

UNITED STATES OF AMERICA
NUCLEAR REGULATOR COMMISSION

DOCKETED
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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In the Matter of

APPLICATION OF TEXAS UTILITIES
GENERATING COMPANY, ET AL. FOR
AN OPERATING LICENSE FOR
COMANCHE PEAK STEAM ELECTRIC
STATION UNITS #1 AND #2
(CPSSES)

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH
Docket Nos. 50-445
and 50-446

TESTIMONY OF CORDELLA MARIE HAMILTON
WITNESS FOR INTEVENOR CASE
(CITIZENS ASSOCIATION FOR SOUND ENERGY)

Q. Please state your name, residence and educational and work background.

A. Cordella Marie Hamilton, Box 59, Glen Rose Star Route, Cleburne, Texas 76031. A statement of my educational and work background is attached hereto as Attachment 1.

Q. Are you presently employed?

A. No.

Q. During your work career, were you employed at the Comanche Peak nuclear power plant near Glen Rose, Texas?

A. Yes. I was employed by Brown & Root, Inc., at Comanche Peak from July 8, 1980 to March 9, 1982.

Q. And during that time, what were your basic duties and responsibilities?

A. For the first three months, I was a laborer. I transferred into Paint QC as an inspector trainee in September 1980. I got into the department, I learned, and I picked up on all of it, and I studied--I didn't have to study but I was interested in it, and I really wanted to be an inspector but Harry Williams wouldn't let me do it. From a clerk's pay up to an inspector's pay is quite a jump. He finally decided he would let me. I was a mix inspector; I took care of the temperature recorders in the warehouse and did some documentation work. The work became increasingly more complicated and my work load kept being increased. I became file custodian and kept up with most current procedures. DCA's (Design Change Authorizations), and anything to do with interdepartmental matters, such as 3-part memos, any kind of change the inspector wrote out, telephone calls, set up

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appointments for inspectors, etc. I took things to and from the calibration lab, took care of filing of M&TE (calibrating instruments), and made sure the instruments made it to the calibration labs on time.

Q. What did you do as a laborer?

A. I swept floors, picked up trash.

Q. In which area of the plant? In the plant or out in the building?

A. No, in the reactors, everywhere.

Q. Was this a maintenance crew?

A. Yes.

Q. And you were there for three months as a laborer?

A. Yes.

Q. Why did you leave that job and go to protective coatings?

A. Because it was a better job and better pay.

Q. What did you do at protective coatings, QA?

A. Okay, I hired in as an inspector trainee. I witnessed paint mixes at the paint warehouse, and I also did documentation.

Q. What do you mean by did documentation?

A. Well, I reviewed like the inspection reports, kept the files up to date.

Q. How much of your work activity was related to documentation, percentage-wise?

A. At first, probably about 50 percent of the day went to documentation; but later on it was full time.

Q. How much later on?

A. I'd say July last year, 1981.

Q. So in July of '81 you became more or less a full-time documentation clerk?

A. Yes.

Q. And what were your duties as a documentation clerk?

A. Well, I reviewed the inspection reports that were made out by the coatings inspectors. I would give them back to the inspector if the reports weren't complete.

Q. You reviewed them for --

A. Correctness, also --

Q. Completeness?

A. Yes.

Q. By correctness do you mean completeness, or do you mean technical correctness?

A. Well, like in hanger numbers. If the hanger numbers had a certain amount, they had a certain code they went by, and they had a certain amount of numbers. If I found a number missing or a hanger number incorrect, I would give it back to the

inspector and ask him to go out and make sure of his documentation, like dates they'd leave off, times.

Q. Sounds like a completeness review then.

A. Right.

Q. What else did you do as a documentation clerk?

A. I also turned in the records to the QA vault.

Q. Where were you officed physically?

A. I would say on the east side of SWI, Service water intake.

Q. In a facility, a building?

A. Yes.

Q. And were you physically located near the paint building or near the quality assurance building?

A. Near the paint building.

Q. What else did you do as a documentation clerk?

A. I just did office duties, filing.

Q. For whom did you work?

A. Directly under?

Q. Yes.

A. Bob--Robert Hamilton. When I hired into protective coatings, he was the supervisor.

Q. You worked under his supervision from September of '80 to March of '82?

A. Yes.

Q. Who was your supervisor when you were on the maintenance crew, if you recall?

A. I don't recall. It was in construction.

Q. Could you describe briefly the circumstance surrounding your leaving Comanche Peak?

A. I was already disgusted with the system, and when the personnel were treated so unfairly, I felt I could not continue to work for the people responsible.

Q. Who are the personnel whom you feel were treated so unfairly?

A. I'm referring to the firing of Bob Hamilton, Joe Krolak, and Sherman Shelton.

Q. Bob Hamilton is your husband?

A. Yes.

Q. Were you married at that time?

A. No. We were married after we left Comanche Peak.

Q. What was your name when you were working at Comanche Peak?

A. Cordella Birdwell.

Q. Is the fact that your husband was fired is the reason that you left at that time?

A. Yes.

Q. You were not fired.

A. No.

Q. You voluntarily left because your husband was fired?

A. Yes.

Q. Going back to your duties as documentation clerk, were you responsible for record completeness to assure retrievability?

