

# ORIGINAL

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the matter of:

TEXAS UTILITIES ELECTRIC  
COMPANY, et al

Docket No. 50-445-2  
50-446-2

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

Deposition of: Robert R. Taylor

Location: Glen Rose, Texas

Pages: 53,500 - 53,553

Date: Tuesday, July 17, 1984

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1 UNITED STATES OF AMERICA  
2 NUCLEAR REGULATORY COMMISSION

3 BEFORE THE ATOMIC SAFETY & LICENSING BOARD  
4

5 -----x  
6 In the matter of: :  
7 TEXAS UTILITIES ELECTRIC :  
8 COMPANY, et al. : Docket Nos. 50-445  
9 (Comanche Peak Steam Electric : 50-446  
: Station, Units 1 and 2) :  
10 -----x

11 Glen Rose Motor Inn  
12 Glen Rose, Texas

13 July 17, 1984

14 Deposition of: ROBERT R. TAYLOR  
15 called by examination by counsel for Intervenors  
16 taken before Suzanne Young, Court Reporter,  
17 beginning at 9:20 a.m., pursuant to agreement.  
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## 1 APPEARANCES:

2 For the Applicants Texas Utilities Electric Company,  
3 et al.:4 NICHOLAS S. REYNOLDS, ESQUIRE  
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I N D E X

WITNESS:

ROBERT TAYLOR

EXAMINATION BY:

MR. HICKS:	53,505
MR. REYNOLDS:	53,542
MR. MIZUNO:	53,548
MR. HICKS:	53,548
MR. MIZUNO:	53,550
MR. HICKS:	53,551
MR. REYNOLDS:	53,552

No Exhibits.

WILLIAMS HALLS  
 RESEARCH  
 SECTION COMMENT

P R O C E E D I N G S

1  
2 MR. MIZUNO: My name is Geary S. Mizuno, and I am  
3 the counsel for the NRC Staff.

4 MR. ROISMAN: My name is Anthony Roisman, and I'm  
5 counsel for the Intervenor, CASE.

6 MR. REYNOLDS: Nicholas Reynolds, counsel for  
7 Texas Utilities Generating Company.

8 MR. HICKS: Renea Hicks. I'm counsel for the  
9 State of Texas.

10 MR. ROISMAN: We have asked the NRC Staff to  
11 produce, and they have agreed to produce for this deposition  
12 this morning, Mr. Taylor, who is a former resident inspector  
13 at the Comanche Peak plant.

14 CASE, at this time, is waiving its direct  
15 testimony for the time being.

16 Thank you.

17 (Discussion off the record.)

18 MR. ROISMAN: I'm sorry. I should say waiving  
19 the direct examination.

20 MR. MIZUNO: Mr. Taylor is appearing today in this  
21 evidentiary deposition pursuant to 10 CFR Section 2.720(h)(2)i.

22 Mr. Taylor was identified in CASE's June 27, 1984  
23 letter to Leonard W. Belter, who is counsel for the  
24 Applicants in this proceeding.

25 The NRC Staff has agreed to voluntarily provide

1 Mr. Taylor for this evidentiary deposition. The scope of  
2 this deposition, as established by the Atomic Safety and  
3 Licensing Board, is limited to the taking of evidence and the  
4 making of discovery on harassment, intimidation, or a  
5 threatening of quality assurance/quality control personnel.  
6 With one exception, that being of Henry Stiner, allegations  
7 regarding harassment or intimidation of craft personnel have  
8 been specifically ruled by the Board to be beyond the scope  
9 of this proceeding.

10 In its June 27, 1984 letter, CASE identified the  
11 incidents and subject matters which it may wish to examine  
12 Mr. Taylor about. The NRC Staff does not agree with CASE that  
13 all of these incidents and subject matters are proper areas  
14 for examination in this proceeding.

15 The Staff has previously indicated its objection  
16 to the relevancy of some of the subject matters and reiterates  
17 that the quality assurance/quality control contention  
18 admitted by the Atomic Safety and Licensing Board relates  
19 to whether or not Applicants have complied with the  
20 requirements of 10 CFR Part 50, Appendix B in the design and  
21 construction of the Comanche Peak Steam Electric Station.

