 1 control room?

20 A Unit 1 control room.

21 Q You advised them of the levels?

22 A That's correct.

23 Q As a result of that they declared a site
24 emergency?

25 A That's correct.

1 Q After the declaration of the site emergency what
2 did you do?

3 A I started establishing the emergency control
4 center.

5 Q Why did you do that?

6 A Instinct.

7 Q Did someone tell you to do it?

8 A No.

9 Q Was it part of a standard procedure of which
10 you were aware?

11 A Emergency procedure, yes.

12 Q That emergency procedure designated you or the
13 person in your position as the senior health physicist as
14 the person who would establish the emergency control
15 station?

16 A That's right. Dick was the one going to the
17 Unit 1 control room which was his responsibility by the
18 procedure. And I established the emergency control
19 center.

20 Q Where was that located?

21 A In the Unit 1 HP.

22 Q What did you do in establishing an ECS?

23 A It was just a matter of setting up the headsets
24 for the communication system until an instrument man came
25 running down because they came running down as soon as

1 the announcement was made for the emergency. They started
2 moving -- people started coming to the control center.
3 He set up the phones. I established the people for the
4 door for monitoring the access, the ingress and egress
5 from the HP area with an auxiliary operator that was there
6 at the time, made sure that the hand units, the telephones,
7 the monitors were all working and turned on at the time.
8 And shortly thereafter Joe Deman came in and he took over
9 there. And I went to Unit 2 with Pat.

10 Q Had you had occasion before this to set up the
11 ECS?

12 A Yes, I had.

13 Q Had you had occasion to do it in the context of
14 an actual site emergency?

15 A No.

16 Q You had the opportunity in the context of a drill?

17 A That's correct.

18 Q Was there any procedure which you were aware
19 was supposed to be followed in setting up the ECS which
20 you did not follow?

21 A That's correct.

22 Q What was that or what were they?

23 A The standard emergency procedure which is
24 establish and which states the designations of the
25 responsibilities for the ECS, the equipment to be set up

1 during the ECS, the establishing of the monitoring system,
2 the establishing of the teams, the onsite, offsite teams,
3 the emergency repair parties and that sort of thing.

4 Q I must have misspoken. I was asking you if there
5 was any procedure which you did not follow which was
6 required by the standard procedures?

7 A No, not that I can remember.

8 Q The list that you just gave me was the actual
9 procedures you did follow?

10 A That's correct.

11 Q When Mr. Deman relieved you was the fact that he
12 relieved you written down in a log book or any other
13 document?

14 A No, it was not.

15 Q What did you do when you went to the Unit 2
16 control room?

17 A I didn't go to the Unit 2 control room.

18 Q I am sorry.

19 A I went to the Unit 2 area. Just returned to the
20 Unit 2 area.

21 Q What was the purpose of going there?

22 A Just to see what I could help out with and
23 establish there.

24 Q At that point as you understood it who was the
25 person from whom you would get instructions?

1 A Me.

2 Q When you got there I take it you did not report
3 to anyone?

4 A No, I did not.

5 Q Did you find Mr. Donnachie?

6 A Pat went with me from the HP area.

7 Q You two were at the HP area together?

8 A That's correct.

9 Q He assisted you in setting up the ECS?

10 A I really don't know what he was doing at the time--
11 the exact time that I was setting the ECS. He was in the
12 HP area. What he was performing, I really don't know.

13 Q At any rate, the two of you left together and
14 went to the Unit 2?

15 A That's correct.

16 Q When you arrived at the Unit 2 area what did you
17 do?

18 A I grabbed the dose rate instrument. I had a
19 dose rate instrument with me. What I really did was just
20 start monitoring the areas in the auxiliary building
21 hallways as I was going through.

22 Q What kind of instrument?

23 A It was an RO2. The rad levels that I saw
24 were significantly higher. They were in the 1 R to 1-1/2 R
25 range at certain spots in the corridor, in the hallway.

1 Exceptionally higher than what we normally saw.

2 Q Did you report this information to anyone?

3 A No, I didn't. Not at the time.

4 Q Subsequently did you report it?

5 A Later. Not very much later. Actually, upon
6 my entry into the HP area, really.

7 Q This would be the Unit 2 HP area?

8 A Right.

9 Q To whom did you report the information?

10 A Just the operators who were right there at the
11 time. The auxiliary operators for the Unit 2 area were
12 still at the Unit 2 rad waste panel which is at the
13 north end of the auxiliary building. And the dose rate
14 where they were really weren't that high yet. They were
15 still really monitoring and trying to figure out -- Mr.
16 Terry Daugherty was the senior aux operator on at the time,
17 auxiliary A operator at the time. He was at the panel.
18 Him and I were communicating really pretty significantly
19 as to what we were doing. In fact, he informed me that there
20 was water coming in the basement. He was telling me there
21 was water coming up through the floor drains in the basement.

22 Q Was it the standard procedure for you to go to
23 the Unit 2 area once you had been relieved at the ECS?

24 A Standard as far as a written-type procedure or
25 just as a practice?

1 Q Either written or practice?

2 A Just a practice.

3 Q That had been something you had done before or
4 known to do on the basis of practice?

5 A Just instinct.

6 Q Did there come a time when you recommended that
7 the auxiliary building be evacuated?

8 A Yes, there was.

9 Q Was the basis for that the readings you took
10 on the way?

11 A No.

12 Q What was the basis for that?

13 A The airborne activity levels.

14 Q How did you determine what they were?

15 A One of the technicians, one of our HP technicians
16 -- well, really there was 2 or 3 of them had come in.
17 The 7:00 o'clock shift had come in. They started air
18 sampling in Unit 2.

19 Q Was this at your direction?

20 A No, it wasn't.

21 Q At whose direction was it?

22 A I really don't know to be honest with you. I
23 would assume that it was the ECS informed them where to
24 go because that was our normal -- Unit 1 was our normal
25 reporting place.

1 Q They reported the results to you?

2 A They really didn't report anything to me. I just
3 walked in the area. Mr. Carl Myers was counting an air
4 sample at the time that he had taken right there in the
5 HP area. And it was up above 30,000 counts. And it was
6 only on for a few seconds. And at that point I evacuated
7 the auxiliary building.

8 Q It was your decision?

9 A Yes.

10 Q Did you consult with any superior regarding it?

11 A No, I didn't.

12 Q Did you advise anyone you had ordered an evacua-
13 tion?

14 A The auxiliary operators who were in the
15 auxiliary building at the time.

16 Q These are all the people who were there to get
17 out?

18 A Yes.

19 Q Did you tell anybody who wasn't there that you
20 told the people to get out?

21 A Yes.

22 Q Who did you tell?

23 A I told the Unit 2 controller.

24 Q To whom did you speak?

25 A I don't know.

1 Q Was it your understanding that the emergency
2 plan or emergency procedures gave you the authority to
3 order an evacuation without consulting the higherups?

4 A No.

5 Q That was not your understanding?

6 A Well, as far as I know I don't have any right
7 to evacuate anything without calling the control room.

8 Q Why did you do it?

9 A Because I didn't want to see anybody get hurt.

10 Q You felt it was an emergency situation and you
11 didn't have time to consult?

12 A Yes.

13 Q Did there come a time later after the auxiliary
14 building had been evacuated that you made a survey yourself?

15 A Yes.

16 Q This was about an hour or two hours later?

17 A No, it was within a few minutes.

18 Q Did you decide to take that survey on your own?

19 A Yes.

20 Q What were the results?

21 A I would say medium dose rates through 305 level.
22 Not very high readings on the 328 level. Water on the floor
23 and the drains in the auxiliary building basement. Medium
24 dose rates in the auxiliary building basement.
25 Increasingly higher levels around the makeup system areas.

1 makeup tank doorway was reading like 10 R. The fuel
2 injection filters were -- that area was -- I had taken
3 a teletector or I had gotten a teletector in the meantime.
4 So, I was reading, you know, that high range-type scale.
5 It was reasonably high. I would say greater than 50 R
6 upwards. Some places 200 R.

7 Q Did you report the results of your^e survey to anyone?

8 A Yes, I did.

9 Q To whom did you make the report?

10 A Mr. Fred Huwe.

11 Q Where was he at this point?

12 A In the Unit 2 EP area.

13 Q Why did you report to him?

14 A Because I thought somebody ought to know.

15 Q Why did you report to him rather than calling
16 the ECS, for example?

17 A Because he was the first foreman with
18 responsibility that I saw.

19 Q Would it be fair to assume that your responsi-
20 bility was to report to the first person at a level higher
21 than you whom you saw and let that person carry the ball
22 from there?

23 A No. I assumed that, you know, I would notify
24 the first person who had health physics responsibility
25 higher than myself.

1 Q And that you would then expect that person to
2 take whatever action was necessary?

3 A That's correct.

4 Q When you made the entry into the auxiliary
5 building what protective measures did you take for yourself?

6 A Just putting on -- I just donned a respirator.
7 I didn't wear any protective clothing.

8 Q Would it have been better for you to have put
9 the protective clothing on?

10 A The original reason for my entry in the auxiliary
11 building was to -- I mean, it was really not to survey the
12 building, to be totally honest with you. It was more
13 to make sure that everybody was out of the auxiliary
14 building who may not have heard the announcement because
15 the speaker system in the basement and the second floor
16 sometimes is a little difficult to hear. And I was
17 more concerned about making sure that everybody was out.

18 Q Did you expect to stay a shorter time in the
19 auxiliary building than in fact you did?

20 A No, I expected to stay a little longer, really.
21 Because I didn't, you know, I really -- after I had thought
22 about it at the time I didn't want to spend anymore time
23 than I had to in there. But I wanted to make sure that,
24 you know, I hit as many areas as I could hit to make sure
25 there was nobody else in.

1 Q What kind of instrumentation did you have with
2 you to measure radiation?

3 A Teletector.

4 Q What kind of personal dosimetry?

5 A The same as I have on now. The same as I have
6 been wearing the whole night.

7 Q Did you read that during the time you were in
8 the auxiliary building?

9 A No, I did not.

10 Q Did you read it afterwards?

11 A Much later afterwards.

12 Q You kept your TLD on at that time rather than
13 giving it to someone to have it read?

14 A I didn't take the time to give it up. Really,
15 there was nobody there because at that time we did do the
16 readings of the TLD's. And there just wasn't time to
17 have anybody read it. When I did check my dosimetry
18 later my dosimeter which was, I would say within like,
19 I don't know, maybe a half hour or an hour after the entry,
20 there was -- it was still on scale. And I really didn't
21 see any reason to have my TLD read.

22 Q Did you tell anyone that you were going to go
23 through the auxiliary building either for purposes of
24 making sure that everyone had left or for purposes of
25 conducting the survey?

1 A No, I did not.

2 Q Is there any reason why you didn't?

3 A Didn't see why there was any need to. Everybody
4 was busy doing other things. They were not really --
5 not really more concerned, I guess they were assuming
6 other responsibilities. And I just didn't see any reason
7 to.

8 Q Is it your understanding of the emergency
9 procedures that HP personnel are required to maintain
10 communication with the ECS?

11 A Yes, it is.

12 Q Is it your understanding that HP personnel are
13 not supposed to leave the ECS without the instructions
14 of or the permission of the person who is in charge of the
15 ECS?

16 A Yes.

17 Q Would it be fair to say that when you left the
18 ECS you felt that you had Mr. Deman's permission to leave
19 or his instructions to leave?

20 A Yes, I did.

21 Q Was that implicit permission by him or did he
22 explicitly say, "Okay, you can go," or, "You should go"?

23 A No, he didn't really say anything. I just
24 mentioned on the way out the door, "I am going to Unit 2."
25 But he didn't answer.

1 Q He didn't try to stop you?

2 A That's right.

3 Q Did you make any other entries into the
4 auxiliary building on March 28?

5 A Yes, I did.

6 Q About how many times did you go into the building?

7 A One other time.

8 Q Approximately when was that?

9 A Let's see, that was probably around 7:30 or
10 8:00 o'clock maybe.

11 Q In the morning?

12 A Yes.

13 Q Why did you make the further entry?

14 A To really determine what the situation in the
15 basement was.

16 Q Why did you feel you needed to determine what
17 the situation in the basement was?

18 A Well, the auxiliary operator had notified us
19 that there was water coming up through the basement floor
20 through the floor drains. And really, we wanted to determine
21 if there was any reading off the water itself where the
22 water was trying to account where the water might have
23 been coming from.

24 Q Who was "we"?

25 A Terry Daugherty and myself.

1 Q Before you made that entry did you discuss the
2 entry with anyone else?

3 A No. Well, yes, I did say to Fred Huwe that I
4 was going. In other words, Fred knew that we were making
5 the entry.

6 Q He didn't protest?

7 A No.

8 Q Did he give you any warning or instructions?

9 A No.

10 Q You did not talk to anyone in ECS directly before
11 you did that?

12 A I would say no, not that I remember. You know,
13 there was a thousand phone conversations made to the ECS
14 during that period, you know. It is very possible that
15 I did. But I really don't believe that I did.

