

# ORIGINAL

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the matter of:

TEXAS UTILITIES ELECTRIC  
COMPANY, et al

(Comanche Peak Steam Electric  
Station, Units 1 & 2)

Docket No. 50-445  
50-446

Deposition of: Stanley G. Miles

Location: Glen Rose, Texas

Pages: 50,600-50,628

Date: Thursday, July 12, 1984

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One copy to E. Johnson, Region IV

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY & LICENSING BOARD

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In the matter of:           :
                             :
TEXAS UTILITIES ELECTRIC    :
COMPANY, et al.             : Docket Nos. 50-445
                             : 50-446
(Comanche Peak Steam Electric :
  Station, Units 1 and 2)    :
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Glen Rose Motor Inn  
Glen Rose, Texas

July 12, 1984

Deposition of: STANLEY G. MILES

called by examination by counsel for the Intervenors  
taken before Mary C. Simons, Court Reporter,  
beginning at 1:10 p.m ., pursuant to agreement.

Sim 1-2

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APPEARANCES:

On Behalf of the Applicant:

LEONARD W. BELTER, ESQ.  
Bishop, Liberman, Cook, Purcell & Reynolds  
1200 17th Street, N. W.  
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On Behalf of the Intervenors:

JANICE ROBINSON, ESQ.  
Baron & Associates  
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Suite 1050  
Dallas, Texas 75225

On Behalf of the NRC:

JIM WOLF, ESQ.  
Office of the Executive Legal Director  
United States Nuclear Regulatory Commission  
Dallas, Texas 75225

Also Present:

CHARLES SIEGEL  
Baron and Associates  
8333 Douglas  
Suite 1050  
Dallas, Texas 75225

\* \* \* \* \*

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OTTON COLLEAT

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25WITNESSEXAMINATION BYPAGE

STANLEY G. MILES

By Ms. Robinson 50,503

By Mr. Wolf 50,508

By Mr. Belter 50,509

By Ms. Robinson 50,526

By Mr. Belter 50,528

E X H I B I T S

(None)

MILLERS FALLS  
EXERASE  
COTTON CONTENT

P R O C E E D I N G S

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Whereupon,

STANLEY G. MILES

having been first duly sworn by the Notary Public, was examined and testified as follows:

MS. ROBINSON: Mr. Miles, I am Janice Robinson and I just have a few questions for you today.

EXAMINATION

BY MS. ROBINSON:

Q Would you state your name.

A Stanley G. Miles.

Q And your address?

A 3824 Eighth Avenue, Fort Worth, Texas.

Q And what is your present occupation?

A I am an iron worker.

Q And where are you currently employed?

A I am between Jobs. I am going to Corpus next.

Q Where were you previously employed?

A Brownfield, Texas, the Panhandle.

Q Were you ever employed at the Comanche Peak power plant?

A Yes.

Q And when was that?

A From 1977 to 1982.

Q Do you know Chuck Atchison?

Sim 1-5

- 1 A Yes, I do.
- 2 Q How do you know Mr. Atchison?
- 3 A He conducted most of the testing for my fits  
4 and also my welders' welding.
- 5 Q Was that during the entire time that you were  
6 at the power plant?
- 7 A No, I had several jobs at the power plant.  
8 That was just during the latter year and a half or whatever.
- 9 Q All right. Did you have an occasion to observe  
10 Mr. Atchison's performance as a quality control inspector?
- 11 A Certainly.
- 12 Q And how would you describe that performance?
- 13 A He is the best that I have worked with.
- 14 Q Can you describe anything that would make him  
15 better than any other inspector?
- 16 A Well, he had a certain I guess you could  
17 say expertise in solving problems that we ran into from  
18 time to time concerning welding and what was causing  
19 impurities, whether it was a rod or whether it was the  
20 welder or whether it was a fit-up and what the problem  
21 was going to be, too cold a rod or too hot a rod or  
22 whatever.
- 23 Q All right. Was Mr. Atchison still there when  
24 you left the power plant?
- 25 A No. He left a couple or three months before

Sim 1-6

1 I did.

2 Q What was the cause of his leaving the power  
3 plant?

4 A He was fired.

5 Q Did you personally observe any change in the  
6 quality control inspectors' performances after Mr. Atchison  
7 was fired?