22 More specifically, with regard to the allegations  
23 concerning intimidation, the issue is whether there have been  
24 any incidents, actions or statements by Applicants and their  
25 subcontractors which have caused QC inspectors or other

1 personnel within the Applicant's QA/QC organization to fail  
2 to comply with the written provisions of the Applicant's  
3 QA/QC program and, moreover, whether such incidents or actions  
4 have become known to the Applicant's management.

5 It is the NRC Staff's position that the NRC Staff's  
6 response to allegations of intimidation or harassment of  
7 QA/QC personnel at Comanche Peak is outside the scope of the  
8 issues in this proceeding.

9 That is my statement.

10 I now present Mr. Taylor for his examination.  
11 Whereupon,

12 ROBERT R. TAYLOR

13 was called as a witness by the NRC Staff and, having been  
14 first duly sworn, was examined and testified as follows:

15 MR. HICKS: I believe the various responses to the  
16 relevancy argument have been stated several times on the  
17 record, so I won't repeat them now.

18 EXAMINATION

19 BY MR. HICKS:

20 Q For the record, would you state your name, please.

21 A My name is Robert G. Taylor.

22 Q How are you employed, Mr. Taylor?

23 A I'm employed by the Nuclear Regulatory Commission,  
24 Region IV, as a reactor inspector.

25 Q What are your duties as a reactor inspector?

XXXXXXX

1           A       I perform and assign inspections of construction.

2           Q       Could you go into a little more detail on what  
3 that is?

4           A       The NRC has a construction inspection program,  
5 documented program. It covers something like 83 areas.

6                    I am assigned, along with others, to inspect those  
7 areas in accordance with those documented procedures.

8           Q       What particular plants do you have under your  
9 responsibility?

10          A       I'm currently assigned to Wolf Creek Station in  
11 Kansas.

12          Q       Are you doing any work right now as to Comanche  
13 Peak?

14          A       Only relative to hearings.

15          Q       When did you leave -- when did you cease having  
16 responsibilities as to Comanche Peak?

17          A       I was officially reassigned January 22nd or 24th.  
18 The exact date I don't recall now. It's one of those two --  
19 in 1984.

20          Q       And since then, except as to testimony in matters  
21 related to the hearings, you have not had responsibilities  
22 for Comanche Peak?

23          A       I have conducted limited investigative-type  
24 inspections at Comanche Peak since my reassignment, all  
25 dealing with assorted issues that have come up in hearings.



1 Q Can you delineate what those issues are?

2 A Most of them are welding issues dealing with  
3 interpass temperature, weave welding, downhill welding,  
4 preheat temperatures for welding.

5 Q Since January of '84, have you done any work at  
6 Comanche Peak in regards to quality assurance/quality control  
7 program or questions of intimidation or harassment?

8 A I have not.

9 Q Just to make it a little easier on the reporter --  
10 I'm not criticizing you, but don't interrupt, because it's  
11 hard for her.

12 Prior to or up until your reassignment in  
13 January of '84, did you have responsibilities at Comanche Peak?

14 A I did.

15 Q What were those responsibilities?

16 A The responsibilities were to conduct routine  
17 construction inspections and conduct such investigations as  
18 the Region IV office assigned to me and to develop assorted  
19 testimonies for hearings.

20 Q What was your title?

21 A I was Senior Reactor Inspector-Construction.

22 Q How long did you hold that position?

23 A Under one title or another, since August 1978.

24 Q Under the different titles, were your duties  
25 essentially the same?

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A      They were indeed.

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1           Q           Can you go into a little more detail, as to  
2 what the duties of a senior reactor inspector/construction  
3 are?

4           A           Essentially the same as I outlined for the  
5 regular construction program. It is, again, a documented  
6 inspection program assigned to the resident inspector  
7 involving essentially examination of components, examination  
8 of procedures, examination of records of the plants.

9           Q           Is there no difference between the job you  
10 hold now -- I'm not talking in terms of a particular plant  
11 you are assigned to, but in terms of the duties that devolve  
12 upon you?

13          A           Essentially no differences other than in the  
14 resident position. You are in a far more intimate contact  
15 with the site personnel than you are if you are a non-resident.