16 Q But at any rate you weren't instructed by the
17 ECS to make another entry into the auxiliary building?

18 A No.

19 Q Would it be fair to say that you decided on the
20 need for that additional entry yourself and informed Mr.
21 Huwe who was your superior?

22 A Yes.

23 Q During the times when you entered the auxiliary
24 building did you have any kind of communication equipment
25 with you which would have allowed you to talk to anyone in

1 the Unit 2 HP area or the ECS?

2 A The page phones were on the walls through the
3 auxiliary building. But as far as, you know, a manual-
4 type piece of equipment, no.

5 Q When you went in the second time did you have
6 the same dosimetry equipment you had been wearing?

7 A Yes.

8 Q During that entry did you read your pocket
9 dosimeter?

10 A Yes, I did.

11 Q Was it still on scale?

12 A Yes.

13 Q After that entry I take it you still kept the
14 dosimetry equipment on rather than having someone read the
15 TLD?

16 A Yes.

17 Q Did you ever determine whether as a result of
18 your entrance into the auxiliary building you were
19 contaminated?

20 A Did I check myself?

21 Q Yes, sir.

22 A Yes.

23 Q Were you?

24 A No. Other than from HPR 227 which was much
25 earlier.

1 Q That was when the thing sort of blew out at you?

2 A That's correct.

3 Q When you were contaminated by that had you taken
4 steps to decontaminate yourself?

5 A Yes, I had.

6 Q They had been successful?

7 A Yes.

8 Q What had you done?

9 A Just washed my hands and stuff off.

10 Q What did you use to wash your hands with?

11 A Soap and water.

12 Q When you went in the auxiliary building the
13 second time did you also take a teletector?

14 A Yes.

15 Q Did you take any other kinds of survey instruments?

16 A Yes.

17 Q Why did you take the teletector?

18 A Because of the rad level and the fact that it was
19 the only instrument we had.

20 Q If you had had other survey instruments would you
21 have used them instead of or in addition to the teletector?

22 A I would have preferred to have an RO2A.

23 Q What would the different functions of a teletector
24 and an RO2A have been?

25 A Okay, the RO2A would have given me a better scope

1 of beta dose which was of some concern to me.

2 The fact that it has a higher range, you know, a higher
3 range scale capable of accurate dose for beta. It
4 doesn't have the dose range that a teletector does as
5 far as a full-scale range, but it does give you, I feel,
6 alot more protective factor with the wide window, with the
7 3-inch window exposed on it. But they were scarce.

8 Q Do you know why they were scarce?

9 A Yes, because the company is too cheap to buy
10 instruments.

11 Q Is there anything else that you would have liked
12 to have taken for purposes of surveying the radiation levels
13 other than RO2A and the teletector?

14 A No.

15 Q In your view that would have given you the
16 necessary pictures?

17 A Yes.

18 Q Did you prior to the time that you entered the
19 auxiliary building on either occasion try to find an
20 RO2A which you could use?

21 A No, not really other than looking around the
22 HP area. But, you know, I have been working in the HP
23 department for a number of years. And I knew how many
24 we had and I knew how many we didn't have. And I knew how
25 many we were supposed to have. And they weren't there.

1 Q Did you make any inquiries of anyone in either
2 the ECS or the Unit 2 HP area to determine whether there
3 was an RO2A available?

4 A No.

5 Q Would it be fair to say that the fact that you
6 didn't do any further looking or further inquiry regarding
7 the RO2A is that you regarded such efforts as futile?

8 A Yes.

9 Q That was based on your past experience and your
10 general knowledge of the availability of the RO2A's?

11 A Yes.

12 Q After you had come back from the additional
13 trip in the auxiliary building did you report the results
14 of your survey to anyone?

15 A Yes.

16 Q To whom?

17 A To Fred Huwe.

18 Q Do you know whether he made reports regarding
19 your surveys to anyone else?

20 A No, I didn't.

21 Q Did you ever ask him whether he did?

22 A No, I didn't.

23 Q Were you debriefed by him or by anyone else after
24 your entry?

25 A No.

1 Q Did you prepare any written documents regarding
2 your entry?

3 A No.

4 Q Are there procedures pursuant to which in
5 ordinary circumstances you are required to prepare a survey
6 form or a written record of an entry to an area which is
7 likely to have a high radiation level?

8 A Yes.

9 Q Why did you not prepare any survey forms
10 or written record on this occasion?

11 A I guess just the situation and the circumstances.

12 Q Did anyone instruct you to do it?

13 A No.

14 Q Did anyone discuss it with you?

15 A No. I guess it would be fair to say that
16 because of the scope of what we had seen it was the time
17 and the sequence of events up to that time and what we
18 were looking at. And we, you know, the ever increasing
19 levels that we saw, you know, it was really -- it was a
20 futile-type thing. It would have, I guess, by procedure
21 should have been done. For my own benefits now when I
22 think back on it I wish I had kept a log of everything
23 that I did and everything that I saw. But because of the
24 scope of the problem and the scope of what I had seen it
25 was like I was thinking, okay, what do I have to do next

1 rather than okay, this is what I did, this is what I have
2 to do. It was more like what do I do next.

3 Q What did you understand to have been the scope
4 of the problem as you put it?

5 A As far as official notification goes?

6 Q No, in your last answer you indicated, if I
7 understood it correctly, that you dispensed with or did not
8 follow certain procedures because of the scope of the
9 problem which you were facing?

10 A Right.

11 Q What I wanted to know is what you understood the
12 problem or the scope of the problem to be at that point?

13 A I had no idea. I had -- I physically did not
14 understand what was going on. I could not in my furthestest
15 reaches understand what was giving me the dose rates in that
16 building that I saw, you know. I just could not visualize
17 a problem that great that could cause what I saw, you know.
18 And nobody -- I really didn't have the time to sit and
19 say to Fred Huwe or to Joe Deman or to Dick Dubiel, you know,
20 what is causing this? What is going on? You know, I
21 figured if they wanted me to know or if they have the time
22 to inform me, well, this is what happened, this is what
23 is going on, this is what is causing it, you know, I could
24 say, okay, I understand what is going on. But I had no
25 idea what could be causing what I saw.

1 I had no idea what caused the water to come up. I had
2 no idea what caused the water to come up in the auxiliary
3 building. We had had water in the floor drains on the
4 305 elevation in the auxiliary building many times just
5 because they overflowed with the boric acid mixed tank
6 upstairs or the, you know, because the drains never worked.
7 The drains never properly worked. They were always either
8 plugged up or there was a block someplace and they'd
9 surface on the 305 level and there would be no water
10 at all in the basement. You know, it was many times.
11 You know, but then with the scope and the amount of water
12 that was beginning to come through the floor in the basement,
13 like when I walked through the floor the hallways in the
14 basement I was walking on pedestals and conduit chases
15 and just trying to keep my feet out of the water, you know.
16 It was crawling over equipment, you know. And I really
17 didn't think, you know, okay, what can we do in this.
18 What can be causing this? You know, I walked by an area
19 and it is rated 200 R, 300 R. I had seen 750 R one other
20 time in my life, you know. And I have been in that area
21 for 18 seconds and picked up 1200 MR. You know, but you
22 walk by and all of a sudden look down at an instrument and
23 walk by a room and go offscale and come right back on,
24 you know, I think where is it coming from? What is
25 causing it? You know, this, you know, rem is dose rates

1 you are looking at, you know.

2 No, I didn't take the time to go to somebody
3 and say, "Explain to me what is causing this and what am
4 I seeing and why am I seeing it?" No, I didn't take
5 that time.

6 Q Would it be fair to say that you believed at the
7 time you were recording the levels that you saw in the
8 auxiliary building that there was a fairly serious
9 emergency going on even though you didn't know exactly what
10 the emergency was?

11 A Yes.

12 Q Let me tell you my problem with trying to figure
13 out what you did and why you did it. Earlier in your
14 testimony you said that you declined and advised Mr. Dubiel
15 that you should not go into the reactor building because
16 you were uncertain of what was going on in there as
17 a result of the situation with the HP 227. A little bit
18 later you said that you saw high levels of radiation in
19 the auxiliary building. And you told everybody to get
20 out.

21 Now, we find you a little bit later in time
22 going back into the auxiliary building to take further
23 measurements and not, if this is a fair characterization,
24 following health physic's practices to a tee.

25 Why, if you wouldn't go into the reactor

1 building and you chased everybody else out of the auxiliary
2 building, did you go back into the auxiliary building without
3 making sure that from your superiors that such a procedure
4 was necessary and taking every personal precaution that
5 you could to minimize the prospect that you would become
6 contaminated?

7 A Now let me answer your question. Number one,
8 5 years I have been going in and out of the Unit 1, Unit 2
9 reactor buildings. I know them.

10 Okay, you got 2 doors to go through. And those
11 2 doors are the only 2 doors in and out of that building.
12 I also know what the structural internal structure of that
13 reactor building looks like. I know where the takeoffs
14 are on the monitors that are in those buildings, my
15 radiation monitors, my air-sampling monitors and that sort
16 of thing.

17 The fact that HPR 227 blew out in my hand tells
18 me that there is horrendous amount of pressure in that
19 building. That monitor just doesn't work like that.

20 Okay, I would not go in that building because
21 I knew that the water that was in the guages on HPR 227
22 was not actual water, but steam. The building is enclosed.
23 The takeoff on HPR 227 is in an area that unless that
24 building was completely filled with steam I wouldn't have
25 seen it.

1 The amount of pressure that blew that lead-
2 covered holder out in my hand and sprayed me with water
3 indicated to me that, you know, when we ran it like less
4 than .1 pounds -- .1 pounds plus or minus zero under normal
5 conditions in a lot of cases would not cause that which
6 indicated to me that there was a horrendous amount of
7 pressure from the inside out.

8 Now, I'm not stupid. I wouldn't go into that
9 building under those conditions.

10 Now, your question about the auxiliary building
11 is I could walk through that door and I can see in front
12 of me. There is no steam in the auxiliary building. I
13 can hold a meter and know that the dose rate levels go up.
14 They go down. I can see that.

15 If I can see it I know what I will go to and where
16 I will go and what I will do, how long I can stay there.
17 That meter will tell me how long I can stay there, you know.
18 If that meter pegs I don't go any further. I come back out.
19 Okay?

20 Unless it is a stream or something like that that
21 if I walk by it it comes up and it goes down. Then I will
22 continue. But if I walk into an area where I can't read
23 that meter anymore and it reaches its maximum readability
24 and I am not going to go any further. I mean, that is just
25 common sense to me, you know.

1 That's the reason I went back in the auxiliary
2 building because I wasn't afraid to go into the auxiliary
3 building. I was afraid to go into that reactor building
4 because I knew if I went into that reactor building
5 I'd never come out or I had a pretty good idea I'd never
6 get out because I know that the amount of pressure that
7 gives me the capability of blowing a fixture out into my
8 hand that weighs probably 3 pounds, you know, coming
9 through a 3/4 inch line is a lot of pressure, you know.
10 For one thing, I doubt very much that we'd even gotten
11 the door open in the first place. Okay. But, you know,
12 I can't -- you know, in the auxiliary building I could
13 walk through there and I could see water on the floor.
14 And I could see dose rates. But I know what is there,
15 you know.

16 I mean, I can visually look at that meter
17 and know what I am getting into and if I am going to go
18 any further, you know. It's a different scope in that
19 reactor building, you know. Once you are there -- Sure,
20 I could have been looking at that meter and seen what I
21 am into. But I also know that if that building is filled
22 up with steam I am not going to stay there very long. Or
23 if I am, it is going to be a long, long time, you know.
24 That's the difference.

25 Q What about the difference between the auxiliary

1 building which you told people to evacuate and the
2 auxiliary building which you then reentered without either
3 instructions from above or without taking all of the
4 precautions that you otherwise would take?

5 A Well, you know, I have restricted people from
6 many areas because of dose rate. But I have entered those
7 areas myself. And this was under those same circumstances.
8 I didn't feel that I took anymore chances regarding myself
9 because there was nobody else in there. I had to worry
10 about me, okay. And I can take care of me when it comes
11 to entering areas of high rad levels because I know and I
12 count to myself and I know -- I concentrate totally
13 on what I am getting into, you know. If I -- I walked into
14 that auxiliary building. If I saw a dose rate, you know,
15 I remember it and I know that, okay, I stay here or I don't
16 stay here. And I move or I avoid this or I avoid that,
17 you know. I can take care of myself under those conditions,
18 you know. It wasn't like nobody knew I was there. I was
19 in there, you know, by myself or with somebody else. But
20 somebody knew I was there. And if, you know, I didn't come
21 out in a certain period of time somebody would come out
22 looking for me regardless, you know. But I didn't really
23 think that way. But I knew what I was getting into under
24 those conditions, you know.

25 Like I said, if I would walk up that hall and

1 the general area in that hall reached a point where I knew
2 I couldn't stay there I didn't go any further, you know.
3 I was looking out for my personal safety as much as I ever
4 had during that period, you know.

5 Hey, I was as scared as everybody else, you know.
6 It is just that I knew there was something wrong and that
7 granted, somebody -- people somewhere along the line were
8 going to have to go back in there shortly or within a,
9 you know, a given period of time. And we had to know
10 what was there.

