UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

2/9/84

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of APPLICATION OF TEXAS UTILITIES GENERATING COMPANY, ET AL. FOR AN OPERATING LICENSE FOR COMANCHE PEAK STEAM ELECTRIC STATION UNITS #1 AND #2 (CPSES)	Docket Nos. 50-445 and 50-446

TESTIMONY OF CASE WITNESS
DOBIE HATLEY

Q: Please state your name and address for the record.

A: My name is Dobie Hatley. My address is P. O. Box 491, Glen Rose, Texas 76043.

Q: When did you first contact CASE?

A: I first contacted CASE President Juanita Ellis on Tuesday night, February 7, 1984, after I had been terminated on that day.

Q: Please give us some brief details about your employment at Comanche Peak.

A: I was first hired at Comanche Peak on January 22, 1979. I worked at that time on the night shift in the pipe hanger department issuing documentation; I supervised the office until August of 1979. At that time I was laid off with an ROF (reduction of force). About a month later, on September 7, 1979, I was called back and rehired into the document control section where I worked until I was fired on February 7, 1984. Initially I was a clerk, for about a month, then I assumed a supervisory position over four people; we did all the control documentation, reproduction of documentation, actual making of prints, filing, etc.

On May 16, 1983, my immediate superior asked if I would go on days and set up the satellite program. These are literally satellites from the main document control center which provides documents to the satellites, which in turn prepare documentation packages, get them ready for presentation to the craft to be worked, maintain all the documentation, etc. The satellites also have reproductive capability and appeture cards so that they can take the film of drawings and reproduce them onto hard copies of the drawings. We kept those logged and filed and made distribution to the craft, engineering, or anybody else who had need of them. Also, each satellite has two computer terminals. We handed documentation for every phase of structural, mechanical, electrical, etc., used in construction. Part of our job was to see that they had the latest drawing of every phase of construction and design at Comanche Peak.

Q: What were the circumstances which led to your being fired?

A: On Monday, January 30 (I believe it was), 1984, my immediate supervisor, Frank Strand, told me that I needed to go underground and he recommended that I go on nights for a while. He made this statement in front of me and some other people. I told him that since I still had four weeks vacation coming, why didn't I just take that until everything settled down.

Q: Why do you think he said you should go on nights?

A: I don't really know for certain. I asked for an explanation and he said, "There's too much heat right now." Those were his words. My interpretation was that the people that wanted to get me terminated had been bringing in different documents all the week prior to our discussion and trying to find something that I had done that was wrong. Each time they'd bring them in I would be proven right. These were supervisors with construction trying to find documentation that was wrong to discredit me. Frank Strand said that I should

go underground for a while and then "Phoenix would rise again from the ashes and return to her satellites."

I was very upset about this. I had worked hard on getting the satellites set up and it was a good program that should have worked. My immediate response was that I would rather just quit, but I finally told him that I would take my vacation until the following Monday (February 6) and then would do as he said and go on nights. On Monday, February 6, when I returned to work he told me that I had the option of either being fired or resigning and that he hoped I would resign (rather than being fired). When I asked why, he said this came from higher management and that it was because I failed to follow instructions. When I asked him for further details, he said it was because the computer didn't match the documentation in the field. (I'll discuss this later in my testimony.)

It's funny to me that I'd been working for Brown & Root for five years, I was the one who set up the satellite, I'd had 23 people working under me, and yet all of a sudden supposedly I'd become incompetent and didn't follow orders. I asked for a ROF (lay-off because of reduction of force). I told my supervisor that I wanted to have a conference with the upper management people who wanted me fired.

Q: Did your supervisor say who specifically wanted you fired?

A: He said specifically that Tolson was one of the ones who wanted me offsite. I had never had any dealings directly with Mr. Tolson and wasn't even sure what his position is. My supervisor said that "the heat's coming from all over."

Q: Why do you think they wanted you fired?