A. Yes.

Q. How did you assure that the documents were completed sufficiently to assure retrievability? Are there codes, are there numbers on the documents that you as a clerk --

A. Yes. I kept a master log book of everything that was coated. That's concrete and steel both. And I also gave them -- they were like PC numbers, (Protective Coating Numbers). It was PC, and we started at 20,001 and went to 40,000. This was set up in, I would say, probably in August of 1981. Before that, we didn't have a log book like that. We just had hanger books with just like coating information, when it was painted, what kind of hanger it was, the color of the paint.

Q. What do you mean by hanger?

A. Like pipe hanger, cable tray hanger, electrical hanger.

Q. That was for steel?

A. Yes, inside containment.

Q. And was there a counterpart for that for concrete?

A. Yes.

Q. So there was a number on the inspection report itself.

A. Yes.

Q. Was a similar number placed on non-conformance reports?

A. On the non-conformance reports it was usually a group of hangers or steel or -- this was just for the records, the inspection reports.

Q. The retrievability coding was on the inspection reports.

A. Yes.

Q. Were you responsible for NCR's.

A. Well, I was responsible for filing them.

Q. So, you said earlier inspection reports. Did you mean NCR's?

A. No.

Q. You meant inspection reports?

A. Inspection reports.

Q. So you were also responsible for NCR's.

A. Yes.

Q. Filing NCR's.

A. Filing them in our office. We would just get a copy of an NCR.

Q. They were not prepared in your office?

A. No.

Q. I see. You simply received them through the normal course of correspondence and filed them in the office?

A. Yes.

Q. For which you were responsible.

A. Yes, for our inspectors' retrievability.

Q. You said earlier that your inspection report retrievability system was segregated into concrete and steel.

A. It wasn't segregated in the log book, but the inspection reports were.

Q. So by the inspection report number, you could tell whether it was steel or concrete.

A. No, just by the inspection report alone. They all had just running numbers. They didn't care if they were mixed up, if the concrete or the steel was -- you know, as long as it had a number on it.

Q. What is your first item of concern about Comanche Peak?

A. Probably the lack of concern about the accuracy of some of the inspectors' documentation, such as one inspector in particular, I had some paperwork of his. We went through about, from a Revision 3 to a Revision 9 while I was there. This was in steel alone. Two revisions passed by, and I asked him to correct paperwork. He refused to.

I brought it to Harry Williams, which was my supervisor over Mr. Hamilton. I gave him the list of the missing paperwork. He gave it to Mr. Joe Fazi. I gave him, I know, two weeks at least, and then I brought it to Mr. Williams' attention again, and again. And I never received the paperwork. And the paperwork that was not corrected, this was before Mr. Tolson insisted that the PC number should be on the inspection report before it left the office for the inspection.

Before that, we had like one inspector in one day's time might have 50 or more inspection reports to fill out until our system was -- all the flaws in it were worked out. And I didn't have any numbers on it, but I had the inspection reports. They had QP numbers on them, and this is when we first started out in the QP at the paint shop.

Q. QP meaning quality procedure?

A. Yes. And they had been coated at the shop. This was for us to know, that they had been inspected and sent down to the field. It's what I call the original document. This is where it had been sandblasted and primed at the shop and sent down. This original paperwork disappeared, and this was what I was trying to get from Mr. Fazi, but he would not correct his paperwork and give it to me.

And these inspection reports in question disappeared from the shack mysteriously while he was on night shift. He was on night shift at the time.

Q. Why did you go around Mr. Hamilton and go directly to Mr. Williams?

A. Why did I go directly to Mr. Williams?

Q. Yes. Why did you go around Mr. Hamilton?

A. I didn't go around him. He knew about it, but he had no power at all about this, about Mr. Fazi.

Q. So he was Mr. Hamilton's supervisor.

A. Yes.

Q. Why did Mr. Tolson say to put the PC number on the document before it was circulated?

A. Well, he didn't but we had an efficiency expert that came in and felt that it should be that way. But he had come over to the shack and had seen that the inspection reports were not numbered, and they felt like we should have them numbered.

Q. So Mr. Tolson adopted the recommendation of an efficiency expert.

A. Yes, sir.

Q. You stated earlier that you felt that there was a lack of concern about accuracy of documentation.

A. Yes.

Q. Specifically what documentation are we talking about?

A. We're talking about coatings.

Q. Inspection reports?

A. Yes, the inspection reports. Like hanger numbers were not complete. They were not correct. They'd leave out numbers. Also Mr. Williams felt like that we didn't need an exact location, elevation, azimuth for each hanger, that they were traceable through their QP number and their hanger number. But like I said, sometimes numbers would be left out, or the item might have been sandblasted or coated so many times that they weren't legible.

Q. If the QP number was on the report, it would be traceable through that?

A. No.

Q. So you say that Mr. Williams was incorrect in his conclusion.

A. Yes, because it might have four or five different QP numbers on it. It really wasn't traceable without the exact location of where the hanger was going in the reactor building, what reactor building it was going to.