11 Q Am I correct that there were protective measures
12 you could have taken which would have minimized the risk
13 you were subjecting yourself to?

14 A Yes.

15 Q Am I correct that you did not take those
16 measures because you felt that you didn't have time?

17 A That's correct.

18 Q Am I also correct that you did not engage in
19 more consultation with your superiors than you did about
20 the entry into the auxiliary building because you didn't
21 feel there was time?

22 A No, not really that I didn't have time to consult
23 with them. It is just that the scope of what was going on,
24 the concentrations were elsewhere, I should -- You know,
25 it is not really a matter of taking the time or not having

1 the time. But it was really the -- I don't know how you
2 -- really to put it, you know. Everybody was everywhere.
3 And nobody was concentrating on one certain thing. It was
4 like I knew I was going to be in that HP area for, you know,
5 a certain amount of time. And I knew that if there was
6 anybody going into the auxiliary building besides myself
7 after that point that I was going to be there to say,
8 hey, look. This is what you have here. Walk up by the
9 makeup valve alley, this is what you have. You walk by the
10 fuel injection filters, this is what you have, you know,
11 avoid these areas, you know. That, you know, we were
12 restricting who was going in there after that point.

13 And I really -- it was like we didn't have a boss,
14 really, at that time. You know, the seniors or the
15 technicians at that time were really -- we were the bosses,
16 you know. The people who were there were asking us
17 questions. They weren't asking Fred Huwe and Joe Deman
18 and the Dick Dubiel's and the Tom Mulleavy's. They were
19 asking the Mike Janouski's, the Pat Donnachie's, the
20 Carl Myers'. Those are the guys they were asking because
21 we were involved in it. We were the ones who were making
22 most of the on-line decisions and giving the explanations
23 and that sort of thing about what we were seeing, you know.
24 What they were doing as far as the questions for the
25 control room and the ECS and that sort of thing, you know.

1 I don't know who was asking those questions and who was
2 talking to who.

3 Q Would it also be fair to say that you didn't
4 record the information regarding the survey of the auxiliary
5 building in the normal manner because you felt there were
6 so many things to do that it was better to dispense with the
7 record keeping?

8 A No, I don't really think I thought that. In
9 other words, I never thought to myself during the whole
10 period, hey, you know, well, I am not going to write that
11 down because it is going to be different an hour from now
12 or 15 minutes from now. Like, I would jot myself down notes
13 on a tablet or something. And I'd just write something
14 down that I wanted to remember. And it would be there
15 on the desk, you know. And, like, the HP log book, that
16 was there and that sort of thing, you know. That stuff
17 was -- it was there but we didn't use, you know.

18 Like I said, it was like when I did something
19 I was thinking what am I going to do next or what do I
20 have to do next, okay. Fact -- The fact that I didn't
21 keep records through the whole thing bothers me more now
22 when I have the time and the ability to sit back and look
23 at what I did and what all of us did. I think, boy, I
24 wish I had kept alot better notes of what happened and what
25 I saw. But I didn't at the time. Not only for you people

1 or for the people investigating the situation but more
2 for myself.

3 MR. DIENELT: This would be a good time to take
4 a break.

5 (Whereupon, a recess was held.)

6 BY MR. DIENELT:

7 Q As you understand, what is the purpose or what
8 are the purposes of maintaining records during an
9 emergency?

10 A I guess the ability to go back and set up a
11 sequence of what happened to say, you know, -- I mean, you
12 never know when it is going to stop or to what degree it is
13 going to go to. It may have, you know, like in this
14 situation I guess it may have gone to a certain point and
15 then, you know, they could have maintained it. And then you
16 would have been able to say, hey, this is where it stopped.
17 You know, at this point it is going the hilt. And you are
18 trying to go back to a middle point or an early point and
19 say, okay, this is what it was and this is, you know, where
20 it's at.

21 Q Would you agree that what you just described is
22 essentially a historical purpose?

23 A Yes.

24 Q Do you also believe that the record keeping has
25 any contemporaneous purpose?

1 A In this situation?

2 Q Yes, sir.

3 A I will be honest with you. I don't know.

4 Q If someone had come to the auxiliary building to
5 conduct a survey after you had completed yours and you had
6 not been present for some reason how would that person
7 learn that a survey had already been conducted?

8 A By discussions that we had with the other
9 technicians.

10 Q If you were not present wouldn't it be fair to
11 say that in the absence of discussions with other people
12 the only basis on which a person would have known what
13 had transpired in the survey that you took would have been
14 if there were some written record at the time that he could
15 look at?

16 A Say that again.

17 Q If you weren't there wouldn't it be true that a
18 person would be able to find out what you had done if you
19 had made record of it?

20 A Yes.

21 Q Would you agree that the record keeping also has
22 that purpose?

23 A Yes.

24 Q You also assisted in sampling the primary coolant
25 on the 28th?

1 A Yes.

2 Q At whose direction did you do that?

3 A Terry Harner.

4 Q Who was he?

5 A He is the Unit 2 chemistry foreman.

6 Q Did he tell you why he wanted a sample?

7 A They wanted to establish a dose equivalent
8 iodine factor.

9 Q What was the reason for that as you understood
10 it?

11 A Just -- I will be honest with you. I don't
12 really know. I don't know why they did it. They
13 wanted -- because they were concerned the E-bar factor
14 in the reactor coolant system --

15 Q Would you tell me what E-bar factor is?

16 A What E-bar is you take all your isotopes, your
17 weight and mean activities of all your isotopes, calculate
18 those all out including your tritium, including your
19 strontium 89's and 90's. And you add these altogether
20 and it gives you a total activity of the coolant. And you
21 take a certain factor for this and it gives you a base line.
22 I don't know exactly what the purpose of it is, you know.
23 Some engineer came up with this thing and, you know, they
24 use it everywhere. I think what it does is it gives you the
25 reactivity or something in the core. I'm not really sure

1 what it is.

2 Q Did you understand the taking of the primary
3 coolant was essentially an emergency measure?

4 A Yes.

5 Q How did you gain that impression?

6 A Just because of the activity that we had seen.

7 Q Did Mr. Harner say to you you have got to take
8 a primary coolant sample and do it as soon as you can or
9 words to that effect?

10 A What he did was he said, "Look, you know, we are
11 going to be drawing a sample. And I would like you to,
12 you know, go in with Tom." Tom Thompson is the other
13 technician at the time he drew the sample. "You know, this
14 is the reason we have to do it. You know, we are going to
15 do it now."

16 Q He said now?

17 A Well, you know, now was like 9:30. But it turned
18 out it was like 10:00 o'clock or a little bit after 10:00
19 till we got completely dressed and everything.

20 Q Tell me what you did in terms of preparing to take
21 the sample?

22 A We got fully dressed in anti-C's.

23 Q What is anti-C's?

24 A Protective -- it is full protective clothing.
25 That involved coveralls, boots, gloves, hood and respirator.

1 Q What else did you do in preparing to take the
2 sample?

3 A Really nothing. It was already lined up. The
4 system was already still in recirc. It was just a matter
5 of going in and drawing the sample. We talked about it,
6 how we were going to do it, what equipment we were going to
7 use, where we were going to use the sample if it turned
8 out to be something horrendous.

9 Q How did you decide you were going to do it?

10 A Well, what we decided was we were going to take
11 a beaker and take the hose and put the hose in a beaker,
12 draw the sample, dump the beaker into a bottle, bring the
13 sample out, sit it behind some lead bricks and let it there
14 for whenever we got a chance to analyze it.

15 Q Were you going to do this manually or with some
16 kind of instrument?

17 A Manually.

18 Q Did you consider doing it with an instrument?

19 A No, we never -- it's routine that we do it that
20 way. We were going to go into it and draw it just as
21 our routine sample.

22 Q Where were you going to put the sample?

23 A The original discussion was we were just going to
24 store it behind some lead bricks on a counter.

25 Q Is that what you did?

1 A No.

2 Q What did you do?

3 A Nothing like we decided. We got in there. I had
4 a teletector. Tom was going to be the one to draw the
5 sample. I was just going to be more or less the HP escort.
6 I put the teletector -- he wore -- I'm not really even sure
7 if he wore finger rings at the time. I wasn't too involved
8 in the actual prep for it. I know I didn't have finger rings
9 on at the time or extremity dosimetry. I'm not really
10 sure if Tom did at the time. It was a situation where
11 everybody else decided what we were going to do and, yes,
12 you are the guys that are going to do it.

13 We came into the room and the dose rates in the room
14 I don't really remember what they were. They were fairly
15 high, you know, maybe 5 to 10 R range, general area in the
16 room. We didn't waste any time, tried not to waste any
17 time -- we -- Tom held onto the sample hose. He cracked the
18 valve. The sample started flowing. He went to put it in the
19 beaker and the dose rates were high. So, I told him I said,
20 "Just stick it in the beaker and set it in the drain."

21 So, he stuck the hose in the bottle, set the
22 bottle in the drain and left it sit. And then we just
23 turned the valves off and I turned the motor-operated valves
24 off on the panel. And I said, "Back out." I had the
25 teletector I would say probably 1 , maybe 14 inches away

1 from the sample itself. And it was reading like 200 R,
2 a little greater than 200 R at the time.

3 Q What became of the sample if you know?

4 A The sample sat in the sink for -- I'm not really
5 sure. [REDACTED]

6 [REDACTED] eventually did an analysis on that
7 sample. I'm not -- I can't remember the exact date that
8 he did that. It would be easy to find that out because
9 he got overexposed.

10 Q Would it be fair to say that you had anticipated
11 lower levels than you found?

12 A Yes.

13 Q What had you been told about the levels you should
14 expect?

15 A Nothing except to be careful.

16 Q At this point were you aware that there had been
17 fuel damage?

18 A No. It's just an assumption.

19 Q Did you assume that?

20 A Yes. Well, not really that there was fuel
21 damage, that there was something wrong in the core. You
22 know, I -- you know, I had really no idea what, you know,
23 what really could have been wrong other than the fact that
24 earlier in the morning somebody had mentioned failed
25 fuel, you know.

1 Q You did not discuss the failed fuel in the
2 context of the taking of the primary sample of the
3 primary coolant?

4 A No. I don't think -- my opinion of it is that,
5 you know, when I think back on it now that there was nobody
6 there really qualified to determine that. I certainly don't
7 think any of my foreman were. I certainly don't think my
8 supervisors were who were there at the time, who were
9 physically there running the show at the time.

10 Q At the time, though, you didn't have that view;
11 is that correct?

12 A No.

13 Q That's not correct?

14 A Well, I didn't depend on them at the time. You
15 know, I have learned that the people who have been my
16 boss for the past 5 years, you know, that you can't really,
17 you know, it is what I know and it is what my fellow
18 technicians who are doing the job know. And we depend on
19 each other, you know, for information and for a background
20 on things and, you know, look have you been through this
21 before? Yes, I have. Okay, you know, what can I expect
22 or, you know, that sort of thing where they say to me, hey,
23 look, you have done this job before. You know, you have been
24 through this, you know, how did you handle it. It's not a
25 situation where my foreman has come up to me and said, look,

1 I am the, you know, I know what is going on. I know how
2 to handle this, you know. I am the foreman and I am
3 experienced in this because my foremen aren't. My foremen
4 have been technicians. You know, and alot of us don't feel
5 that they were good technicians. You know, and I don't
6 feel my foremen are any more qualified to tell me my job
7 regardless of what their position or color of the hat they
8 wear. They are not as qualified to do that job as I am.

9 Q Had you discussed taking the sample of the primary
10 coolant with any of the other technicians?

11 A No.

12 Q Were you aware of any records or surveys that were
13 made regarding the levels of radioactivity in that area
14 before the sample was taken?

15 A Yes.

16 Q What had been done?

17 A Well, Pat and I had surveyed it prior earlier,
18 you know, at the very beginning when G-4 went off. But
19 there had -- that I know of other than Dave Zeiter and
20 Tiny, they had gone in and drawn a sample around 6:00 o'clock
21 for a boron sample. And other than that I, there was no
22 surveys done during the period because ...

23 Q Had you discussed the survey that the other 2
24 individuals took around 6:00 o'clock with them?

25 A Yes. Yes.

1 Q I take it that they did not find high levels?

2 A Right. In fact, the levels at that time were
3 fairly routine. In other words, the general area in there
4 isn't very high anyway.

5 Q When you left the sample in the sink and left the
6 area did you report what you had done to anyone?

7 A Yes.

8 Q To whom did you report it?

9 A Numerous people, Gary Read, Kerry Harner,
10 Pete Velez was there at the time. You know, Tom Mulleavy
11 was there at the time. I think, yes, Tom Mulleavy was
12 there at the time.