16          Q           Do you actually have an office on the plant  
17 site?

18          A           I do indeed have an office on the plant site.

19          Q           What were your normal work hours, when you  
20 were the senior resident inspector?

21          A           7:30 a.m. to 4:00 p.m., five days a week.

22          Q           Can you tell me where your office was?

23          A           It was in the east end of the construction  
24 administration building.

25          Q           Are there other offices in that building?

sy21b2

1 A There are many other offices in that building.

2 Q Are the other offices in that building  
3 offices of the utility that is building the plant?

4 A Yes, sir.

5 Q And are there -- were there, when you were  
6 working there in that position, management offices there?

7 A Yes, sir.

8 Q Can you name some of the management offices  
9 that are along the hall going to your office?

10 MR. MIZUNO: Objection. What is the relevance  
11 of listing the kinds of management offices that were along  
12 the hall?

13 MR. HICKS: The relevance is that it has to  
14 do with, I guess you might say, the gauntlet that people might  
15 have to run if they walked to Mr. Taylor's office --

16 MR. MIZUNO: It hasn't been established that  
17 the people had to walk that hallway to get to Mr. Taylor's  
18 office.

19 BY MR. HICKS:

20 Q Could you go ahead and answer the question?

21 A I think I can. I know what you're getting at.  
22 The resident office consisted, in reality, of two offices.  
23 One with my, we will say, personal office and adjacent to it,  
24 and connected to it, was a small conference room. It was  
25 also used by any visiting inspectors that came from the

sy21b3

1 region. In the conference room there was an exterior  
2 door to the building. It allowed access into those two  
3 rooms without going through the rest of the building at all.

4 Q Would the exterior door have gone north-south  
5 or east-west?

6 A It went east. It was an east access door.

7 Q Was there another way of access to your office?

8 A There was also an access into the same room,  
9 the conference room via the -- a small office lobby and the  
10 hallway leading into the rest of the building.

11 Q Where did that hallway lead to?

12 A The hallway led -- I guess you could say in  
13 two directions. One of the directions was along the main  
14 corridor of the building, running east and west and then  
15 branching off of that was a shorter corridor running north  
16 and south.

17 Q Along the shorter corridor, running north and  
18 south, to the best of your memory, were there any management  
19 offices of the utility there?

20 A Mr. Hicks, if I answer your exact question,  
21 I am evading what you are asking for.

22 Q All right. First, answer my exact question  
23 and then I'll try to figure out how to keep it from being --

24 A Along the corridors, no, there were no  
25 management offices, to my recollection.

sy21b4

1 Q Were there any management offices near the  
2 corridors?

3 MR. MIZUNO: Objection. What do you mean by  
4 near? One mile?

5 BY MR. HICKS:

6 Q Would you like to answer the import of my  
7 question, since you better understand what it's about?

8 A I think I know what you're looking for and  
9 I will answer the question.

10 Adjacent to my office was the office of  
11 John Merritt, who is the, I believe now, the Assistant  
12 Project General Manager and during most of the time that I  
13 was on the station he was Engineering & Construction Manager  
14 for the utility.

15 And in the same general area was the office  
16 of Mr. Joe George, the Vice President and Project General  
17 Manager for Texas Utilities for that particular site.

18 Q Would people that did not come in through the  
19 exterior door that you mentioned, to the conference room,  
20 if they came in through the other door, have to pass by these  
21 particular offices?

22 A Yes, sir.

23 Q Can you think of any other management offices  
24 that they would have to pass by if they didn't come in through  
25 the exterior door, but instead came in through the interior

sy21b5

1 door?

2 A The only other one that I can think of was  
3 a period of time in which the office right outside of the  
4 management compound, for lack of a better term, was occupied  
5 by the procurement supervisor for Texas Utilities.

6 Q Do you know that person's name?

7 A It was Hicks, Dan Hicks.

8 Q Because I am not familiar with the plant, I  
9 will need to ask you, were these offices -- either your office  
10 or -- were these offices, either your office or the other  
11 offices, that these people would have to pass by if they came  
12 in through the interior door -- were they just doors or did  
13 they have windows into them, or were they open?

14 MR. MIZUNO: Objection. This line of  
15 questioning has gone on for quite a long time, regarding  
16 where Mr. Taylor's office was located. I would like counsel  
17 to explain the relevance of this line of questioning to the  
18 admitted issues in this particular proceeding.