A: I think it's because they knew I was concerned about the documentation

and was afraid of my access to controlled documentation. They were afraid I would do something about it.

Q: Did you ever go to the NRC about your concerns?

A: No. All the NRC onsite does is sit in their offices all day. And you have to walk by the Project Manager's and the Assistant Project Manager's office doors to get to the NRC's office onsite. There's no privacy. This inhibits people from coming to the NRC. Also, they make no special allowances to meet you somewhere away from their offices onsite. Most people would never go to the NRC at Comanche Peak.

Q: Please continue regarding your termination.

A: On Monday night, February 6, 1984, I went ahead and prepared a letter of resignation in case I decided to resign the next day. On Tuesday, February 7, at 12:30 P.M., I had a conference with the Brown & Root Project Manager, Doug Frankum, and Hayward Hutchison (who I believe is the Assistant Project Manager, although I'm not certain of his title), and Ray Yockey, the EEOC (Equal Employment Opportunity Commission) officer for Brown & Root onsite. They told me they were going to terminate me, that we could talk about it all day but that that's what they were going to do. I told them they couldn't fire me because I was quitting and I gave them my letter of resignation.

Q: Is that the letter of resignation which is attached to your testimony?

A: Yes, it is.

Q: And do you also adopt it as part of your testimony in these proceedings?

A: Yes, I do.

Q: Is it true and correct to the best of your knowledge and belief?

A: Yes, it is.

Q: What did they say when you gave them your letter of resignation?

A: They repeated that they were going to fire me. The termination slip (which is attached to my testimony) which they made out showed "failure to obey instructions" and showed my performance rating as "fair." It also said to see attached letter to Ray Yockey, site EEOC officer; I wasn't given a copy of that letter and don't have a copy. I refused to sign the termination slip. Hayward Hutchison escorted me out to the time office, then Doug Frankum very bruskly called me back to his office and said that there was a man down the hall who wanted to talk to me. I talked to Bruce Crier, with Texas Utilities. He said I had to tell him what the problems were that I referred to in my letter of resignation. I told him that my attorney had advised me that this was not the time or the place to do that, but that I would tell him about what had happened about my firing, if he wanted me to. I told him about it and that I was especially concerned because of an article I had seen that day in the FORT WORTH STAR-TELEGRAM that said that CYGNA was going to do another $500,000 study at Comanche Peak. I told him that I was particularly concerned because when CYGNA came out to the plant (I believe it was about November 1983 or so), one of the areas they looked at was the documentation in my satellites. The day before CYGNA came to look at that documentation, I was told that this is what CYGNA will be looking at tomorrow and to be sure that it was all right.

Q: You were told in advance what CYGNA was going to look at?

A: Yes. I had been called into the office of Frank Strand, my supervisor; Hayward Hutchison was also there. Mr. Hutchison handed me a hand-written list and told me to copy it, and that CYGNA would be coming tomorrow and these were the documents that they would be looking at when they came and for me

to be sure that the documentation was all right. I had about 3 or 4 copies of the list made. It had specific documents listed, such as specific support numbers, mechanical drawing numbers, etc. The next day CYGNA came and looked at those specific documents and no others. It was obvious that someone had been given advance information about which specific documents CYGNA would be reviewing.

Q: Did you have any contact with the CYGNA personnel while they were there?

A: Just casually. I mentioned to them that I was concerned about construction of the plant. They had no response. I didn't tell them that we had the list of the specific documents they were to review.

Q: The satellite program sounds like a good idea. Wasn't it working?

A: It could and should have worked, and for a while it did. TUGCO did an audit when it was first set up; then they did a follow-up audit I believe for the period about August-November 1983 and they seemed to think it would work. It got to where it caused a problem for people who couldn't remove just one or two pages from the document package; they were not willing to take the entire package and keep it together the way the procedures called for. Gold hats (superintendents) were constantly asking that we break procedure. Upper level management always wanted us to break procedure. I think the craft in this instance would have done it right, but upper level management would always come in and raise cain about it. People got tired of carrying 3 to 4 lb. packages into the field with them (because there were so many changes made in the documentation).