13 Q Who is Gary Read?

14 A Gary Read is the Unit 1 chemistry foreman.

15 Q Did any of the people to whom you reported this
16 information respond to you?

17 A No, not out of the ordinary like, you know, where
18 did you leave the sample? What did you put it in? You know,
19 what did it read? Now, that's just -- that sort of thing,
20 you know. Like, you know, we said, "Well, we left it sit
21 in the sink and it is fine," you know, "That is great. Just
22 let it there," you know. "It won't hurt anything there."
23 That sort of thing. There was no responses to, you know,
24 "What color was the water?" You know, "Did it foam and
25 steam," and, you know, that sort of thing.

1 Q If you had been using instruments to draw the
2 sample and pick up the bottle would you have been able to
3 get it behind the lead bricks?

4 A No, I don't believe so because to get it -- to put
5 it behind the lead bricks that we were originally going
6 to put it behind we would have had to carry it out of the
7 lab or out of the sample room to a counter in the nuclear
8 chem lab or the hot lab really. And, you know, it is a
9 normal, little brick cave that we have established for our
10 reactor coolant samples when we are doing routine analyses
11 on them everyday. It is not a fantastic designed thing.
12 It is 5 or 6 lead bricks standing together and just
13 something to shield us while we are working in the lab.

14 Q Prior to taking the sample of the primary
15 coolant did you discuss what you were going to do with either
16 Mr. Dubiel or Mr. Mulleavy?

17 A No. Most of the discussions we had was with
18 Gary Read and Kerry Harner. Tom Thompson had discussed the
19 sampling with Kerry Harner earlier. But I don't
20 know what the discussion on that was. I know that
21 Tom wasn't very enthused about drawing the sample. In fact,
22 Tom Thompson quit like a day after that. This was on
23 Wednesday morning and Tom quit Friday.

24 Q You had the impression that he was doing it under
25 protest?

1 A He wasn't very happy about it, yes.

2 Q Did he tell you why?

3 A No. Well, Tom was very anti-nuclear the whole
4 time he was here. You know, he was here because it was
5 good money and, you know, he was a very fussy-type person.
6 In other words, he was very, very critical of the company.
7 He was very critical of his job. He was very dissatisfied,
8 you know. He was a very difficult person to work with.

9 Q Were you uneasy about taking the sample?

10 A No. No. I am not very -- I don't shake very
11 easily when it comes to that. A lot of people tell me I am
12 supposed to. But I figure it is my job. And if I'm afraid
13 to do my job, I shouldn't be here.

14 Q What dosimetry did you have?

15 A We had -- Now, like I said I don't remember if
16 they put Tom -- had Tom in finger rings or extremity TLD's
17 or not. I honestly can't answer that question. I know I
18 didn't have them on at the time. And I had a high-range
19 dosimeter on, a 5-rem dosimeter, a standard 200-millirem
20 pocket dosimeter and a TLD.

21 Q What was your exposure as a result of the sample?

22 A It wasn't very much. I will be honest with you,
23 I don't really remember.

24 Q Did you have the 5-rem dosimeter read?

25 A Yes, they read it. But I don't remember what it

1 was. In fact, our dose was real low, if any. It was, you
2 know, 10, 20 MR, something like that. It was really very
3 low.

4 Q Do you know whether the dose that you received
5 was recorded somewhere?

6 A It was recorded someplace, yes. But I don't
7 remember where or what happened to it. A lot of our
8 records during that time got -- the records that we did
9 keep, the notes that we kept -- I told you that there was
10 no survey -- completed survey form done in Unit 2. But
11 there was notes kept during that period. Those have
12 somewhere along the line, who has them or where they got
13 to, you know, some of us have questioned because, like I
14 said, I did a survey, a documented survey a day or two later
15 after the accident. It was Friday or Saturday of that week.
16 And it was all 3 levels of the auxiliary building from one
17 end to the other. And that survey isn't around. And it
18 was stapled together and it was 3 sheets. And it was the
19 entire auxiliary building, every cubicle, every door,
20 everything. And that survey as far as I know has not been
21 able -- they have not been able to find it since the week
22 after the accident. And that was just one of numerous-type
23 things, air sample results that we had kept. Other surveys
24 that were done by other technicians during that. Those
25 documents are all gone someplace.

1 Q Apart from the sampling of the primary coolant
2 and the entries into the auxiliary building on the 28th
3 did you do any other sampling or expose yourself to any
4 additional risk of radiation during that day?

5 A During that day?

6 Q Yes, sir.

7 A No, I don't believe so. Not that I can
8 remember, anyway.

9 Q Will you summarize your activities on the 29th?

10 Let me back up for a minutes. When did you leave
11 on the 28th?

12 A It was around probably 3:00 o'clock or so in the
13 afternoon.

14 Q When did you come back?

15 A That night about 11:00 o'clock.

16 Q For your normal shift?

17 A For my normal shift.

18 Q Did you work that normal shift?

19 A Yes.

20 Q Did you leave at about 7:00 the next day?

21 A No, next day I worked till about 11:00 o'clock
22 or something like that. It was late in the day again the
23 next day.

24 Q Tell me what you did roughly during that 12-hour
25 span if you can recall?

1 A I really can't.

2 Q Was that the day on which you did the survey
3 on the auxiliary building?

4 A I think it was 2 days later.

5 Q Did you do any surveys that day that you can recall?

6 A Not that I can remember, no.

7 Q Do you know where you were physically during that
8 period?

9 A No, no, I don't remember.

10 Q Did you work at the shift beginning at 11:00 o'clock
11 on the next day which would have been the 3:00 to 11:00
12 shift?

13 A No, I was off the next day. I had other
14 arrangements and took a personal day off. One thing, I was
15 pretty well exhausted. And I had made plans and the accident.
16 I really didn't inform -- they had known like a week or so
17 in advance that I was going to be off. And I just didn't
18 come in. And nobody said anything. They knew I wasn't
19 going to be there or I think they expected me to be there
20 but they didn't tell me, "No, you can't have your personal
21 day off."

22 So, I took my personal day. And this was on I
23 think it was Saturday morning. I'm not really sure. And
24 I was at the Hershey Motor Lodge at the time.

25 And about 11:00 o'clock in the morning this lady

1 came in. She was hysterical. And I thought -- I was
2 eating breakfast and I thought, well, I had better call
3 the plant and see what's going on.

4 So, I called the plant about 11:00 o'clock. And,
5 of course, I had trouble getting through. And I thought,
6 well, I'd better go to work. So, I left the Motor Lodge,
7 and I came straight to work from there. And I got there
8 about 11:30 I guess. And I went right to work then. And
9 I worked -- I don't know, 20 hours that day.

10 Q Was that the day on which you did the survey
11 of the --

12 A That's the day I did the survey of the auxiliary
13 building.

14 Q You stated that the lady whom you had encountered
15 was hysterical?

16 A Well, she was very emotional. She was crying.
17 And I was really eavesdropping in her conversation with this
18 waitress.

19 Q What did you hear that caused you to call the
20 plant?

21 A Well, she said that, you know, they were talking
22 about a core meltdown, you know, and the whole bit, you
23 know. And, you know, there was a lot of people pretty
24 upset that day. And I just thought, hey, you know, I better
25 find out if they need help. I felt kind of guilty really

1 about not coming to work.

2 Q Who, if anyone, instructed you to do the survey
3 of the auxiliary building?

4 A Nobody instructed me to do it. I informed --
5 I talked to Tom Mulleavy about it. Tom Mulleavy was aware
6 that it was being done. I told Tom, "Look, you know, we
7 don't know what we have." Because as far as we had --
8 well, as far as anybody had known nobody had been there since
9 late in the day of the 28th, maybe early in the morning of
10 the 29th.

11 Q How did you know that?

12 A Just from discussions. I knew that Gregory Hitz,
13 the shift supervisor, and Carl Myers had taken water samples
14 off the basement floor and they had gone in and done some --
15 a couple small things, very quick entry type things during
16 that period. But nobody really knew what anything was.
17 I mean, nobody had any idea really what any of the cubicles
18 read. There was no idea really what kind of dose rates
19 there were in the building or in the auxiliary building
20 during that period.

21 And I had talked to Tom about it. And they were
22 already talking about starting to send operators back in
23 to start doing some small things, you know. And I had
24 talked to Tom about it.

25 Q Who was "they" in this conversation?

1 A Well, shift foreman, you know, just general
2 foreman-type discussions that you would overhear,
3 Conversations and stuff like that. The operators were
4 talking, you know. You'd hear an operator say, you know,
5 they are already talking. They want me to go over and line
6 up this or, you know, go over the rad waste panel and just
7 close the valve or something, you know. Real quick type
8 entries. Nothing extended or anything like that.

9 And they really had no idea. You know, you'd
10 talk to somebody and say, "Hey, look, what do you have in the
11 basement?" "Well, we don't know. We don't have any idea, you
12 know." Because there was no entries, real entries made.
13 And I talked to Tom about it. And he said, "Well, go
14 ahead." You know, "Go do what you have -- get some readings
15 if you can and get some kind of idea what you have, you know."

16 Q That was your initiative to conduct the survey?

17 A Yes.

18 Q Did you discuss it with anyone other than Mr.
19 Mulleavy?

20 A No.

21 Q Did anyone accompany you in taking the survey?

22 A No.

23 Q What precautions, if any, did you employ?

24 A Well, I checked the instrument that I used very
25 carefully to make sure that it worked properly, the batteries

1 were okay.

2 Q What instrument did you use?

3 A I used a teletector.

4 Q Still no RO2A?

5 A Still no RO2's. Made sure my dosimetry was
6 right.

7 Q How did you do that?

8 A Well, just, you know, zeroing my dosimeters, my
9 pocket dosimeters and that sort of thing.

10 Q Zeroing means that you bring it back to the point
11 where it shows a zero reading?

12 A Zero reading, right.

13 Q So that you would be able to tell how much you
14 had gotten from that particular event?

15 A Right.

16 Q Did you wear a respirator?

17 A I wore a Scott Air Pack.

18 Q Did you wear protective clothing?

19 A Yes, and wet suit.

20 Q Did you wear any extremity --

21 A No. I had no intention of touching anything or
22 turning any valves or grabbing hold of anything. I didn't
23 really see any reason for it. The only thing I probably
24 should have done which I didn't do was wear extremity badges
25 on my ankles.

1 Q Why would that have been a good idea?

2 A Well, because of the water in the basement on the
3 floor.

4 Q What form did the written survey that you prepared
5 take?

6 A It was a -- it was the auxiliary building -- it
7 was full layout prints of -- they were regular 11 -- 8 X 11
8 sheets with the hallway drawings on them. Well, I am sorry.
9 No, they were 14 or 8 X 14's, full layouts of the entire
10 floor elevations with all -- each cubicle in it, the
11 hallways, the full layout.

12 Q As you went around did you write down the levels
13 as you were taking the survey?

14 A Well, what I did was I went to the basement.
15 I knew -- I laid out in my head exactly where I was going
16 to start, what I was going to do, how I was going to
17 approach everything. What I did was I came to the basement.
18 I came down the stairway at the south end of the auxiliary
19 building to the basement first. I laid my survey forms
20 right inside the door for the upper two levels so that I
21 wouldn't have to carry them around with me and all that.

22 I took my -- There's a desk in the basement in
23 the center of the hall about midway between north and south
24 ends. It is a regular operator's log desk. It is really
25 what it is. I laid my survey there in the hall. I went back

1 and I started at the south end. And I worked to the center.
2 And then when I got to the center I wrote everything down
3 on the log sheet by cubicle, what readings I could, you know,
4 I had in the hallways, that sort of thing.

5 Then I went to the north and I started back in the
6 decay closed cooling heat exchanger area, the valve -- the
7 decay heat valve area and came back out through that area
8 and logged everything down then.

9 Then I went and went to the next floor. And I did
10 the same there at both ends. And then I went to the other
11 floor.

12 Q Did you have gloves on?

13 A Yes.

14 Q When you went outside to record the levels you had
15 found did you remove your gloves?

16 A No.

17 Q You wrote with the gloves on?

18 A Yes, I taped a pen to my wrist so that I wouldn't
19 lose it and, you know, just wrote everything down. I
20 figured I could always put it in poly bags and copy it, you
21 know. As it turned out it wasn't hot because really I didn't
22 touch anything.

23 Q "It" being the pen or the paper?

24 A Both.

25 Q How long did you spend in the building?

1 A Probably 2 hours.

2 Q When you finished your survey what did you do
3 with it?

4 A It was put in the HP lab, Unit 2 HP lab.

5 Q Was there a particular place where you were
6 supposed to put such documents?

7 A Well, at the time we were just laying them on the
8 desk for reference really at the time. And normally they
9 would have been filed in the file -- in the filing
10 cabinets.

11 Q Is there a procedure of which you are aware which
12 is supposed to be followed with respect to the maintaining
13 of documents during an emergency?

14 A No, not that I know of.

15 Q Did you discuss the survey after you had taken
16 it with anyone?

17 A No.

18 Q Who did you discuss it with?

19 A Dick Dubiel, Tom Mulleavy, Fred Huwe.

20 Q All at one time or on different occasions?

21 A Different occasions.

22 Q Did you show any one of them the survey?

23 A Yes, Fred Huwe had the survey, yes.

24 Q You showed it to him?

25 A Yes. In fact, I gave it to him.

1 Q He walked away with the survey?

2 A Yes. If I'm not mistaken, you know, I could
3 be wrong. But if I am not mistaken he took that survey
4 to his office, if I'm not mistaken. I really -- Yes, I
5 am pretty sure that is what he did with it. He took it to
6 the office. I did see it later, though, back in the HP
7 lab. It was returned to the HP lab.

