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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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
(CPSES)

Docket Nos. 50-445
and 50-446

TESTIMONY OF JOSEPH J. KROLAK, JR.
WITNESS FOR INTERVENOR CASE
(CITIZENS ASSOCIATION FOR SOUND ENERGY)

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

A. Joseph J. Krolak, Jr. I live at 1529 Barron Lane, Fort Worth, Texas 76112. A statement of my educational and work background is attached as Attachment 1.

Q. Are you presently employed?

A. I am not employed at the present time.

Q. What is your educational background?

A. My educational background is a GS, the equivalent of a diploma, which I received at TCU in Fort Worth in 1970 or 1971.

Q. How many years of high school education do you have?

A. Two years of high school.

Q. You attended high school through tenth grade?

A. Yes.

Q. Where was that?

A. J. Sterling Morton High School in Cicero, Illinois.

Q. What date did you leave?

A. The year was 1949. The date I don't recall.

Q. When did you go to work for Brown & Root?

A. In 1978.

Q. Where?

A. In Glen Rose, Texas.

Q. What caused you to go to Brown & Root?

A. Oh, I heard a lot of people talking about the wages out there. And at the time, if you recall, we had a good recession going around here anyway.

Q. If there is such a thing as a good recession.

A. Well, yeah, if there is a good one. Anyway, I went out there to seek a better-paying job.

Q. And you were hired on in 1978? Do you recall the month?

A. Yes, July 11th.

Q. And in what capacity were you hired?

A. I was hired as a carpenter helper.

Q. And what did those duties entail?

A. Well, I worked mostly on forming up walls, working on the outside of the reactor, forming the outside of the reactors.

Q. By forming the outside of the reactor, are you referring to the containment building?

A. Yes.

Q. Placing forms against which concrete was later poured.

A. Right.

Q. For how long did you do that?

A. I did that til February 20th 1980, when I went into quality control, protective coating.

Q. In what capacity?

A. As a trainee in protective coating.

Q. Why did you leave your carpenter's job?

A. Well, I left it mainly because the work was getting harder, and I wasn't getting any younger.

Q. Physically strenuous work?

A. And Brown and Root has a policy if you work for them -- I had three different foremen and they all tried to get me top pay. And Brown and Root has a policy, you have to be there some years before they advance you. And I figured by the time I got to be a full-fledged carpenter, I would be 50 years old, which I am right now.

Q. When you say the work was strenuous, you mean it was physically burdensome work, difficult work?

A. Yes, very much so.

Q. Carrying heavy loads?

A. Well, hanging off the side of the reactor by your belt and all. I mean I still have scars from my safety belt and so forth. Carrying up heavy objects.

Q. So February 20th, 1980 you went over to QC, protective coating as a trainee?

A. Yes.

Q. For how long were you a trainee?

A. Oh, it was approximately three months, I believe, three or four months.

Q. And what type of training did you receive?

A. Well, the first month all I did was read, and then I went out with the supervisor and had on-the-job training, and then I trained with other inspectors.

Q. And at the end of that three-month period, what did you become?

A. I became certified, and I was in quality control. I was a full-fledged inspector.

Q. Level?

A. Level 2, I believe.

Q. That would be the end of May 1980?

A. In that area, vicinity, uh-huh.

Q. And for how long were you a QC inspector in protective coating?

A. Approximately 25 months.

Q. Until what date?

A. March 9th, 1982.

Q. At which time you were terminated?

A. Yes.

Q. And you stated at the outset that you are currently unemployed?

A. Yes.

Q. Have you been employed since March 9th, 1982?

A. No, not full.

Q. Have you had part-time work?

A. Well, if you want to call a day a week part time.

Q. Doing what?

A. I'm helping Bob Hamilton remodel a home.

Q. Carpentry?

A. Yes, sir, laboring, carpentering.

Q. What were your activities as a QC inspector Level 2 in protective coatings?

A. Well, whenever the Paint Department had an object to show for inspection, I was called in the field. Level 1 areas, reactor buildings. That's what it boiled down to before I left. That's the only areas we inspected.

Q. Called to the paint shop or out in the field?

A. No, out in the field.

Q. Would you describe a typical inspection that you would conduct pursuant to a request from the plant?

A. Well, we'd get a lot of pipe hangers or conduit supports that they're finishing up in Reactor 1 especially, and this is on an everyday basis. That is

the main object of their inspections right now. Ninety-nine percent of it is hangers. It was when I left anyway.

Q. All hangers are painted?

A. Yes.

Q. Is this hangers in Category 1 structures, in containment, all over the plant?

A. Well our area has been reduced to containment areas now. When I first started, we were spread out to the whole area. To the whole plant, safeguards and fuel buildings. Now they've boiled it down to just containments 1 and 2.

Q. And your job was to inspect the painting?

A. The colorings, before and after coatings, yes.

Q. On hangers.

A. On hangers.

Q. What else?

A. Liner plate, imbeds, anything to do with coating. Concrete or steel.

Q. When we talk about coating, are we talking about paint?

A. Yes.

Q. Is there anything other than paint that is a coating?

A. I wasn't associated with anything but protective coating, paint.

Q. Primer and paint.

A. Yes.

Q. Oil based or latex?

A. Either one.

Q. Epoxy?

A. Yes -- no, no, I'm sorry. Not epoxy either. Let's put it this way before I get confused here. I've been out of there four months, and I just got it out of my mind.