It finally got where people didn't want to follow the system, and they set up task forces. Each task force has 4 gold hats (superintendents). All of these task forces started with new paperwork; they got nothing from the vault. I had to work over the Thanksgiving and Christmas holidays to get the documents ready for them. Now there are documents just kept in file cabinets, uncontrolled. And there are hundreds of documents out in the field that shouldn't be there. One of the problems at Comanche Peak is that the plant has been built one piece of paper at a time, rather than ever looking at the whole picture.

When they first set up the task forces, my boss agreed with me that it was contrary to procedures. So they changed the procedures. They do that all the time at Comanche Peak. They have a full-time staff out there rewriting procedures.

Now the Task Forces are losing documents. They've already lost over 100 hanger packages. My boss finally called TUGCO QA, which is referred to onsite as the "God squad." But nothing changed. In my opinion, the Task Forces should be disbanded. Nobody cares that documentation is being lost in the field.

Also, the computer is a mess. There is lots of input error, for example. Also, there are many, many instances where changes have never been incorporated into the drawing. On the computer, there are numerous items marked "NI," which stands for "never incorporated" -- those items will probably be outstanding forever, even after the plant is turned over for operation.

Q: Did you object to the documents being uncontrolled?

A: I complained about it every day. I had the people who worked under

me get three-part memos from people in the field who lost documentation. Some of the memos were very flippant (some for instance, had poems, etc.).

Q: Why do you believe you were fired?

A: I believe I was fired because the upper management and construction supervision did not like it because I would not let any type of documentation go out outside of procedure. Whenever I caught something that was wrong, I would yell and scream about it. The other reason, I feel, is that I did start to voice my concerns about the safety of construction in certain areas where I felt that they were trying to cover it up instead of making it right.

Q: Could you give us some examples of those areas?

A: The first one I really became aware of was that all of the instrumentation piping had been color-coded wrong and they had to go back and check and rerun those lines, and try to find out if it was usable the way it is. My concern was that it was done that way in the first place.

The clamps that hold the cable trays up which carry the electrical cables were never inspected and they were having to perform a complete backfit of those. They required new documentation to make the backfit, rather than using the original documentation. I expressed my concern to my supervisor and to other people. It caused my department an enormous amount of work. (That's how I became aware of it.)

They said that the steel that is installed as pullers in the spread room had begun to flake as though it were laminated when in fact it was supposed to be extruded. It's my understanding that they are cutting those out and

putting others in now. This was discovered about three weeks ago. It involves steel beams about 4" or so used as pillars to hold up the electrical control room. I understand that about 1,050 feet of it were brought onsite without being inspected before installation. According to the crafts' comments (I haven't looked at this myself), they have located all but 10 feet of it and are now correcting what they have found. I would assume that that installation probably took place about three years ago or earlier, since that would have been part of the basic construction.

Cable tray supports are off location because of documentation. They were supposed to be worked by packages that consist of the drawing and all supporting documentation, rather than the way they wanted to do it. They wanted to take out only what they needed and work with only that because they said everything else was irrelevant. Procedurally, according to what I know, they were supposed to keep the package intact and not have just pieces and parts of it. I believe this is one of the reasons I was fired. I fought against their being able to break up the packages like they wanted to do. But I was given the responsibility without the back-up authority to make the craft and upper management stick with procedures.

Some of the documentation is in very, very large packages that exist. The average would have a minimum of about 50 design changes against it. The maximum has three boxes full of changes against it; that's on S-910 which affects the cable trays and the El-1700 drawings which is a cable and raceway schedule (it also has about 30 notebooks full of design changes). All of those changes are what we know as site changes that have not been through design review, to my knowledge.

