7/6/83

GPU - TRIAL EXHIBIT

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MR. KOLB: You are asking to the extent he knows?

MR. SELTZER: Yes.

Q Was it your understanding that the Davis-Besse operators had also ignored procedures that they had wher they terminated high pressure injection at the time that pressurizer water level was first rising?

A No, I don't know that.

Q You have never looked into that?

A No.

Q At some point in time, you were put in charge of the ATOG program, right?

A Yes. Would you define in charge?

Q What did you mean wnen you said yes?

A I was project engineer for the technical manager of the program.

Q One of the objectives that you outlined for the ATOG program was to simplify the procedures for operating nuclear plants, is that right?

MR. KOLB: Just so we can be clear, because his position is a position in relation to others. When you say you outlined,

are you talking about the company or Mr. Kelly personally or both? What do you mean exactly?

MR. SELTZER: J.J. Kelly.

(Record read by the reporter.)

A Yes.

Q You recognized, didn't you, that before the Three Mile Island accident, the procedures that the plants had were procedures that had been drafted with the assistance and participation of B&W, isn't that right?

MR. KOLB: You are talking about the procedures as a whole? You are not talking about every single procedure, am I right?

MR. SELTZER: The operating procedures, the emergency procedures, the abnormal transient procedures which the B&W designed plants were working with.

A We supplied them with draft material to write those procedures, yes.

Q And B&W in some cases supplied engineers pursuant to contract to assist the utilities in completing the drafts of those procedures, isn't that right? I don't mean in every case, but you are familiar with the fact that some utilities did

pay for additional engineering services from B&W to complete the drafts of their procedures, am I correct?

A Yes.

Q You have noted in your ATOG work that the procedures that had been drafted before the Three Mile Island accident tended to require the operators to identify what the upset event was in order to find the emergency procedures with which to respond to the upset event, isn't that correct?

A Yes.

Q You believed that that was unduly cumbersome, didn't you? That it should be simplified?

MR. KOLB: There are two questions there. One is unduly cumbersome, and another should it be simplified.

MR. SELTZER: Let's take them in pieces.

Q You recognized as the technical director of the ATOG program that a procedure which required that the operator identify the cause of the upset before he could turn to the emergency procedure to deal with the upset was unduly cumbersome, didn't you?

A I thought it was cumbersome. My hesitation is

the word unduly. I don't know what that means.

Q You thought it was unnecessarily cumbersome, didn't you?

A Yes.

Q You felt that the procedures could be simplified so it would be easier for the operators to make the appropriate operating response to a transient?

A That was at the time a desired objective. I didn't know at the time that it could be done. That was an objective to try to do something like that.

Q Why did you think that was desirable?

A Anything that could be done to assist the operator or make his task any easier would have to be an improvement.

Q What you were saying was desirable as the director of the technical side of the abnormal transient operating guidelines program was that the operators should only have to recognize the symptoms of the upset event in order to know what the correct emergency response was, isn't that true?

A That was a desired objective, yes.

Q Would you take a look at the famous J.J. Kelly November 1, 1977 guidelines, GPU Exhibit 76.

You stated about two-thirds of the way down "I recommend the following guidelines be sent." Do you see that?

A Yes.

Q You had two guidelines for the conditions under which an operator could appropriately decide whether to terminate or bypass high pressure injection, right?

A Yes.

Q High pressure injection is a system that automatically actuates, right?

A Yes.

Q So it doesn't require any operator action to actuate high pressure injection, right?

A Right.

Q When reactor coolant system pressure falls below a certain point known as a trip point or set point, high pressure injection automatically comes on, right?

A Right.

Q What is that pressure at the time you were writing your famous memo?

A In some of our plants, it was 1600 pounds, and in some of our plants it was 1500 pounds.

Q You have two prescriptions here or guidelines on when an operator could terminate high pressure injection, right?

A Yes. Well --

Q The first one says --

A The first one is not a prescription on when he could stop it. It is an admonition to not stop it under given circumstances.

Q Never interfere with its actuation, in fact, right?

A Yes.

Q So that it is only the second guideline which tells the operator when he could terminate following its automatic actuation?

A Yes.

Q Under your second guideline which you recommended be sent, and I take it sent means sent to all operators of B&W plants? Is that what you meant by sent?

MR. KOLB: Are you asking him whether he meant that B&W should send it directly to operators?

MR. SELTZER: No. Just that it should be supplied to those who operate B&W plants.

MR. KOLB: Operate doesn't mean the operator in the control room. It means in the general sense of supervision or running the plant.

MR. SELTZER: Let him tell us what he meant instead of you and I.

MR. KOLB: Ask him that question.

Q To whom did you recommend these be sent? Whom were you thinking of when you said you recommend they be sent?

A If they were required, I intended they be sent to our operating plants.

Q So that they would get into the hands of the people that operate the plants?

A Yes.

Q You said that item b is the only guideline that you were recommending be sent and given to the people who operate the plants that would tell them when they could properly shut off high pressure injection, right?

A Yes.

Q Am I correct there is nothing in b that requires the operators to identify what the source of the upset event or transient is, is that correct?

A That's correct.

Q In order to follow your guideline b, all the operators have to do is know the high pressure injection has automatically actuated and then proceed to watch for the three conjunctive signals that you have listed there, is that right?

A Yes.

Q By conjunctive, I mean they are three conditions which all have to be met, right?

A Yes.

Q In many ways your guideline b is like the simplified procedures that you were proposing be developed when you were director of the technical side of the ATOG program, isn't that right?

A The current ATOG recommendation is different, but insofar as they are both a symptom type, yes.

Q Bert Dunn's February 16, 1978 guidelines are also symptom type guidelines, aren't they, of the simplified form you said was desirable when you were head of the ATOG program?

A Yes, in that respect, that's right.

Q Prior to the Three Mile Island accident, B&W had never communicated to the operating utilities procedures for handling high pressure injection which