Q. And your statement that there was a lack of concern in directed to whom? Who do you say lacked concern?

A. Well, Mr. Harry Williams for one.

Q. You say Mr. Williams lacked concern about the accuracy of documentation.

A. Right. It was more or less get it out of the office as soon as possible into the vault, because we did have documentation that was entered into the vault, and we had calls every day. They didn't know what to do with it in the vault because it was so incomplete. But we were pushed to enter it into the vault because they were afraid something might happen or that NRC might come in and find all this paperwork inside the office. But the reason it stacked up was because we went through so many revisions, and I was the only one checking the paperwork.

Q. It was your job to assure the completeness of the inspection report?

A. Yes. But in, I would say, late November of '81 and December and after the first of this year in '82, Bob Hamilton, Joe Krolak, John Moon and myself worked overtime -- Saturdays and Sundays also -- to get the paperwork complete and ready to enter into the vault. Even Mr. Williams himself came over and helped us check paperwork.

So I didn't review all the paperwork that went into the vault at that time. And that's when we had all the problems with the vault. They found incomplete hanger numbers, and mix times were left off, dates were left off. Sometimes the inspector wouldn't even sign his report, which it has to be signed off by the inspector who made the inspection.

Q. Well, wasn't it your job to ensure that they had done that?

A. Yes, but I didn't review all the documents. This was when there was something like, I guess it would be safe to say, close to 500 documents or more that had to be reviewed and into the vault.

Q. You're saying that you and Mr. Williams and others came in and got those documents?

A. The inspection reports were in the shack.

Q. The 500?

A. Yes. There ~~were~~ at least 500, easy to say. And there was a group of us that reviewed them. Each person reviewed them. But we didn't go over each others. I mean the inspectors didn't go over their own paperwork, or they did, but whatever.

Q. But this was a review for sufficiency.

A. Well, for correctness, everything.

Q. For correctness.

A. They were supposed to be complete when they were turned in, but they were not.

Q. What happened as a result of this review by you and Mr. Williams and others? Did you identify documents that were not complete? Did you find that some of these inspection reports did not contain adequate information?

A. Yes. And those were corrected. But there were still things overlooked. And this resulted in Mr. Hamilton having to spend most of his time in the QA vault correcting paperwork that had been done by the inspectors.

Q. Did he correct it?

A. Yes. Harry Williams ordered him to correct it.

Q. Mr. Williams ordered Mr. Hamilton to go into the vault and correct it?

A. Yes.

Q. So then the outcome was that Mr. Hamilton made all the necessary corrections?

A. Yes.

Q. Was your review, you personally, your review for completeness the final such review before the documents were deposited in the QA vault?

A. After the paperwork flow kind of evened out, I was able to review them. Then I handed them to Mr. Hamilton, and he reviewed them. And then I reviewed them again, and then I sent them to the vault.

Q. Wasn't it Mr. Hamilton's responsibility as supervisor of QC inspectors in the Paint Department to assure that the inspections were properly documented?

A. Yes, it was, I suppose. But like I said, on more than one occasion, whenever I found incorrectness, and especially Joe Fazi's paperwork, Mr. Williams, never really made him produce any of the paperwork. Like I said, paperwork disappeared.

Q. Your husband's job was to assure that documentation was complete and satisfactory. And in some cases, the initial pass through, that wasn't done. Completeness was not verified, and you had to go back later and take this group and do it again. Is that correct?

A. Yes, sir.

Q. So the fact that Mr. Williams ordered Mr. Hamilton to do it was natural because it was Mr. Hamilton's job in the first place.

A. I really don't know if it was his job. He had several jobs, but I guess you could say that.

Q. I think you just stated earlier that one of his jobs was to do that.

A. Well, it was my job. It was his job. It was really the inspector's job.

Q. Yes, but you as the clerk and he as the supervisor had overview responsibility on the inspectors, right?

A. Supposedly.

Q. What does that mean? Did you or didn't you?

A. We were supposed to.

Q. Did you do your job, or didn't you do your job?

A. Oh, yeah, I did. Sure did.

Q. And Mr. Hamilton did his too. So I think the bottom line of this line is that there was some problem with completeness of these inspection reports. It was recognized, because you called it to the attention of Mr. Williams and others and that Mr. Williams directed that Mr. Hamilton complete them, you and Mr. Williams and others spent Saturday or sometime.

A. Saturday? No, more than that. A couple of months.

Q. Making sure that all that documentation was completed correctly?

A. But it was not.

Q. It was never completed correctly?

A. Not that group of documentation, no, not until it was into the vault.

Q. Who did it then?

A. Mr. Hamilton did it.

Q. I see. That's when it was all corrected finally.

A. Yes.

Q. If Mr. Williams directed Mr. Hamilton to go and correct the documents, does that show like a lack of concern about accuracy of documentation? Wouldn't you agree it sounds as though he wanted the documentation to be accurate, and he asked Mr. Hamilton to go and do the job?

A. Well, not exactly, because, as I said, there was documentation that disappeared; and Mr. Williams didn't try to find out what happened to it. He just kind of swept it under the rug. Mr. Fazi's paperwork disappeared mysteriously. A lot. And his was the most incomplete.