Q. I understand. Well, to the best of your recollection.

A. Yes, I'm trying to recall. It wasn't latex, and it wasn't epoxy because epoxy we didn't associate with.

Q. Oil based, I guess. Is there anything other than oil base left?

A. Well, the paints we used, the particular paints, are different; and I just don't recall at the time the ingredients, at the time of my certification and recertification, which I was certified twice. I mean we were given written exams to clarify all our work. So I mean as far as that goes, if you want to break out a book, I'll read it over; and then I can tell you.

Q. No, that's not necessary. I'm just trying to obtain the facts from your recollection. You said that you didn't use epoxy paints?

A. I'm trying to recall if we had epoxy paint and if we did use it or not. You can put me on the record saying I don't recall, because I don't.

Q. Okay. What is a hanger?

A. Well, it depends on what kind of hanger you're talking about. They have a lot of cable tray hangers where the cable trays are mounted on throughout the reactors, other areas. And we have conduit supports. That's self-explanatory. They have conduit on the supports.

Q. Are we talking about pipe hangers?

A. Well, I mean I inspected the pipe hangers too, yes. They have all kinds of pipe hangers, different sizes.

Q. We have cable tray hangers, conduit, support hangers, pipe hanger. Any other kind of hangers that you recall?

A. No.

Q. What is liner plate?

A. Well, that's the inside of your reactors -- well, the outside of the wall is concrete. I imagine it's about five to six foot thick, and you have the

liner plate inside the reactor.

Q. This is the pressure boundary inside the containment structure itself?

A. Yes, it's a steel liner plate. The exact measurements I don't recall.

Q. And you inspected painting of that?

A. Yes, we inspected the liner plate.

Q. What are imbeds?

A. Well, they have all types. They have floor imbeds. They have imbeds on the wall. The imbeds we're more familiar with are the imbeds that are right directly in the wall where they hang different items on. In other words, they'll have a concrete wall and have maybe 20 or 30 imbeds coming inside the wall. The craft comes in there to set up a hanger, so they have a map of these imbeds, and they use it for a support.

Q. And they're painted?

A. Yes.

Q. And you inspect the painting?

A. Yes.

Q. What other activities did you conduct as a QC inspector in protective coatings?

A. Well, at times we watched the mix and verified the procedures at the shop. Watched the mix of the paint they use out in the field.

Q. You watched who conduct the mix?

A. The Paint Department. They have a special person in there that makes the mixes. He is in charge of the paint shack. And when we are called for a mix, they have to have the QC personnel there to watch to make sure there is the exact amount of paint mix and so forth, make sure the paint isn't out of date.

Q. For whom did you work?

A. I worked for Bob Hamilton.

Q. He was your direct supervisor?

A. Well, Bob was -- when we left, Bob was more of a working inspector or leadman, you'd call it. But the two years I was there, Bob fell under the supervisory category. I mean I answered to Bob.

Q. You said before we left. What did you mean by that?

A. Well, Bob was terminated also.

Q. At the same time you were terminated?

A. Yes, sir.

Q. Who was Mr. Hamilton's supervisor?

A. Harry Williams.

Q. Did you ever interface with Mr. Williams?

A. I'll be honest with you. I was in QC a year before I knew who Harry Williams was.

Q. So the answer is no.

A. No.

Q. Who is his supervisor, if you know.

A. Oh, at the time we left, I believe it was -- they had so many. Well, Hawkins was at one time, but he left. I believe he was QA Manager. Mr. Tolson.

Q. How many QC inspectors did Mr. Hamilton supervise when you were under his supervision?

A. Oh, let's see, there was one, two, three, four, approximately five.

Q. And if you know, how many inspectors did Mr. Williams supervise?

A. I don't know roughly. All I heard was he was in charge of three or four different departments. How many people he had, I don't know.

Q. Who made the determination that you would go out and do a certain job on a given day.

A. Bob Hamilton.

Q. Mr. Hamilton. And how did he convey that direction to you?

A. Well, when a craft wanted an inspection, normally they would call on the telephone, giving us the location.

Q. Calling Mr. Hamilton?

A. Well, usually Bob answered the phone, so I would say yes.

Q. By Bob you mean Hamilton.

A. Yes. Bob answered the phone most of the time. If Bob wasn't there, I'd pick up the phone. If there was an inspection, he would relay the information as to where he wanted us and what they were inspecting.

Q. Let's take a hypothetical and say that there is a hanger that the craft has prepared for painting, and the craft calls the QC inspector, and you're assigned to go out and inspect. How do you conduct your inspection?

A. Well, the first thing I'd do is go up to the paint foreman and ask him what he's doing, if he's putting primer or what and get all the information first.