8 A Yes, immediately.

9 Q What changes can you describe for me?

10 A The first fit-up, I didn't know that Charles  
11 Atchison was gone at the time, so the first fit-up I had  
12 and weld I had to have inspected I went to QC and left  
13 a card telling them where I was located and the fit-up.  
14 They sent to QC inspectors down there and I asked them  
15 about Charles Atchison and they said that he was no longer  
16 employed there. I noticed, and in fact it was pretty  
17 evident that these people didn't know what they were  
18 doing. I had to show them what I was doing and what they  
19 were supposed to check and the whole thing.

20 Q Were there any other differences other than  
21 that one that you can describe?

22 A Yes. In fact, in that same room ---

23 Q What room was that?

24 A Let's see, the North Valve Room is what it is  
25 called. We have a plate in the ceiling that had to be

Sim 1-7

1 removed before we could weld in our gusset plates. CB&I  
2 was called in since it was their iron to arc gouge the  
3 plates free so we could do our welding, and then we in  
4 turn would replace the plates they arc gouged out. We  
5 put a fire blanket down and went out. They just started  
6 arc gouging and spraying the room with fire and carbon  
7 particles and dust particles while a stainless pack weld  
8 was being made in the same room

9 Q Is there a problem with that?

10 MR. BELTER: I am going to object to this on  
11 the grounds of relevancy. What is the relevance of all  
12 of this testimony to the issue of harassment and intimidation  
13 of QC inspectors?

14 MS. ROBINSON: I believe that if you will let  
15 Mr. Miles finish his testimony that you will see what the  
16 relevance is. I am trying to lay a predicate for it.

17 MR. BELTER: I am asking you, Counsel, and  
18 I understand that. I can't see the relevance of any of  
19 it at this time and I am asking you to state for me and  
20 for the record what you understand the relevance of this  
21 testimony to be so that I can decide whether I need  
22 to continue objecting.

23 MS. ROBINSON: All right. I believe that  
24 this anecdote that Mr. Miles will testify that he believes  
25 that later QC inspectors were harassed and intimidated



Sim 1-8

1 from preventing the occurrence which he is now describing.

2 MR. BELTER: My objection stands. You can  
3 continue, or is that it?

4 THE WITNESS: The pipefitters were in one  
5 end of the room. Pipe QC came in and came down to me and  
6 asked what was going on and I related what was happening,  
7 that CB&E had to arc gouge this plate out, and he said  
8 well, I will stop this. He left immediately in a rush.  
9 He was gone a few minutes, came back and he ignored the  
10 arc gouging and the CB&I hands and myself. They just  
11 continued to weld and fit-up and CB&I continued to arc  
12 gouge.

13 BY MS. ROBINSON:

14 Q Was this arc gouging in accordance with standard  
15 quality control procedures as you understood them?

16 A No, it wasn't.

17 Q You stated earlier that the quality control  
18 inspectors' performance changed after Mr. Atchison was  
19 fired from the plant. Did you ever observe Mr. Atchison  
20 handle a similar situation in a different manner?

21 A On several occasions. Any dust being blown or  
22 any concrete being chipped or any grinding going on around  
23 a weld that was going to be checked by himself, if a  
24 journeyman can do such things, or if the helper was  
25 doing that, he always cautioned them to keep the dust level

Sim 1-10

1 down and not chip while welding to prevent contamination  
2 of the weld.

3 Q And was that in accordance with the standard  
4 quality control procedures?

5 A Yes, it is.

6 MS. ROBINSON: That is all the questions I  
7 have.

8 EXAMINATION

9 BY MR. WOLF:

10 Q Mr. Miles, my name is James Wolf, and I am  
11 the Counsel for the NRC staff.

12 Mr. Miles, did you personally observe or hear  
13 of any instances, that is to say personally hear of any  
14 instances where a QC inspector or any other person working  
15 for the QA/QC Department was told to do his or her job  
16 in violation of any procedures or guidelines or other  
17 instructions, handbooks, memoranda or other documents  
18 written or oral instructions which were officially issued  
19 by the QA/QC Department?

