A Materials received included masonry block, sand and coarse aggregate,concrete, structural steel reinforcements, post-tensioning tendons, and bolts.

Q With respect to steel that was received on site, what types of items would this encompass?

A Primarily structural steel beams and embedments..

Q What would you do when the materials arrived on site?

A I would assure that the applicable documentation accompanied the shipment, specifically relating to heat lot numbers, traceability to the origin of the steel and insure that nothing was broken, bent or misformed, and they were coated properly if applicable.

Q How did you determine whether the items conformed to the requirements?

A I did a visual inspection of the items as they were received and examined the paperwork.

Q Was there ever a time when the paperwork or documentation did not match what the material was supposed to be?

A Yes, this happened frequently.

Q Could you describe for me what you would do in this instance?

A I followed Mr. Barnhart's practices, which I learned from him, especially relating to Mid-City Architectural iron and structural embedments. Many times the paperwork would not show up, but steel would be accepted, a phone call would be made to Mid-City and usually the next day or the day after that, the right paperwork would arrive for the truckload of steel. I would then fill out the paperwork in such a way that it would appear that the steel had arrived on site with the paperwork, and the shipment would be shown to have been accepted on the date the steel actually arrived on site, although it was not actually acceptable until several days later when the documents arrived. In other words, I would postdate the Receiving and Inspection (R&I) report for the shipment.

Q When you say the material would be "accepted" on the day it was actually physically received at the plant, what does that mean?

A It was allowed on site.

Q Were you instructed to place a quarantine tag on such material?

A No, I wasn't.

Q Have you reviewed the portions of Blount's QA/QC receiving and storage inspection manual which Commonwealth Edison produced to you?

A Yes, I have. It is marked as Exhibit E to my testimony.

Q Do you now know of any way in which the manner you were instructed or trained to do these inspections deviated from the requirements of that manual?

A Yes, I do.

Q Please describe that deviation.

A According to the manual, the steel should have been rejected and/or accepted but quarantined. The way I was told and taught to do it was easier and generated less paperwork. According to §8.2 of the manual, I should have quarantined a shipment, but then I would have had to write up a second R&I report and a letter explaining the quarantine and release. I assume that this, in turn, would have generated even more work for and by Mr. Donica, since he was to review and sign all R&Is and related reports.

Q Who showed you how to receive and document this type of shipment?

A Mr. Barnhart.

Q You also mentioned that you were responsible for receiving inspections of concrete blocks. Can you describe how you did receiving inspections for concrete blocks?

A All or nearly all of the concrete blocks came from Eller & Wylie

Block Company in Ohio. Mr. Wylie was an extremely uncooperative individual when it came to quality conformance of block. He was told on numerous occasions that he was to have the applicable block tarped and completely weather sealed but he often did not do so. Many times the block would arrive wet or dirty because of snow, rain, road salt, etc.

Q What would happen when the block would arrive wet, dirty or with road salt on it?

A Mr. Donica instructed me to receive block to be segregated and tagged for Category II construction only. He instructed me not to document that the block was not tarped, and instructed me to accept wet Category I block.

Q Do you believe that the practice you were trained to do is in conformance with the way the manual states that concrete block is to be received and inspected?

A I don't know, but I have concerns about what actually happened to the block once it was on the site.

Q Please describe the nature of those concerns.

A My concern is based on the fact that Category II block was often stored in a location which was more convenient for Category I use, indeed often right next to Category I construction such as in the fuel handling or auxilliary buildings.

Category I block was not marked. Block which, because of its condition upon receipt, was to be used only in Category II construction was marked with yellow tape; however yellow tape

was also used to mark many other parts of the construction project, for example, an open stairwell.

In addition, block which was wet on receipt was put in different places, such as the turbine building, to dry out. I did not supervise the drying process and I do not know who, if anyone, did. I do not know whether this block was eventually used in Category I construction. Category I block was stored in not one specific location but in a variety of locations, often quite a distance from where Category I construction was going on.

In short, I know of no way of assuring that block that was segregated for Category II use or was wet did not end up in Category I use because the marking system was no inadequate and Category II block was often more convenient to Category I construction than Category I block was.

Q Whose job was it to make sure Category II block was restricted to Category II construction?

A I do not know whose responsibility it was; however, I know that I did not have the means to insure this. Because of the location of storage, and my other duties throughout the construction site, I was physically unable to make sure that Category II block was used only in Category II construction.

Q You also stated previously, and also brought up in your affidavit, that you were responsible for receiving and storage inspections of tendons. Could you describe for me what a tendon is?

A A tendon is a bundle of quarter-inch wires, some more than 200 feet long. Tendons are used in post tensioning of concrete

containment buildings.

Q Can you describe for me what post-tensioning is?

A Post-tensioning is a process involving stressing of steel wires. The tendons are installed after the concrete is in place in order to provide additional strength to the concrete.

Q Please describe for me how you performed your receiving and storage inspection of tendons?

A Tendons arrived two to a bundle, two bundles per truck. They were tarped and sealed in plastic bags. The tendons were separated by wood beams. Upon arrival I would first check to make sure all the applicable paper work was there. The second step was opening the bag to insure that there was no dirt, rust,or nicked or bent wires. Also, I would place a drainage slit in the bottom of the bag. From there the tendons would be taken to one of the authorized tendon storage areas where they were unloaded and stored for future use. About one-fourth of the time I would accompany the tendons to the storage area to watch them being unloaded.

Q Have you reviewed portions of Blount's QA/QC materials receiving manual which deals with how tendons were to be inspected on receipt?

A Yes. I have. Two versions of it are marked as Exhibits F-1 and F-2 to this testimony, and were exhibits 5 and 6 respectively to my deposition.