Q. It disappeared from your possession?

A. Yes.

Q. Who had access to your files?

A. Oh, everybody did.

Q. You weren't a safekeeper of files.

A. I didn't have a lock and key, no.

Q. What kind of documentation would this be? Inspection reports?

A. Yes. Inspections that he had made on items going inside the containment.

Q. Any particular area in the plant?

A. In, say, both reactor buildings.

Q. Steel or concrete coatings?

A. Steel coatings.

Q. Steel coatings?

A. His concrete coatings, his paperwork was -- he didn't like concrete, so he didn't do it very much. But quite a bit of it was incorrect, and we did have problems with them.

Q. And it's that matter that has given rise to your concern about Mr. Williams' lack of concern about accuracy of documentation?

A. Yes.

Q. Could you have lost Mr. Fazi's documentation?

A. No.

Q. Couldn't have?

A. No.

Q. You don't lose documents?

A. I didn't lose that.

Q. How much documentation are we talking about?

A. Inspection reports that disappeared?

Q. Yes.

A. Probably 15.

Q. Over a period of time or all at once?

A. No, all at once.

Q. All at once. A group of 15.

A. Yes.

Q. Did you conduct a search for them?

A. Yes.

Q. You reported it to Mr. Williams?

A. Yes. I went to Mr. Williams with it; I had everthing written down that had disappeared, and they didn't do anything. I gave it to a man they had come in who was supposed to be an efficiency expert and he came in and was trying to tell everybody. He tried to redo my system, the inspectors' system -- you know, their inspections, their paperwork -- and trying to tell us it shouldn't take us so long to go over this paperwork. And I gave Mr. Williams a copy of it and he never gave it back to me, but I knew what was missing.

Q. Did you report it to Mr. Hamilton?

A. Yes.

Q. What did Mr. Hamilton say?

A. I asked Mr. Fazi what happended to it. He asked Mr. Fazi what happened to it.

Q. What did Mr. Fazi say?

A. He didn't know. The thing was, he was on night shift. We were on day shift. When I left the shack, the paperwork was in his basket for correction. I left it for him to correct. And this was over a period of two weeks I left it in his basket, and he didn't correct it.

Q. Do you recall what the subject matter of the missing inspection reports was specifically?

A. Yes. It was steel that was sandblasted and primed at the shop. This was the original paperwork on it. They gave parts, like they'd have a certain group of parts that they do at the shop; it was like groups of steel. They

would sandblast and maybe send it down to the field and they had it set up where they gave it a QP number is what they called it, and it might be from one item with one unique QP number (just a stamp to say that it had been inspected by a quality inspector -- that was some one's idea they thought up where they could create traceability). Like it would be QP-00322. And what they'd do after they gave them the QP number, they'd take it and they might chop one piece of pipe with a QP number into maybe 100 little pieces and they were supposed to stamp all of those, and it was really a messed up deal. We had people in there that really didn't know what they were doing and shouldn't really have been over it because they let the craft just snowball us -- they got away with anything. If we caught them in something, it was always shoved under the rug, and like I had them on paperwork and we know for sure that there were a lot of things that the other inspectors did and passed passed that they shouldn't have. But supervision didn't seem to care about that. It was really disgusting is what it was.

And that paperwork just mysteriously disappeared, which we needed the original paperwork on the steel for the total package to be complete.

Q. Do you recall whether there were any non-conforming conditions reported on the inspection reports?

A. No, there weren't.

Q. How were you going to get this paperwork to fill the gaps?

A. They didn't seem to care if that paperwork was missing. I think they thought maybe the auditor might be stupid enough that they could put something over on him.

Q. But they didn't try and fill the gaps?

A. No, they didn't seem to care. I know they never came up with any paperwork for the paperwork that was missing.

Q. Were the 15 inspection reports that disappeared the only documentation relating to inspections of the material, the steel that you talked about?

A. His documentation was what we call the primer application. It was the only part that was missing from those groups of steel. The steel was then transferred to the field and was coated, and then we had all the other documentation on it, except for the original paperwork on it which Mr. Fazi had made out.

Q. What did Mr. Williams say when you called this to his attention?

A. I called him over to the shack, explained it to him, gave him the information, showed him the inspection reports, my notes on them. I wrote it down on a piece of paper. He gave it to Mr. Fazi that afternoon, told him to redo his inspection reports and give them to me. And he said he would. And, as I said, this went on for about two weeks. And I asked him every day for them, and he'd tell me he didn't have time the night before to redo his paperwork. And then they disappeared.

Q. What disappeared?

A. The paperwork, the inspection reports.

Q. Then what happened?

A. Then I brought it to Mr. Williams' attention.

Q. What did he do?

A. Nothing.

Q. What did your husband do?

A. Well, he asked for the paperwork.

Q. This man worked for your husband; is that correct?

A. Mr. Fazi?

Q. Yes.

A. Yes.

Q. What did your husband do as supervisor of Mr. Fazi?

A. He had no power to do anything.

Q. No power?

A. No. Mr. Williams would have overridden him.

Q. So he didn't do anything because he anticipated that Mr. Williams would override him.

A. Well, you know, he asked him for the paperwork; but Mr. Fazi -- well, he had the opinion that he didn't have to answer to anybody but Mr. Williams, that Mr. Hamilton really didn't have any say-so in the matter.