Q. Do you have a piece of paper that has what's going on on it?

A. No, I don't. We don't carry a piece of paper with us. It's a long story if you want me to go into it. When I left, we started coming out with new IR's. Then you had to start carrying paper with you because you had to have a copy of what they were doing to keep it all on record. But at the time before my termination, I would meet with the foreman and get all the information from him. And if he told me what he wanted or when he told me what he wanted, I would check the weather conditions and so forth and then examine the item. We have to check the weather to see if the conditions are favorable for painting.

Q. What are favorable conditions?

A. Well, surface temperature, air temperature.

Q. You mean the environmental conditions in the area of the painting?

A. Yes.

Q. Not the weather outside necessarily.

A. Oh, no.

Q. And how would you make that check?

A. Well, we had two gauges we used. We used one psychrometer, which would get our humidity values and our dew point; and we had a surface temperature gauge, which would tell us how cold or warm the object is inside the containment.

Q. What was the range of temperature that was acceptable for painting?

A. I don't recall.

Q. What was the level of humidity that was acceptable for painting?

A. Oh, concrete was a hundred percent. We couldn't go over that, as I recall.

Q. Couldn't go over a hundred percent?

A. Yes, sir.

Q. A hundred percent humidity?

A. No, a hundred degrees. I'm sorry. Air temperature.

Q. How about steel?

A. I don't recall what steel was. I believe it was something, 85 percent humidity on steel, if I recall.

Q. How about temperature?

A. Temperature varied, depending whether you used CZ or phenylene. You had two different temperature ranges.

Q. What is phenylene?

A. Phenylene is your finish color. CZ-11 is your primer.

Q. So it depended on what you were to apply as to whether the temperature was an acceptable range?

A. Yes.

Q. Was there an acceptable lower range of the temperature for concrete?

A. Between the two now, I don't recall. Like I said, I just got it out of my mind. Just forgot about it all.

Q. But you don't recall it today.

A. No, I don't recall it today, no. That's the type of job you've got to keep at every day. You've got to read every day.

Q. So then you would go out, and you would take these tests for temperature and humidity?

A. Yes.

Q. And if it was acceptable, what would you do?

A. Well, if he wanted, say, to reblast a pipe hanger, we would still check our temperature because you know they are going to coat. And what you would do is check the item first to see if it had a visual acceptability, which is in our standards.

Q. And what were you looking for when you visually inspected?

A. We would look for rust or we'd look for foreign objects, dirt.

Q. This is an unpainted object that you were looking at.

A. Yes.

Q. And if you found a rough spot, what would you do?

A. The craft would have to remove it.

Q. You would point it out to them?

A. Certainly.

Q. Would they do it while you were there?

A. If it was small enough, yes. I wouldn't let them waste time calling me back. I would just wait for them to do it. They had equipment where they could do it very quickly.

Q. And if they were unable to do it, then you would go away and come back?

A. Yes. I would tell the foreman to call us when it was straight.

Q. Let's assume that the equipment was in satisfactory condition for painting. You had determined that there were no surface blemishes. The humidity was correct;

the temperature was correct. What else did you have to look at?

A. Well, we'd give it a visual inspection, like I said. And we'd get all the information from the foreman. Elevation, location, if it had a number on it. We'd have to check the numbers, serial numbers, for our documentation. And we'd keep a record of all of it.

Q. And if everything was satisfactory to your mind, what then would happen?

A. They would coat the object in question.

Q. How did you indicate your approval?

A. I would say, okay. For instance, if the foreman was Don, I'd say, okay, Don, it looks good.

Q. So he would apply the coating?

A. Yes.

Q. And you would go back to your shack and wait for the next call?

A. Well, normally with the documentation involved, you would have to go back and finish up your paperwork.

Q. So then you would document your approval.

A. Yes.

Q. On what document?

A. It's a new IR they came out with before I left. It has everything from your primer all the way up to your finish coat. If it's a reworked object, you have different IR's. In other words, when you write it out, it shows just exactly what you've done. I mean it's self-explanatory.

Q. When did the new IR's come out?

A. Oh, they came out, I'd say, two months before I was terminated.

Q. So January of '82?

A. I believe it was in that neighborhood.

Q. What was the documentation before that time?

A. Well, the documentation before that was -- the only records we would keep were records in our shack of all the items done from beginning to end, and we would put the locations. We would have different books. For instance, we'd have the cable tray book, and then we'd have a work log we had to fill out, and all the information had to be the same. In other words, if somebody did a primer job and they called me three days later to put a finish coat on it, I would check his records and get the information and keep them together.

Q. You testified earlier that you were a Level 2. Are you certain that you were a Level 2?

A. No, I'm not certain. I believe I stated that. It could be a Level 2 or 3.

Q. But not Level 1.

A. It may have been one. I know that there was a higher level than I was. Let's put it that way.

Q. There is a lower and a higher level than you were as a two.

A. Yes, well --

Q. You don't know.

A. No, I don't, not at the present time.

Q. You could be Level 3; you could be Level 1.

A. Could be.

Q. All right. Then you've approved the painting. You've given the craft the go-ahead to do the job. You come back, and you prepare your paperwork.

A. Yes.

Q. Does that complete your job for that particular activity?

A. Yes, for that particular activity, yes.

Q. Okay. Was your inspection activity always related to the condition of the object to be painted before it was painted, or did you also inspect objects once they were painted?

