UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:	)	
	)	
DUKE POWER COMPANY, et al.	)	Docket Nos. 50-413
	)	50-414
(Catawba Nuclear Station, Units 1 and 2)	)	
	)	

DEPOSITION OF:

BRENDA GAIL ADDIS

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APPEARANCES:

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Columbia, S. C.

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RONALD L. GIBSON, ESQ.
Charlotte, N. C.

Counsel on Behalf of Applicant, Duke Power Company

Also Present:

George W. Grier
Duke Power Company

Roger Ouellette
Duke Power Company

Glenn H. Bell
Duke Power Company

Michael F. Lowe
Palmetto Alliance

Phil Jos
Palmetto Alliance

Betsy Levitas
Carolina Environmental Study Group

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The Deposition of Brenda Gail Addis is taken at the corporate offices of Duke Power Company, Charlotte, North Carolina, on this the 27th day of June, 1983, in the presence of Robert Guild, Attorney for the Intervenor; and Ronald L. Gibson, Attorney for the Applicant.

All formalities as to caption, certificate and transmission are waived. It is agreed that Lynn B. Gilliam, Notary Public in and for the State of North Carolina, may take said Deposition in machine shorthand and transcribe the same to typewriting.

Said Deposition is taken subject alone to testimony for competency, relevancy and materiality; and all objections, save as to the form of questions asked, are reserved until the Hearing.

BRENDA GAIL ADDIS,

having been first duly sworn to tell the truth, was examined and testified as follows:

DIRECT EXAMINATION

BY MR. GUILD:

Q Ms. Addis, state your full name and business address for the Record, please.

A Brenda Gail Addis, Duke Power Company; Box 33179, Charlotte.

Q Do you work here in the corporate headquarters?

A That's correct.

Q What is your present position?

A Director of Employee Relations.

Q Ms. Addis, my name is Bob Guild, and I represent Palmetto Alliance in the Licensing case for the Catawba Station; and are you aware that Palmetto Alliance has filed and the Board has accepted for litigation a contention called Contention Six relating to the subject of Quality Assurance at Catawba Station?

A The Notice of the Deposition explained about the welding at Catawba.

Q I want to show you a copy of the text of that Contention so you can refresh your recollection or see it for the first time, if it is the first time.

This is a document dated December 31st, 1982, Applicant's Response to first set of Palmetto Alliance Interrogatories (indicating).

This is the section of that Contention as Admitted by the Licensing Board.

MR. GIBSON: Can we point specifi-

cally to what you are talking about?

MR. GUILD: It is the indented section of that paragraph, if you can take a minute and read that, and it goes over to the next page.

MR. GIBSON: Mr. Guild, you are showing her the originally Admitted Contention Six and not the Contention Six as recast by the Board.

MR. GUILD: Yes, I will show her that in a minute, Counsel. That is the originally filed text of Contention Six and describes Palmetto Alliance's concerns.

THE WITNESS: All right, I read down through (indicating).

BY MR. GUILD:

Q Now there is another quoted paragraph that has a bracket around it, if you would take a moment to look at that as well, this paragraph I mean (indicating).

MR. GIBSON: Can we agree this is a paragraph which is Contention Six as recast by the Board?

MR. GUILD: Yes.

BY MR. GUILD:

Q All right, ma'am; have you seen those before today?

A No, I haven't.

Q Please speak up to make sure that the tape picks you up.

A I had not seen those before today.

Q I want to ask you a series of questions, Mrs. Addis, and what I am trying to do is gather some information in Discovery, try to learn from information on this general subject reflected in the text you just read specifically relating to your knowledge concerning Quality Assurance and welding at the Catawba Station.

You have been involved in responding to concerns that were raised by a number of Catawba Welding Inspectors; haven't you?

A The recourse procedure that some of the inspectors used about the pay grade, I was involved in.

Q Yeah, that would be generally the subject of my questions. I will try to ask you questions in plain English, and please stop me if I am not clear in my questioning or you don't understand.

If you don't understand, just say so, and I will try to rephrase it or explain what I mean.

Otherwise the transcript will reflect your answer to a question, and we will understand that your answer was responsive, and you understood the question.

If reference to a document would help you answer a question, if you could indicate that document and we can take a moment, there are a number of documents here in the room that relate to the subject, and I also just this morning had a copy given to me of what was indicated to be your files with respect to this subject.

Those are available, too; is that an acceptable procedure?

A I will do my best.

Q Tell me a little bit about what your job is and your responsibility.

A I am Director of Employee Relations in the Corporate Personnel Office, and the scope includes but is not limited to a variety of things involving human resource, management things in general.

The emphasis in coordinating pilot efforts in quality circles, looking at systematic kinds of procedures such as corrective discipline, positive discipline, communications, channels and processes are a part of our jurisdiction.

We work through Employee Relations people

in the field at each construction site, steam station, division offices.

There are many people involved in this role. I am also taking a lead role in the Step Two Phase of the Employee Recourse Procedure, which is one of my primary responsibilities, and also really in helping the company have a kind of progressive and innovative human recourse functioning that we are desiring to have represent the company in national organizations, utilities, industry, committees for handicapped people, and those types of things.

Q How long have you held your present position?

A I'm in my fifth year.

Q Describe for me briefly, Ms. Addis, the structure of Employee Relations at the Catawba Station?

MR. GIBSON: I will object based on the limitations or narrowing of Contention Six, but I will allow her to answer.

THE WITNESS: I guess my concern is--which department?

BY MR. GUILD:

Q You have to help me understand; assume

no knowledge on my part on how Duke Power is organized or your area of responsibility.

I hear you make a reference to Employee Relations people in the field. We will be focusing on Catawba.

Help me understand how the Employee Relations function at Catawba and the organizational structure of your work at Catawba.

A There is an Employee Relations function in the Construction Department at Catawba, which is a major department, meaning the number of employees on site, the way the Employee Relation function works in some of the other areas, division operations not located at Catawba, there is a geographic kind of service which is what Quality Assurance Department has, and the Nuclear Department has an Employee Relations function through their Personnel Assistant position at Catawba.

Q All right, let's take the Construction first. Is there a specific Employee Relation staff that works in the Construction Department at Catawba?

A Yes, several.

Q Would you give me an idea of who those people are and how many there are and how generally that effort is structured?

A At Catawba construction, of course, the Employee Relation specific function is assigned to I believe two people presently who are called Employee Relation staff, although the Personnel Manager is involved in various and other positions at Catawba.

Q Yes, who are the two people presently in Employee Relations?

A Steve Alexander and Faye Fowler are the ones I have worked with.

Q Have those people been at Catawba for some time in that capacity?

A Steve has, I am not sure how long Faye has been assigned there.

Q Would Mr. Alexander have been in that function at Catawba during the period that is the subject of the Welding Inspector concerns?

A I believe he was, yes.

Q Say from early 1981 forward?

A I think so, in the Construction Department.

Q Now then, how about for Quality Assurance at Catawba? Would there be a separate Employee Relations staff there that deals with Quality Assurance personnel at Catawba?

A No.

Q Help me understand then how someone who

was in Employee Relations in the Quality Assurance Department--

A The QA Department basically handles their personnel function from the Charlotte offices.

Q Who in the Charlotte office then is responsible for employee functions in the QA Department?

A Well, the staff is under the direction of Neal Alexander.

Q Help me understand; we have a couple of Alexanders. Is this C. N. Alexander?

A Yes.

Q As opposed to Steve Alexander?

A Yes.

Q C. N. Alexander, what is his title?

A I believe Personnel Manager in Quality Assurance, by title.

Q And he has Employee Relations responsibilities in that capacity?

A Yes, the functions are subordinate to him.

Q Does he report to you?

A No.

Q Is there an Employee Relations person in the Quality Assurance Department who does report to you?

A No, they do not report to me in direct line.

Q How about Mr. Steve Alexander and Faye Fowler, do they report to you?

A No, they do not.

Q This is a list of the persons whose Depositions are to be taken this week (indicating). Are there any persons on that list, Ms. Addis, who are responsible for Employee Relations; and if so, if you would indicate who they are and I will get you to tell me what their position is?

A I am the only person I am aware of on that list who is directly responsible in title.

Q We have Mr. C. N. Alexander on that list.

A There is a line through there on my list.

Q All right, ignore the line. You have told me about Mr. Alexander.

A Mr. Grogan has subordinates reporting to him who are responsible for Employee Relations.

Q What is his position?

A Functionally the Personnel Manager in the Construction Department, although he has a broader scope of responsibility.

Q And also David Abernathy--do you know Mr. Grogan's title specifically? Give me a paraphrase of it if you don't have it exact.

A I think he is the Manager of Construction Resources.

Q Now, Mr. Abernathy; do you know what his title is?

A He is the Manager of the personnel function in Construction.

Q All right, Bill Bradley is involved in Personnel Services in the Quality Assurance Department. Do you know what his title is?

A His present title, no; I don't.

Q Ms. Addis, do you supervise either directly or indirectly any persons who perform Employee Relations work at the Catawba site?

A No.

Q And then how about any persons who are responsible for Employee Relations involving persons who might be working at the Catawba site?

A Not directly, no.

Q Ms. Addis, I want you, if you can, take as much time as you need and we can break this down into smaller pieces after a bit; but I want you to relate to me your knowledge of what I will call the Catawba Welding Inspector concerns.

Give it to me generally how you got involved in the subject and what your work was in

regard to that subject; and as we go along if refreshing your recollection would help, we can get access to our file.

But tell me generally how you became involved and what you did.

A In my role in leading the company in Step Two of the Employee Recourse Procedure, I became aware that several employees had gone through Step One, Catawba Welding Inspectors, in terms of asking management to take another look at their pay periods.

At Step Two I received notification of the employees' desire to pursue it beyond that department to Step Two; and in reviewing those concerns at Step Two, a standard practice is to meet individually with those employees.

So I met with each one of them assigned to me. I did have some help in the process. Their concerns, each concern, was founded on the pay grade differences; and each man presented to me in the context of that, reasons and concerns, perceptions and opinions to some extent, about why the pay grade should be equated to other people in the company in their opinion.

I took those concerns, which I believe you have seen, and relayed those to management. The

step process is one where the company management actually takes a second look at any employee's request or concern or question and is guided by the corporate office and serves as a communication resource, actually, between the employees and the appropriate level of management.

That is what I did.

Q All right, when did you first become aware of the Catawba Welding Inspector concerns?

A I was aware in July of '81, or I was somewhat aware when they started Step One; although we try to keep these steps distinct; and I did not get involved in the details.

MR. GIBSON: Excuse me, I am not clear whether you are referring to the concerns as indicated in the documents attached to your Motion for extended time and identified in the Board's Order, or you can use the term "inspector concerns" referring to the pay recourse procedure that Mrs. Addis was involved with.

MR. GUILD: If she wants to explain her understanding, that would be helpful.

MR. GIBSON: I want to understand that; I need to understand each question.

MR. GUILD: If the Witness understands, if she has a problem with the question, I hope she will ask me to clarify.

BY MR. GUILD:

Q Ms. Addis, do you understand the use of the term "concerns," as you answered it?

A My understanding, I thought that he was referring to the Step Two concerns over the pay I have been describing, Mr. Guild.

If you do change the subject, please let me know.

Q I will be happy to, and if you have a problem with my terms, please let me know.

A Okay.

Q Beyond the Step Two grievance you stated that you had some awareness of these concerns at Step One; did you not?

A All I knew was that some QA employees were beginning the recourse process. I am usually notified of that, not by subject or detail, just in anticipation of our staffing time and whether the employees will elect to go to Step Two.