Q. But Mr. Hamilton was the supervisor.

A. Well, he was supposed to be, yes.

Q. But was he in fact?

A. Yes, he was the supervisor.

Q. Did you ever hear Mr. Williams tell Mr. Hamilton that he had no authority over Mr. Fazi?

A. Well, Mr. Hamilton had tried to on several occasions to either transfer Mr. Fazi or fire him.

Q. Did you ever hear Mr. Williams tell you husband that he had no authority over Mr. Fazi?

A. No. But Mr. Hamilton did not have the authority to hire personnel either. Mr. Williams hired personnel from July of '81 until we left the jobsite. What I am saying is: He didn't have the authority to hire personnel, so he didn't have the authority to fire personnel.

Q. In general, when documents leave you office, are they reviewed by other people?

A. In the QA vault, I suppose they are.

Q. You suppose or you know.

A. Well, I'm sure they are, because they've got a computer; and they were trying to enter all the hanger numbers on a computer so they'd have them. All the

information on each hanger. And that's when they were reviewed.

Q. Are there other situations where this type of this occurred where Mr. Fazi's paperwork disappeared?

A. Yes, but this was before the new system was -- before the NRC came in. This was earlier, before July '81.

Q. What happened in July of '81.

A. Well, we had a total change in the paperwork. They made out a new IR system, inspection report system. Everything had, as said, a PC number on the inspection report; and everything was turned into the vault. Before that, the paperwork had been held in the office. That was from the time the coating started, whenever the coating started in the reactors. And we had the paperwork in boxes, and then we turned it in to the vault. We were so snowballed when they started all those new procedures that before I could get what they call a unique number on it, that paperwork would disappear, so we started a new system where before they even started on a piece of paperwork, I gave it a number. Like if they were inspecting steel for primer, I'd give it a number and then they could fill it out. But they could not fill it out or leave the shack until I gave it a number, and I already had it written down and who the number was assigned to. That way, I knew who was responsible for that piece of paperwork. What happened was that system was so new and they snowballed me - they gave me all the documentation to review which at first the inspectors when they started this new system, they had like 100 pieces of paperwork a day still out.

Q. Each inspector?

A. Yes. It wasn't anything unusual the first day one of our inspectors, who was the only one on nights at the time, he got behind. It was monotonous because it was the same information on each piece of paper except maybe one little thing might be different, like the size of the steel or something like that. They finally changed that system to where they could make it in one large group so that if they presented them with 100 pieces in this one group, they'd stamp this group with one QP number and they'd let you write it all down -- the time, the temperature, all the variable information, the date and the time of inspection, the batch number of the mix, the mix time and they'd let you do it all on one piece of paperwork. And that cut the paperwork in half but by that time -- let's see, there were four inspectors at that time, and the paperwork was probably 5' tall and they didn't think I needed any help. This was plus filing, running back and forth doing errands, answering the phone, and they got upset because I got behind and couldn't understand why I couldn't keep up with the paperwork, but it was because the

inspectors would leave off like the a and the p, you know, if it was morning or afternoon when the inspection or the mix time or the date, they'd leave off their name, they'd forget to sign it, they'd leave off batch number, they'd even screw up the batch number and I had all the batch numbers memorized. It was awful, the mistakes they made.

They told me to just look over them briefly and send them in the vault, but I was responsible for it because I was the one that turned them in to the vault. I wanted the paperwork correct. I was the one who would have been in trouble if it wasn't done right, because it would have been on paper that I was the one that submitted it to the vault and that it was correct. And I wouldn't do it. I took my time, I looked over the paperwork and they got a little upset about it. We had to work a lot of overtime around Christmas, and even Harry Williams got in on that. And he would look over paperwork and then I'd look over what he'd looked over and he'd miss things. They were just trying to get all the paperwork out of the way before the NRC came back in for an audit. Then we had one of those inter department audits -- Tom Brandt, some of the Ebasco engineers they brought in and some others -- they audited us and found all these mistakes and jumped on Mr. Hamilton about why can't these people fill out this paperwork right. But yet they were willing to go ahead and let it all slide. And they they wanted to know about all the previous paperwork from years gone by. And they had one inspector who might sign his name and put maybe a mix time or something on it, but never fill out a location or anything. Documentation in the protective coatings is just not there. I wouldn't say it's traceable at all.

Q. In other words, if I went into containment No. 1 and looked around and looked at the painting and said let's trace this hanger up here or whatever, could I do it?

A. No, you couldn't trace it. Because they may come in and put something like another piece of metal or attach something to it. You really don't know if it's been inspected by a quality inspector, to tell you the truth. They'll sneak things in on you. You have to watch them. It was really awful, the things they'd do, just to get production.