A. Both.

Q. Can you give us an illustration of how you would inspect the latter situation?

A. Well, it would be what they call as a final buyoff. When they have an item that is finished, and the craft is waiting for it, such as a loose cable tray, we'll say, or conduit support.

Q. Something that is painted in the shop?

A. No, painted out in the field. They have a system set up now where they have a tunnel. They call it the blasting tunnel or painting tunnel where the night shift normally would work these items because the crafts -- I don't know whether they were getting pressed or what, but they were trying to get these items out. And they have a heater in there, especially in the winter, which makes the item cure quicker. And what we would do is come in the morning, and this was happening quite frequently. They would call us and say we have maybe ten hangers, would you look at them and check them for final buyoff? And we'd go -- first, we would pull the paperwork, get the number from the foreman. And I'd pull out the paperwork, see how long they had been curing and see who inspected them for primer or who inspected the finish coat. And I would go check them out.

Q. And you would conduct tests?

A. Yes.

Q. What kind of tests?

A. We'd run a visual check, a continuity check. We had what you call a beeper. It's a Holiday detector actually. You would wet a sponge and run it over the painted item; and if there was any discrepancy, it would beep. And you were allowed so many discrepancies in a certain area.

Q. What would beep?

A. The holiday detector I'm describing is a battery-operated instrument. Roughly it was a box about this big with a gauge in it.

Q. About 6 inches long?

A. 6 inches square, we'll say. It worked as a battery. It had two terminals running from it. And you'd work it off of a stick about, oh, maybe 18 inches long with a sponge attached. And you would wet the sponge, and it would have a magnetic current. And when you run it over an item where there was a discrepancy in the paint, such as a pinhole or a holiday, it would beep.

Q. A holiday? What is that?

A. A piece they missed painting. And just listen to it, and you could spot or detect the discrepancy. And like I say, a certain amount of area is given a certain amount of leeway. And if you find too many discrepancies, you would have to have them recoat the areas.

Q. By specification the leeway is provided?

A. Yes.

Q. What is a continuity test?

A. A continuity test is to check for discontinuity. The beeper is the continuity test.

Q. So we have a visual test and a continuity test.

A. That's right.

Q. And if it passes both of those tests --

A. It's released to the crowd. It's released, yes.

Q. And then do you document your inspection?

A. Yes.

Q. How do you document it?

A. I document, turn it in as a finish coat. And this in turn is submitted to the vault. And if the item ever comes back as a repair, the document is there.

Q. You pull the paper?

A. Yes. You don't pull it out of the vault. You just make a repair IR on it.

And that's also submitted to the vault with the original finish paperwork.

Q. It's filed with the other paperwork?

A. Yes.

Q. Is there any other type of activity that you performed? We've talked about inspecting objects that have not been painted. We have talked about inspecting objects after they've been painted. What else did you do?

A. Well, my chief function was to inspect objects or items before and after.

Q. Just as you've described.

A. Yes.

Q. How much auditing of the mixing of paint did you do?

A. Well, not too much during days because a QC inspector at the shop out in the field was right next door. He saved us the trip of driving back and forth.

Q. Did you work day shift or night shift?

A. I worked both. When I was terminated, I was on day.

Q. How long had you been on day shift?

A. I would say it was pretty close. A year apiece, day and night.

Q. So of the 25 months that you were a QC inspector, half was day shift.

A. I would say it was pretty close to my recollection.

Q. Did the nature of your service differ when you were on one shift relative to the other shift?

A. No.

Q. Basically the same during both shifts?

A. Basically the same. I'll have to correct that. I'm sorry. The night shift we did a lot of shop work.

Q. Shop inspection?

A. Shop and field, right. As opposed to strictly field during days, containment area.

Q. I see. More shop inspections at night than during the day.

A. Yes.

Q. And to what do you attribute that?

A. Well, I don't know, to be honest with you. The day shift got a lot out, but the day shift was putting a lot of non-Q work out when I left. I don't know what the Paint Department reasoning was.

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

A. Yes.

Q. And in that deposition were you asked what you were going to testify to?

A. Yes.

Q. Would you please tell us what your response was?

A. That I would testify to a lot of safety features out there that should be corrected. The Safety Department in general, they should have someone out there that knows what they're looking for.

Q. Were you in the Safety Department?

A. No.

Q. Let's talk about the Safety Department. What is their job?

A. Well, they're supposed to maintain safety throughout the plant.

Q. What do you mean by maintain safety?

A. Protect people working there, watch the conditions, make sure that nothing is happening to jeopardize any specific area.

Q. It's working conditions that they're relating to?

A. Right.

Q. And how do you feel that they didn't fulfill that function?

A. Well, in the first place, I worked up in the cap a lot in both reactors; and I had been out there almost four years; and not one time did I ever see one safety man crawl that 105' ladder to go up there.

Q. Does that mean that they never climbed the ladder.

A. It's too strenuous.

Q. Do you know for a fact that a safety man never climbed it?

A. Well, I don't check these people 24 hours a day. I've never seen them myself. And I've talked to people that never have. They'll stay on Elevation 905 and look up.