8 Q It was put back on the desk or table?

9 A Yes.

10 Q Was that the last time you saw it?

11 A Yes.

12 Q You don't know who picked it up, if anyone?

13 A No. We were using it for a reference really
14 at the time.

15 Q How were you using it as a reference?

16 A Well, occasionally the operators were going in and
17 isolating a valve, you know, here and there.
18 And they were very rare entries. Like this might have been,
19 you know, like 2 or 3 entries or something like that during
20 that period. Far and few between.

21 Q They would consult you?

22 A No.

23 Q They would consult the written document?

24 A Yes.

25 Q After the day on which you took that survey did

1 you take any other surveys or have any other risk of
2 exposure from that kind of activity up until about April 15?

3 A I don't know. I made about 12 entries in the
4 auxiliary building in about the first week and a half.

5 Q Was the purpose of all these entries to record or
6 determine levels of radiation?

7 A Some were. Some were escorting operators during
8 certain jobs. Drawing -- other than drawing the first --
9 like we drew the first waste gas decay tank sample before
10 it was purged back into the building, in the reactor
11 building. I don't remember what the dates of those were.
12 We drew -- I drew the first HPR 227 samples later. But I
13 don't remember the dates of that either.

14 Q On all of the occasions when you entered the
15 auxiliary building after the survey that you had just
16 testified about did you wear protective clothing?

17 A Yes.

18 Q Did you make any entries into the auxiliary
19 building after taking the survey alone?

20 A No.

21 Q Why didn't you have somebody with you when you
22 took the surveys?

23 A I guess limiting exposure for one. We wanted to
24 get as few people -- to have as few people in there --
25 you know, there was people in there that, you know, they

1 knew that, you know, I would be coming out of there about
2 every 25 minutes to have a bottle changed.

3 Q Bottle changed, meaning a change for your
4 respirator?

5 A For my respirator. And if that I didn't come out
6 there was somebody who was ready to come in and look for
7 me. You know, there was enough people that knew I was in
8 there that it wasn't anything -- because by that time we had
9 alot of outside contractors in for health physics support.
10 And, you know, there was alot of guys in the HP area who
11 knew I was in there and knew what I was doing and about
12 where I was going to be and that sort of thing.

13 Q With the influx of the outside contractors
14 did the change of command in the health physics area as
15 you understood it change?

16 A Yes, many times. It reached the point at about
17 the end of the first week that I didn't know who my boss
18 was.

19 Q I don't want to ask you to try to remember each
20 and every change. But can you elaborate for me a little
21 bit what the changes were and who some of the new people
22 who were involved were?

23 A Well, let me see. The first -- I guess the first
24 thing was that they put Dick Dubiel and Tom Mulleavy and
25 my first level foreman on shift, okay, which means Dick

1 Dubiel was really no longer my third level boss if you want
2 to call it that, supervisor. It was more or less the
3 HP foreman on shift at the time was the supervisor. Dave
4 Limroth was instilled in there somehow. And I, you know,
5 I still don't know what Dave's function is or was. I really
6 -- there was a whole bunch of changes, you know. You were
7 wondering everyday when you came in. During the emergency
8 they made Peter Velez supervisor, you know, just by title-
9 wise. You know, he never performed the supervisor's
10 functions.

11 I don't know who was handling the outside
12 contractors at the time. Later on a gentleman named
13 Sandy Lawyer was thrown in there. I don't know what his
14 function was or I don't know that we got memos, the HP
15 department, you know, per Sand Lawyer. You know, there was
16 a constant change.

17 Q Was either Mr. Limroth or Mr. Lawyer to your
18 knowledge experienced in the area of radiation protection?

19 A I don't think so. They didn't, you know, they
20 may have been. But if they were it wasn't at my level or
21 at my foreman's level that I know of. It was more of an
22 administrative HP-type thing, paper pusher.

23 Q Did you have any dealings with Mr. Graber?

24 A A Mr. Graber?

25 Q William Graber, Bill Graber?

1 A I don't even know Mr. Graber.

2 Q Was it your view that the outside contractors
3 who came in were useful?

4 A That depends what you mean as far as useful,
5 you know.

6 Q Did you think they helped?

7 A They offset some of the work load, yes. Whether
8 they served a good function or whether they were capable in
9 what they were doing, that's a matter of debate.

10 Q On what side of the debate are you?

11 A I am against it, you know. I am on the anti-side.
12 The first group that we had in Unit 2 Rad Services, they
13 threw anybody in there that they could get. You know, they
14 were really bad. They were shaky. Most of their technicians
15 didn't know what they were doing.

16 Q When you say they threw anybody in there they
17 could get, where were they throwing these people?

18 A They had them at the HP control points. They had
19 them at the -- doing just routine-type survey-type things
20 in Unit 2. Strictly Unit 2.

21 Q When you say they were throwing people in to
22 areas of high exposure or are you saying they were throwing
23 people who might not have been fully able to do the job
24 into a job?

25 A Right.

1 Q The latter part?

2 A In other words, what they were looking -- they
3 had specific areas that became an HP essential, okay.
4 Or it needed some type of HP support to one degree or
5 another. And, you know, anybody they could get, it was
6 like they just, you know, put out a paper clipping in
7 every paper in the country that said if you know anything
8 about HP come to Three Mile. You know, they had people who
9 were milkmen and they had people who were painters and,
10 you know, and these guys said -- in fact, the one guy I
11 talked to said he was from Camp Hill. He had been working
12 on a garbage truck. And he had worked for an HP firm when
13 he was in the service like 10 or 12 years ago. And he
14 came to the company. He came here to work, you know.
15 They had, you know, they had guys here who were doing surveys
16 that didn't know how to read the instruments. They had
17 people here who were, you know, like myself and a few
18 other guys who were making the everyday entries into the
19 auxiliary building, you know, you had to watch how they,
20 you know, how they helped you get dressed, how they taped
21 you up. You had to be, you know, super -- you had to
22 read the RWP's over and over just to make sure that what
23 they had on there was right and that they weren't sticking
24 you into something and requiring something or not
25 requiring something that you should have been wearing.

1 Q An RWP is a radiation work permit?

2 A Right. They were really -- really shaky about it,
3 about their whole job, you know. It got to a point
4 where you had to be afraid to depend on them, really.

5 Q Would it be fair to say that you believe that
6 the health physics organization at the time when the
7 incident began was disorganized?

8 A You mean as far as my department?

9 Q Yes, sir.

10 A Yes.

11 Q Would it be fair to say that as the incident
12 progressed the health physics areas became more
13 disorganized?

14 A Yes. Can I explain something to you?

15 Q Yes, please.

16 A You asked me if it was disorganized prior to the
17 accident or at the start of the accident. I do not
18 consider myself a good senior technician. I don't consider
19 myself the day of the accident a good senior technician
20 and I don't consider myself now a good senior technician.
21 And the reason I don't consider myself a good technician
22 and I know most of my fellow technicians feel that way is
23 because we haven't had any training. And I have said this
24 many times before. I have not had a stitch of training,
25 HP training other than the general, yearly training that

1 lasts 4 hours. I have not had a single bit of training
2 HP-wise since I have been with this company. Everything
3 I have learned I have learned on the job myself or from
4 talking to the people from nuclear services support who have
5 come here every year on our outages. You know, this is where
6 our guys learn this stuff from. We learn it on our own.
7 It's been that way with this company since day one, you know.

8 And, you know, I am not afraid to say that if
9 I had to go someplace else and walk into another company
10 or another plant and say, hey, you know, I am a fully
11 qualified senior tech, I couldn't do it. I feel I have
12 as much experience as any senior tech in the country for
13 what I have gone through, for what I have seen and for what
14 I have had to do. But as far as my theory and knowledge
15 in the radiation protection field as far as knowing the
16 radiological health end of everything, I have no knowledge
17 at all. I have no theory at all. Everything I have is
18 practical and commonsense-type stuff, you know.

19 Q You testified that you were aware that your
20 co-workers felt the same way?

21 A Yes.

22 Q Are you saying that your co-workers to a man
23 feel this way?

24 A Explain what you mean?

25 Q Everyone?

1 A No, I don't feel everyone feels that way. There
2 are ones who just won't say. And there are ones who are
3 afraid to say. And there are ones who won't admit, okay.

4 Q But there are a substantial number of them
5 with whom you have talked who feel the same way that you do?

6 A Yes. If you were to go and pick I would say a
7 large majority, a very large majority, and ask them to be
8 totally honest and say, look, have you been properly, fully
9 trained in your job? I would be willing to bet that 100%
10 will say no.

11 Q I don't want to put you on the spot, but will you
12 give me the names of people with whom you have discussed
13 the inadequacy of the training program and who have told
14 you or have given you the understanding that you have just
15 stated to me, that it is inadequate? If you don't want to
16 give me the names, I am not going to press you for it.

17 A Can I have a second?

18 (Discussion off the record.)

19 THE WITNESS: If you people want a better background,
20 you know, what I have said to you is strictly, as far as
21 this situation goes, is strictly my opinion, okay? I am
22 sure that upon talking to some of my fellow workers that
23 they -- there would be individuals who will or who would
24 back what I have said, okay. I cannot name those people
25 without talking to those people first. Because it is, like

1 I said, it is strictly my opinion from discussions that
2 I have had with these individuals. And I know things that
3 they have said to me. And without their permission and
4 without consulting with them, I can't do that.

5 BY MR. DIENELT:

6 Q All right, that is fine. If we decide that we
7 want to pursue other people and to try to obtain the names
8 from you we will try to work something out at a later date.
9 But I am not going to press the matter now.

10 A Okay, thank you.

11 Q Tell me what formal training you did receive?

12 A From day one?

13 Q Yes, sir.

14 A When I came -- when I first came to Three Mile
15 Island 7-1/2 years ago I came here as an analyst. And
16 I went through a standard training program of 3 months
17 of half-day training where I went to formal classroom, book-
18 type training for routine math and chemistry-type training.

19 Q This was to be an analyst?

20 A This was to be an analyst, okay. It had nothing
21 to do with health physics whatsoever. That is for formal
22 training, that is all that I have had concerning the total
23 aspect of the job that I was performing at that time.

24 I have had a B&W, Babcock and Wilcox radio-
25 chemistry course for handling the radioactive material,

1 liquid sources and that sort of thing, certain specific
2 analysis performed with radiochemistry.

3 Q When did you have that course?

4 A That was probably 4 years ago, 3 years ago, 4
5 years ago.

6 Q How long did that last?

7 A That was for one week.

8 Q Was it done in Lynchburg?

9 A No, it was here at Three Mile.

10 Q It was not a correspondence course?

11 A No.

12 Q You had an instructor here; is that correct?

13 A That's correct, right.

14 Q What other formal training?

15 A And I have had the radioanalysis program that they
16 have for using the jelly detector.

17 Q Who is they?

18 A B&W.

19 Q What is a jelly detector?

20 A That is the probe that we use for -- it is a
21 lithium germanium (phonetic) detector. We use it for
22 analyzing our water samples and our air samples and that
23 sort of thing.

24 Q When did you have that course?

25 A That was about 3 years ago.

1 Q Was that also here?

2 A Yes.

3 Q How long did it last?

4 A 2 days, 2 or 3 days. Other than that, that's
5 all.

6 Q Before you assumed any responsibilities as a
7 rad chem tech am I correct that you did not have any
8 classroom instruction in what you were to be doing?

9 A You say any? No, there was very limited amounts
10 of it. There was maybe a half a day here or an hour or two
11 here, and that sort of thing. We are in a situation where
12 we have a what we call a training week in our rotation. We
13 are shift workers. And the sixth week of that shift is
14 considered what we call a training week, okay. That
15 training week has not been used for training since we have
16 had it. That has always been a working week for us, okay.
17 They would throw in occasionally something where they
18 might go over a procedure for a half a day or some procedure
19 for a half a day and that sort of thing. But there was
20 no 2-week theory -- theory-type refresher courses or
21 anything like that. There hasn't been anything like that.
22 There hasn't been any training whatsoever for the last
23 3-1/2 to 4 years. All of our training was early in the
24 program right after we actually got into Unit 1 startup
25 where we actually went over a few procedures now and then

1 and that sort of thing. But as far as formal theory
2 training we have had very, very little.

3 Q Before you began work as an analyst junior
4 you had a 3-month classroom training program?

5 A Yes.

6 Q That was half a day?

7 A Yes.

8 Q The other half a day you were working or a
9 trainee? Would that be fair to say?

10 A Yes.

11 Q Was there anything similar to that when you
12 began work as a rad chem tech?

13 A No.

14 Q You did not spend half a day or part of a day
15 for a period of time in classroom instruction and the rest
16 of the time as a trainee?