Q How did you become aware of the Step One stage?

A Mr. Bradley informed me some of the employees were beginning to use the process, but not the details of the subject matters.

Q Mr. Bradley, who is he again?

A Bill Bradley, he was responsible for Personnel and Quality Assurance. At that time he was the person involved in that.

Q What was his responsibility at that time with regard to those concerns?

A His exact responsibility I can't tell you.

Q Generally can you give me a general description of his role?

A As I understood it, he was the contact resource involved at the departmental level.

Q Did the Welding Inspectors come to him?

A The recourse process involves, and I believe this is what these gentlemen knew, involves an employee giving a written statement of concerns to management, and that begins pretty much at the local level and goes to the staff for any evaluation support they can give.

Q What was Mr. Bradley's role as you know it or as you understand it?

A He in effect conducted the evaluation and analysis and helped me understand the concerns and

answer the employees. It is a similar function to mine.

Q But at Step One of the recourse?

A (The Witness nodded her head affirmatively.)

Q How do the concerns come to his attention, if you know?

A My understanding is of the typical process, the employees' written concerns come up through their supervisors.

Q All right, let's take a moment, Mrs. Addis. I just had a previous opportunity to have your file in front of you. Why don't you make reference to that?

I have a copy of the materials that were identified as your file, and perhaps you can describe those; not in detail, but generally what is it that we have here?

A All of these things?

Q Yes, ma'am.

A This brown envelope, the part that is stapled together is the contents of the Step Two concerns, some of the history as it is presented at Step Three.

Q Okay, hold that a moment. It is the contents of the Step Two file?

A Yes.

Q Now you made a reference to Step Three. What is the Step Three reference?

A Step Three is the presence, this is the summary of the data that was presented to Step Three at present.

Q So this is a summary of your Step Two file that was present to Step Three at present?

A It is all the referenced information that I have.

Q What was excluded from that that you had that did not summarize or include that bound folder?

A Nothing pertaining to this situation. I didn't exclude anything that dealt with Step Two.

Q What did you mean when you said "relevant"?

A I didn't include some of the things, I guess, with regard to where I went or when most of the dates are in there.

There really isn't anything excluded that is pertinent to this, to the case.

Q Yes, well, I appreciate your judgment on that, but I would like to understand, to have a fair sense of what process you went through to summarize those documents or decide what was relevant or what was pertinent; so help me understand what is not

included in there so I don't presume that everything is there.

A The things that I included completely are the employees' statements to me, messages to me, positions, opinions about their pay rate.

I did not fully copy and document all of the information at Step One. That would be the only thing that would be not totally assembled here.

Q All right, did the Step One materials come to you?

A I had the opportunity to review them.

Q Did you?

A (The Witness nodded her head affirmatively.)

Q I'm sorry, the tape needs an affirmative or negative answer.

A Yes, sir.

Q What did those Step One materials consist of?

A Basically the department's position in response to the letters that the employees had sent.

Q Which department would that be?

A Quality Assurance.

Q And what did those department responses consist of?

A They are individually made--I can't tell you

from memory.

Q Give me an idea of what form they would be in, a letter to the complainant?

A That is the typical response, the employee is given a written response during 30 working days after the recourse procedure.

The time frame may be extended, but that is just the procedure.

Q Who would at the Step One process for this particular instance, who would have been responsible for the departmental Step One response?

A Jim Wells.

Q Now look in that folder, if you would, Ms. Addis; is there at least a specimen response from Mr. Wells to the Welding Inspectors?

A Yes.

Q Would you identify that by the date so we can note what it is?

A October 24, 1981.

Q And is there an indication on the face of that document? Is that a document that is a copy of one of the Step One responses to the complaining inspector?

A That is my understanding.

Q And were there different responses made

to each inspector?

A Yes; this is one (indicating). There is an August 10, '81, response also.

Q Who is that?

A This was also Mr. Wells.

Q Mr. Wells to a complaining inspector?

A (The Witness nodded her head affirmatively.)

Q And I believe the name of the actual inspector has been marked out?

A I did that.

Q And those were specimens of what was sent?

A When I assembled this packet, that was my intention.

Q Can you explain why we have an August and then an October response?

A Employees did not start on the same days, so the time frame doesn't start--

Q Some came earlier than others?

A Different employees started at different times.

Q Both of these are Step One supplemental responses?

A That is my understanding.

Q Do you know what the range of times were for the completion of that Step One response, when was

the first and when was the last, generally?

A Without reviewing those in detail, no. I know when I got involved.

Q Is August through October representative of the range of times for the Step One response?

A Well, again, without reviewing those in detail, I can't tell you.

Q If you can refresh your recollection from looking at the file in front of you, how about taking a moment and doing that?

I would like to try to establish the timing.

A These were my files, which means those were Step Two; so I can't tell you about Step One, precisely.

Q All right, look through that binder there, that summary binder, Mrs. Addis. Is there a specimen of a Step One recourse letter or recourse complaint from the complainant, from a Welding Inspector?

A I did not include the Step One letters in the summary. The employees, particularly in meeting with me, they have basically an option of writing another outline of their concerns, but there are letters in here of Step Two and the concerns are mainly the same.

Q By Step Two letter, identify what you are speaking of here. Just pick one specimen that is representative.

A I have one here from Mr. Bentley, Welding Inspector at Catawba; October 28, '81.

Q Yes, is Mr. Bentley's Step Two recourse letter representative of the--

A This is an individual process, and each employee presents his individual concerns.

Q So are all the Step Two recourse letters that came from Welding Inspectors included in that binder?

A All the ones in this particular binder which are identified in the front.

Q And the front, you mean the page that is entitled, "Introduction"?

A Yes.

Q And how many Welding Inspectors are shown on that introduction by name as pursuing their recourse?

A There are eight Welding Inspectors from Catawba.

Q All right, ma'am, I see eight in type-writing listed under the title, "Catawba," and I see four in hand.

A Right, those gentlemen elected also to go to Step Three, but it was after I had written this summary.

It was the same concern, and they asked to be included.

Q And when was this summary written; can you tell me?

A I took this to the President on December 4.

Q Is that when it was written?

A It was typed the third.

Q Now on the face of the introduction, Ms. Addis, it indicates, "Initially there were 53 Step Ones on the pay issues; 34 continued to Step Two. With those, 11 continuing to Step Three. A summary of the concerns is as follows," and it goes on.

Did you review the Step One, grievance Step One recourse letters for the fifty-three?

A No, I dealt with the ones that were processed to Step Two.

Q The 34?

A Yes, remember the number changed slightly with some of the ones joining Step Three.

Q Help me understand how those numbers would change with those others joining?

A The handwritten names there made it more

than 11.

Q Thirty-four did continue to Step Two; that is the complete list, the complete number?

A At this writing it did; I didn't have any more come in that I am aware of.

Q Eleven went to Step Three and they were joined by the four others indicated here?

A That's correct.

Q Did you see any of the original Step One grievances or recourse complaints?

A Yes, I did.

Q You did, and in what form are they?

A Letter.

Q They are not included. Describe the Step One recourses.

A Some were handwritten, some were typed.

Q Where are those documents now, if you know, Ms. Addis?

A I don't know.

Q Where were they when you reviewed them?

A I reviewed those through Mr. Bradley.

Q Explain how do you mean that?

A He had them when I saw them.

Q Did you go to him and find him in his office? Did he bring them to you?

A I think I went there.

Q Where is "there"?

A Do you mean where is his office?

Q Yes, where did you see it; here in Charlotte?

A Yes.

Q Have you reviewed those documents since?

A No, I haven't.

Q Now, those Step One grievances or recourses, if I use that term, is that a fair term to use?

A I will understand what you mean.

Q Those Step One grievances, would they have come following July of 1981?

A The recourse concerns that I received were in July, started in July of '81.

Q Step One concerns?

A Step Two that I got involved in.

Q Ma'am, you got involved with them in July?

A Officially, some.

Q Some had reached Step Two by July?

A Yes. To the best of my knowledge, I can open this and look; but I think so.

Q I am trying to understand, I'm recognizing not all of them happened on the same day. I would like to understand when the Step One grievances were

filed or Step One recourses were filed.

MR. GIBSON: While she is doing that, Mr. Guild, may I see the copies we gave you the first thing?

May I see that?

MR. GUILD: Yeah.

MR. GIBSON: Mr. Guild, this copy I gave you inadvertently includes the pay data we indicated would not be included, so I'm removing it.

MR. GUILD: We will cross that bridge when we get to it in the other Depositions. These computer printouts, does that appear to have names of people on it?

MR. GIBSON: Yeah, each one.

MR. GUILD: Are you sure? I looked at it over the break, and I didn't think it was what you were talking about.

MR. GIBSON: Top left corner has employee's name, location, occupation, rate of pay, and some of the coding information.

MR. GUILD: Fine, if you would provide me the generic pay information.

MR. GIBSON: I think we will have to hear your question and make a determination

at the time as to relevance and everything to see what you specifically need.

THE WITNESS: I think I was involved in July and August at Oconee. The Catawba welders were October.

BY MR. GUILD:

Q These would be the Oconee, and these would include the 30 Oconee inspectors who are listed on the first page of your introduction as pursuing the Step Three recourse?

A It may have.

Q All right, I am sorry then, it was October you said when you began receiving the Step Two's from Catawba; is that right?

A Yes, that is what my records show.

Q Now, Ms. Addis, I want to show you a series of documents, and these have been introduced in Response to a Discovery Request by Palmetto Alliance, and they have been identified by the company as handwritten notes from QC and QA Inspectors which set forth their specific problems and concerns; and they are an attachment to a Motion that was filed with the Licensing Board in this case.

What I am trying to understand is that is

a cover sheet I'm showing you, a cover sheet which lists the names with letters beside the names as indexed by the copy in their response; and following that is a fairly thick stack, some typed and some handwritten notes.

Are those Step One recourses or if not, tell me what they are? Take a minute and look through them and tell me if you can identify those for me, please.

A Do you want me to review all of these?

Q Just flip through them and tell me if you can identify those documents, please.

A No, I can't.

Q Have you ever seen them before?

A No, I haven't; not to my knowledge.

Q Those are not the Step One recourses then?

A They do not appear to be at all. Again, I have not completely gone through this stack, but they don't appear to be.

Q All right, you have not seen those before to the best of your knowledge?

A No, not to the best of my knowledge.

Q Describe generally without necessarily a specific regard to these Welding Inspector concerns and their processing, how the employee recourse

procedure works, and generally what happens at what step. Not a detailed description, but just generally the functions.

A It is intended to be a formal kind of process which in essence means that the concerns are written and the responses from management people are written as outlined.

There is obviously an open door and verbal routes for employee concerns. This is a separate thing from the written.

Any employee, as an individual, can use the procedure by outlining his or her concerns in writing, submitting them through management, starting with the supervision up.

Staff support is available to help employees express themselves if they ask for that. A written response is from the department head in some form or other, I guess the variation or the reason I am vague is because the corporate procedure calls for a response within 30 working days unless both parties, the management and employee agree to extend that.

Within each department there is some variation on what happens within those 30 working days.

The corporate says 30, and they take it

from there. Step Two is where I become involved or some other designee of corporate Employee Relations, to work with the management of the department and the employee to be sure that the company understands the employee concerns and the position or opinions or thoughts or feelings related to those concerns.

This is all at the request of the employee that we might be involved in taking a second look at it.

The decision at Step Two is, however, the one of the department management, not the staff, such as myself.

We do not render a decision.