Q. But you don't know for a fact that they --

A. No, I don't know for a fact. I've just never seen them up there. And I know the conditions up there. And I know that items have been turned in up there to the Safety Department where you can't walk up there. Everything is so cluttered, and that's one of their jobs, to make sure it's not cluttered. And areas throughout the reactor, I've seen welders welding.

And these cable trays we were discussing earlier are full of hot wires, and you see the slag going down and just hitting the wires. And I mean things like this. It's costing the utility company money, and reasons like this is why, because they're not properly handled by people that know what they're looking for.

Now, they'll watch while you're hanging on a safety belt six foot of the ground. I mean they'll write you up right away. But have them watch a guy welding over hot wires or something is a different story.

Q. This really doesn't relate to the quality assurance program. It's really the safety conditions of the craft.

A. That's right. We're talking working conditions and safety conditions out there.

Q. Did the safety conditions have anything to do with your termination?

A. No. Well, the area where we were supposed to go was deemed safe. We were terminated because we failed to make an inspection in an unsafe area that we thought was unsafe. And until this day I still say it was unsafe. Now, I've

crawled every area in that whole jobsite, and I've got three foremen, four foremen to back me up. I've never refused it in my life. I can bring in paint foremen if you want names to show you. I've climbed areas -- I had to use my hands where I didn't have to do it. But I said, well, I'll make the inspection for you. I said, you know, let's get it over with. And if I would have fell, I would have dropped a hundred foot. When they tell me I'm scared to go up in an area like that, they're very wrong.

Q. Let's talk about the area in question.

A. About a year ago, we were asked to make an inspection in Reactor 1 at elevation roughly 105 feet off of the ground. It's straight off of a platform crane up in the dome. And at this time they had quite a bit of work to do up there. They were doing a log of patch work up there, and it called for having to walk around that whole rail, 360 degrees around the reactor. And I was the first one called up for it. And I went up there, and I looked at it. And I said to the paint foreman, I said, all you've got is that life line, and you've got to reach for it. There's nothing on either side of you, and there's oil and trash and grease. And the foreman in question was like a monkey. I mean he'll run it and laugh at you. I mean, you know, he figures if he can do, you can do it.

So I called Bob Hamilton. And Bob said, just a minute. Let me look. And Bob went through the same thing I did. He worked everything in that reactor, in cadweld and everything. He never refused. So he looked at it. Bob and I even stood on it, and we walked a little bit. And Bob said, I can see if they want us to go today but not every day, not a constant thing, around that whole 360-degree area.

So Bob went over and talked to Jim Hawkins, who at the time was QA manager, I believe, our immediate supervisor. And Bob took him up there. And I was there also. And he looked at it; and he said, I'm not scared of height, but no

way are my people going to risk their lives. So he called up -- I don't know if he called up, because he left the reactor. He went over and called or went to see the plant manager. And two hours later they built a scaffold, or they started it. It took two days. And you'd be surprised how many people in that Paint Department thanked us for having that scaffold built.

Q. Who built the scaffold?

A. The Building Department.

Q. So the Building Department sent their men up there.

A. Well, the Building Department -- well, that is their job. I've worked scaffolding. I know.

Q. So it wasn't unsafe to sent the Building Department up.

A. The Building Department worked off the platform crane, the crane that we used to have access to to make our inspections. But conveniently it was pushed aside where we couldn't get at it anymore.

Q. Why do you think that happened?

A. I think it was the Paint Department. That's why. That's why we were terminated. They got rid of three good people.

Q. What do you mean you think it was the Paint Department?

A. Because we were holding up the production is why.

Q. Do you have any basis for that allegation?

A. My termination to me is basis enough. When a man leaves, and they put what kind of worker, good; and you put four years here, and one put six, and if he's a good worker, why do you get rid of him? What are you firing him for?

Q. Was it in the Unit 1 Containment that the matter arose that led to your termination?

A. No, but that's what started it. When we went to Reactor 2 just before my termination, we were asked to make the same inspection. Now, we asked the

paint foreman, the general foreman in the Paint Department, if we could have access to the crane, and he said no. We can't get it.

Q. What was the inspection you were being asked to conduct?

A. It was small patch repairs on the liner plate.

Q. So the liner plate had been painted and inspected and then repaired and it was the repairs you were asked to go up and re-inspect.

A. Yes.

Q. How did the painters first paint the liner?

A. They painted it on the ground at the shop in sections.

Q. And then it was raised up?

A. It was raised up, yes.

Q. Is that welded into place?

A. Yes.

Q. How did the welders do the welding? Did they do it on the ground, or did they do it up at 105'?

A. Up in the air.

Q. At Elevation 105?

A. Yes.

Q. And how did the painters then make the repairs?

A. The painters made the repairs by walking the rail.

Q. I see. At 105?

A. Yes. And if they didn't make -- some of them made a comment, I mean if we're talking about what has been said and what hasn't been said, some of the painters were told, if they didn't walk it, they can go out the gate too.