17 A No.

18 Q When you started as a rad chem tech were you
19 given any books to read?

20 A No, other than radiological health handbook.
21 But that -- they -- here it is.

22 Q Were you given any books or manuals with respect
23 to how you should perform in an emergency?

24 A No. That was all handled during drills once
25 a year, you know. This is what we are going to do. It is

1 the -- Like, we would have practice drills prior to the
2 drills every year. We would have 7 or 8 practices prior
3 to that. Well, if you were on a shift the first 2 years
4 I caught like one practice and never was in on the drill
5 and, you know. It just depended on your shift rotation.
6 There was many times we never even got involved in it or
7 they would assign you to a specific job. They would say,
8 okay, for this job you are the off-site team. And then you
9 didn't see what physically went on in the ECS and how
10 things were handled and the musters and that sort of thing.

11 Q Did you participate in a drill or a practice
12 drill every year?

13 A Did I?

14 Q You personally, yes, sir?

15 A Yes, at least once every year, yes.

16 Q At the end of those drills did you attend any
17 summary or discussion or critique of the drills?

18 A I think I have attended 2 in the 5 years that I
19 have been with -- in this actual job where we actually had
20 drills.

21 Q Were you supposed to attend more discussions or
22 critiques?

23 A I was never told to, no.

24 Q Were you allowed to? Would you have been
25 allowed to?

1 A I would assume if I would have asked, yes.
2 But most of the time I didn't even know they were holding
3 them until, you know, -- Everybody was under the impression
4 that they were for foremen. Nobody said, you know, the
5 HP's, you could go to the critique if you would like.

6 Q Was there available to you any classroom
7 instruction prior to or at the time you began your job
8 as a rad chem tech?

9 A No, we requested training for 5 years. And
10 they keep telling us, well, we are working it up, we are
11 working it up. You know, this is the way it is. And we
12 are establishing something. But, you know, it never came
13 back.

14 Q "We" in this context is you and co-workers?

15 A Myself and co-workers, yes.

16 Q Have you personally ever written a criticism
17 or a request for more training which was submitted?

18 A Yes.

19 Q What form did that take?

20 A Just a written -- we occasionally -- now, when
21 I say occasionally it might have happened twice in 5 or 6
22 years, I guess, where somebody has come to the shop and
23 said, "Look, you know, we have some problems in the shop,
24 you know." It's mutual problems with the company and the
25 union-type things. And they would say, you know, "Give us

1 something that will help better the department."

2 So, what we would do is we would write down, you
3 know, we need more training. And then we would be
4 specific on what we wanted training on, you know, the
5 theory end of it, the procedure end of it, the
6 calibration end and use of dose equipment, you know,
7 instruments and that sort of thing. Better understanding
8 systems and that sort of thing. You know, we'd list them.
9 And then we would turn them into the foreman who was
10 requesting it at the time. Pete Velez. One time it was
11 Dick Dubiel -- not Dick Dubiel but Ken Beale who was at
12 one time radiation protection supervisor. John Romanski
13 who was the radiation chemistry technician or radiation
14 chemistry supervisor prior to Dick Dubiel, you know. And
15 that's as far as they would ever go.

16 Q The foreman would not transmit them further?

17 A I can't answer that. I don't know, you know.
18 I really don't know. It would -- we would turn to them.
19 And what happened from there is out of our view. We don't...

20 Q You never got any written response to the
21 written submissions that you made?

22 A No. Like we would hold a department meeting like
23 once a week on Fridays. And they would come back and say
24 this is what we are planning. And that would be as far as
25 it would go. And, you know, we would come back and say --

1 for example, they have said to us that, now, in our
2 shop right now they have changed the way we work. In
3 other words, now we are assigned to chemistry for a 12-week
4 period. I am senior radiation protection technician and
5 I have to work in chemistry for 12 weeks. I have been in
6 chemistry now for 8 weeks. And I have totally lost
7 concept of what is going on. Now, 2 nights ago I got
8 assigned to HP because they wouldn't fill a shift. We were
9 a man short, 2 men short. There were 2 men in Unit 1,
10 one guy worked in chemistry and one guy in health physics
11 on this site on the 11:00 to 7:00 shift. They would not
12 replace a man. I haven't been in the health physics for
13 8 weeks. For one night I get assigned to the health physics
14 and I have to fill out RWP's. I have to know what is
15 going on in the auxiliary building, you know. I have to
16 know any changes in sampling and that sort of thing.
17 And I am just not there. I just don't know what is going
18 on because I haven't been in it, you know.

19 The only non-chemistry thing that I have been
20 involved with in the last 8 weeks is the drawing of the
21 water samples from the Unit 2 reactor building, you know.
22 And I caught flack for that from my foreman, you know.

23 But we have this 12-week period. They told us --
24 all the technicians that were involved in this thing
25 questioned why we are going to be tied up in one department

1 for 12 weeks, okay. And how do you expect us after 12
2 weeks to go back into health physics or back into chemistry
3 after being in the opposite department for 12 weeks and know
4 what is going on. Well, this is what we are going to do.
5 This is what our plan is. We are going to give you a one-
6 week orientation in your training week of -- which would be
7 our 12th week to refresh you in what has happened in
8 health physics in Unit 1, what the conditions of the plant
9 are at that time, what the conditions of the auxiliary
10 building are at that time, any changes in procedures that
11 have been invoked since the 12 weeks started, you know. We
12 -- and that happened 24 weeks ago or 20 weeks ago. And we
13 have had one rotation. And I went from health physics
14 to chemistry and everybody that was in chemistry the first
15 12 weeks of the rotation has gone to HP. We have
16 instilled every new -- all these new procedures in Unit 1
17 and Unit 2 for radiation monitoring, air sampling,
18 respiratory equipment, TLD's everything like this. Sure,
19 we were pulled out of chemistry to go over these procedures
20 with somebody. We were given that time. We were given a
21 full day to go over all of these procedures. And they were
22 explained to us and all that. The next day I was right back
23 in chemistry.

24 But I have not and no other technician in my
25 department has had that one-week orientation to refresh him

1 in what is going on.

2 Q You had one day?

3 A We didn't have one day. When I was told to go
4 into chemistry on Monday to start my 12 weeks, I started
5 working Monday. I -- in fact, my foreman was not even in
6 chemistry for the first 3 hours of the day on Monday.
7 It is a commitment that they make that they never keep.

8 Q Who is "they"?

9 A My supervisors.

10 Q Mr. Dubiel?

11 A Yes.

12 Q Mr. Mulleavy?

13 A Yes. Well, Mr. Mulleavy in the past Mr. Mulleavy
14 is not involved with us at all now. I don't know what his
15 function is. He is with Rad Waste Management or somebody.
16 He is not even involved with us. I don't deal with Mr.
17 Mulleavy at all now. But Mr. Dubiel, you know, he promises
18 alot and gives nothing.

19 Q He is the one who promised a one-week refresher
20 course and has not yet delivered?

21 A Yes.

22 Q Has the lack of or the inadequacy of the training
23 for rad chem techs and others in the health physics or the
24 chemistry area to your knowledge been a subject which the
25 union has brought to the attention of the management?

1 A Yes, many times.

2 Q Has this been in the context of collective
3 bargaining?

4 A Yes. We have discussed it under, you know, under
5 our agreement with the company under 9.1 in the agreement
6 which states that, you know, that we have that right to,
7 you know, to question and to ask for training and stuff like
8 that under the contract, you know.

9 Q Do you know whether there has been correspondence
10 back and forth between the union and the management
11 relating to this?

12 A Do I? John would better be able to answer that.

13 Q I will ask him off the record then.

14 Do you know the person in the company who has
15 the primary responsibility for responding to concerns
16 as they are expressed by the union about these kinds of
17 matters?

18 A I would say that the superintendants are the ones
19 who we would deal directly with concerning this sort of
20 thing. Most of the time when I deal with a situation as
21 my department, being that I am the union representing
22 officer in my department, I deal directly with Dick
23 Dubiel.

24 Q At anytime during your training or lack of
25 training have you taken a written examination with respect

1 to health physics or chemistry matters?

2 A Other than just in the last month, no.

3 Q What was the exam that you took last month?

4 A Well, it was -- we had training, our last
5 rotation we had chemistry training on our last training
6 week, the last time I had training. I would consider
7 training, we had a couple days of chemistry training.
8 Where our chemistry foreman actually took the time and
9 went over the equipment that we had, reviewed us on the
10 equipment and theory on the equipment and that sort of
11 thing, you know. I mean, it was basic, very basic,
12 routine-type things that we do. And then he quizzed us
13 very basically on what we had gone over like the 2 days
14 before, the 3 days before that. But other than that,
15 no. As far as a recall-type thing, if that is what you
16 are referring to, no.

17 Q Earlier in your testimony you said that, if I
18 am not mistaken, the amount of training that you had
19 had, formal training was a total of 4 hours. Do you
20 recall that?

21 A No, I said under normal conditions our formal
22 training lasts, HP training is a general training which
23 lasts 4 hours per year. Okay, it is something required
24 by the regs. The general education -- general employee
25 training is what it is called. They hold that every year

1 in respect to the Federal regs that they are required to ...

2 Q Was that held last year?

3 A Yes.

4 Q Did you attend it?

5 A Yes.

6 Q What did it consist of?

7 A Just more or less going over what high rad
8 areas are, you know, what roping off of an area means,
9 the classification of what is clean and what isn't clean,
10 what is contaminated and what isn't contaminated, what
11 can be released and what can't be released; tagging, as far
12 as tagging the equipment; reading the scales on certain
13 instruments; undressing and dressing.

14 Q Who gave you the instruction?

15 A Pete Velez did.

16 Q You did not take an examination?

17 A Yes, a very basic examination.

18 Q Have your concerns regarding the training program
19 ever been brought to the attention of any NRC inspector
20 by you?

21 A Since the accident, yes.

22 Q What about prior to the accident?

23 A No. I shouldn't say that. I think the statement
24 had been made -- I think, if I am not mistaken, I had
25 mentioned it in discussion with one other NRC inspector

1 a couple of years ago. That was Mr. Carl Plumly.

2 Q What response did he make?

3 A Really none.

4 Q Who did you discuss the training program with
5 more recently?

6 A In my testimonies with Mr. Greg Newhaus.
7 We had discussed it numerous times with another inspector.
8 And I can't think of what his name is, during the accident,
9 during the period of the accident. He was one of the new
10 guys that just came in, a young guy. I truthfully can't
11 remember what his name is. And they said that they would
12 check on it for us.

13 Q Did they get back to you?

14 A No.

15 Q Did the NRC play any role in the health physics
16 response to the accident?

17 A Yes.

18 Q What role was that?

19 A More or less overseers, I guess you'd want to
20 call them. A few of the guys were really concerned, you
21 know. They helped -- I feel they helped me on numerous
22 occasions when they raised questions about certain things
23 that were being done that maybe didn't occur to me when I
24 was involved with a specific job. Like they said, they would
25 come up to you and say if you were doing a hot job like

1 going in to check a valve, would you -- are you wearing
2 extremity dosimetry and if you are not, don't you think
3 maybe you ought to because of this and this and this. Or
4 what do you expect? And if you see what you expect, what
5 are you going to do? And they raised the question -- and
6 sometimes raised questions to me in my head when I was
7 doing specific jobs. Or don't you think you ought to be a
8 little more concerned about certain things which was
9 very helpful because it brought in my thinking a little
10 bit in my job and what I was doing. But there were other
11 times when they got to be a real pain. They actually were
12 more in the road than they actually should have been.
13 I think they were nitpicking. You know, we had a very
14 touchy situation here. And, you know, understanding the
15 point of view of the public and all that. But it got to
16 a point where they were more detrimental to the job than
17 they actually were worth. In other words, they would
18 question things that we did and turn around and do things
19 themselves in complete, you know, contradiction to what
20 they said.

21 Q Are you saying that when they first became
22 involved in the response they were helpful and as time
23 went on they became less helpful?

24 A Certain ones were helpful. Certain individuals
25 were helpful.

1 Q Was it more of a situation where some individuals
2 had been helpful throughout and some individuals had been
3 not so helpful throughout?

4 A Right. In other words, some were -- it seemed
5 to me like they were thrown into a situation where they
6 really didn't know what they were looking at. They had
7 no conception of really what it was all about. They were
8 just -- they were needed here. They needed people here.
9 So. they were put here, you know. And they really had
10 no idea really what it was all about.

11 Q Would you characterize their roles as more the
12 role of observer and overseers?

13 A Yes, overseers.

14 Q Your perception is that they had some authority
15 which they could exercise?

16 A They thought they had some authority that they
17 would exercise.

18 Q They did attempt to exercise it or they did
19 exercise it?

20 A Yes.

21 Q They did exercise it?

22 A They tried. It got to a point where as
23 technicians we were doing things to avoid them. You know,
24 we were trying to keep them out of our hair.

25 Q Had there been an occasion during the time that

1 you would have been a rad chem tech and that a new
2 instrument was introduced for use?