Q Help me understand that you perform the Step Two review--

A Take the lead role in the review; yes.

Q But you don't decide the Step Two recourse?

A That's correct.

Q Who would make that decision?

A It goes back to the department head with whatever input, information that we may have gathered with our independent discussions and reviews.

If the employee at that point elects, the matter is presented to Step Three, which is the President and I or another Employee Relations staff

person makes that presentation, compiles that information for the President.

Q And Mr. Lee was President during the time that is important in dealing with the Welding Inspector concerns?

A In '81 when I went with them.

Q So the department head decides both Step One and Step Two?

A That's correct.

Q And you facilitate at Step Two by performing an interviewing function. Do you make a recommendation?

A We will discuss with the management things such as precedent knowledge we have gained in the same or similar situation somewhere else, if that exists.

Q Do you make a recommendation?

A We do provide input, but in terms of recommendations, at times we have been asked for professional opinion, but it is not really a management recommendation at that point, more of a professional opinion.

Q Is there a formal written description of the employee recourse procedure?

A Oh, yes.

Q Where is that description contained?

A In the management procedures book and the employee handbook.

Q Is that the formal title of that book, the "Manager's Procedure Book"?

A Manual I think instead of book, that is it.

Q Do you have that with you?

A No, I don't.

Q Mrs. Addis, I want to show you a Notice that provides for the taking of your Deposition here. It is probably at the bottom of the list or close to it.

I show you a document and ask if you can identify it, please, ma'am.

A I can read it, yes.

Q Have you seen that before?

A I've seen a copy of this, yes.

Q You have seen it before?

A (The Witness nodded her head affirmatively.)

Q Is that the Notice of taking Depositions that was served on you?

A It was given to me.

Q Would you read the second paragraph, please, ma'am, for the Record?

A The second paragraph?

Q Yes, ma'am.

A "You are required to attend and may be represented by Counsel and are required to bring with you any and all documents in your possession or subject to your control reflecting your knowledge of the above described matters upon which you will be examined."

Q Have you seen that before?

A Yes.

Q Have you read that before?

A (The Witness nodded her head affirmatively.)

Q Why didn't you bring those documents with you?

MR. GIBSON: Mr. Guild, I object to the question. We repeat what we have repeated before.

We have produced all of the items we contend are to be produced consistent with the Board's two Orders which relate to Contention Six.

Mrs. Addis is free to talk to you about what documents she has and what she brought.

The objection to that question is we have produced what is available.

MR. GUILD: I would like the question answered as asked, Counsel.

THE WITNESS: Repeat the question.

BY MR. GUILD:

Q Why haven't you brought those documents with you, Ms. Addis?

MR. GIBSON: Which documents are you referring to, specifically, when you say "those documents"?

MR. GUILD: Does she understand the question?

MR. GIBSON: I will understand it before she answers the question. If I do not understand it, she does not answer it.

Would you explain what you are referring to?

MR. GUILD: There is no need to raise your voice. The Witness should have an opportunity to tell me whether she understands the question.

Of course, it is the Witness responding to the question, not Counsel.

MR. GIBSON: I will not let, during Discovery, a Witness answer questions that

I don't understand as their Counsel, okay?

So would you describe what you are talking about when you use the term "why didn't you bring those documents," which documents are you referring to, and we can move on and get an answer.

BY MR. GUILD:

Q What documents have you produced? Mrs. Addis, I will withdraw the question.

MR. GIBSON: Okay.

THE WITNESS: These are my documents here (indicating).

BY MR. GUILD:

Q What are they?

A Each folder relating to the welding concerns and the summary information which I presented. That is the information here.

Q In the bound document?

A Yes.

Q And there are two separate stacks of documents that are clipped together, and what are those?

A These were copies of letters that Mr. Lee's secretary sent me concerning his disposition at

Step Three.

Q Did you bring with you the Management Procedure Manual that describes the recourse procedure ?

A No, sir; I didn't.

Q Is that the written description of the recourse procedure that those files reflect?

A Yes, it is a general outline as amended.

Q Do you have a copy of that manual in your possession?

A I have one in my office.

Q So you could have brought it with you?

A Had I known that it was relevant.

MR. GUILD: Counsel, I would suggest that if we could get a copy of that document it might be helpful now.

MR. GIBSON: We will refuse to do that. I entered an objection earlier to your going into areas that are not within the scope of Depositions at present.

I thought it might be less time consuming to let her answer some of those background questions.

If that document was not requested and turned over, we do not believe it is

covered by her Notice of Deposition, given the limitations that have been placed on the Board's Order.

If you want us to get that, I will have to stop and talk with her about whether we will change our position.

That is not a document covered by the present status of the matter.

MR. GUILD: Mr. Gibson, we can avoid this gamesmanship--

MR. GIBSON: This is not gamesmanship.

MR. GUILD: Excuse me, sir; we have a specific question that talks about employee recourse procedure.

MR. GIBSON: Have you asked for it?

MR. GUILD: Sir, I'm asking for it now. If that procedure that she is describing is reflected in a document, that document, in my judgment, should have been produced.

If it hasn't, Counsel, we can take that up with the Board. The Witness said she has the manual in her possession.

I contend she was gi en the Notice

that documents that were relevant to her testimony should have been produced.

She has not produced it. Notwithstanding that, I would ask that she make that document available so we can proceed in a timely fashion so we can see what it provides with regard to the employee recourse procedure.

MR. GIBSON: Mr. Guild, since we are now at 12:15 and the normal lunch hour is 12:15 to 1:15, we break now and upon returning, I will let you know after analyzing that position, and we can resume her Deposition approximately one hour from the time we adjourn.

So we do not have to have an adjournment time, we will let you know as soon as we return.

Are you aware of any other documents you take that--

MR. GUILD: Counsel, I would ask if she was aware of any other documents needed in order to have a fair and full explanation of her involvement in this subject.

I will ask that she be requested to produce them.

MR. GIBSON: Why don't you go through--

MR. GUILD: If you have a question for clarification, please--

THE WITNESS: I guess when I got the Notice then to some extent it was judgment what was relevant to the Catawba welding situation, which I did produce.

BY MR. GUILD:

Q Yes, ma'am; it would be helpful to me if we have reference to a specific procedure that you have referred to several times now, and what the procedure refers to, if instead of you having to paraphrase or try to recollect or me presuming that the document says something that it may not, if we had that manual in front of us so we would have no questions or misunderstanding, I wou ask if over the luncheon recess you could produce a copy of that Management Procedures Manual.

MR. GIBSON: I will discuss this during the lunch hour. We will make a determination whether we will produce it.

We will resume the Deposition approxi-

mately one hour from the time we adjourn here and take up the matter again at that point.

MR. GUILD: Yes, all right, so we are breaking for lunch for an hour.

MR. GIBSON: Sure, what time do we have now?

MR. GUILD: We have 12:25.

(Whereupon, the Deposition adjourned for a luncheon recess at 12:25 and resumed at 1:41 p.m.)

MR. GIBSON: Prior to the lunch break we were objecting to and differing with you in terms of your interpretation of which documents should be made available.

We have decided to give you a document entitled, Employee Recourse Procedure, which I believe is the document Ms. Addis was describing as setting forth the various steps of the recourse procedure.

We are doing this in the interest of trying to move things along and lessen the number of items that the Board may have

to pick up at a later time.

We stay with our position that the Depositions are limited to welding concerns, but there is the document (indicating).

MR. GUILD: Thank you, Mr. Gibson.

BY MR. GUILD:

Q Does this procedure describe the recourse procedure that was in effect at the time that was material to the Welding Inspector concerns?

A There was an amendment made in October of '81, which is identified in the columns here.

Q Yes.

A And subject to that one change, it reflects the procedure then in effect, yes.

Q Thank you. Now with respect, as far as you know, Ms. Addis, was the recourse procedure followed as set out in this written policy with respect to the Welding Inspectors?

A The Step Two recourse process that I handled, it was. This was followed especially with regard to the time frames may be extended upon the agreement, so it was followed as written.

The Manager of Employee Relations designated me to handle Step Two, so there is a designation

mark there.

Q Who is the Manager of Employee Relations?

A T. F. McCracken.

Q Is it Mr., Ms.?

A Mister.

Q Was Mr. McCracken in that position at the time of these concerns?

A Yes.

Q Do you report to him?

A That's correct.

Q What was his involvement in processing these employee recourses?

A He was not involved.

Q All right, Ms. Addis, you did have an opportunity to not only review the Step One recourses, but you had copies of all of Step One recourse documents forwarded to you; didn't you?

A No.

Q You did not?

A I read through them with the CA person.

Q Let me show you a document that is a November 6, '81, letter (indicating). Is that your signature on it?

A That's correct.

Q What does it reflect at the bottom of that

letter?

A I asked Bill to share with me the records from Step One and the service records.

Q "Please send copies of the correspondence and records of Step One as well as the employee service records," also the employees forward a copy of service positions analysis for this position.

Did Mr. Bradley do that?

A I reviewed those documents with Bill. He did share them with me. It is my recollection that I went to him because of the volume.

Q You asked him to send copies of it to you; didn't you?

A Yes.

Q And he did not send them?

A This is a letter related to one fellow.

Q There are others, they all say--

A What I did was review those with him because of the volume of them; and I left them with that department.

Q You asked him to send copies in all of the instances? We can go through a number of the others, you said, "Please send copies of correspondence."

A I was aware of Step One.

Q Did you get copies?

A I don't have them; I reviewed them with Bill Bradley.

Q He did not send you those copies?

A I don't remember getting them, per se. I didn't keep them.

MR. GUILD: We will take a break for a second.

(Whereupon, the Deposition recessed at 1:48 p.m. and was resumed at 1:53 p.m.)

BY MR. GUILD:

Q You just don't recall whether or not you actually had those Step One documents in your possession?

A I had them in my hands, but they had been returned to Quality Control.

Q They have been returned?

A I didn't keep them.

Q Is that consistent with the recourse procedure for you to review the Step One documents?

A Oh, sure.

Q Why wouldn't you tell the complaining employee that you were going to review the Step One? Why is it a message that is not reflected in the actual

letter sent to the employee instead of blind copies to Mr. Bradley?

A Personal choice; each employee is well aware that it is a sequential process, the concerns they present at Step One are the ones they present at Step Two.

Q And you reviewed the file from Step One in reaching your recommendation?

A Sure.

Q What is a Corporate Personnel Employee Relations Report?

A I write several, so I'm not sure what you mean.

Q All right, I have a document that is entitled, "Summary for Task Force Appointed to Investigate Allegations by QC Inspectors," dated 12/10/81; and it has the initials W-H-O, Warren Owen?

A Possibly.

Q Is that his initials, Warren H. Owen?

A Those are his initials, yes.

Q Have you seen that document before?

A I did not receive a copy of this.

Q But have you seen it is the question?

A I don't remember reading this, no. I see my name, is that what you are referring to?

Q Yes, I'm asking you if you recognize the document; and your answer is you don't?

A I didn't get this, no.

Q All right now, Page Three of the document, second paragraph before the end of the--I'm sorry--third paragraph before the end of the first part, just before the second part begins that is entitled, "The Task Force."

Would you read that paragraph for the Record, Ms. Addis, please?

A Yes, "A number of inspectors started, in deciding to use the employee recourse procedure, to question the pay adjustments. See the Corporate Personnel Employee Relations Report for details."

Q What is that Corporate Personnel Employee Relations Report that is referenced there; do you know?

A Not for sure.

Q What do you think it is?

A The only Employee Relations Report that I'm aware of that I generated are the documents that you have, the brown folder.