Q. Can you give me a specific example?

A. Well, like whenever this started, let's say the electrician -- we were doing electrical hangers (conduit supports is what they were calling them), and if the electricians could get in there and get those pieces before they were even dry, right then they were screwed up. They didn't care, as long as the inspector signed his name and said it had been inspected, they'd grab that piece and run with it. Well, we'd just have to recoat it once they got it in the reactor. And what really makes me sick is when these supports, which were all supposed to have unique numbers (this was the number besides the QP number, they were supposed to have a

hanger number) and they had me set up a card file where I could tell you how many time this thing had been coated. I set it up and they wanted me to set it up on every hanger. We had conduit supports, we had pipe hangers, we had cable tray hangers, we had shop primed material, I don't know how many different categories we had.

Q. They wanted a card file on each one?

A. Yes.

Q. This is besides your 5' of other paperwork and telephone calls and everything else?

A. Yes. I had to do that and keep that up to date plus everything else. But what I would find in it I would bring to Mr. Williams attention and he'd listen to what I said but then he'd turn around and not do anything about it. Like construction would maybe prime -- take just one piece that they had maybe done at the shop and sent it down and it had been painted with the finish coat, then they might scratch it or decide to re-do it and they'd send it back to the shop, have it reblasted and send it down as a whole new piece. And I argued with him about whether it was really a new piece or whether it had just been reprimed, and we went into which was the original documentation on it. And I never really got a straight answer out of them. But they might have primed and finish coated one item -- it'd be safe to say -- some of them had been coated over ten times -- reblasted, sent back and forth, back and forth, from the shop to the field and then back again, and it kept everything all messed up. And my card files were kind of hard to stay up with, because I'd run into the inspectors wouldn't use -- like they'd mess up a number, like if they reblasted it, sometimes an 8 would look like a 3. They wouldn't go ahead and trace it with the QP number that it also had on it and find out for sure if that was the right number because they really didn't care if it was the right number. Or they'd use the excuse it was the bad lighting, they couldn't see the number well enough. One of the inspectors that got fired, if I would come up with some kind of discrepancy, he'd go out and hunt down the hanger for me and find out for sure what the right number was.

Q. And he was fired?

A. Yes. That's what happened to us. The two inspectors that got fired and Mr. Hamilton and I were the only ones working the day shift at that time, and they had this backfit as they called it they were supposed to come in and come behind us and backfit all the things that were previously coated that the documentation was missing on, like from whenever they started the coating up until whenever we started our new procedures in about July or August of 1981. And what they were doing was training these guys to take the place of the guys that got fired.

Q. Prior to July of 1981, were there incidences where documentation disappeared, such as what you described to us?

A. Okay, the documentation program was -- seemed to be of no concern to the supervision over Mr. Hamilton before July of 1981. He set up like log books on the different hanger classifications, like the pipe hanger, the paper tray hanger, such as that and the concrete coatings. And it was just like a log book. Each inspector would come in in the afternoon, get a sheet out of the log book; and he would write his information down. And I would review those log books. This was before the inspection reports. And Mr. Fazi 's were incomplete or he might not--he might go for a week without writing anything down. And he did -- he did inspections.

Q. So it's primarily with regard to Mr. Fazi that you're concerned about the completeness of documentation and the missing documents and so forth?

A. Yes.

Q. What about the other inspectors?

A. The other inspectors, of course, made mistakes. But when you gave them the paperwork back, they made the corrections.

Q. During what time frame was it that the Fazi documents disappeared, month and year?

A. Let's see, I would say October 1981--last of October, something like that, first of November.

Q. Is that the only specific incident that you can recall where documents disappeared?

A. That's a specific one, yes. There was such a large amount that disappeared.

Q. Fifteen did you say?

A. Yes. But I have those noted on paper also. So I was -- his paperwork was stacking up, his corrections, and I had them noted on paper without his -- he didn't know I had --

Q. Had what noted on paper?

A. The inspection reports that he needed to correct.

Q. Revise.

A. Right.

Q. By inspection report number or subject matter?

A. Yes, subject matter.

Q. Did you have copies of them?

A. No. I did not make copies of inspection reports.

Q. Since these 15 were the subject of a request from Mr. Williams to Mr. Fazi to do them again, didn't someone else have copies of them?

A. No. There was one copy, his copy, yes.

Q. When did you make your notes about which inspection--

A. Whenever I checked it the first time and I wrote down the corrections that needed to be made on each inspection report. And then I put another note, a duplicate note, on his paperwork. And I dated it. And it went by for several, several weeks. And then it disappeared. It went through -- it was a Revision 4 and 5 in the steel paperwork.

Q. Always coming back to you or to Mr. Williams?

A. No, it came back to me.

Q. Through you.

A. Yes, sir. We went through several revisions right together. And his excuse for not doing the paperwork was because I didn't handle the Revision 5 blank paperwork for him to go back and correct his paperwork. So he was using that excuse. We were like in Revision 6 or 7, and still by then he had let it slide for this period of time.

Q. Sounds like you didn't get along too well with Mr. Fazi.

A. No.

Q. Sounds like you and he were battling.

A. Well, not really.

Q. He would come in. You would -- was it you that was rejecting so that the subsequent revisions --

A. Well, it was like he would leave off dates, times.

Q. So then you would reject it. It wouldn't even have to go up the road.

A. Right. I was so incomplete. Hanger numbers, they wouldn't be complete. He never went back and checked.

Q. Did he have a history of incomplete reports?

A. Yes. He used the excuse, the lighting was bad if he made a mistake or left out numbers. He was probably the most familiar of the inspectors we had at the time with how many numbers should be in, or what hangers looked like.