In my opinion, if one were to put a minimum of 10 people working overtime on these design changes putting them into the original design, they wouldn't be through with that until after September 1984. It is also my understanding that many of them when entered into the computer have an "NI" by them, which stands for "never incorporated." This means that these will never be incorporated into the original design.

I wish the Board could just see some of the packages, such as 2323-S-910, E1-1700, M1-513, S9-15 and S9-16, E1-713 and -713S, E1-710-01 and -01S, M1-605. For example, E1-713S has over 750 current changes against it. And M1-605 contains around 500 changes or so, and that is only what's active against it at this time. If you pulled everything that was ever written against them, it would probably be closer to 1500 changes on each package. I kept complaining that these changes should be incorporated into the original design but I was told just to make the packages.

Q: What's the difference between, say, E1-713 and E1-713S?

A: To begin with, each of the numbers properly should have 2323- in front of them. That's the designation for Gibbs & Hill. "S" stands for structural, "E" stands for electrical, and "M" stands for mechanical. On most of them, the number immediately following the letter designation stands for the unit number; for example, E1-713S is in Unit 1. An "S" at the end of the number stands for a change which was made on site. So, in the instance of E1-713 and E1-713S, for example, E1-713 would be the original Gibbs & Hill design, and E1-713S means changes have been made on site. This applies to the electrical designs.

Another package is FSE-159. This contains about 13,000 drawings that are all related to cable tray hangers. Each drawing is for a separate cable tray hanger. It is my understanding that they are just now running a full set of this package to go to the Task Force. I'd like to have some engineer with the Applicants sit down and explain to me why there have to be that many design changes written against those drawings. I'd like to know how much deviation could be allowed from the original and still be within design specifications. And I haven't worked at a lot of nuclear plants, but I understand that most places when they have attached about the third document to the original, they have to go and change the original and incorporate all the changes so that it's all still part of the original design. Until we started building packages for the satellite program, I don't believe anybody really knew the enormous amount of documentation that currently exists against the drawings that are going to have to be used to sell the plant.

I'd like to have some of these complete packages (including all the original designs) just sitting there when I testify so I could show the Licensing Board first-hand what I'm talking about. (If this couldn't be supplied for some reason, this is all supposed to be on the computer so Applicants could provide a print-out of all the documentation on each package.)

Q: Are calculations part of the documentation packages?

A: No. None of the documentation packages I've ever seen have any calculations included except occasionally some on the CMC's (component modification cards), to the best of my recollection.

Q: Are there any other problems in documentation you'd like to call to the Board's attention?

A: Yes. For example, there is one design change in particular, 91699, Rev. 1, which is not even in the system yet but they are already backfitting and inspecting to it.

Regarding CMC's, there's no systematic way of following them. For example, when drilling holes in a wall trying to find a place where they don't hit rebar, there might be 10 holes drilled; then, because no one ever goes back and checks the original CMC, they might very well drill in the same place they drilled to begin with.

Many of the people in charge of the task forces just don't know what they're doing. For example, I received one three-part memo from one man who was complaining that he did not have specification SS09, that he had never had it, and that he wanted it removed from the list of drawings that we had signed out to him. I showed him that it was a specification and showed him what book it was in. He didn't even know it. Yet nobody will do anything to stop this sort of thing. Nobody cooperates to see that it's done right, according to procedures. At Comanche Peak, construction supervision has control of QC and documentation, even though many times construction supervision doesn't know what it's doing. And I don't see any change in the works. I thought it would improve when they started the satellite program, but since they've started up the task forces, there's no way it's going to work.

There's something else I think the Board should be aware of. A man named John Griffin was brought onsite, trained, and did hundreds of inspections. He was supposed to be certified, but he wasn't. When they

found out about this, they told him he must be certified, because he made 100 on his test. He told them that when somebody tells you the answers to a test, you can make 100 on it. He told them he had 30 minutes on-the-job training (OJT). Instead of firing him, or retraining him, they just transferred him to another place where he's sitting drawing pictures (at least that's my understanding). It's been said that he threatened to go to the NRC. I know about this because I had to redo a lot of his paperwork; it caused me a lot of extra work.