Q Yes?

A That is it.

Q All right now, at the front of that folder that is reflected in the copy I have here is a docu-

ment of four pages that is headed, "Indoctrination," and is that your work?

A Yes.

Q And this was written for whom?

A Step Three in the recourse procedure.

Q For Mr. Lee?

A Yes.

Q Is that the report that you had reference to as possibly the reference in the Owen's summary?

A This is the report.

Q There are, of course, a number of documents that are included in there; but is there anything else in there that represents your work, your analysis or your report, if I can use that word?

A There is a memo that I wrote dated October 7, '81.

Q Yes, ma'am, I see that. To whom is that addressed?

A Jim Wells and Bill Bradley. Here is a December 3, '81, letter.

Q Yes, to whom?

A Warren Owen.

Q Yes.

A Those are the only ones in the book that I wrote or reported.

Q Are there any other reports that you made on this subject, Ms. Addis?

A (The Witness shook her head negatively.)

Q When did you interview the Catawba Welding Inspectors, Ms. Addis?

A There were several dates that I--there were different employees on different dates.

Q Yes, ma'am, the December 31 reports, the dates set forth next to those dates, is that the date that you interviewed them?

A Yes, they were interviewed more than once and so there were dates other than those indicated and other people.

Q First the more than once, each of these people would have been interviewed on dates other than what is set forth here?

A They may have.

Q May have; and there were others beyond those referenced here, beyond the names set forth?

A I think this is fairly inclusive, but there may have been; yes.

Q All right.

A All of the people in the front of this book look like the Catawba names were interviewed.

Q Including the handwritten names in the front

as well?

A I personally interviewed the typed names.

Q All right.

A And any other of the gentlemen that I had quoted in the December period.

Q You interviewed the ones you had quoted in the December report?

A (The Witness nodded her head affirmatively.)

Q Now I show you a letter dated November 19, 1981, from you apparently to Mr. John R. Bryant. Can you identify that?

A Uh huh.

Q That again was from the file produced this morning; is that simply representative of similar or the same communication sent to Welding Inspectors upon your receipt of the Step Two recourse?

A No.

Q No?

A This was not a recourse request.

Q Can you explain that to me?

A As I explained to Mr. Bryant, we understood he was expressing a concern rather than asking for a review through the recourse procedure.

Q What was the concern that Mr. Bryant expressed?

A As it states, concern about the pay grade of the Welding Inspectors.

Q In what form did Mr. Bryant's concern get expressed to you?

A It was in a letter, November 3rd letter just outlining concern about the pay grade, but not using the recourse procedure.

Q How is it distinct, if it was, from the recourses or the complaints or concerns expressed by the others?

A Mr. Bryant had no personal concern with regard to his pay rate. He was stating a position and opinion.

Q I see.

A To the best of my memory.

Q All right, and did the others explicitly say that they were invoking the recourse procedure?

A Yes.

Q You know, formally they used the term we are invoking the Step Two of the recourse procedure?

A Most of their letters stated that. They all stated it to me at Step Two.

Q And Mr. Bryant, by contrast, did not say he was invoking the recourse procedure?

A That's correct, and that was my impression

in response to him.

Q Did Mr. Bryant respond to you after receiving this letter?

A I don't remember him responding at all.

Q Now, Ms. Addis, there is attached to a stack of documents that include the letters that you wrote to various Welding Inspectors informing them of your receipt of the Step Two recourse request and your delegation of responsibility for pursuing that, are a number of pages of handwritten notes.

Can you identify that handwriting?

A This is mine.

Q What are those notes, and I am looking at one in particular, but there are several like that? Can you tell us what the circumstances were?

A On this particular page?

Q Yes, let's take that one. The letter that appears in front of that is to whom?

A This is to Mr. Peeler.

Q And it is dated what?

A November 6, '81.

Q And what is the handwritten note that follows?

A This is regarding different men.

Q Oh, it is? Okay, what are the handwritten

notes that follow that?

A These are basically a summary of the dialog between this man and myself.

Q A summary of your review?

A It is more of a dialog.

Q Are there notes reflecting your dialog or interview or meeting with each of the Step Two recourse or Welding Inspectors?

A There is some notation usually.

Q Are there in this instance, Ms. Addis; can you tell?

A On every one that would be reflected in the documents, it is my understanding that there are.

Q All right, thank you. Were there transcriptions made of the dialogs, interviews, meetings that you had with the Welding Inspectors?

A Do you mean like typed?

Q Electronic, any sort?

A My own notes which I read back to them for vertification of understanding.

Q Those are notes attached here?

A Typically.

Q Are there others?

A No.

Q Let me see if I can follow this, ma'am.

Let's turn to your December 3rd, 1981, memo to Mr. Owen.

Now you placed, let's say for Mr. Burr, he is the first one on the list, there are quotation marks placed around your description of your dialog with Mr. Burr.

What do you mean, what do you intend when you use quotation marks?

A To represent what I heard him saying to me.

Q It is intended to be a verbatim reflection of what he told you?

A As close as I can get it, which was read back to him.

Q Now then, let's see if you can help me find the notes in here reflecting your meeting with Mr. Burr.

MR. GIBSON: Mr. Guild, why don't we pull the file over here, which you should have a copy of.

It might speed things up so we can look at the individuals instead of thumbing through.

MR. GUILD: Your method is quicker than mine.

THE WITNESS: Okay.

BY MR. GUILD:

Q Now I'm looking at a one-page set of hand-written notes; and let me show you mine (indicating). Are those your notes of your meeting with Mr. Burr?

A Yes.

Q That is 11/23. Now on your report to Mr. Owen you indicated 11/24. Would there have been an 11/24 meeting with Mr. Burr?

A No, it would have been a three or four. I don't know why it varies.

Q Might there have been a second day meeting with Mr. Burr?

A It would have been in here.

Q So it is likely just an error in the day?

A (The Witness nodded her head affirmatively.)

Q Okay, that is fine, if you help me find in your notes here the text which you then reproduced in your report to Mr. Owen.

A Okay, the first document, "We have had craft people come in that can't read the blueprints and paperwork problems appear to be the major function."

My major problem there is something that

he told me.

Q Yes?

A "I've had to face feeling..." This little square right here (indicating).

Q Yes.

A That is basically what he was talking about in the second paragraph.

Q All right, and this note is the basis for the transcription that appears on your memo to Mr. Owen?

A Yes, this whole sheet; the employees have requested that essentially their positions be presented or their concerns of any type, and they were aware that they would be.

Q And then explain to me, you would read it back to them and make sure you had it accurately quoted?

A I would summarize when I finished. What I did not restate in this particular statement was obviously the primary concern, why he was there, was the pay grade recourse, which I mentioned earlier.

Q Try to understand, Ms. Addis, in the box up there, "Is what you have stated more important than $? I have had to face feeling like I would be fired in order to see that work would be done right,"

etc.

A And also where he said, "The prime concern is the pay process," so that is the subject of his recourse.

Q Where is that now?

A Right here (indicating).

Q "Internal comparison plus comparison to Daniel and Union Shop," did Mr. Burr or the other Welding Inspectors, were they shown the inserts that you reported to Mr. Owen and asked whether that was an accurate reflection of their concerns?

A Not after they were typed.

Q All right, there are no other notes that were taken or other transcriptions made of those interviews?

A No, this is it.

Q Did anyone else participate with you in interviewing those Welding Inspectors or meeting with them?

A Mr. Wells talked with some of them.

Q And did you sit in when Mr. Wells talked with them?

A No, I didn't.

Q Do you know what the product was of his interviews or meeting with them?

A I understand that he outlined his concerns, his management also, as I did or the employees' concerns and his.

Q Did Mr. Wells keep notes of his interviews?

A I don't know.

Q Did Mr. Wells transcribe his interviews?

A I don't know.

Q You have never seen any notes or transcriptions of his meetings with the inspectors?

A There is a memo that he wrote outlining the concerns as he understood them.

Q Right, can you help me identify that more specifically? Is that contained in--

A Let's look. No, I guess it is not in my report, but there is a Jim Wells' note because we were working and the men understood that and agreed because the concern about the pay grade was so generalized that they all had it.

But I don't have his specific report in my stuff.

Q And who was his report to; do you recall?

A No; his supervisor was Warren Owen.

Q Likely to Mr. Owen then?

A (The Witness nodded her head affirmatively.)

Q On what basis did you and Mr. Wells divide

up your tasks or your responsibilities in meeting with the inspectors?

A There was really no specific selection about who would meet with whom. It was more a matter of timing in being able to respond to the employees in a time period.

Q Can you give me a rough idea of how you divided up the work, who got what and how many he did and you did?

A On the days we both visited Catawba, I think we each saw approximately six people.

Q How many days did you spend doing that?

A We were at Catawba at least one day that Jim was there, and I was there independently at least one other time.

Q One other time?

A Or more.

Q You just can't remember?

A I can look on the dates in the files, but other than that I really can't remember specifically.

Q Let's look at those, this is your report to Mr. Owen, December 3rd report (indicating)?

A (The Witness nodded her head affirmatively.)

Q And there were several that list the 24th of November; is that one of the days that you were

there at Catawba interviewing?

A Oh, yes, the 23rd and 24th.

Q On the third page we have the 23rd; were you there that day as well?

A Yes, that or we transposed the 23rd and 24th; and I would have to check to be sure.

Q All right, then there is an indication that you met with Mr. Rockholt on Page Four, it shows 11/9/81. Would that have been the date that you met with him at Catawba?

A Yes, unless we typewrote it wrong; yes, that is my record.

Q And you also interviewed on some different days workers at Oconee; is that right?

A That's right.

Q Is it fair to say that the Oconee Welding Inspectors had similar complaints to the Catawba Welding Inspectors?

A The recourses about the pay grades were facts similar.

MR. GIBSON: We would object to any further questions about Oconee since it is clearly not within the scope of these Depositions at this point.

MR. GUILD: Counsel, my intent is

not in Quality Assurance at Oconee except to the extent that it relates to the subject of my inquiry which is Quality Assurance at Catawba.

BY MR. GUILD:

Q Ms. Addis, stand back from the detail a little bit, and if you can, give me a general description of the process by which you determined how to proceed in responding to the Quality Inspector concerns that came to you, specifically at the Step Two recourses?

A The process is fairly standard. The process, itself, calls for an individual meeting with any employees in the recourse procedure followed by an analysis of those, any issues that the employee may raise with the management to be sure that that is understood.

Then the management of the department issues a decision basically after reviewing the information, and we deliver that to the employee at the end of the Step Two verbally.

Q Were there any features or circumstances which distinguished these recourses from recourses that you would handle in the normal course of your

work?

A This was handled like all the recourse procedures are.

Q Nothing unusual about this one?

A The process of it, no.

Q How about the subject of the recourses?

A Those vary individual by individual.

Q Yes, my question is was there anything unique about these recourses?

A They are all unique; each employee presenting their concerns.

Q So your answer was there was nothing unique about these?

A I think the only thing that might have been somewhat unique in the process was the high level of involvement of the management, which was certainly welcome because the pay issue was rather emotional.

Q Explain that, if you would. What was different about the high level involvement in this case? Compare or contrast it with another recourse where the involvement would be otherwise.

A The difference in involvement really centered around the numbers. It is unusual to have that many employees with the same concern at once.

So we had departmental support, as I

mentioned, Mr. Wells assisting me.

Q How frequently do employees exercise the employee recourse procedure?

A Could you clarify that?

Q Yes. Give me some measure for comparative purposes, comparazation so that I can understand how common the exercise of an employee recourse procedure is at Duke.