20 A Personally, no.

21 Q Did you personally observe or personally hear  
22 of any instances where a QC inspector or an another person  
23 in the QA/QC Department was threatened with some adverse  
24 action for doing his or her job correctly?

25 A No.

Sim 1-11

1 MR. WOLF: I have no further questions.

2 EXAMINATION

3 BY MR. BELTER:

4 Q Mr. Miles, in order to avoid confusion here,  
5 I am going to divide what you testified to here into  
6 two incidents if I can.

7 A All right.

8 Q The first incident I think you described  
9 what you called a fit-up.

10 A It has to have certain tolerances and dimensions  
11 like the gap between the two pieces of metal have to be  
12 a certain width, the air gap, and your tacks have to be  
13 so far apart and that sort of thing. That is the concern  
14 with fit-up.

15 Q Do you recall when this incident occurred?

16 A Yes. It was about a month or two months before  
17 I was fired at Comanche Peak.

18 Q That would have been approximately March or  
19 April of 1982?

20 A Well, it may have been earlier than that, but  
21 when I say recently, when I am out there working day in  
22 and day out, you sort of lose the exact time, and I  
23 couldn't tell you, no.

24 Q Well, let's try and pin it down.

25 A There is a way that you can find out if you

Sim 1-12

1 are really interested in it though because that piece of  
2 iron that I was working on had a traveler on it, what they  
3 call a package, and everyone involved that welded on that  
4 iron, cut on the iron, drilled on the iron or moved that  
5 iron, his name is on that package.

6 Q And the date?

7 A Yes, it is. It is the North Valve Room in the  
8 Auxiliary Building and it is easy to find.

9 Q Okay. Well, let's call it the fit-up incident  
10 in the North Valve Room, okay, because then you and I know  
11 what we are talking about.

12 A All right.

13 Q The fit-up incident in the North Valve Room.  
14 Now you left the job at Comanche Peak I believe on May  
15 5th, 1982 Does that sound about right?

16 A It was May, yes, of 1982.

17 Q So this would have been sometime in early 1982  
18 approximately?

19 A I think so.

20 Q Could you tell me when you first found out  
21 you were going to be a witness in this current round of  
22 the proceedings here?

23 A Last week.

24 Q And was this the result of a phone contact  
25 by the intervenors?

Sim 1-13 1

A Yes.

2

Q At the time you were contacted, were you advised

3

that the subject of these current proceedings related to

4

harassment and intimidation of QC inspectors?

5

A Yes.

6

Q And did you feel at that time that you had

7

relevant testimony to give in these proceedings?

8

A The only one I knew of was this.

9

Q Was this incident in the fit-up room?

10

A Yes.

11

Q The fit-up incident in the North Valve Room?

12

A The North Valve Room, yes.

13

Q And you concluded at the time you were contacted

14

that this was relevant to the subject of harassment and

15

intimidation?

16

A Yes, because I saw the action of this young

17

QC hand, his reaction after came back to the room.

18

Q Well, let's get into that for a minute. Do

19

you know his name?

20

A No, but Comanche Peak has a photographic

21

personnel file and I would know him if I seen him, yes,

22

sir.

23

Q Do you know how long he had been employed as

24

a QC inspector?

25

A I had seen him there quite a while.

Sim 1-14

- 1 Q He had been there quite a while?
- 2 A Yes, he had.
- 3 Q So when you say young, you mean he was ---
- 4 A In age, not in duration of the job, no.
- 5 Q Did you review any documents in preparation for
- 6 your testimony here today?
- 7 A No, I sure did not.
- 8 Q Do you recall that you have testified previously
- 9 in these proceedings?
- 10 A Yes.
- 11 Q Let me see if I have got the chronology straight
- 12 here. You gave a deposition on July 2nd, 1982?
- 13 A I don't know.
- 14 Q Did you give a deposition in these proceedings?
- 15 A Yes.
- 16 Q Shortly after you left the job, a month or two?
- 17 A Something like that.
- 18 Q And shortly after you gave the deposition you
- 19 gave testimony before the Board, is that correct?
- 20 A That is true.
- 21 Q And then several days after that you gave
- 22 supplemental testimony?
- 23 A That is true.
- 24 Q And then approximately a year later you gave
- 25 an interview to an NPC person; is that right?