19 MR. HICKS: I've already explained it.

20 MR. MIZUNO: I didn't hear an explanation.

21 MR. HICKS: Well, we can worry about it later.

22 MR. MIZUNO: No, I want the explanation on the  
23 record. I will allow the answers to go on, but I want you  
24 to state --

25 MR. HICKS: I've already stated the explanation.

1 If you have forgotten it, you can ask the court reporter  
2 to read it back to you.

3 MR. MIZUNO: What is that explanation? When  
4 did it occur?

5 MR. HICKS: The explanation occurred when you  
6 first objected.

7 MR. REYNOLDS: Mr. Hicks, why don't you  
8 indulge him with a restatement of your position.

9 MR. HICKS: Oh, I suppose I will, since I  
10 want to go home this afternoon.

11 This line of questioning concerns what people  
12 that are coming into Mr. Taylor's office, if they came in  
13 through the interior door, would have to walk by in terms of  
14 management offices.

15 MR. MIZUNO: That does not respond to my  
16 question. I asked you -- I understand what your line of  
17 questioning is about. I asked you to connect the subject of  
18 your line of questioning with the issue in the proceeding.  
19 That's what I have not heard yet.

20 MR. HICKS: The connection is that it has  
21 to do with possible obstacles that people may have felt to  
22 coming in to report matters to Mr. Taylor.

23 BY MR. HICKS:

24 Q Mr. Taylor, will you go ahead and answer the  
25 question now?



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1 MR. MIZUNO: Before I allow Mr. Taylor to  
2 answer that question, I want to make a statement that the  
3 State of Texas has not shown any direct connection, or even  
4 indirect connection to the issue in this case, which I  
5 have said at the beginning of this deposition is limited to  
6 the Applicant's QA/QC program and whether there has been  
7 intimidation of QC inspectors or other personnel within the  
8 QA/QC department.

9 And now, Mr. Taylor can go on and answer the  
10 question.

11 MR. HICKS: Before you answer, Mr. Taylor,  
12 let me go ahead and speak to Mr. Mizuno. Mr. Mizuno, I will  
13 recognize that you have a continuing objection to this  
14 particular line of questioning, as you indicated at the outset.  
15 If you feel the necessity to preserve it at each point, then  
16 I suppose you can interrupt every time I ask a question.

17 MR. MIZUNO: No, I will not.

18 BY MR. HICKS:

19 Q Would you go ahead and answer the question,  
20 if you can remember?

21 A I think the question related to doors and  
22 windows?

23 Q Yes.

24 A Mr. Merritt's door was frequently, perhaps  
25 50 percent of the time, open. When it was closed, it had

sy21b8

1 a window. If he were looking out the window, I believe he  
2 probably could have seen whoever was entering my office  
3 area.

4 In relation to Mr. George, his office in  
5 essence is, shall we say, backward for the purposes of the  
6 observation. His desk was not positioned where he could  
7 readily see out of his office window and see who was coming  
8 into my office, unless he made a special effort to do so

9 Q You mentioned one other person, I believe,  
10 that had an office along there?

11 A That would be Mr. Hicks. I believe he would  
12 have had great difficulty in discerning whether a party  
13 walking past his office was going to my office, or simply out  
14 the front door of the building.

15 Q Did he have a window?

16 A He had a window in his door. To clear that  
17 one up, every door belonging to the utility, exclusive of  
18 mine, has a window in it.

19 Q The eastern exterior door, was it marked as  
20 your door? Your office's door?

21 A It had a sign in the window that was the NRC  
22 official emblem.

23 Q And was it unlocked or kept locked?

24 A It was unlocked from the time I arrived in the  
25 morning until the time I departed in the evening.

1 Q But it was possible, I take it, for people  
2 coming into your office to come in either of the two doors,  
3 the interior or the exterior doors? They were open?

4 A That is correct.

5 Q When you were working, during your normal  
6 work hours at the plant, the resident inspector, did you  
7 travel out into the various areas of the plant regularly?

8 A Yes, sir, unless there was a higher priority  
9 task than doing the inspection program. I was in the buildings  
10 some part of every day.

11 Q What would be your purposes, when you would go  
12 out into these buildings?

13 A Observe the progress of construction, observe  
14 how the construction was being done, observe how the inspectors  
15 were doing their jobs, examining equipment to see if it was  
16 being properly installed.

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1 Q What would the observations consist of?  
2 Would you just watch people doing work?