A Last year the number of Step Two concerns was 23 related to Step Two, desiring to go to Step Two.

Q Calendar year '82?

A Yes. Approximately 40 percent of recourse procedures since we initiated the process in '79, have been resolved at Step Two.

That is fairly consistent in this case also.

Q By that do you mean they exercised their Step Two recourse and do not go beyond Step Two to Step Three?

A That's correct.

Q How many exercised Step Three of the recourse last year, if you know?

A Step Three?

Q Yes.

A I think it was 14, 13; one held over into

January, about 14.

Q Those would be people who went to the President of the company?

A Referred their concern that way, yes.

Q How many Step One recourses during the last calendar year, if you know?

A Those are handled by the departments; I don't do a corporate report on those.

Q Do you have an estimate, recognizing your answer; can you give me a ball park feeling for how many they would likely file?

A The official written recourse procedure is probably two to three hundred; and the verbal processes, but the departments maintain those records.

Q So two to three hundred approximately would exercise the written Step One recourse procedure, and many more, or more, a verbal?

A No, not really; some of the departments are using the recourse process as it is used here which encourages the verbal; so I think that would be the total, and the written process, we would have to check with the departments to give you a definitive answer.

Q Less than two to three hundred though?

A Oh, yes.

Q And this procedure has been in effect since the first of May, 1979?

A Yes.

Q Would it be fair to assume that there have been approximately the same numbers of recourses or fewer recourses for Step Two and Three and Step One informally in years before 1982?

A It is really, I think, too early to really tell you how it is going to pattern. I don't know.

Q This has been running about even?

A You are talking about this year now?

Q Yes.

A 1983 has been running about like 1982, yes.

Q Take it back before that was what I was trying to direct your attention to; '79, '80 and '81, can you give me a rough idea of the numbers of recourses that were exercised during those times?

A I can't tell you specifically because when the system was implemented, of course, it started off gradually as employees got use to the system, so we tracked up through '81, and there have been approximately 75.

Q Seventy-five which step?

A Total that had gotten to Step Two.

Q Through the end of 1981?

A I think so.

Q Ms. Addis, can you tell me, if you know, whether or not there had ever been a group of recourses on the same or similar subject filed before at Duke Power Company?

A Before the inspectors at Catawba, yes.

Q What would the subject of that have been?

A It was a pay issue.

Q Can you give me the circumstances and the type work involved?

A Can you help me understand what you are trying to learn?

Q Had groups of workers filed recourses together on the same or similar or general subject?

A No, it is a quite individual matter.

Q Here you had 53 characterized as similar enough to treat in the same process?

A Yes.

Q My question is was there any precedent? Have you encountered this practice before? Have you seen groups of employees exercise recourses around a common problem or concern that you had treated as a common problem or concern before?

A I think we had as many as seven, seven or eight over a period of time with the same concern.

Q Yes, and then take that seven or eight and tell me a little bit about that subject, type work involved, so I can understand for comparative purposes, please.

A That was a reduction in force situation and Construction was the service being concerned.

Q I'm sorry.

A Senior classifications, Senior Craft, the concern about their being declared an excess in their position level.

Q All right, and where were these workers located; where were they assigned, if you recall?

A At various construction plants.

Q So they weren't all at the same project, seven or eight were at different places?

A Yes, at different times.

Q Different times and different projects?

A (The Witness nodded her head affirmatively.)

Q Let me see if I can--I am interested in any other instance then where a group of workers who were at the same project who had the same kind of concerns, exercised recourses in the same time frame.

A No, I'm not aware--I think I had maybe two or three at one place or another, a policy issue

at one time or another.

Q Do you mean a group with a specific kind of numbering, anything more than one; have you ever had more than one employee jointly filing a recourse?

A No, you can't file recourses jointly.

Q I appreciate your correcting me; but filing recourses on the same or similar subject that you recognized and treated as a common concern?

A No; they are all individual cases.

Q You did treat the Catawba Welding Inspectors and the related Oconee Inspectors as a common concern?

A To the extent that their concern was in common, which is reflected in their letters to us.

Q This had never happened before that or a similar action by employees had never happened before?

A I have not been aware of any other situations similar to this one.

Q And how did you, what significance did you attach to this development?

A I think as always, the individual significance to the employee and his concerns was attached.

Q No special significance?

A They are all special.

Q Yes, ma'am; I appreciate that and I

appreciate your trying to do a good job; but did you attach any special significance to this because of its unprecedented character about a group recourse with a common concern, 53 Step One grievances?

Did you attach any special significance to it because of the common ability or the subject matter?

A I think the significance more to me was in terms of coordinating and making sure each individual was properly handled and recognized.

Q Did it present somewhat of a logistical problem in response?

A This is true.

Q Was that your primary basis for treating it as significant or unusual?

A I think the primary emphasis in treating these individuals and their concerns according to I guess their value and their importance and being sure that they were given that consideration to which they are entitled.

They are all significant.

Q Did you feel that the Catawba Welding Inspectors received the consideration they were entitled to?

A To the best of my ability, yes; they did

with the role that I played.

Q Ms. Addis, did you go to bat for the Catawba Welding Inspectors?

A Would you define that, please?

Q Sure. Did you advocate for them; did you try to urge management to redress their grievance, to do what the Welding Inspectors urged you to do? Did you go to bat for them?

A I did what the Welding Inspectors asked me to do, which was to be sure mamagement understood their concern over their pay grade.

Q Did you recommend that the Welding Inspectors get the relief that they requested?

A What do you mean by "relief"?

Q I mean they asked you very specifically for specific reliefs; did they not?

A They were conveying a message to management, not to me.

Q Yes, and did you make a recommendation that the requests that they made of management be granted?

A I did not make a wage and salary recommendation, that is reserved for the wage and salary professionals.

Q Is your answer no?

A My answer is no, nor did I not recommend.

Q Recommendations that individual letters be sent explaining again how their pay was determined for this year and that it is an accurate reflection of inpersonal equity and external compensation; so you did not do anything more than recommend that they confirm the decision that had already been made, perhaps in a more elaborate way?

A My intent in my communication and my interest aspect is what is behind that, not the wage and salary question, per se, which is made by the wage and salary people.

Q Is that a way of explaining that you wanted them to feel better about getting turned down?

A No, it isn't.

Q Help me understand what your role was if it wasn't to make a recommendation or try to either say you are wrong, Welding Inspectors; or you are right and I'll see what I can do to get them to change their minds.

What was your role, Ms. Addis, if I can understand?

A My role is to be sure at that time communications between the individuals involved is as good as it can be, not always that agreement is always reached, but that understanding is reached.

Q Why do you think the Welding Inspectors expressed the concerns that they did?

A Which concerns?

Q Take collectively everything that was brought to you?

A It is difficult for me to remember everything that they said, the recourse that was brought to me in Step Two concerned the pay grade adjustment, the lowering of the pay grade for the Welding Inspectors.

Q Why they did that is because they disagreed with that decision, according to what they told me?

A Yes.

Q Now, the Welding Inspectors brought to you much more than simply a complaint about the pay grade reclassification; did they not, Ms. Addis?

A Some individuals expressed varying opinions, rationales behind that; but it was the pay grade issue that they brought me.

Q They also brought you complaints about the effectiveness with which they were able to do their work, did they not?

A The concerns presented to me had to do with the pay grades and why different ones of them felt that the pay grade decision was not equitable.

Q Are you telling me that they did not complain about the effectiveness of Quality Assurance at the Catawba Plant?

A No, I told you what I meant.

Q Your own report to Mr. Owen belies your characterization of their complaint to you as limited soley to complaints about pay.

MR. GIBSON: Object to the form of the statement. Is that a question? I'm objecting to the form of that statement.

If you have a question, go ahead and ask it.

BY MR. GUILD:

Q Isn't it true, let's look at your December 3rd report to Mr. Owen.

A Okay.

Q "I've had to face feeling like I would be fired in order to see that the work was done right," is the first one listed there.

You wrote that; didn't you?

A I had that typed.

Q That is what he told you; correct?

A That is what he said.

Q Does that have to do with pay?

A The entire discussion with these gentlemen was centered around their recourse for pay.

Q Wasn't what Mr. Burr telling you had more to do with the substance of his work?

A The context of the entire conversation was over the pay grade recourse.

Q Yes, ma'am; but Mr. Burr is telling you that he is feeling like he would be fired if he did his work right.

A Mr. Burr's statement, to the best of my ability, is restated here for Mr. Owen. It is not something that I pass judgment on, if that is what you are wondering.

Q Why didn't you?

A My function at that point in time was to get the information that the employee wanted the

company to consider about his pay grade from him to the appropriate management.

That is what I said here.

Q But that doesn't have anything to do with pay grades, does it, Ms. Addis?

A The entire discussion we had centered around the pay grade of these gentlemen.

Q Yes, ma'am; what I'm trying to understand is this, I mean the document will speak for itself--on the one hand you've told me that their only concern was the pay, and that is what your involvement was, was to pass on this concern about pay; is that right?

A All of the concerns that the employees raised were passed on. The entire context of our discussion had to do with that.

I brought the information back to management.

Q Yes, and you included, I'm not criticizing you, I'm asking you, you included a specific concern that interpreted as a pay concern; and you communicated that. That is good.

A When I presented that informatio. hat I had learned to Mr. Owen at his request, these

statements were written.

Q All right, let's see if we can back up a second. All of the recourses, the Step Two recourses that came to you expressly stated the pay reclassification as the basis for their recourse?

A That's correct.

Q They wanted that decision undone, didn't they?

A They wanted the company to look at that decision again.

Q They all asked specifically to undo the pay classification?

A Very many of them asked that the decision be reviewed.

Q But I don't want to mince words. You agree their problem was they had been reclassified in a way that they thought adversely effected their pay; and they wanted their pay and they wanted Duke Power to change that decision so they wouldn't be adversely effected?

They wanted a change, didn't they?

A They asked me what will you do in this process--ask the management to look at this decision again.

Q But they did want the pay issue; they wanted the pay decision to be changed.

A What they have asked for is here, Mr. Guild, in their own letters.

Q Yes, ma'am, and we can go back through all of them again.

A If you need to.

Q No, ma'am; if you need to. I see them asking them for the company to change its decision to reclassify the pay.

MR. GIBSON: Are you referring to a specific document?

MR. GUILD: We can go through each one of them.

MR. GIBSON: You are drawing a conclusion that she differs with.

MR. GUILD: If she differs I wish she would say so. I am trying to get a clear answer to what I thought was a pretty clear question.

THE WITNESS: Many of them asked that the decision be reviewed, that the letter be given consideration.

"I sincerely hope you will give the

matter your deepest consideration." Mr. Burr, that is what he asked for and that is what he got.

BY MR. GUILD:

Q Yes, okay; in the context of bringing that concern about the pay readjustment to you, the Welding Inspectors, many of the Welding Inspectors also raised questions concerning work quality and the relationship with Craft; did they not?

A Yes.

Q And those were not specifically pay concerns, were they?

A The entire conversation with these people, although these matters do concern the December 3rd memo, were quality relationships and communications.

In my judgment those are my words, and I am not qualified really to make quality kinds of statements.

Those discussions were the basis for these gentlemen presenting to management through me why they thought their pay should be different in relation to other people.

Q All right, did Mr. Owen ask you

specifically to report on the non-pay concerns that were raised to you in these interviews with the Welding Inspectors?

A Yes, he did.

Q How did he do that?

A We met, it was either the 2nd or the 3rd, shortly before I wrote this memo, probably during the same day and outlining the entire feedback to him, he asked that this be outlined for him.