Sim 1-15

1 A That is right, Brooks Griffin.

2 Q And do you recall sometime in the fall of 1983  
3 testifying by way of an affidavit on behalf of the  
4 intervenor?

5 A I am not certain.

6 MR. BELTER: I am not certain either, Mr. Miles,  
7 and I don't want to ask you about documents that you haven't  
8 seen or reviewed.

9 BY MR. BELTER:

10 Q Are you aware that a document entitled "Affidavit  
11 of Stan Miles" was submitted to the NRC in a pleading on  
12 November 28th, 1983 unsigned, and I would like to show  
13 you that document?

14 (The document was shown by Counsel Belter to  
15 Witness Miles.)

16 And I will ask you if you have ever read it  
17 or executed such a document?

18 A Yes, I believe I have. I remember this  
19 question right here -- (Indicating).

20 Q Do you recall, and I specifically direct your  
21 attention to the end of the affidavit, whether or not you  
22 ever signed such an affidavit?

23 A I don't know if I have a copy of this. So I  
24 don't know.

25 Q Did you write that affidavit yourself or was

Sim 1-16

1 it written for you?

2 (Pause.)

3 A I did not write this myself, but I was questioned  
4 on this.

5 Q You can't recall executing it?

6 A I remember some of the questions. I remember  
7 the questions here, yes.

8 Q Thank you.

9 And lastly, Mr. Miles, do you recall submitting  
10 a handwritten statement dated January 22nd, 1984 witnessed  
11 by Mr. Jerry Ellis?

12 A Witnessed by Jerry Ellis.

13 (Pause.)

14 Q I will show you this.

15 (The document was shown by Counsel Belter  
16 to the Witness Miles.)

17 A Yes, that is my signature.

18 Q When you were contacted last week about the  
19 possibility of giving relevant testimony, in the first  
20 phone conversation did you immediately recall this  
21 incident, the North Valve Room incident?

22 A Yes. Like I said, that is the only one I knew  
23 of.

24 Q That is the only one you knew of.

25 A Right.



Sim 1-17 1

Q Had this incident ever been a concern of yours  
before?

3 A It was at the time that it occurred.

4 Q Do you think ---

5 A And I am talking about the day that it occurred.

6 Q The day it occurred.

7 A I wondered, you know, what was going on.

8 Q Mr. Miles, I am going to go back through briefly  
9 some of the previous statements that you made and ask you  
10 if you recall being asked certain questions.

11 For example, in your testimony before the Board  
12 on July 16th, 1982, do you recall being asked the following  
13 question, and I will show it to you if you care to see  
14 it?

15 "Question. And since your deposition, have  
16 you continued to try to recall all of the concerns you  
17 had about Comanche Peak?"

18 Do you recall being asked that question?

19 A Yes.

20 Q Do you know whether in that testimony before  
21 the Board on July 16th, 1982 that you mentioned the fit-up  
22 incident in the North Valve Room?

23 A No, I don't know as I recall that or not.

24 Q Would you accept my representation that you  
25 did not?

Siml-18

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A Well, that may be true.

Q Do you recall being asked a question on page 48 of that testimony?

"Question. You stated earlier that you thought Chuck Atchison was a good inspector. Is there anything further you would like to say about his work?"

Do you recall that question?

A No, but I have been asked that question many times.

Q Do you recall in your testimony before the Board in July of 1982 being asked the following question?

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

A I remember that, yes.

Q Could you tell me, Mr. Miles, why you didn't tell us about the fit-up incident in the North Valve Room back in July of 1982?