3 A On occasion, yes; that was part of the  
4 program.

5 Q Would the observations be anything other  
6 than just watching?

7 A Oh, yes, the observations would be a  
8 detailed examination of the components as well.

9 Q When you would go out and make the  
10 observations, would you ever make say random visits with  
11 the people you were observing?

12 A On occasions, yes.

13 Q Would they respond to your questions or  
14 comment?

15 A Oh, yes; very freely.

16 Q How did you notify -- once you became the  
17 resident inspector how did you notify the employees at  
18 the plant site that you were there? Did you make any  
19 special notification?

20 A No, sir; there was no public address system  
21 and we didn't gather up 4,000 people and put me up on a  
22 podium to announce that I am there.

23 Q Did you put out any announcements in the  
24 company newspaper or post any notices around the plant?

25 A There was a long-standing notice inviting

1 people with concerns to contact the region and the  
2 region's number was provided.

3 Q Was the notice posted in the plant?

4 A Yes, sir.

5 Q Was this the forerunner of I think it is  
6 called NRC Form 3?

7 A Yes, sir.

8 Q And it was posted in the plant at the time  
9 you came in 1978?

10 A It was posted some six months before I  
11 came to the plant.

12 Q I'm sorry. At the time you came do you know  
13 where it was posted?

14 A Yes, sir. There was a large bulletin  
15 board on the opposite end of the building where my office  
16 was that had that notice posted on it.

17 Q Was that the only place you know in the  
18 plant that had it?

19 A That's the only one I am aware of now.

20 Q What did the notice consist of, to the  
21 best of your memory?

22 MR. MIZUNO: Objection. I would like  
23 counsel to state the relationship between the line of  
24 questioning that is occurring and notice to the workers  
25 about the NRC and the issues in this proceeding.

1 BY MR. HICKS:

2 Q Would you go ahead and answer my question?

3 MR. MIZUNO: Objection. I objected. I  
4 would like to know what counsel's statement is with  
5 regard to the relationship of his line of questioning  
6 regarding notifying workers of the presence of the NRC  
7 staff and the issues in this proceeding. I think I am  
8 entitled to an answer.

9 I will allow Mr. Taylor to continue  
10 answering your question.

11 MR. HICKS: It is the same reason I have  
12 stated twice before today.

13 MR. MIZUNO: Your reasons earlier were with  
14 regard to a line of questioning on the office. This is  
15 not involving the office. I would just note that I have  
16 an objection. If this continues then I will have to  
17 direct Mr. Taylor not to answer the questions and we will  
18 get on the phone with the Board.

19 BY MR. HICKS:

20 Q Would you go ahead and answer my question,  
21 Mr. Taylor?

22 A I don't recall the exact wording of the  
23 memorandums. It was like an open form letter to whom it  
24 may concern. Essentially it came down to expressing that  
25 if the workers, be they QC or be they craft, had a

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1 concern with the quality of the station in any way that  
2 they should contact the NRC at a phone number that was  
3 provided on the form.

4 Q Was that phone number your phone number?

5 A It was not. It was the region phone  
6 number.

7 Q Let me go ahead and finish. It is a  
8 little easier to make the record clear.

9 A I am sorry.

10 Q It was not your resident office phone  
11 number?

12 A It was not.

13 Q So the notice did not notify people that  
14 you were on site; is that correct?

15 A Not specifically, no.

16 Q Did you have any method for employees that  
17 might wish to talk to you to be able to talk with you  
18 confidentially?

19 A The best that I can offer is that I, along  
20 with all other NRC inspectors, typically wear a white  
21 hardhat that has our name and NRC on the side of it and  
22 the NRC official emblem on the front of it and we are  
23 literally a walking billboard when we are in the plant,  
24 and if someone wants to contact us all they have to do  
25 is walk up to us and tell us that they would like to

1 contact us and we will work out arrangements accordingly.

2 Q If anybody wanted to contact you and not  
3 do it in the presence of other people that are there at  
4 the plant, was there any method?

5 A If they knew my name by reading it off my  
6 hardhat they could have called me at home. That would be  
7 the only way that you could guarantee that they could  
8 contact me with no one else's knowledge but theirs and  
9 mine.

10 Q Did you ever make it known in any way that  
11 you were available in your off hours to talk with workers  
12 at home?