Q What was Mr. Owen's role in the processing of the Step Two recourse, Ms. Addis?

A As Mr. Wells' supervisor, he was involved in it as was Mr. Wells.

Q Mr. Wells was the department head whose decision on the employee recourse, according to the procedure, was the decision on the Step Two?

A The department head.

Q And in this case it was Mr. Wells, and he had the authority to resolve Step Two of the recourse?

A Yes, he did.

Q How did Mr. Owen become involved?

A He is his supervisor.

Q Is that consistent with policy of the

recourse procedure?

A The policy does not exclude that.

Q No, but does the policy deal with the department head soliciting the participation of his superior in resolving the Step Two recourse?

A It is not excluded at all. All we do is make a difference between Step Two and Step Three.

Q All right, is there a formal procedure that is followed that would make the responsibility for the Step Two resolution that of the department head?

A As a matter of all our past practice, if there is a supervisor of the department he had a Senior or Executive Vice President.

They are informed before anything goes to Step Three by us.

Q Before Step Two is completed?

A The department head has the option of consulting with their supervisor whenever they choose.

Q That is what happened in this case?

A That is not excluded at all.

Q Is that customary or normal?

A I believe it is with the Senior or

Executive VP.

Q So if I were an employee I would assume my boss was going to talk to his boss before he actually made a decision on your recourse?

A Your assumption would be up to you; it is not omitted.

Q But excluding the President of the company, obviously the President of the company is not supposed to be involved in Step Two if he was involved in Step Three?

A If he were he would have to designate another Step Three. That is outlined in there also.

Q It is, all right. So your testimony is that Mr. Owen became involved at Mr. Wells' request?

A Yes.

Q And when was your first contact with Mr. Owen?

A I think it would have to be prior to this memo. I don't remember an earlier one.

Q The meeting that you have talked about ?

A Yes.

Q Who else was present at that meeting?

A Jim.

Q Mr. Wells and yourself and Mr. Owen?

A Yes.

Q Any others?

A Not that I recall.

Q What did Mr. Owen say to you?

A What did he say at the meeting? As I understand it was exactly this, that I was to outline a record of the comments made to me on this subject, the pay concerns, the primary concerns the gentlemen presented to me were fairly well outlined in there own letters.

Q All right, and what he asked you to do was to outline as you have described in this introductory paragraph, comments concerning work, quality, and relationships with construction?

A Yes.

Q Is this the first, this December 3rd, 1980, memo, that you wrote to Mr. Owen, is this the first documentation that you know of that reflects the non-pay concerns of the Welding Inspectors at Catawba?

A I think Mr. Wells' summary may predate this.

Q All right, we have not been able to put

our hands on that, but anything other than Mr. Wells' summary that would have been earlier in time than this document, Ms. Addis?

A Not that I'm aware of at all.

Q All right, what did you say to the Welding Inspectors when they brought up to you these concerns, the concerns other than pay?

A They understood, you know, at the outset what my function was was basically to be sure that management understood their position.

I explained to everyone at Step Two what that role is was to be sure that management understands that if any independent kind of evaluation of precedent or whatever in any kind of case would be done, who would do it.

Q You, meaning yourself?

A Employee Relations, but to assure them that management would hear their position as accurately as possible as they presented it to us.

Q What was your reaction to hearing concerns that were not relative to pay, Ms. Addis?

A The issues really were related to pay to the recourse, pay recourse, which was why I was there. And my reaction was to write them down.

Q Were you surprised to hear the complaints that you have reflected here?

A I don't really pass a personal judgment; I was just trying to listen and be sure that I understood.

Q I am not asking for your personal judgment, your professional judgment as Employee Relations person and you're hearing a large number of Welding Inspectors, not only saying that they are unhappy about a pay adjustment, but that that, interrelated with that pay adjustment concern, are concerns that have to do with the effectiveness of doing their job, Quality Assurance job.

Did that cause you concern? Was that a red flag? Was that something that as someone who is responsible for Employee Relations, you thought was significant?

A I was concerned about the communications as my notes do reflect, and my recommendations that attention to improve communications be a priority.

Q What did you do next after you met face to face with these Welding Inspectors and you heard for the first time these, as you have

characterized them, work quality and relationship communication concerns?

A What was my first--

Q What did you do next, what was your first response?

A Mr. Wells and I discussed it and made an appointment with Mr. Owen.

Q What did you and Mr. Wells say to one another?

A Verbal exchange really that we had finished, to make sure that we had an opportunity to meet with each person, and more or less a coordination type discussion.

Q Yes, and what did that consist of?

A I don't remember exactly except that we wanted to be sure that the information got back to the appropriate levels.

Q And what did you do to insure that that happened? What did you decide to do to make sure that happened?

A I followed Mr. Wells' lead, really, and we came back and met with Mr. Owen.

Q He came back and set up a meeting with Mr. Owen?

A I believe he did, it could have been the secretary.

Q And that was the meeting that took place just prior to your December 3rd memo?

A Yes.

MR. GIBSON: Mr. Guild, are you going to be much longer or can we take a short break?

MR. GUILD: Yeah, if you want to take a break, we can do that. Let's take about five minutes.

(Whereupon, the Deposition adjourned for a brief recess and reconvened as follows:)

BY MR. GUILD:

Q Ms. Addis, let me ask you a few questions about interviews you had with inspectors. First I have some documents that seem to reflect Mr. Irby's file.

Do you remember Richard Irby?

A Yes, I do.

Q I have two sets of notes here (indicating). One set is two pages dated 11/9/81. Is that your

handwriting?

A Yes, it is.

Q Are those your notes?

A Yes.

Q And a second set of notes has "Step Three," at the top. Is that your writing?

A Yes.

Q Was that done at the same time or a different date?

A Later.

Q How did you come to talk to Mr. Irby more than once?

A Particularly the way the recourse process works, when I initially met with Mr. Irby there is always a face to face meeting at Step Two when the answer is, I guess, given to us after discussing with the management we give the answer back to the employee, either face to face or over the phone.

't is a verbal kind of process, and it depends on what the employee requests. What we like to do is understand the employee has the option of referring it to Step Three or not, and explaining if he or she has any differences, specifics that he wants Step Three to consider.

Q All right, is that what happened in this instance?

A Yes, it certainly appears to be. I would have talked to Mr. Irby on another occasion at which he indicated he wanted Step Three.

I would note that, when he wanted to go to Step Three.

Q So you met face to face with Mr. Irby to take his concerns; and once to explain the Step Two to confirm the earlier decision?

A I did talk to him twice.

Q Would the second time have been to explain the results of Step Two?

A Yes, typically. That is typically the way it went. The volume caused us to have some variation.

Each person whom I have notes on, I did meet face to face with at least once.

Q And some more than once?

A Yes.

Q All right, on the second document where you reflected you meet with Mr. Irby a second time, you have a note with a little star beside it.

Did you put that little star beside the

notation?

A All those notations are mine.

Q Does that mean you thought that was important at the time?

A I don't remember what I thought when I wrote that little star.

Q Do you put little stars by things that are important or randomly, or do you do things like I do and put stars by things that you think is important?

A I don't remember why I put that little star.

Q As a general matter, is that what that means?

A I really do not track myself that closely. It may or may not.

Q Do you see any other stars?

A No.

Q What does that note say?

A "Convinced the basis of whole issue is to downgrade OA to get them out of the way to get back to work."

Q Is that what Mr. Irby told you?

A Yes.

Q Did you think that was important?

A Yes, all of them are.

Q I think everything is important that you do, but do you think that was particularly important?

A I think all of that is important.

Q How about just answering the question?

MR. GIBSON: Mr. Guild, she has answered the question. You are attempting to get her to answer it in a way that you are satisfied with.

MR. GUILD: I'm trying to get her to answer yes or no and not double talk. The question, and I will restate again--

BY MR. GUILD:

Q Do you think that statement that you have indicated with a star is particularly significant; yes or no?

A All of those statements were significant to Mr. Irby, and I wrote them down.

Q Did you think it was particularly--yes or no?

A Everything I wrote down on behalf of Mr. Irby was important to me and to Mr. Irby.

MR. GIBSON: Mr. Guild, it appears she does not feel comfortable answering that question with a yes or no.

Every question is not answerable with yes or no.

MR. GUILD: I will observe that she has declined to answer the question yes or no.

MR. GIBSON: If that is your evaluation, I suggest that you ask another question and move on.

BY MR. GUILD:

Q Did you make relative judgments about things that are significant? Do you write everything down that comes out of the man's mouth?

MR. GIBSON: I object, you asked her about her role and what judgments and recommendations she made; and you asked her that after lunch and now you are starting on the same road again for the third time.

Would you answer that question for him?

THE WITNESS: Would you restate it?

MR. GUILD: If you have an objection, please state it, Mr. Gibson. Otherwise you will prolong the difficult process of getting an answer from the Witness.

BY MR. GUILD:

Q Do you evaluate what people tell you or do you write down everything that is said or consider it all important because it is said?

Do you make any effort to judge what is said?

A I write down what the employee feels is important; rather than tell an individual that his thoughts and concerns are unimportant, they are important if he feels they are important.

Q And the answer to my question?

A I write down what the employee feels is important.

Q And you make no judgment about what is important or not important?

A I don't tell the employee his thoughts are not important.

Q You wouldn't be in your job this long if you did. My question to you, ma'am, do you make any evaluation relative to the importance of what these inspectors tell you?

A Yes.

Q How do you do that?

A The concerns expressed by the employees are important; I know that even before I meet them.

Q And this particular concern that Mr. Irby expressed that you have the star at; that is no more important than any other. Is that your testimony?

A I don't remember why I put the star.

Q It is no more important than any other?

A I would have to study everything he said.

Q Tell me whether or not you can answer that question. Take a look at it.

A I know this was particularly important to Mr. Irby, all this, that statement.

Q Yes, ma'am; take a look at it and give me an answer to the question. How about looking at it right now and tell me today, Ms. Addis, looking at all the things you have written from Mr. Irby's interview, tell me why you consider that a particularly important thing he said to you.

You truly do not consider that to be of more outstanding importance than some of his other feelings or perceptions?

A Right.

Q Okay, what did you understand that statement by him to mean?

A About his perception?

Q Yes, his feeling, his perception, his statement?

A Pretty much that he was feeling that the pay grade decision was a put down to him.

Q Was a put down to him?

A That is the man I was talking to, yes.

Q You have written down here it was an effort to downgrade QA. Is that him or the program?

A That is the way he presented it; he felt it as a put down.

Q Downgrade Quality Assurance to get them--he is speaking more broadly than himself, if you wrote that down accurately.

A And I did.

Q "To get them out of the way and get down to work." Did you understand that to be more general than the QA Inspector?

A Here again, I am trying to remember in the context of our discussion. He was talking about his pay grade and how he felt about his own function, yes.

Q Is that how you understood it; as only relating to him?

A To his function, to himself, his QA role.

Q Quality Assurance at Catawba?

A His piece of it.

Q Did you see that as a programatic complaint on his part?

MR. GIBSON: What do you mean by "programatic," Mr. Guild?

MR. GUILD: Let's see if the Witness can answer.

MR. GIBSON: She will not answer until we both understand it.

MR. GUILD: I am having a difficult enough time.

MR. GIBSON: I instruct her not to answer until it is clear what you mean by the "programatic" concern.

MR. GUILD: She will not answer?

MR. GIBSON: You will not get an

answer the way it is asked.

MR. GUILD: Are you instructing her not to answer?