Q. Well, did you hear that said.

A. I've talked to foremen and painters. I mean if we need names, I can talk to them again.

Q. Well, did you hear that said though?

A. No.

Q. That's just what you heard?

A. Right. Hearsay, if you want to call it. fine.

Q. Then, if you know, after you were terminated, did other QC inspectors inspect the repairs?

A. From what I heard, if I rememeber right, one of the inspectors said they had access to the platform crane.

Q. Do you know whether that's a fact or not?

A. Well, he told me that.

Q. Did he do the inspecting, or was he giving you heresay from someone else?

A. He made the inspection, but he didn't have to walk the rail.

Q. And so what we have is a situation where the welders had been up an 105' doing their work, and the painters did their work, but the QC inspectors refused to go up and look at the work.

A. Oh, no, we didn't refuse to look at the work. We refused to walk that rail to go look at it. I told them I'll go up on that platform crane. I'm never refusing an inspection. I said, you build this rail safer, I'll walk it. I mean I wasn't the only one involved in this. And we did have it clarified in Reactor 1, and everyone was happy at the time.

Q. Didn't you just say the painters walked the rail?

A. The painters walked the rail, right, but none of them walked the rail when they built the scaffold in Reactor 1.

Q. What does that have to do with Reactor 2?

A. Reactor 2, the point I'm driving at is: They wouldn't build the scaffold for us.

Q. But the painters walked the rail, nevertheless.

A. The painters had to walk the rail, yes.

Q. I see. But you chose not to.

A. That's correct.

Q. And it was at that time that you were terminated?

A. Yes.

Q. You and Mr. Hamilton?

A. Sherman Shelton also. There were three of us involved.

Q. Mr. Shelton also. That really isn't -- again, that's really a safety of jobsite matter. It's not a quality assurance matter.

A. No. I agree with you there.

Q. Safety in the workplace is what it is; isn't that right?

A. Right.

Q. Did you file any formal complaints with the Occupational Safety and Health Administration?

A. Well, when I was terminated, the three of us weren't aware of OSHA being on the jobsite where we could file with them. What we did is: We found out a day after we were terminated about OSHA, and we contacted them.

Q. How did you contact them?

A. Well, it was first by phone.

Q. Did you call them, or did one of the other people call them?

A. Well, I did. I called their office in Arlington, I believe; and I was directed to Dallas.

Q. And what did they say?

A. Well, the final investigation proved us wrong because there is an article in their statute that states as long as you're wearing a safety lanyard, there is nothing they can do about it.

Q. Did you disagree with that conclusion?

A. I certainly did.

Q. Did you fill out a questionnaire for OSHA?

A. I filled out a form, my statement, written statement. I mailed it.

Q. Did you receive a letter back from them?

A. Yes, I have a letter back from them. It's attached hereto as Attachment 2.

And I also filed with the Equal Opportunity on age discrimination. And from what I understood, both OSHA and Equal Opportunity contacted Brown and Root via telephone, never in person; and the favor goes to Brown and Root.

Q. The decision goes to Brown and Root?

A. Yes.

Q. How old are you? Fifty years old?

A. Yes.

Q. How old is Mr. Hamilton, if you know?

A. I believe Bob should be 38.

Q. And Mr. Shelton?

A. He was 32, I believe.

Q. Were you treated any differently than those individuals?

A. Not those individuals, no.

Q. What other concern do you have about Comanche Peak?

A. One of them was when I was working with the Carpentry Department roughly three years ago, they were making a pour in Reactor 2. The areas I'm not quite sure of. But if they ever went there and x-rayed, I imagine they could find it.

My job that day was to watch the pour from inside the compartment, make sure any forms weren't leaking or so forth. And they were using a vibrator to circulate the concrete, keep it flowing, you know, without setting. And the vibrator got stuck. So what they did is cut the vibrator and leave it in the wall.

Now, this had five or six foot of hose, the size of the hose I'm not aware

of, two or three inch maybe. And the only thing I heard that day was nobody saw nothing. And to be honest with you, I didn't think it would affect the wall.

Now, the area is in one of the compartments as you go into the reactor. Now, I keep thinking a wall adjacent to the core. Now, this I'm not positive about. I know it was between Elevation 832 and 860, the east wall, the west face of Reactor 2.

Q. You were a carpenter at the time?

A. Carpenter's helper, yes.

Q. Carpenter's helper involved with the placing of forms for a concrete pour.

A. Right.

Q. And you saw the vibrator placed in the concrete become stuck and be cut off.

A. Yes.

Q. You witnessed that yourself.

A. Yes.

Q. Do you know that it wasn't later removed?

A. No, I don't know.

Q. So it could have been later removed. You don't know that.

A. It could have. I'm not denying that. It could have.

Q. Can you be any more specific as to the elevation?

A. No. I've been trying to go over it in my mind in the last day or two. That's about the best I can give you. I remember we crawled up a scaffold. And I know it wasn't on 808. It had to be at least 20 foot in the air or higher.

Q. Is there a month and year you can tell us?

A. No. I'm trying to even think of the foreman that I worked for at the time to give me more information in my mind about it. But I don't recall. I'm sure they

have records over there at Brown and Root, worksheets that people turn in. They must have copies of that, all the documentation. So you could go over there and dig it out maybe.