3 A Yes.

4 Q What was that?

5 A Sam 2.

6 Q What is a Sam 2?

7 A It is a crystal-type instrument. It is a
8 -- I guess it is an ionization chamber. I'm not really sure.

9 Q Have there been other instruments introduced?

10 A Not extremely new instruments, no.

11 Q Am I correct that you do not feel you were
12 given adequate training with respect to the use of a Sam 2?

13 A I couldn't -- if you gave me one right now I
14 couldn't set it up. I have not -- the training that I have
15 had on a Sam 2 consisted of about 15 minutes of watching
16 somebody say, well, this is -- you do this, you do this,
17 you do this. And this was prior to our last emergency
18 drill practices.

19 Q You did not get an opportunity to handle the
20 Sam 2 yourself; is that correct?

21 A No, and I still have not had the opportunity.

22 Q Did you ask?

23 A Yes, many times.

24 Q Who did you ask?

25 A Mr. Len Landry who is one of the cadre of our

1 supervision in HP. I don't know what his function is. But
2 he was the one training on the Sam 2. I think we have had
3 2 -- maybe 2 or 3 shifts out of the whole shop that have
4 formally sat down and trained on the Sam 2.

5 Q Would you have used the Sam 2 if you knew how to
6 use it in any of your activities in response to the
7 accident?

8 A Yes.

9 Q What would its use have been?

10 A Well, it would have given me a better capability
11 of counting iodine for one which, you know, other than
12 counting it on our jelly right now we have no way -- I have
13 no way of doing it, okay. The setting up of channels on
14 it to count -- to use the correction factors for strontium
15 89 or 90 calculations. You know, we have a -- they have
16 a factor based on cesium/137, okay, to correlate, you know,
17 to come up with some type of a strontium factor or a number.
18 I guess you would call it a fudge factor. You know, other
19 than someone having a piece of paper laying there on the
20 instrument saying this is how to do it, I don't know the
21 first thing. If somebody would come in there and change
22 that Sam 2, I wouldn't have any idea how to fix it. I'd
23 have to pull out the procedure, go through verbatim
24 everything that is on that procedure just to set it up.
25 And I'm not so sure then I could.

1 Q Did Mr. Landry respond to your request for
2 training on the Sam 2?

3 A He just kept saying we will get it.

4 Q What training, if any, did you receive in the
5 specific plan and procedures dealing with an emergency?

6 A Other than the emergency practices and the drills
7 and occasionally going, you know, just reading through
8 the procedures, none.

9 Q You were given a copy of the procedures or a
10 copy was made available to you?

11 A There is a copy available to us, yes.
12 They are in the offices.

13 Q Were you instructed to read them?

14 A At one time, yes. I have read them numerous
15 times.

16 Q My question is whether you did so on your
17 own initiative or in response to instructions that you
18 received from someone else?

19 A Both.

20 Q Is it your impression that all of the rad chem
21 techs have read them?

22 A Yes. Now since the accident especially.

23 Q Let's take prior to the accident?

24 A Yes, I would imagine most of them had, yes.

25 Q Did you regard the emergency drills as effective

1 in training you to respond to an accident?

2 A Prior to the accident, no. But now, yes.

3 Q They have changed?

4 A They haven't really changed. But, you know,
5 like before they were -- during the drills they would give
6 us these numbers. And these numbers sounded so very
7 unrealistic, you know. And we used to say, "Hey, give us
8 something that is a little more realistic." Well, now, alot
9 of us don't feel that those numbers were so unrealistic.

10 Q Are you saying that part of the reason that the
11 drills are now more effective is that you are taking
12 them more seriously?

13 A Yes, or they will. We haven't had any reason
14 to drill them because I think we are still in the drill.

15 Q You have testified now at some length regarding
16 efficiencies or inadequacies that you perceived in the
17 training program. In your opinion why do these deficiencies
18 exist?

19 A Money.

20 Q Would you elaborate on that?

21 A Budgeting company's money. How much they are
22 really willing to spend. I think it is an easy place to
23 cut corners.

24 Q Is it your view that influx of money would solve
25 the situation?

1 A Partially.

2 Q What else would be useful?

3 A More qualified people in their training programs,
4 to get the people in who know what they are talking about
5 who can adequately train people in whatever they are doing.
6 They have people now who maybe theory-wise are the best
7 people in the world. But they don't have anybody who
8 can practically apply it. Their training program as such --
9 their training department as such is a joke.

10 Q You have testified about the lack of availability
11 of RO2's. Were other instruments or was other equipment
12 which would have been useful in responding to the incident
13 not available?

14 A Say that again?

15 Q Were there other kinds of equipment which would
16 have been helpful to you in responding to the incident that
17 were not available?

18 A Yes.

19 Q What was that equipment?

20 A Just more of what we had. In other words, there
21 weren't -- I don't feel there was equipment that we didn't
22 have that could have been had that would have made the
23 job easier. But I think if we would have had more of the
24 equipment that we needed it would have been better. Like,
25 we had one or two or three or four, I don't know how many

1 exactly we had, R02A's at the time. Okay. There weren't
2 any of those in service at the time, okay. Even still
3 there wasn't enough of them. E520's with the GM probes,
4 they should have been more of them. Or the ones that we
5 had -- we had -- I am going to pull a number out. It's
6 a number that as I remember was a number that was reflected
7 to me. 47 instruments on the shelf the day of the accident
8 out of 55 or something like that. It was -- that were
9 not operative the day of the accident. 47 of them.

10 Had those instruments been available to us or
11 at least a larger percentage of them we could have better
12 done our job. You know, we waited in line for instruments,
13 you know.

14 Q To what do you attribute the lack of workable
15 instruments?

16 A Money is the big one. Okay, the fact that we had
17 the priority of what our instruments concerned the company,
18 the repair of our instruments were of a concern to the
19 company. They were at the bottom of the list. In other
20 words, we had our instrument people, I&C shop repairing the
21 instruments. But if they had something else to do or they
22 had something else they wanted these certain individuals
23 who worked our instruments to do, well, they sat. You know,
24 we had instruments in the shop for 5 or 6 or 7 months at a
25 time, you know. And it was just a priority. It seemed like

1 it didn't really matter. Nobody was concerned in
2 purchasing enough of the equipment or the technical pieces
3 of these instruments to repair them. There was no shelf
4 stock for any of the repair parts. You know, I think it
5 comes down to money.

6 It's been something that we asked consistently
7 over a 2 or 3-year period for more instruments, more
8 instruments. Get us more instruments, you know. Get us
9 enough teletectors to do the job. Get us enough RO2's and
10 RO2A's to do the job. Get us enough air samplers. Air
11 samplers more than anything else. But, no, we can't -- we
12 beg and we beg and we beg. The instruments sit on the
13 shelf. They just keep building up. They just keep sitting
14 there. Nobody repairs them. Nobody seems to be worried
15 about them, you know. And then we are at a loss. And
16 then something like this happens. And we are pulling out
17 our hair.

18 You know, there is no reason why this company
19 should have had to go to, you know, 2 or 3 different companies
20 to get enough instruments in here to support the job. We
21 had 100-some instruments brought in here in the first 2 days
22 or 3 days of the accident from other companies.

23 Q You testified that "we made requests for more
24 workable instruments." In this context who is "we"?

25 Not necessarily by name?

1 A The other technicians.

2 Q To whom was the request made?

3 A All of our supervisors and foremen consistently.

4 Q Dubiel?

5 A Dubiel, you know.

6 Q The other people that you have mentioned today
7 as foremen?

8 A Yes. Fred Huwe is about the only foreman that
9 I can honestly say made -- ever made really a super
10 attempt to get what he wanted or what he thought he
11 needed. And that was cut. You know, Fred has -- I have
12 talked to Fred many times since then about it on a personal-
13 type thing outside of here. And, you know, he just, you
14 know, he just gave up. And he'd say -- they had somebody
15 telling him there is no reason for it, and, you know, or
16 he'd go to purchasing and purchasing couldn't justify it.

17 Q Are you familiar with the RWP program?

18 A Yes.

19 Q Was it followed during the incident?

20 A I would say after the first 2 or 3 days, yes.
21 First 2 days or so, yes. In Unit 1 it was followed through
22 the whole thing. I'm positive of that.

23 Q Was it ignored for the first couple of days in
24 Unit 2 completely?

25 A Yes, I would say, yes.

1 Q Why?

2 A Update of information more than anything else.
3 The fact that there was really not that many entries being
4 done. And when there were entries being done there was
5 HP involved in it. The fact that we were, you know, keeping
6 track. We were daily keeping track of our dosimetry by --
7 because they were counting the TLD's daily and that sort
8 of thing. I think more than anything else the reason was
9 that the HP's were so involved in what was going on. And
10 90% of the work on entries that were being done were being
11 done by the HP's. Not that it makes it right that an HP
12 can go in without an RWP. I have entered many areas without
13 an RWP and filled the RWP out afterwards with the information
14 and everything and what I saw during that entry because the
15 prior information was not uptodate enough to do it. Like,
16 I would enter say an area that might not have been surveyed
17 for a month or a month and a half earlier. And, you know,
18 I went in in full PC's and a Scott Air Pack and everything
19 like that just to get the results to apply to a new survey.

20 Q What did you understand as the reason for
21 obtaining the RWP?

22 A To give the information on what levels and air-
23 borne activity-type things you are entering into, to give
24 you information on what type of clothing are going to be
25 required to enter that area and to account for your dose.

1 Q Has there been any change in the availability
2 of necessary instruments since March 28?

3 A Up to today?

4 Q Yes, sir.

5 A No. In fact, we are operating Unit 1 with, I
6 think, 2 RO2's even today, 2 or 3 of them.

7 Q Did you regard it as important during the
8 accident to follow the RWP program?

9 A As far as what?

10 Q Obtaining the permits?

11 A Yes.

12 Q Why was it important?

13 A Well, because it got to a point where more than
14 anything else the accountability of the dose and MPC hours
15 and that sort of thing has become very significant. And
16 the fact that, you know, you have to specify -- because of
17 the conditions you almost have to be certain of what you are,
18 you know, allowing a guy to go into. The amount of time that
19 he is allowed to stay in that area and to assure that he
20 doesn't, you know, he is authorized only in the area that
21 the RWP signifies, okay. He can't go roaming around. He
22 can't go around a corner. If his job is in one area, you
23 know, he has to, you know -- I think the RWP has, you know,
24 because of requiring these people to sign the RWP and
25 understand the RWP before they go into that area that, look,

1 you are assigned to work here. This is what the RWP tells
2 you, the area that you are supposed to work in. You don't
3 go around a corner and sit and relax and have a cigarette,
4 you know. Because you are liable to go around the corner
5 and sit on something that is going to burn you up, you
6 know.

7 Q Do you know what the total exposure you have
8 had has been as a result of the TMI accident?

9 A Yes. Since January 1st?

10 Q I suppose we ought to break it down. One since
11 January 1st to the present.

12 A Yes.

13 Q What is that?

14 A About [REDACTED] millirem.

15 Q Second from March 28 to the present or to the
16 time at which you had any reading done of dosimetry
17 monitors that you had in the accident?

18 A About [REDACTED] probably.

19 Q How was the level measured?

20 A My levels?

21 Q Yes, sir.

22 A TLD.

23 Q Will you clarify the last answer?

24 A Since March 28 I have probably got probably

25 [REDACTED] or something like that, [REDACTED]

POOR ORIGINAL

1 Q What is the basis for that estimate?

2 A Form 5.

3 Q What is that?

4 A That is my accountable -- the record, recorded
5 of my accountable dose based on my TLD.

6 Q You read the TLD yourself?

7 A No. We have a department now that is handling
8 that.

9 BY MISS RIDGWAY:

10 Q That is your reading from March 28 to the present?

11 A Yes. Somewhere in that range. I would have to
12 have the Form 5 to actually -- I could give it to you
13 exactly with the Form 5.

14 BY MR. DIENELT:

15 Q At anytime during the incident beginning on
16 March 28 did you wear an extremity monitor?

17 A Yes.

18 Q When did you do that?

19 A On -- When we did the waste gas decay tank
20 lineups I wore them. And we did the -- when we actually
21 drew the last waste gas decay tank sample I wore them. I
22 have worn them numerous times drawing other samples, like
23 handling samples of water that were, you know, extremely
24 high in radiation levels, 10 to 12 R or 10 to 20 R,
25 probably something like that where I had to move it from one

1 spot to another, or from one room to another or from one
2 building to another building where I physically carried or
3 handled these samples. Most recently I wore them when I
4 drew the Unit 2 water samples from the containment building.

5 Q Has the extremity on which you have had the
6 monitors always been your hands?

7 A No. I have just recently did a survey in the
8 Unit 2 makeup valve alley in 2AB-1 level. And in fact,
9 that was only 2 weeks ago. And I wore them on my ankles
10 then, too.

11 Q What is the highest level of exposure that you
12 have had as recorded by the extremity monitor?

13 A I guess the one that is recorded that is the
14 highest is the one that I have just recently picked up.
15 That was somewhere around 700, 750 MR on one ankle.

16 Q Did you wear extremity monitoring prior to the
17 accident at all?

18 A Yes, many times.

19 Q That is a standard procedure for you?

20 A Yes. Anytime that we would be handling, you know,
21 pumps or anything where we would physically be handling
22 hot, extremely hot-type things we would wear them where there
23 was a chance.