MR. GIBSON: Not until you can give us a definition of programatic.

MR. GUILD: We will leave it hanging.

BY MR. GUILD:

Q Did you pass any judgment on the Welding Inspector complaints, Ms. Addis?

A No.

Q Did you form a judgment?

A I didn't form a judgment on the pay grade issue.

Q Did you form a judgment on anything you had to say to them?

A I didn't want to interrupt you. My function was to relay the information.

Q I understand that, but did you form a judgment? You are a human being and we make judgments and I wanted to know if you formed a judgment on the basis of talking with these Welding Inspectors and doing your work?

A I reported my judgments to management,

and that was that communications, in my professional opinion, needed attention.

Q What did you urge management to do?

A Some of that is reflected in my notes where I suggested that they improve the communications and very clearly explain the pay issue; and I offered to work with them in developing better communications.

Q Does that represent your judgment and recommendation?

A That is my professional judgment.

Q That is a description of what you did?

A In addition to relaying the employee concerns, which I did not pass technical kinds of judgment or wage and salary judgments on.

Q Okay, did you form the opinion that the Welding Inspectors were over qualified for their positions?

A I didn't form that opinion, no.

Q Did you ever express that opinion?

A No, I didn't.

Q You didn't?

A You mean my personal opinion about my qualifications?

Q Yes, either personl or professional or any opinions; did you ever say that or words to that effect?

A Not in my opinion, no.

Q Were you aware of others with the company holding or expressing that opinion?

A Interms of people being over qualified?

Q Yes, Welding Inspectors being over qualified for their positions?

A No, not directly, I didn't hear it.

Q In any way, shape or form, Ms. Addis, did you hear directly because men told you or because you learned in the course of dealing with this issue there was an opinion held by some or a few or any that the Welding Inspectors were over qualified for their jobs?

A No, it was not a matter of over qualifications. I remember better understanding that the qualifications in QA were the qualifications that were amended.

Q Did they lower the qualifications?

A I wouldn't characterize it that way.

Q Did they reduce the amount of prior experience?

A They changed it.

Q Did it call for fewer years of experience in grade, fewer levels of certification in grades of actual welding?

A I wasn't aware of it, Mr. Guild.

Q Did you know any of that?

A All I know is they are amended or changed.

Q Were they changed in the way that I have described? I am not a Welding Inspector and neither are you; but is that consistent with what happened?

A That is a wage and salary judgment as to whether it was lowered or changed.

Q That was no part of your information available to you at the time you pursued this matter or were involved?

A Some of the employees' feelings about having been Craftsmen in the past were expressed. But it was not a major factor that they presented to me.

Q Look, if you would, at those notes for Mr. Charles Crisp. Do you remember Mr. Crisp to mean--let's see, we have two sets of notes.

One says Step Three at the top and the

other one is dated, let's see, it looks like it is 9/1/81.

Both of these notes are conversations you had with Mr. Crisp?

A Yes.

Q Initially what did you understand Mr. Crisp to mean when you have him saying, "I've been a welder and I know the difference. It would take an idiot to be an inspector on welder pay."

A Where are we?

Q Do you see it?

A Oh, all right. The pay grade adjustment would have equated the top Craft pay with the Inspector pay. My memory of Mr. Crisp is that he believed, again, that his job justified a higher pay grade was his concern.

Q That was his concern, and he said, "I have been a welder and now I'm an inspector and I know the difference."

A My memory is that he believed his inspector's position merited a higher pay than a welder. He was presenting that position to me, that opinion.

Q Is that all you understood from that?

A Yes, that he thought the inspector's job warranted a higher rate of pay than welder pay.

Q What did you understand he meant by "feels that it will hurt the program down the road"?

A Being able to recruit what he believes is Craft knowledge.

Q For Welding Inspectors?

A (The Witness nodded her head affirmatively.)

Q He said, "Let people go back to Craft." Is that a request on his part?

A Where did you skip to?

Q Just a few more lines below that, he said, "Let people go back to Craft."

A What he said was he had been told people would be able to transfer back to Craft jobs if they chose to, and he felt like the people really had not been able to do that; and of course, they were given that opportunity.

Q Subsequently, later on in the process they were offered the opportunity to have some preference in going back to Craft?

A Yes, the opportunity had been there, but there wasn't the availability.

Q Now then, you then spoke to Mr. Crisp

on what appears to be the 23rd of November, and that is when he informed you he intended to take his Step Three?

A Yes.

Q What did you understand by the note that you have on the bottom? It appears to say the union "on hold".

A Things Mr. Crisp told me.

Q What did he tell you?

A I think there was some interest, Mr. Crisp was fairly angry and feeling a little bit powerless and sometimes when employees feel that way he feels the need for some third party help.

Q The Lord, what third party help are you referring to?

A I'm sorry, that is professional language: the union.

Q Did any of the others make that kind of comment to you?

A I don't remember any Catawba person, maybe one or two.

Q Maybe one or two who?

A I don't know.

Q Are they reflected in these notes?

A Everything they emphasized that they felt was important I tried to write down for them.

Q There aren't any unions out at Catawba, are there?

A No, sir; not that I am aware.

Q It is part of your job to be aware of those things; isn't it?

A Pretty much, we have a Labor Relations Director.

Q Did you ever have any indication that the Welding Inspectors worked together in formulating recourses that they filed?

A Did I have indications?

Q Yes.

A They told me that they talked quite a bit among themselves.

Q That they met together in groups?

A I don't remember that.

Q You don't remember whether they did or not?

A No.

Q How did you understand them telling you that they worked together, worked in the same job, have the same responsibilities?

A My people felt that it was a quite generalized concern, and they were well aware--in fact, I had their consent to proceed through this kind of--as making one effort to resolve the concerns because they were so similar.

Q Did you ask them whether they could do that?

A Any time I extended the time frames of Step Two, yes; I certainly did.

Q How did you do that?

A Asked.

Q How would you ask?

A Either face to face or on the phone.

Q Did you say can I handle this as one big problem?

A No, I asked each individual. It wasn't a group thing.

Q Did you ask each individual can I handle this as a common concern?

A No more than the concern was being dealt with at various stages and the concern was very similar; and I asked that my efforts at Step Two be delayed.

Q And they said fine, they agreed to that?

A Yes, they did. It wasn't necessary to all of them because they started at different times.

Q Mrs. Addis, what happened after the Step Two recourses were resolved and you communicated that resolution to the Welding Inspectors?

What happened next in this matter?

A Well, some of them said they understood and thanked me and decided not to go to Step Three; and some of them, about a dozen or so, elected to refer it to the President, which I did.

Q How did you do that?

A I put together, I tried to compile the data in one place and met Mr. Lee.

Q Did Mr. Lee know of the Step Two resolution of the Catawba Welding Inspector concerns?

A I didn't discuss it with him.

Q Did he know of it?

A I don't know, I didn't tell him.

Q Did you have any indication that he knew, that he had been informed in one way or another before the resolution of Step Two?

A No.

Q You don't know?

A Because I got there on December 4, I

believe it was.

Q And did he know before December 4?

A It did not appear to me.

Q You were informed or you understood that some dozen were going to pursue it in Step Three?

A It wound up to be about that many from Catawba. We had 11 minus the 3 Oconees would be 8 plus the 4 more from Catawba, 12; right.

Q And they went to Mr. Lee, the President?

A The situations did, their concerns.

Q How did it get to Mr. Lee?

A I took it.

Q Tell me step by step how you processed it beyond the point where you communicated the Step Two resolution?

A What I do in this situation and others, see that the Senior Executive Vice President is aware of it. In this case Mr. Owen was aware.

Q Mr. Owen?

A Yes, they are aware of it. When a case goes to Step Three, I take this information to Mr. Lee, the President, at that time, and I left it with him.

There was some discussion about the

course of action, his recommendations, in which I was not involved.

I was informed about a task force that was being established of engineering kinds of people. I was not involved in that.

They worked with the President, you know, he has the option at Step Three of having other people analyze or forming individual investigations or whatever; and Mr. Lee would have to tell you what was involved. I don't know.

I took this up with him, met with him. There was more than one meeting because when he finalized his analysis of this and his review, I helped with some of the communications and some of the language that was used to try to be sure to voice understanding of the decisions.

Q Let's take this one step at a time. You communicated with the Welding Inspectors and a dozen of them from Catawba decided to go to Mr. Lee, and you prepared the briefing book that you have there (indicating). Did you physically carry it to Mr. Lee?

A Yes, I did.

Q Did you physically give it to him, carry

it to his office at a meeting?

A I don't remember on this particular case; it is either in his hands or his secretary's hands.

Q But you recall face to face meeting with Mr. Lee when you first presented that book?

A No.

Q You just don't remember?

A I know I was in one, but that particular day I just don't remember.

Q Do you remember meeting with Mr. Lee and discussing this subject?

A Oh, yes.

Q What did you discuss?

A The information I was attempting to log and explain the process. That is just standard procedure, the understanding that the employees have raised.

Q Did you make a summary of concerns?

A Not much in addition to what is here. It is about as well summarized as I could do.

Q He had not seen that when you met with him?

A Yes, he had. I don't actually remember, but usually the President has an opportunity to have

this and read it and then we discuss it.

Q So you don't recall having given him any kind of description or oral presentation prior to him having had an opportunity to review your written statements?

A I don't recall doing that.

Q But you do recall meeting with him and after he had an opportunity to review the report?

A At least once.

Q Let's talk about the first one. When would that have been?

A I don't remember the date.

Q Would it have been--

A It would have been on or after December 1st is the best I think I can tell you, and prior to the final letters going to these gentlemen.

Q In January?

A Yes.

Q January 1st?

A Yes, prior to that.

Q I have a sample. They may be all dated the same, but each file we have a January 6 letter. This one happens to be Mr. Kirkland from Mr. Lee; correct?

A Yes.

Q Is that the final letter that you had reference to or not?

A The January 6, yes, that would be the end of the issue as far as the recourse procedure goes.

Q This one reflects that he is working on it. This one does not reflect any decision; does it? Take a look.

A The investigations and indepth review for my decision, "I will see to it that a decision is reached as promptly as practicable and meantime ask for your patience."

So this is simply an I have received your recourse, and it is pending letter; right?

A (The Witness nodded her head affirmatively.

Q You met with Mr. Lee before that letter went out?

A Yes, I met with him shortly after I delivered this book.

Q Do you recall Mr. Lee writing a memo on or before December 4 that initiated the review of the task force?

A Am I aware of it?

Q Would that memo have gone out before or after your meeting with Mr. Lee?

A What was the date?

Q December 4.

A I met with him or delivered this on the 4th. He did not work with me on the task force. I really don't know; I think it had to be around the same time, but the task force, I believe, came from Mr. Owen's area, not my area.

Q All right, so you met with Mr. Lee on or about the 4th and read your report to him?

A By the time I discussed it with him he was very well aware of the issues.

Q It appears to you he read it?

A Yes.

Q What did Mr. Lee say on the subject?

A I don't remember.

Q Give me the best of your recollection what he said.

A You know, I really don't remember that long ago exactly what he said other than taking the information and being sure he understood it, which is the way Mr. Lee is.

Q Did he give you any instructions?

A No.

Q Did you make any recommendations to him?

A All of my information is here, the points we covered earlier about the employees having the right kind of communication about the decisions, about the wage and salary decisions.

Q Was that the subject of your discussion to the best of your recollection how to communicate the wage and salary situation more effectively?

A My communications are usually employee communications and understanding.

Q Was that your discussion ?

A Yes, I don't usually get involved in matters of which I don't have a working knowledge.