Q. So is that all the information you can give us?

A. That's all I know about that. That's all I can recall.

Q. And you said you didn't know whether it was later removed or not.

A. No, I don't know.

Q. But you saw it cut.

A. Yes.

Q. Okay. Now, something else?

A. Well, I just want to say something about my ex-boss, the person I worked for who was above Bob Hamilton. Mr. Harry Williams, my supervisor. As far as the documentation setup and so forth the protective coating and all, I think they have the wrong man there. The man is not knowledgeable. He runs two, three, four different departments. I don't know how many now. But he's not aware of what's going on, and he doesn't know anything about it.

Q. For how long did Mr. Williams perform that job while you were there?

A. Well, like I said, I was there two years; and I met Harry Williams a year after I was there.

Q. Do you know when he took over that job?

A. No, I don't.

Q. Why do you say he's not knowledgeable?

A. Because I've talked to him. He's come into our shack. Anyone in QC can tell you. I mean this just isn't from me.

Q. Well, what's his job.

A. He's supposed to be our boss in protective coating. He was in Hilti bolts, I believe, and electrical. And he was like an overseer.

Q. A supervisor?

A. When you run departments, I thought you were supposed to be familiar with what people are doing in these departments. I mean what kind of respect can you have for a man when you're holding a job and he doesn't even know what you're doing?

Q. Well, what specific examples can you give us of situations where you thought that he demonstrated a lack of knowledge?

A. Well, one main reason was that the new IR's we came out with, inspection reports, Harry Williams came in there; and he went up with the coating engineer trying to make out new IR's. We must have revised them three or four times, because he didn't even know what to put in them. And when he came into our shack, tell us to do them, we'd do them, and then he'd tell us they were wrong. I mean it was just like a joke. I mean we worked hard at them to get our paperwork right, and Harry would come in and just foul it up.

Q. Isn't it common for employees to think they know more than their supervisors?

A. Yes, it is. That's right.

Q. So there may be a little of that involved in what you're saying here, don't you think, in fairness?

A. Well, I was proud of my job.

Q. That doesn't reflect --

A. At the time I was there, I knew my job.

Q. We're not disputing whether you knew your job or not. Let's assume you did know your job. Isn't it also fair to say that a little bit of what you're saying may be the employee being angry with his supervisor? Isn't that a common --

A. It's a natural feeling, but I sure as heck wouldn't be sitting here in front of all these people telling them if I didn't feel it and mean it.

And my peeve is when you take a person like that and have them in the position he is, especially in a nuclear plant, or any plant with importance, and he's not knowledgeable, I don't think it's right.

Q. Could you be wrong in your assessment of Mr. Williams?

A. Which way?

Q. Well, that he's not knowledgeable.

A. In protective coating, I know he's not.

Q. Well could he be using the management tool where he attempts to be humble and not as knowledgeable as he may otherwise be just to draw out information from his people? Do you understand the question?

A. I understand the question, but I still say he's not capable of his position.

Q. But that doesn't answer my question. Could he be using that management tool.

A. Sure. I agree with you. Yes.

Q. He could be simply allowing you guys to do more of the talking, asking questions as though he doesn't know the answers, when in fact he may well know the answers. That's fair to say, isn't it?

A. Yeah. It's fair to say, right.

Q. Mr. Krolak, was the preceding testimony taken primarily from the deposition which was taken from you by the Applicants on July 1, 1982?

A. Yes, primarily. In many cases, it's almost word for word.

Q. Mr. Krolak, on page 16 beginning with the fifth question on that page, and continuing on for the next few pages, you discussed the Safety Department and safety features at Comanche Peak. Was your testimony on those pages basically the same as what was contained in your deposition which was taken July 1, 1982, by the Applicants?

A. Basically, it was the same.

Q. With further reference to that testimony, the attorney for the Applicants stated that this really doesn't relate to the quality assurance program but was really the safety conditions of the craft. And you said "That's right. We're talking working conditions and safety conditions out there." Do you recall that portion of your testimony and deposition?

A. Yes.

Q. Did you mean to indicate by your answer that the working conditions and safety conditions at the plant had no bearing on the quality of the work being done or on the attitude of the inspectors?

A. No, I didn't.

Q. Did it have an effect on the morale of the inspectors and the workers?

A. Sure it did. Most people develop the attitude that they want to get in there and get through and get paid. It's very discouraging when you try to do a good job and people don't care and you get overruled all the time. It's bad for morale. There were some QC inspectors who always tried to do a good job and to do things the way they ought to be done.

Q. Were you one of those inspectors?

A. I always tried to do a good job, yes.

Q. Who were some of the others who tried to do a good job?

A. Bob Hamilton and Sherman Shelton always tried to.

Q. Were there some inspectors who didn't do as good a job?

A. Yes. There were some who would sign off anything.

Q. Who in particular?

A. One was Joe Fazi. He would often inspect hangers but not write up documentation for his inspections. Even when he did write up his inspections, his work was poor.

Q. What is your basis for that statement?

A. Bob Hamilton and I worked on a weekend one time and we checked over some of Joe's (Joe Fazi's) work. Out of 10 items numbered in order one after the other, four of them were recorded wrong. When he was asked about it, Joe said the light was bad.