A Well, what we are talking about is five years of incidences, and I don't know. From time to time it is hard to remember all of them at one particular time.

Q You indicated to me that about a short time after you gave the first round of testimony before the Board that you filed supplemental testimony on July 19th, 1982. Do you recall that?

A Yes.

Sim 1-19

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Q And do you recall being asked in supplemental testimony the following question?

"Question. Is there any other concern you have remembered that you would like to tell us about?"

A I remember the question, yes, sir.

Q And would you agree with me that you did not in the supplemental testimony indicate any testimony about the fit-up incident in the North Valve Room?

A Yes, I agree with you that I didn't mention that.

Q And you did not mention it in your interview with Brooks Griffin in August of '83?

A I don't know if I told Brooks Griffin that or not. I know we talked at some length.

Q And you did not mention it in the handwritten statement of January 1984 that was witnessed by Mr. Jerry Ellis?

A No, I may not have.

Q Am I correct then that the first time you ever told anyone about this incident was in the first phone conversation you had last week with a representative of the intervenors who contacted you about testifying here this week?

A No, I talked to my foreman about it.

Q You talked to your foreman about it?

Sim 1-20

1 A When it happened, yes.

2 Q You were asked last week to recall the circum-  
3 stances of an incident that had happened almost three years  
4 ago; is that correct?

5 A That is right.

6 Q Have you ever written down your recollection  
7 of that incident anywhere?

8 A No.

9 Q Mr. Miles, it is not surprising that you would  
10 not remember a lot of the intimate details about it. So  
11 to test your memory, I am going to ask you a few questions  
12 along those lines.

13 A I know both of my welders were there.

14 Q Both of your welders were there?

15 A That is right, standing right beside me, one  
16 on each side.

17 Q Would you agree with me that if we asked them  
18 today about the incident that they might have the diffi-  
19 culties as you might have in recalling specific details  
20 of the incident?

21 A They may.

22 Q For example, do you know what color shirt the  
23 QC inspector that came back was wearing?

24 A No, of course not.

25 Q I would doubt that you would.

Sim 1-21

1 A I know both of the QC -- or not QC -- but I  
2 know both the CB&I hands, you know, that were doing the  
3 arc gouging.

4 Q You were never a QC inspector, were you?

5 A No, sir, I was not.

6 Q Do you recall whether this was in the morning  
7 or the afternoon?

8 A It was in the afternoon.

9 Q What period of time elapsed between the time  
10 the QC inspector first said I am going to stop this and  
11 when he came back?

12 A I would say within 20 minutes or 30 minutes.

13 Q Did he say anything when he came back?

14 A Not a word.

15 Q Can you tell me what procedure was violated  
16 by this action?

17 A No, I can't.

18 Q Have you ever read that procedure?

19 A No. I have just been told that by QC inspectors  
20 for several years.

21 Q Do you recall the name of the QC inspector?

22 A No, I do not.

23 Q Do you know whether this incident happened before  
24 or after Mr. Atchison ---

25 A It happened after.

Sim1-22

1 Q --- after Mr. Atchison -- you didn't let me  
2 finish -- after he left the job?

3 A Yes, it happened after he left the job.

4 Q What was the second incident that you described  
5 earlier and approximately when did that occur?

6 A Oh, I couldn't say.

7 Q What was involved in that incident that violated  
8 procedures?

9 A Impurities in the air.

10 Q There were impurities in the air which meant  
11 that ---

12 A Well, they were produced by personnel that  
13 were spraying this room with particles that became  
14 incorporated into the weld.

15 Q Do you recall making a statement in this  
16 proceedings previously describing such a similar incident  
17 about welding going on while there were impurities in the  
18 air? Is that the same incident you are talking about  
19 here?

20 Q Do you recall testifying in that incident  
21 that a QC inspector came by and stopped it?

22 A Yes, he did. Well, that is not really true.  
23 I think the General Foreman in Pipe stopped it and brought  
24 the QC in at the same time. He didn't want to be held  
25 responsible for the weld, of course.

Sim 1-23

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Q He knew that QC would stop it?

A Yes.