Q Do you recall any discussions that reflected a decision on his part to investigate the technical concerns of the Welding Inspectors?

A I don't remember the task force timing being discussed with me. It may have been.

Q How about the task force concept or general work plan and mission?

A I remember hearing about that.

Q Would that have come up at that meeting?

A I don't know.

Q You just don't recall?

A I don't recall.

Q Who else was present at that meeting?

A Mr. Guild, I don't remember. I know Mr. Owen was present at a couple of meetings I was involved in.

Usually the initial recourse discussion is between me and the President; but there were subsequent discussions to that meeting.

Q Do you recall on at least one occasion, likely the first, that you would have met alone with Mr. Lee on the subject?

A That usually happens. As far back as '81, I'm not sure I can remember exactly.

Q Those don't happen every day, do they?

A Recourse procedures?

Q To the President?

A Well, they have some frequency.

Q We have already talked about how they are not common occurrences; are they?

A I guess I can restate my point; two checks, one is that I usually meet with the President once a month and the second is I don't remember as far back as '81 about which day I talked to whom.

Q All right, did you ever carry a dozen Step

Three recourses to Mr. Lee at one time before or since?

A No, I haven't.

Q Did you ever carry more than one Step Three recourse to Mr. Lee before or since?

A Yes, I have.

Q When?

A This year.

Q How many employees were involved in that one?

A Two.

Q Is that the most other than this incident?

A Let me clarify; are you asking about employees' concerns about the same issue?

Q Yes.

A No, but I have had more than one Step Three at once; yes.

Q But never more than one about the same issue?

A We have had as many as two.

Q And this was a dozen, and it does not stick in your mind?

A The specific dates do not stick in my mind.

Q I just want to know what you talked about, Ms. Addis.

A It is right here (indicating).

Q Let's tell me about it.

A I just did.

Q What did Mr. Lee say?

A Excuse me, I said the information that I discussed with him was to insure that he understood what was in this information.

Q Yes, right, I got that part. Tell me what he said.

A I don't remember what he said.

Q How many other occasions did you meet with him?

A I remember at least two.

Q All right, tell me about those meetings, please?

A There was a meeting involving discussing this matter with Mr. Owen, Mr. Wells and some other staff members were present.

Q What other staff members, to the best of your recollection?

A Mr. Davison.

Q Larry Davison?

A Yes.

Q How about Mr. Grier?

A No, not Mr. Grier.

Q How about Mr. Henry?

A No.

Q I think that's it. When would that have happened, give me an approximation if you can recall?

A Well, it is roughly within a four week period there.

Q In December perhaps?

A After December 4 up until right around Christmas.

Q Are you aware generally that the first task force issued a report before the close of that year sometime around the last week of December?

A Yes, but I haven't seen it. I know they were working very hard to give it what they considered to be proper attention, but I was not involved in the technical aspect.

Q I am trying to refresh you as to the time frame. It would have been December?

A I was involved in this pay procedure, what the employees were using the recourse procedure for. The time I got started at Step Three was in early December.

Q What was the subject of the meeting, the second meeting where Mr. Owen and Mr. Wells and Mr. Davison and yourself were there with Mr. Lee?

A We discussed the salary issue.

Q What was the discussion?

A The resolution came out in the analysis of it, but the wage and salary decision about the pay grade was accurate.

Q That wasn't your input, was it?

A No, the wage and salary administrators and the management decided that.

Q Who related that expertise at this meeting, if anybody?

A Mr. Fain may have been there.

Q F-A-I-N?

A Yes, his memo is in here. His opinion, at least the wage and salary administration opinion, was available to management.

Q What did Mr. Lee say at this meeting?

A I don't remember exactly what Mr. Lee said; I can't quote him.

Q I don't want you to quote him. Tell me the substance.

A His finding was that the wage and salary decision that the company had made was accurate, and I do not remember him--I remember him asking questions about it, about the pay grade.

The company has a commitment to internal

quality and external competition; and I remember him inquiring well enough to satisfy in his own mind that those commitments were met.

Q All right, did Mr. Lee say anything on the subject of the technical concerns of the Welding Inspectors?

A I really don't remember. After I turned over this information, I remember that they had decided, and I am not exactly sure who decided that there would be a technical kind of task force, which differentiated perhaps any of the technical concerns that the employees had presented through me or Mr. Wells.

What was decided with that on a priority level, that is no longer in my area at all.

Q You don't know of Mr. Lee expressing concern or interest or involvement of the effectiveness of the Quality Assurance work at Catawba?

A I think the entire company is.

Q Yes, you were saying--about whether there was an expressed concern?

A Yes; I think there is a very definite impression that I got was that Mr. Lee was very concerned about these employees and the pay grade issues and everything they had to say.

Q Concerned about everything?

A Their perceptions and beliefs about how they felt about their work.

Q Did he express that concern?

A Yes, he did.

Q What did he say?

A In my area I think that he was very much interested and advised actually that some attention be given to employee relations matters, the working relationship, all of the concerns of employees.

He wanted those attended to and that was very clear to me.

Q Was anything clear about his expression of concerns about the effectiveness of Quality Assurance at Catawba?

A Not to me.

Q Not in the meeting at which you were present?

A No, I don't remember him expressing any doubt in front of me about the quality.

Q How about the matter of encouraging or providing some sensitivity or preference for Welding Inspectors who might choose to transfer back to Craft positions?

A What was the question?

Q Mr. Lee on that subject?

A What was his position?

Q Do you recall him expressing anything on that subject?

A The decision was made that employees who felt they wanted to move into Craft positions were given that opportunity on a priority basis.

Q Did he express that to you?

A It was the consensus, I'm not sure which manager made the statement, but it was agreed to.

Q You don't recall whether Mr. Lee said anything on the subject?

A I am aware that the consensus that that would be an appropriate thing to do was reached.

Q In one of the meetings in which you were present?

A Yes, this was based on some of the employees feeling that their career path decision was not comfortable for them.

Q In light of the pay adjustments?

A Totally.

Q All right, that is two meetings with Mr. Lee that you can recall. Can you recall others on that subject?

A I can't; there may have been, but I can't

recall.

Q You stated that you recall communicating Mr. Lee's decision. How did you do that and what did you do?

A That was in discussions also in working with his clerical staff. I tried to help them be sure that they had the proper mailing addresses and some of the things.

Q Did you draft the letter he mailed to the Welding Inspectors?

A I worked on the contents and language that those employees would best understand in my opinion; but there were several people involved.

Q Did you draft a proposed letter?

A Sections of some of the information, yes; at least I proposed it. I'm not really sure who made what sections with Mr. Lee and myself.

It was his letter though, I can tell you that.

Q But you assisted him in trying to formulate effective communications?

A On an opinion level.

Q What role did you have, if any, Ms. Addis, in further work on responding to the Welding Inspector concerns?

A None after the recourse procedure and the pay rate issue was resolved. I was no longer involved.

Q Were you involved beyond assisting in composing this letter?

A No.

Q Were you aware of a number of meetings that occurred between management and the Welding Inspectors subsequent to Mr. Lee's resolution of the third step of the recourse procedure?

A I was aware that the plan to concentrate on communications and the Employee Relation matters were in place and management in that area intended to use the expertise of their own staff to make those efforts.

I was aware of that.

Q Were you involved in any of that?

A No.

Q Were you involved in any implementation of the final report of the welding, Catawba Welding Task Force?

A No.

Q Were you involved in any of the efforts of the consultants that were retained by the company with respect to the Catawba Welding Inspector Task Force?

A No, I wasn't.

Q Have you been involved in prccessing any subsequent recourses from Welding Inspectors at Catawba?

A One.

Q Who was that?

A A young man concerned about not being promoted.

Q Was he one of the Welding Inspectors who raised initial concerns here?

A No, he wasn't.

Q Somebody different?

A (The Witness nodded her head affirmatively.)

Q Do you know what has happened to the Catawba Welding Inspectors who exercised the recourse procedure, Ms. Addis?

A No, I have had no other recourse from those gentlemen at all.

Q Nor have you had any other information that would help you answer that question?

A No, sir.

Q Do you know whether or not the Catawba Welding Inspectors' concerns, either technical or non-technical, have been resolved to their satisfaction?

A To their satisfaction?

Q Yes.

A No, I don't know.

Q Do you care?

A Certainly.

Q Do you make it your business to find out?

A As I said, the personnel professionals within the QA Department are providing the functional services to them, not the corporate office.

Q Who might I ask?

A It would be in the Personnel area of Mr. Alexander.

Q It is Neil?

A C. N., right (the Witness nodded her head affirmatively).

Q All right, if I can have just a moment--Ms. Addis, if we can go back for a moment, I show you this December 3rd, 1981, memo from you to Mr. Owen (indicating).

Look through there and tell me in light of your subsequent involvement in this issue, if there is anything in there not factually correct or if it has come to your attention those are not accurate transcriptions of concerns brought by Welding Inspectors, or if there is anything else that is inaccurate and therefore should be corrected to that so

that I may have a full understanding of what you communicated to Mr. Owen at the time and what, in fact, had been communicated to you.

A One thing that comes to mind is the difference between a notation of talking to somebody on the 23rd versus the 24th, if that is a material kind of situation.

Given some time I can probably decide which one is incorrect.

Q Otherwise we assume there is a typographical error since there is an inconsistency between the notes?

A Unless my secretary kept the document she typed it from, I would have a little bit of trouble.

Q Well, the document she typed it from should be the document included in the file?

A No, it would have been outlined.

Q You would have drafted this entire memo in hand from using as a source the notes that we have now in the file?

A That's right.

Q And that handwritten draft of this memo would have been described as a matter of course?

A Usually she does.

Q You don't but usually she does after she

completes the memo?

A That's right; one thing I can state, and I can take the time to read all of this, is that the quotations outlined here are from the notes that I made or this information was written down directly after talking to these fellows.

It was read back to them to be sure I understood the real essence of what they were saying as well as I could relate it, saying it as they said it to me.

It is not intended to be electronically recorded and totally in sequence, exact quote of what that person would have written down for himself.

That is what I heard them saying.

Q Have any of them subsequently corrected your understanding or given you any information that would lead you to amend the remarks that you reflected in this memo?

A No.

Q Ms. Addis, has anybody ever instructed you to characterize the Welding Inspector concerns as simply a pay dispute?

A No.

MR. GUILD: All right, thank you very much.

MR. GIBSON: No questions.

FURTHER THE DEPONENT SAITH NOT.

(The Deposition was concluded at 4:11 p.m.)

I, Brenda Gail Addis, hereby certify that I have read and understand the foregoing transcript and believe it to be a true, accurate and complete transcript of my testimony.

_____

Brenda Gail Addis

This Deposition was signed in my presence by Brenda Gail Addis on the _____ day of July, 1983.

_____

Notary Public

C E R T I F I C A T E

STATE OF NORTH CAROLINA

COUNTY OF MECKLENBURG

I, Lynn B. Gilliam, do hereby certify

that the proceedings were by me reduced to machine shorthand in the presence of the Witness, afterwards transcribed upon a typewriter under my direction; and that the foregoing is a true and correct transcript of the proceedings.

I further certify that these proceedings were taken at the time and place in the foregoing caption specified.

I further certify that I am not a relative, Counsel or Attorney for either Party or otherwise interested in the outcome of this action.

IN WITNESS WHEREOF, I have hereunto set my hand at Charlotte, North Carolina, on this the _____ day of July, 1983.

LYNN B. GILLIAM
Court Reporter

My Commission expires May 12, 1988.