Q. So he knew how to do it.

A. Oh, yes, he knew how to do it. He just didn't want to do it.

Q. Maybe he was trying to get your ire.

A. Maybe.

Q. You were, I think you stated, familiar with the subject matter of those inspection reports in general terms.

A. Yes.

Q. You didn't know all the relations and detailed numbers and so forth?

A. Oh, that was not required.

Q. Can you relate to us the subject matter of the reports?

A. It was the first coating on the steel at the paint shop. It had been sandblasted, inspected by him; and it had been primed at the shop.

Q. And this would have been in the October 1981 time frame?

A. Yes. This would have been the first set of paperwork on these items.

Q. Mid-October? Can you be specific as possible in the date?

A. Well, I'd have to know exactly when the revisions came out. It was in the last of October, first of November of '81.

Q. And you stated earlier that there were no deficiencies noted on those inspection reports.

A. No.

Q. Did your husband have the material re-inspected that was inspected in the reports that disappeared?

A. No. They'd already been sent to the field and cut up into so many different parts, or hangers had been made. Raw steel that was coated is what I'm speaking of.

Q. And I think you've stated this situation was the only time that you can recall that a package disappeared.

A. Yes.

Q. I know it's not within your expertise to be able to say; but in your judgment, what is the safety significance of the fact that 15 inspection reports disappeared when those reports contained no reported deficiencies?

A. Well, I felt like the documentation part of it was just as essential as the coatings.

Q. The work itself.

A. Yes. If the documentation is not there, how are you supposed to know if it was coated right?

Q. Can we move on to your next concern?

A. Yes.

Q. Please do.

A. Well, I felt like the supervision over Mr. Hamilton, Mr. Williams in particular, was not qualified to make the judgments that he made, such as we needed a clarification on tack-free time of a coating. We asked for that. And Mr. Williams' exact words were: Stick your finger in it; and if it doesn't leave an imprint or you don't have paint on the end of your finger, then it's dry. That's tack-free time.

Q. Why is that a concern to you?

A. Well, because if the coatings were -- like if the coating was not dry and was moved, it could be scratched off.

Q. Why as a documentation clerk is that a matter within the scope of your knowledge or --

A. I was just familiar with the things that went on in the office, in the field; and even myself as a documentation clerk knew that this wasn't exactly the way it should have been done.

Q. How should it have been?

A. I really don't know.

Q. How do you know that that's incorrect?

A. I don't. But it sounds like he wasn't very familiar with the coatings.

Q. So this is just your supposition, your reaction, to what was said. You don't really know whether he was right or wrong.

A. No, not really.

Q. Let's move on to the next issue.

A. Okay. The order not to write NCR's on the Paint Department for some of their coatings.

Q. Who made that order?

A. Mr. Williams. Then when the NRC came in, he told us that we could start writing NCR's again. It had been about a year since an NCR had been written probably.

Q. Mr. Williams ordered Mr. Hamilton?

A. Yes, and the department told them they could not write NCR's. I'm not an inspector.

Q. Were you there when he made the order?

A. Yes. He would give the order to Mr. Hamilton. He would come back and tell the inspectors, you know, what he had said.

Q. What do you know about that? You weren't there. Just hearsay?

A. I just know that they were not able to write NCR's.

Q. They were told by Mr. Williams not to write NCR's.

A. This was before July of '81.

Q. And you're relating to us what you heard other people say? You didn't hear Mr. Williams say it?

A. No, I didn't hear Mr. Williams say it; but the inspectors couldn't write NCR's. They said themselves they couldn't. If they found a non-conformance, they couldn't.

Q. What were they to do? Ignore it?

A. I really don't know.

Q. So someone else might have written the NCR?

A. No one wrote it.

Q. Are you saying that the inspectors were told that if they found quality problems, not to write NCR's?

A. Yes, that's right. They did not write NCR's.

Q. And NCR's were not written when those inspectors found quality problems?

A. No. They usually either worked the problem out with the Paint Department, I guess. I really don't know. I'm not that familiar with it. I just remember that part of it, that they could not write NCR's during a certain time in there.

Q. Isn't it true that traceability of bulk steel is maintained even after it's cut up and sent to the field?

A. It's supposed to be.

Q. In that case, why do you think Mr. Hamilton didn't have Mr. Fazi's work re-inspected?

A. Because it was in pieces, and it had already been sent to -- the paperwork was so stacked up that by the time I got to it, it was already probably -- hangers were made out of it. It was cut up into all the different pieces and stuff.

There was a time limit in there. Usually within a day or so's time, the steel is gone. And like up there, that was the original bulk steel. And then they took it and made different things out of it. So by the time I found the paperwork and then paperwork disappeared, it was not traceable.

Q. Did you have occasion to have a deposition taken by the Applicants on July 1, 1982?

A. Yes.

Q. During your deposition, did you discuss most of the concerns you've mentioned in your testimony?

A. Yes, most of them.

Q. And since your deposition, have you continued to try to recall all of the concerns you have about Comanche Peak?

A. Yes.

Q. And in the preparation of your testimony, did we attempt to incorporate both the concerns specifically discussed in your testimony and the concerns you've remembered since that time into your testimony?