Instead of keeping documents controlled with our red control stamp, they let QC clerks stamp their own drawings and documents with a black control stamp, in the interest of getting things done and out. These QC clerks are not documentation specialists. I don't believe this should have been allowed.

Another thing that is of concern to me is that they get most of their QC hands from construction. This applies to all areas of QC. Most of these people go right from the craft to QC inspecting, and a lot of times are inspecting the same craft they just came from. I'd say at least 70% of the QC hands come from the crafts. It just stands to reason that if one were to inspect one's own work or the work of a buddy, one wouldn't perhaps be as critical of that work as of someone else's. Also, many times construction crafts have a different outlook towards quality control than a trained QC inspector. I'm not saying that a craftsperson couldn't become a good QC inspector, but it does concern me that so many of them come from their own craft and that some of them have a poor attitude about quality.

Q: Did you talk to your superiors about the problems you've mentioned?

A: Yes. When I expressed my concern to my supervisor about some of the problems and told him I was worried for the first time since I worked out there that things were not as they should be, I was told that it was not my concern and that people a lot smarter than me were taking care of it.

I want to emphasize that I am not anti-nuclear, in fact, I'm pro-nuclear. I was never really worried about the way the plant has been built until about November 1983. But since then I've become very concerned about the way the plant's being built, at least about what I've seen regarding the documentation, which covers every phase of construction and design at Comanche Peak.

I know that at Comanche Peak you don't express your concerns, you don't go out into the field and look at what's built there, if you're a QC inspector you don't come up with too many problems, you don't buck construction supervision, you don't make waves -- or you're fired. My boss begged me not to do this and told me it would cause me lots of grief. Brown & Root has been told that they can't fire any QC hands until after the QC hearings are over, but it's understood that the good ones will be laid off later.

Q: Is there anything further you'd like to add?

A: Brown & Root called all the QC people together a couple of weeks ago and told them that GAP was in town, that they were not to talk to GAP, and that anyone who did talk to GAP would be fired. All of the QC people were called in and told that in one big meeting.

Q: Who told them that?

A: Gordon Purdy.

Q: Did you attend the meeting?

A: No, but I've talked to people who did.

Q: Have you seen a copy of the CYGNA Report?

A: Yes, I have. My supervisor had a copy and he let me read it. The parts in it that refer to my satellites is marked "DC." It's generally at the front of the different sections. As shown in the report, the satellites were in excellent shape as far as our paperwork was concerned. I'm very proud of the work we've done on the satellite program. I worked very hard, from 60 to 84 hours a week (with one day off for Christmas) to get it set up. Most of the people who work in the satellite program are very good at their jobs, take pride in their work, and do good work. If the program had been allowed to continue the way it was first set up, before they started the task forces, it would have worked and I think it would have eventually gotten the paperwork all straightened out.

A while back, the NRC had them go onto a computer, and the print-outs have to be put into the documentation packages. (The computer always seems to go down when the NRC comes around, even though it works very well most of the rest of the time.) And the NRC told them in October of 1983 or so that they had to quit writing DCA's; they tapered off writing them for a while, but now they're writing more than ever. They're also writing NCR's like crazy, trying to buy off documentation. (I've even heard that there has been falsification of documentation as well.)

Q: Did the CYGNA report identify the problems you've discussed here?

A: I really only thoroughly read the part that applied to the satellites. I haven't read the entire report, and I don't have a copy of it.

Q: How do you know about the problems you've mentioned?

A: Most of them I know about because they would have to come pull the paperwork from the satellites in order to work on the problems.

Q: Is there anything else you'd like to say?

A: This has all happened so fast that I may not have remembered everything at this time. I'll probably be remembering other things for a long time.