13 A No, I didn't at the time.

14 Q Just so I understand clearly, there was no  
15 number where people could call and request anonymity?

16 MR. REYNOLDS: Objection. Mr. Hicks,  
17 that was a leading question. I think it is the first  
18 that you have asked. I would like to know whether you  
19 are treating this witness as a hostile witness or not.

20 MR. HICKS: I am not.

21 MR. REYNOLDS: Then maybe you could  
22 rephrase that so you don't lead the witness.

23 BY MR. HICKS:

24 Q Was there any number other than your home  
25 number that people could call and request anonymity?



1           A           We have been there before, Mr. Hicks.  
2           The letter that was posted on the bulletin board  
3           contained the NRC original office phone number with an  
4           invitation to call collect. They certainly could use  
5           that phone number from an on site phone or they could,  
6           certainly use it from an off site phone.

7           Q           How long did that notice that you just  
8           referred to stay up?

9           A           In one form or another, be it the notice  
10          that was the memorandum to who had concern or the NRC  
11          form 3 I believe was there the entire period that I  
12          was there.

13          Q           Was it always just in the one spot or was  
14          it put in other spots?

15          A           No. As the NRC form 3 was promulgated  
16          it had by regulation it had a set of rules that indicated  
17          that the form had to be posted such that a person leaving  
18          the job site or entering the job site could see it.  
19          Thereby the bulletin board posting of the form took the  
20          place of the board that had previously been there.  
21          The boards were moved to the drive-in entrance gates and  
22          to the walk-in entrance gates.

23          Q           Do you recall when this new rule became  
24          effective?

25          A           I believe it was on the order of October

1 1983. It might have been October 1982. Now I can't  
2 really recall.

3 Q You wouldn't be surprised if it was  
4 October '82, would you?

5 A No, I wouldn't.

6 Q Do you recall preparing a report following  
7 an inspection that you did that noted that the form 3  
8 sign had been posted in January of '83?

9 A Yes, sir.

10 Q So if the rule was effective in October of  
11 '82, then there would have been a lapse of time during  
12 which it was not posted; is that correct?

13 A I couldn't establish exactly when it was  
14 posted. I could only establish that it was posted when  
15 I went to look, and I believe the report so states.

16 Q Would this have been something that in the  
17 normal course of your duties you would have noted?

18 A Ordinarily no, it is not part of the routine  
19 inspection package for resident or non-resident inspectors.  
20 The inspection was, shall we say, conducted specially by  
21 or motivated by allegations that had been made that the  
22 forms were not posted.

23 Q So that I understand, between October of '82  
24 and January of '83 then you don't know of your own  
25 knowledge if the form 3 was posted?

1           A       You are correct.

2           Q       Do you know -- well, I am sorry. I

3 apologize.

4                   Was it still posted up until you left the

5 plant?

6           A       Yes, sir.

7           Q       Mr. Taylor, do you know who Chet Atchison is?

8           A       Yes, sir.

9           Q       This week can you state who he is other

10 than his name?

11           A       He is now terminated for a period of about

12 two years; a former QC inspector, former training

13 coordinator, former document reviewer, former clerk.

14           Q       Were you present on site when he was

15 terminated?

16           A       It has been indicated by the dates that,

17 yes, I was.

18           Q       The way you stated that I am not clear.

19 You said it was indicated that you were.

20           A       Mr. Hicks, I will try and explain that.

21 My recollection is that Mr. Atchison was terminated on

22 the 12th of April of 1982 at some point during the day.

23 I have no knowledge of what that point during the day was.

24 My normal working day on April 12 -- and I was there from

25 7:30 until 4:00 o'clock. Now, if he was terminated before

1 4 o'clock, I was there. If he was terminated after  
2 4 o'clock I was not there.

3 Q At or near that time did you tell anybody  
4 connected with the utility something to the effect that  
5 referring to Mr. Atchison, "There goes your 1980  
6 alledger?