A. Yes.

Q. Are the concerns now contained in your testimony as it is herein written the only concerns you have about Comanche Peak?

A. All I can think of right now.

Q. Is it your belief that some or all of these matters or the results of these matters may jeopardize the health and safety of the public if the Comanche Peak plant is allowed to go into operation?

A. Yes.

Q. Do you believe the Atomic Safety and Licensing Board in these hearings should consider these matters before making a decision as to whether or not to grant an operating license for the Comanche Peak plant?

A. Yes.

Q. You mentioned that you took things to and from the calibration lab, took care of filing of M&TE (calibrating instruments), and made sure the instruments made it to the calibration labs on time. Were there many problems with things being out of calibration?

A. Yes. There were new systems and new inspection reports. The instruments they were using were supposed to be calibrated items, but the paint department

kept no cards on them. There were no records on the instruments before it was started by us. Then we had a card on each as to what day it was used, to show it had been in calibration, up-to-date. J. D. Martin, supervisor of the calibration lab, said that he was told that the Paint Department didn't have to keep records on what the Paint Department used. This bothered J. D. (Martin) a lot; there was nothing written into the procedure to that effect.

I had to go get 32 Q cups (16 oz. and 32 oz. ones) and scales from the Paint Department to the Calibration Lab and issue them to them. They had no record of the calibration on the cups or scales before that. This was in about December 1981.

Q. Did the matters you've mentioned in your testimony have any bearing on the morale of the workers or the inspectors at Comanche Peak?

A. Yes.

Q. Please explain.

A. Most of the morale was low; inspectors I worked with were disgusted with their jobs because they weren't able to do things the way they thought it should be done. If they found something they didn't like, they couldn't do it their way.

Q. What was the general attitude of higher-ups regarding quality and documentation?

A. The person I mainly dealt with was Harry Williams. On several occasions I presented him with various things I found discrepancies with. Most of the time, we never had any results from him. I was totally disgusted with the fact that he could get away with not completing inspection reports or not even listing what he was supposed to; he'd just make up something, or use generalities.

Another problem area was drugs -- it was common knowledge about drugs

and marijuana on site. In fact, I had a foreman ask if I wanted to purchase some from him; he said he had it in his pocket at the time. I have had other employees tell me that he's a known drug user.

There are also a lot of things built on site that aren't supposed to be. They've painted lawnmowers, washers and driers, refrigerators, I don't know what all they've painted -- they've done all kinds of things out there. Repaired stuff, you know, bring somebody's things in to repair. And they did all kinds of stuff. They didn't have a choice; they'd lose their jobs if they didn't. *People* don't have a choice -- if you're told to do it, you do it or you're out the gate because there's always somebody else that can take your place. And that's the way they look at it, and that's the way they believe, and, you know, it's good pay for around here, it's very good pay and people find that jobs are hard to find, so it doesn't take too much to put the fear in them. That's the truth. But I made a choice -- I decided I wouldn't eat for a while.

Q. How did you become involved in these proceedings?

A. I was contacted at the same time my husband, Bob Hamilton, was. We both decided to testify in the hearings.

Q. Do you consider yourself to be anti-nuclear?

A. No, I don't.

Q. Do you know who the NRC Resident Inspector at Comanche Peak is?

A. No.

Q. Have you ever had occasion to have contact with the NRC Resident Inspector?

A. No. I've never seen him, as far as I know.

Q. Is the reason you're testifying in these proceedings because you are a disgruntled employee or because you have a grudge against Brown & Root or Texas Utilities?

A. No.

Q. Why are you testifying?

A. I feel like the quality program at Comanche Peak is not as it should be. My main concerns are the lack of documentation, lack of traceability, improperly filled out documentation, and supervision by people who did not have enough education or experience to be in charge of the departments they were in charge of.

Safety is my number one concern -- I've got two little kids plus myself, my family, and all my friends, and everybody within ever how many miles there are that it could harm. I certainly don't want it to open -- not the way it's been constructed right now, not if things aren't straightened out. It's not going to get any better -- it has gotten worse since they're pushing for their opening date. And they do not care what they have to do to get it. They're not going to be nitpicking for quality, that's for sure.

R E S U M E

Cordella Marie Hamilton
Box 59, Glen Rose Star Route
Cleburne, Texas 76031

Graduated from Glen Rose High School in Glen Rose, Texas, in 1972

Attended Hill Junior College for one year, in Hillsboro, Texas, in 1973 - studied
medical technology

Married 1973

Housewife 1973-1980 (for 7½ years)

Hired by Brown & Root, Inc., at Comanche Peak nuclear power plant, Glen Rose,
Texas, July 8, 1980, as a laborer.

Transferred to protective coatings (paint) quality control (QC) as an
inspector trainee in September 1980; was mix inspector; took care of temp-
erature recorders in warehouse; did documentation work; was file custodian;
took things to and from calibration lab; took care of filing of M&TE (cali-
brating instruments); made sure instruments made it to the calibration labs
on time; and related work.

Quit March 9, 1982.