Q Now the incident that you have related here this morning, did this occur before or after the incident that you had previously testified about?

A It had occurred after.

Q Do you recall how long after?

MS. ROBINSON: Excuse me. I am confused about which incident.

THE WITNESS: He is talking about a pop-off valve room in the upper elevation.

MS. ROBINSON: And which incident did you say occurred first?

THE WITNESS: That pop-off valve room occurred first. This is some time before. I was even in a different period.

MR. BELTER: Help us to identify the second incident, the one that you described this morning. Where did it occur?

THE WITNESS: In the North Valve Room.

BY MR. BELTER:

Q And the only incident you are talking about is the North Valve Room incident?

A Yes.

Q Let me see if I understand you. I may have

Sim 1-23

1 misunderstood you earlier.

2 Your testimony a little while ago in response  
3 to Ms. Robinson's questions related to one incident in  
4 the North Valve Room; is that correct, sir?

5 A Yes.

6 Q There is no other incident that you have  
7 testified about earlier?

8 A Well, this one that you related to. You said  
9 the one prior to this.

10 Q Yes, the one about ---

11 A You mean the one about the particles in the  
12 room and everything?

13 Q Right. The one that you have already made  
14 a statement about before the Board.

15 A That is true, the concrete particles.

16 Q So just to be clear ---

17 A It is not the same as what you are saying?

18 Q No, no. Just to be clear, Mr. Miles, I am  
19 going to cross-examine you one hundred percent about every-  
20 thing you have said here.

21 A Okay.

22 Q I only need to talk to you about the North  
23 Valve Room incident; is that correct?

24 A Correct.

25 Q That is the only incident that came to mind



Sim 1-24

1 to you when you were advised that the subject of these  
2 hearings was harassment and intimidation; is that correct?

3 Q Well, that is the only one that I know that  
4 QC was harassed or I feel it was harassed.

5 Q That you feel it was harassed.

6 A Right.

7 MS. ROBINSON: Excuse me. I just want to make  
8 clear that this morning here today he described two  
9 different incidents, and only one of which ---

10 MR. BELTER: Counselor, you are testifying  
11 now. Your witness is answering the questions to the  
12 best of his ability and I don't want you putting words  
13 into his mouth.

14 MS. ROBINSON: I think the witness is confused  
15 about the questions that you are asking him. Since I  
16 can't discern exactly what you are asking him, I suspect  
17 he is having similar troubles.

18 MR. BELTER: I object to your trying to  
19 instruct him right now and educate him.

20 MS. ROBINSON: I am not trying to educate  
21 the witness.

22 MR. BELTER: Mr. Miles, I am not trying to  
23 confuse you at all, but you have testified today about one  
24 incident in the North Valve Room and one incident only.

25 MS. ROBINSON: You just wrote down on a piece

Sim 1-25

1 of paper that incident so that you could keep the two  
2 different incidents straight, and you said you are going  
3 to call one the North Valve Room and then you are going  
4 to call the other one something else.

5 MR. BELTER: Counselor, I object to your trying  
6 to educate your witness, and will you stop interrupting  
7 me?

8 MS. ROBINSON: I am not trying to educate the  
9 witness.

10 MR. BELTER: Are you confused, Mr. Miles?

11 MS. ROBINSON: I object to your attempt to  
12 confuse the witness.

13 THE WITNESS: In part.

14 MR. BELTER: Let's go back over it.

15 BY MR. BELTER:

16 Q How many incidents did you relate to me in  
17 response to Ms. Robinson's questions a little while ago?

18 A One.

19 MR. BELTER: Thank you.

20 And I am going to object vehemently if you  
21 try to tell him there are two again.

22 I appreciate your candor, Mr. Miles.

23 BY MR. BELTER:

24 Q This incident in the North Valve Room, can  
25 I summarize it in this fashion? In your opinion, a QC

Sim 1-26

1 inspector came in and saw something that he thought shouldn't  
2 be going on. He said I am going to put a stop to this.  
3 He left and 20 minutes later he came back and said  
4 nothing and the work is still going on.