Q. Was the light bad?

A. The rest of us could see.

Q. You felt his work just wasn't up to par?

A. Right. His documentation didn't mean anything as far as traceability goes.

Q. Is he still employed at Comanche Peak.

A. Yes.

Q. But you and Bob Hamilton and Sherman Shelton are not?

A. That's right. I believe we were all fired at the same time as a set-up to get rid of the inspectors who were really trying to do things right. And on my firing slip, they put not for rehire.

Q. What is the name of the person who fired you?

A. Tom Brandt was the one who arranged it. Harry Williams marked "good" on my firing papers about my work.

Q. Harry Williams was the man who was Bob Hamilton's immediate supervisor?

A. Yes. As I understand it, he was a Gibbs & Hill employee working for Texas Utilities. I never really had a lot of dealings with him directly.

Q. Did you work on the paperwork in the QA vault?

A. Yes.

Q. Could you tell us about that?

A. Well, one of the problems was that Harry Williams often had fouled-up paperwork sent to the vault, to be straightened out someday. When the new IR (Inspection Removal) system began, several of us were working as hard as we could to straighten out the paperwork mess and Harry Williams said to just throw it in the vault. The IR paperwork changed four or five times in one month. There was paperwork on the reactor liner plate for Unit 1 which was five or six years old and all fouled up. Bob Hamilton tried to get the paperwork straightened out but Harry Williams cut him off.

Q. Do you think Harry Williams knew what he was doing?

A. Well, as I said, I didn't have an awful lot of direct dealings with him. But based on what I did see, especially regarding the paperwork, I don't think he was qualified to be in the job he had.

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

A. Yes, all the ones I could think of at that time.

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 deposition and the concerns you've remembered since that time into your testimony?

A. Yes.

Q. Are the concerns now contained in your testimony the only concerns you have about Comanche Peak?

A. All the ones 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. Is there any other concern you wish to discuss at this time?

A. Yes. There are a couple. At one time, QC was inspecting protective coating on concrete and steel in almost every area of the plant. We were told to stop such inspections for all but the reactor buildings as being too time consuming.

Another thing was that there were lots of missing QC records in the vault about paint. Bob Hamilton couldn't complete and file them because everything was going for repair. Records of what had been done were there, but they were meaningless. A lot of the documentation on the paint was messed up anyway because one of the inspectors, Joe Fazi, didn't do his job right.

One other thing -- when we were fired in March, there were just us three field inspectors in paint. Now there are about 15.

Q. Are you testifying in these proceedings because you are a disgruntled employee or you have a grudge against Brown & Root or Texas Utilities?

A. No.

Q. Why are you testifying?

A. Because I want to see a safer plant built -- a plant which when it is in operation is as safe as it can possibly be.

Q. You don't think Comanche Peak has been built so that it can be operated safely?

A. No.

Q. Are you anti-nuclear?

A. No. With our natural resources dwindling, I think that this is the thing. But it's got to be safe.

Q. Do you think the Atomic Safety & Licensing Board should grant an operating license for the Comanche Peak plant?

A. Not at the present time, no.

Q. Do you believe the problems at Comanche Peak can be corrected?

A. I imagine they could be if they put a little effort toward it, but it's going to take them some time.

Q. What do you think it would take to correct the problems?

A. They need to look into their leadership. I believe there's too many buddy-buddy relatives involved, and they need to look at qualifications more. Also, their Safety Department isn't what it should be; they're undermanned and I don't believe these people are qualified.

Q. Do you think the NRC's investigations in the past have made the plant safe?

A. I'm not too familiar with the NRC's investigations. The only thing I know about the NRC investigations is the audit they performed and what I read

in the newspaper what they said about the crack and the last hearings.

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

A. No, I don't. I've never met anyone from the NRC out there. I never came in contact with any of them.

Q. Is there anything else you'd like to tell the Atomic Safety and Licensing Board at this time?

A. Not that I can think of right now.

R E S U M E

Joseph J. Krolak Jr.

PERSONAL: 1529 Barron Lane, Fort Worth, Texas 76112

EDUCATION: J. Sterling Morton High School, Cicero, Illinois

1949 United States Navy-Seaman First Class

GS (diploma equivalent) 1970-71 TCU, Fort Worth, Texas

EXPERIENCE: July 11, 1978 - March 9, 1982 -- Brown & Root, Inc. CPSES, Glen Rose Texas.

February 20, 1980-Protective Coating Trainee. Became certified for Quality Control Inspector (QC Inspector)

Responsibilities included:

Inspecting colorings before and after protective coatings on cable tray hangers, conduit supports, pipe hangers, Liner plates, imbeds, steel & concrete. Inspecting the mixing of paints. Keeping documetations of all inspections.

July 11, 1978 - Brown & Root, Inc. CPSES, Glen Rose Texas
Carpenter helper

Responsibilities included:

Forming walls of containment buildings.

1959-Police Department, Wheaton, Illinois

Responsibilities included: Patrolman for 5 years.

1954-George D. Hardin Construction Company, Chicago, Illinois

Responsibilities included: Pipefitter apprentice

Between jobs I worked mostly with driving delivery routes. In all 20 various jobs, I was never fired. In most instances, the company asked me to stay longer.