24 Q Apart from the contamination you got when you
25 attempted to read the HPR 227 were you otherwise contaminated

1 as a result of the TMI incident?

2 A No. I had a little bit of contamination about
3 2 weeks ago when we entered the makeup valve alley. I had
4 a spot on my neck that was -- I don't remember what the
5 counts were. It wasn't very high.

6 Q How were you decontaminated?

7 A Just with soap and water.

8 Q On either of the 2 occasions when you were
9 contaminated did you receive any report on the contamination?

10 A Other than a whole body count, no.

11 Q Was there any written report that is generally
12 required?

13 A Oh, I am sorry. Maybe I misunderstood what you
14 said.

15 Q Is there a written report? Did you receive any
16 kind of written report?

17 A Yes.

18 Q On both occasions?

19 A Yes.

20 Q What form did that take?

21 A It is the personal exposure and contamination
22 reports that are kept in both the HP labs. It goes in your
23 personnel -- in your HP file. It is kept on record.

24 Q Do you know who prepared the report?

25 A Let me see, the one on the HPR 227 sample was

1 never documented.

2 Q So there was not a report on that one?

3 A No, that one was not a report. The most recent
4 one was. And Nuclear Services Support filled that out.

5 Q What is it that prompts the making of the
6 report?

7 A Any contamination.

8 Q Do you need to tell somebody that you have been
9 exposed in order for them to make a report?

10 A No, it is up to me to do it.

11 Q You make up the report yourself?

12 A In other words, if I'm involved with a situation,
13 whether it be myself or somebody else, yes. I am required
14 to fill out that report.

15 Q You just didn't fill one out on the --

16 A I didn't take the time. And it was a situation
17 where, you know, I went -- I washed off and it was, you know,
18 there was no problem. So, I just didn't take the time to
19 fill it out.

20 Q Did you tell Mr. Dubiel, Mr. Mulleavy or any other
21 person who is a supervisor of yourself that you did not
22 prepare a report on your exposure as a result of the
23 attempting to change the HPR 227?

24 A No. Mr. Dubiel was aware that I was contaminated.

25 Q Was he aware that you didn't prepare a report?

1 A I don't know if he is or isn't.

2 Q Did he ever --

3 A He never asked.

4 Q Did he ever ask you or instruct you with respect
5 to the preparation of the report?

6 A No, he didn't.

7 Q You testified that when you set up the ECS you
8 began to make arrangements to control access into the
9 auxiliary building, is that correct?

10 A No. In Unit 1 I controlled ingress and egress
11 out of the HP area.

12 Q Excuse me. Are you aware of any arrangements
13 that were made to control access into the auxiliary building?

14 A In Unit 2?

15 Q Yes, sir.

16 A Not prior to me going there, no.

17 Q What about subsequent to your going there?

18 A Yes.

19 Q Who did that?

20 A Carl Myers and Michael Kuhns.

21 Q What was done?

22 A They just kind of, you know, restricted anybody
23 from going into that area. It was just a short time after
24 that that we evacuated the HP area. It was, you know, it
25 wasn't very much after. I don't remember the exact time.

1 Pat said 7:20 here. So, it was a short time after 7:00
2 o'clock that, you know, that it was -- that we evacuated.
3 Because Carl Myers took the first -- took his air sample
4 in the auxiliary building hallway at 7:10. Now, that's
5 on the notes that Pat and I had discussed.

6 Q After the evacuation do you know how access was
7 controlled?

8 A No. That was Fred's responsibility. I really --
9 after that I really don't know.

10 Q Fred?

11 A Fred Huwe. After we evacuated the HP area
12 everybody went to the Unit 1 area, okay. The only thing
13 that was not evacuated at that point was the Unit 1 and
14 Unit 2 control room and the HP area. Everybody else had
15 been mustered at specific areas or had not been allowed on
16 the island. Most of whom had not been allowed on the
17 island. They were -- everybody was, you know, ordered to
18 stay at the observation center or to go to the observation
19 center. Because by that time, really, you know, nobody
20 really knew what had occurred. The daylight people had not
21 really started coming on the island. So, they were
22 restricting them. The main gates were locked.

23 Q After the evacuation, as you understood it, was
24 there a person who was in the position to know who was
25 entering the auxiliary building?

1 A Say again?

2 Q Was there a person who had the responsibility
3 for knowing who was going into the auxiliary building?

4 A Yes.

5 Q That would have been Mr. Huwe?

6 A Yes.

7 Q Are you aware of any entries into the building
8 which were made without his knowledge?

9 A No. I'm not saying there couldn't have been.

10 Q After April 1st or about that time were you assigned
11 to any on- or off-site monitoring teams?

12 A No.

13 Q I am going to show you a document that has been
14 marked in an earlier deposition as Exhibit 3018 which is
15 entitled General Reviews of Health Physics Program at the
16 Three Mile Island Nuclear Station dated March 20, 1979. Had
17 you ever seen that document before?

18 A Yes, sir, I have.

19 Q When did you see it first?

20 A The actual document itself?

21 Q Yes.

22 A I don't remember the date. It was prior to the
23 accident.

24 Q Did you see some version of the document or some
25 other document in addition to that?

1 A Yes.

2 Q What else did you see?

3 A It was a different form than this. It was the
4 formal NUS evaluation.

5 Q When did you see that? Before the accident?

6 A Before the accident. I am sorry, no. That was
7 after the accident. I have seen forms of this prior --
8 I had seen forms to this -- No, I am wrong. They were
9 both after. It was in April when I saw them.

10 Q Were you aware of the report before the accident?

11 A Yes.

12 Q Were you aware of its conclusions before the
13 accident?

14 A Yes.

15 Q How did you become aware of them?

16 A From Mr. LaVie.

17 Q Mr. LaVie is one of the authors of the report?

18 A Yes.

19 Q Did he interview you in connection with the
20 report?

21 A Yes, I took Mr. LaVie on the -- on one of his
22 tours.

23 Q How much time did you spend with Mr. LaVie?

24 A 6 hours maybe.

25 Q Would you say that the description and the

1 conclusions that are reached in the report reflect
2 information that you furnished to Mr. LaVie?

3 A I didn't read it that close to be honest with you.
4 I would have to read it.

5 Q Did you review the conclusions of the report?

6 A I have looked over them, yes.

7 Q Did you agree with them?

8 A Certain aspects of them.

9 Q Did you disagree with certain other aspects?

10 A I questioned some of them.

11 Q Can you tell me if you recall what you questioned?

12 A No, I can't. No. I know it did enter my mind
13 when I was going over as to, you know, was that really
14 what we meant or is that what somebody else through
15 discussions with Mr. Dubiel or whomever, that is the way it
16 came out. I don't remember exactly which was which.

17 Q When you were talking to Mr. LaVie did you make
18 an effort to provide him with as complete and accurate
19 information in response to questions that he gave you as you
20 could?

21 A Yes. I was as honest with him as I am with you.

22 Q Have you been interviewed by any other outside
23 consultant in the past regarding the health physics program
24 at TMI?

25 A No.

1 Q To your knowledge was this the first outside
2 report which has been done regarding the health physics
3 program?

4 A Yes.

5 Q Had you discussed this report prior to the
6 accident with Mr. Dubiel?

7 A No.

8 Q With Mr. Mulleavy?

9 A No.

10 Q With Mr. Velez?

11 A Other than -- not with -- not in regards to the
12 report. In regards with discussions I had had with Mr. LaVie,
13 yes.

14 Q You had discussed with Mr. Mulleavy or Mr. Dubiel
15 what you had discussed with Mr. LaVie?

16 A Right. Well, I guess -- I am not sure who or
17 which one of those it was. But it was one of those, yes.

18 Q One of either Mr. Dubiel or Mr. Mulleavy?

19 A Or Pete Velez.

20 Q Had you been assigned to take Mr. LaVie around?

21 A No. He just happened to come in. They informed
22 me that he would be coming in. Well, yes, I guess I was.
23 Because I was told that he would be coming in on the 11:00
24 to 7:00 shift, on my 11:00 to 7:00 shift. And that, you
25 know, I was supposed to, you know, show him around and, you

1 know, more or less give him, you know, my opinions and
2 show him around the plant and let him look around and
3 explain to him how we do certain things and stuff like that.
4 Yes, I was asked to do that.

5 Q He spent 6 hours with you?

6 A Yes, it was the better part of a shift, yes.

7 Q Do you know if he spent time with anyone else?

8 A He may have. I know that he had talked to other
9 people as far as, you know, who they were and stuff like
10 that. I don't remember.

11 Q To your knowledge did he spend as much time with
12 anyone else as he did with you?

13 A Not to my knowledge, no.

14 Q Did you spend any time with Mr. Murri, the other
15 author of the report?

16 A No, I didn't know Mr. Murri.

17 Q After the time you spent showing Mr. LaVie around
18 did you have any subsequent conversations with him?

19 A Yes, I talked to him. I have talked to him 3 or
20 4 times like in passing in the halls and stuff like that.

21 Q Were any of the conversations ones in which he
22 sought specific information from you?

23 A No. They were in just, you know, like did you
24 see the results of the report and, you know, I hope this
25 works out the way we hope it does and, you know, there are

1 some real problems and we are hoping that, you know, such
2 and such happens, you know, in regard to this. I think
3 the biggest -- the most important thing in here was the
4 fact that the implementation between the chemistry and
5 health physics as one department is the biggest, most
6 devastating hindrance to our department. You know, that we
7 are so spread out that, you know, our functions and our
8 required knowledge involves so much about both of the
9 departments that we really, you know, we have certain
10 people like myself who are more concerned with health
11 physics. Like I would much prefer to stay in health
12 physics all the time. And we have certain guys who don't
13 want anything to do with health physics. So, therefore,
14 you know, I would prefer to focus all my intent on learning
15 health physics, you know. I don't really care about
16 chemistry. I don't really enjoy working in chemistry. I
17 would prefer not to work in chemistry, you know.

18 But it is a point that we have stressed and NUS
19 has stressed.

20 Q Do you know who, if anyone, higher in authority
21 than Mr. Dubiel was aware of either the report or the
22 conclusions of the report prior to March 28, 1979?

23 A Can I talk to John?

24 (Discussion off the record.)

25 MR. DIENELT: Would you read that question back.

1 (Whereupon, the Reporter read back the question
2 referred to.)

3 MR. CODY: He is not going to answer that
4 question.

5 THE WITNESS: I would rather not.

6 BY MR. DIENELT:

7 Q Let me just ask you a clarification. Do I infer
8 correctly from the fact that you won't answer that question
9 that someone higher than Mr. Dubiel to your knowledge was
10 aware of the report or its conclusions and you just don't
11 want to say who or how you know?

12 A Yes.

13 Q I think we will leave that the same way we left
14 the other information for now. If we feel that we need to
15 have --

16 A I am under an assumption, to be honest with you,
17 okay, through discussions to people that I wish not to name.
18 I assume that somebody else knew.

19 Q Fair enough.

20 I don't believe that I have anymore questions
21 at this point. I know you have been interviewed by I&E.
22 You have been patient with us and given us alot of information.
23 But I want to give you the opportunity if there is anything
24 else you would like to say particularly if there are
25 matters within your knowledge which you believe would assist

1 us in conducting our investigation or preparing our
2 report we would be happy to hear that now.

3 A No.

4 MR. DIENELT: I don't think it will be
5 necessary to call you back. It is possible that it will
6 be. If that is the case, we will try to work something
7 out through the attorneys and, of course, Mr. Cody or
8 somebody else from the union will be welcome to come at
9 that time as well.

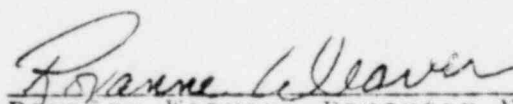
10 Thank you, very much.

11 (Whereupon, at 12:45 p.m., the deposition was
12 concluded.)

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CERTIFICATE

1
2 I, Roxanne Weaver, the officer before whom the
3 deposition of MICHAEL A. JANOUSKI was taken, do hereby
4 certify that MICHAEL A. JANOUSKI, the witness whose
5 testimony appears in the foregoing deposition, was duly
6 sworn on September 19, 1979, and that the transcribed
7 deposition of said witness is a true record of the
8 testimony given by him; that the proceedings are here
9 recorded fully and accurately; that I am neither attorney
10 nor counsel for, nor related to any of the parties to
11 the action in which this deposition was taken, and further
12 that I am not a relative of any attorney or counsel
13 employed by the parties hereto, or financially interested
14 in this action.

15
16 

Roxanne Weaver, Reporter-Notary Public

17 Notary Public in and for the
18 Commonwealth of Pennsylvania

19 MONICK STENOGRAPHIC SERVICE

20 My Commission expires
21 July 19, 1983.
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I have read the above and it is true and
correct to the best of my knowledge and belief.

Michael A. Janouski

Sworn to and subscribed before me by said
Michael A. Janouski this _____ day of _____, 1979.

Notary Public

My Commission expires _____