5 A That is true.

6 Q Is that the sum and substance of it?

7 A That is true.

8 Q Did you ever have any conversation with this  
9 QC inspector about that incident?

10 A No, we never acknowledged anyone's existence  
11 in that room, except the pipefitter, and he turned his  
12 back towards us.

13 Q Did you hear any conversation directed towards  
14 that QC inspector?

15 A No, I did not.

16 Q Nobody shouted or yelled at him?

17 A No.

18 Q You don't know where he went for the 20 minutes  
19 that he was gone?

20 A No, I don't.

21 Q And you don't know who he talked to?

22 A True, I don't.

23 Q You don't know whether he looked up the written  
24 procedures that might be involved, for example?

25 A No, I don't.

Sim 1-27

1 Q And you don't know what those procedures are;  
2 is that correct?

3 A That is correct.

4 MR. BELTER: I have no further questions of  
5 the witness.

6 Thank you very much, Mr. Miles.

7 MS. ROBINSON: I have some questions.

8 EXAMINATION

9 BY MS. ROBINSON:

10 Q Mr. Miles, we were talking earlier today  
11 about an incident in the North Valve Room; is that  
12 correct?

13 A That is right.

14 Q I believe that you described that incident  
15 in response to my question about whether you personally  
16 observed any change in quality control inspectors'  
17 performance after Mr. Atchison was fired.

18 A This all took place in the same room.

19 Q All right. Do you remember that question?

20 A Yes.

21 Q And you did describe that incident in response  
22 to that question?

23 A That is right. This all happened within the  
24 same day.

25 Q All right. Then I believe that I asked you

Sim 1-28

1 a question about whether you had ever observed Mr. Atchison  
2 handle a similar situation in a different manner. Do you  
3 remember that question?

4 A Yes.

5 Q And do you remember your answer to that  
6 question?

7 A Yes. On several occasions he told helpers  
8 not to chip concrete, not to blow dust and not grind when  
9 a weld was being done and so on.

10 Q And so when I questioned you earlier today,  
11 you described for me first an incident which occurred in  
12 the North Valve Room?

13 A All of these incidences occurred in the North  
14 Valve Room.

15 Q Okay. And then the incident that you are talking  
16 about with Mr. Atchison and concrete chipping also occurred  
17 in the North Valve Room?

18 A And the grinding in that case.

19 Q All right, but those were two different  
20 incidences; is that correct?

21 A Correct, and preheat, but it is all happening  
22 in the North Valve Room. This is how he described it.

23 MS. ROBINSON: That is all the questions I  
24 have.

25

Sim 1-29

1 MR. BELTER: What did you mean by "he" in  
2 your last answer, Mr. Miles?

3 THE WITNESS: Yourself.

4 MR. BELTER: Myself.

5 THE WITNESS: Yes.

6 EXAMINATION

7 BY MR. BELTER:

8 Q You don't consider the earlier incidence  
9 involving Mr. Atchison an incidence of harassment and  
10 intimidation of QC inspectors, do you?

11 A No.

12 Q Just so we are clear, the incident of harassment  
13 and intimidation of QC inspectors is the later incident  
14 involving the other QC inspector in the North Valve Room?

15 A That is true.

16 Q And that is the only incident of harassment  
17 and intimidation that you are talking about?

18 A That is true.

19 MR. BELTER: I think we understand each  
20 other, Mr. Miles.

21 Thank you, sir.

22 (Whereupon, at 1:50 p.m., the taking of the  
23 Deposition of STANLEY G. MILES concluded.)

24  
25  
\_\_\_\_\_  
STANLEY G. MILES

CERTIFICATE OF PROCEEDINGS

This is to certify that the attached proceedings before the  
NRC COMMISSION

In the matter of: Deposition of STANLEY G. MILES

Date of Proceeding: Thursday, July 12, 1984

Place of Proceeding: Glen Rose, Texas

were held as herein appears, and that this is the original  
transcript for the file of the Commission.

Mary C. Simons

Official Reporter - Typed

*Mary C. Simons*  
Official Reporter - Signature