7 MR. MIZUNO: Objection. What time?

8 MR. HICKS: April 12, 1982.

9 THE WITNESS: No, sir, not on April 12, 1982.

10 BY MR. HICKS:

11 Q Did you tell anybody that at any time?

12 MR. MIZUNO: Objection. What is the  
13 relevance of this line of questioning to the issues in  
14 this proceeding?

15 MR. HICKS: It has to do with the same  
16 matters I have stated several times before.

17 MR. MIZUNO: What is the same matters? I  
18 keep hearing -- the first time I asked you this I asked  
19 you to state the relationship between the line of  
20 examination and issues in the proceeding you gave some  
21 statement; you never answered my question to you. And now  
22 you just keep referring back to this relatively nonsensical  
23 answer to my original objection. It is just not responsive  
24 to what I am asking you. I would like you to state for  
25 the record how your line of questioning relates to the

1 issues in this proceeding.

2 MR. HICKS: I have already stated it for  
3 the record to the extent that I am going to state it.  
4 If it is nonsensical, the record will reflect that it is  
5 nonsensical. You may make your argument when the time  
6 comes, if you want.

7 MR. MIZUNO: Okay. Please answer the  
8 question.

9 THE WITNESS: I identified Mr. Atchison  
10 to the utility -- precise words not recollected -- on  
11 the 13th of April.

12 BY MR. HICKS:

13 Q Who did you tell this?

14 A Mr. Tolson.

15 Q Did you tell anyone else?

16 A My recollection is no.

17 Q What was the occasion for your telling  
18 Mr. Tolson that?

19 A Mr. Tolson came to me on the morning of  
20 the 13th of April with two pieces of paper in hand,  
21 showed me the paper and indicated that he had terminated  
22 Mr. Atchison the preceding evening.

23 Q And what prompted you to tell him that  
24 Mr. Atchison was your 1980 allegor?

25 A I would have to say two things: one is that

1 prior, up to, and including 1982 our unwritten guidance  
2 on the anonymity issue was that we would shield the name  
3 of the person indefinitely so long as that person was  
4 employed on the site. As of the 13th Mr. Atchison was  
5 no longer employed on the site and Mr. Atchison was  
6 told that in 1980 that so long as he was employed on the  
7 site the NRC would not divulge his name and we did not.  
8 When he became unemployed the guarantee was gone.

9 Q Okay. You may have stated it and I just  
10 missed it, but when did that policy become effective?

11 A That policy was a verbalized -- I think for  
12 lack of a better term -- common sense policy that  
13 evolved in at least our region and probably in all the  
14 rest of the regions in the NRC. Just as an element, as  
15 I said, of common sense.

16 If a person was employed and he wished to  
17 make allegations that we would indefinitely, so long as  
18 he was employed, withhold his name.

19 Q You said that you notified Mr. Atchison  
20 of this in 1980.

21 A He was told that by my then supervisor  
22 on the basis of the first contact of Mr. Atchison with  
23 the Region IV office.

24 Q Who was that person?

25 A That person was William Crossman.

1 Q How do you know that Mr. Crossman told  
2 Mr. Atchison that?

3 A In accordance with our normal policy the  
4 person who receives allegations immediately documents the  
5 allegations and any commitments made therein.

6 Q So is there a written documentation of this  
7 notification?

8 A There is.

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4pbl

1 Q Would it be by Mr. Crossman?

2 A It was written by Mr. Crossman.

3 Q Would it be in a form of a memorandum to the  
4 file?

5 A That's my recollection. It's a memorandum  
6 to what we call the docket file.

7 Q It would have been dated some time near the  
8 time that Mr. Atchison contacted the NRC about his allegations?

9 A Yes, sir.

10 Q Was there anything written to your knowledge  
11 embodying this policy?

12 A No, sir.

13 Q And can you explain why, you say it's a common  
14 sense policy?

15 A Yes, sir.

16 Q Will you explain please?

17 A I will try to. If there is an allegor who  
18 is employed on the site, be it a construction site or an  
19 operation site, who contacts the NRC, we do not wish to  
20 allow anyone either of the licensee or the agent contractors  
21 to be able to take punitive measures against the allegor.  
22 The best way to do that, we believe, is to not notify  
23 anybody who he is.

24 Once he leaves the site, the employer doesn't  
25 have much in the way of retribution that he can make.



4pb2

1 Q Well, is it common practice, in your experience,  
2 that the very day after someone has made an allegation leaves  
3 employment that you notify the company against which the  
4 allegations have been made that that was the allexer?

5 A I cannot say it's common practice. To my  
6 knowledge, the only incident in which it occurred was in  
7 regard to Mr. Atchison.

8 Q So I take it, during your time as senior  
9 resident inspector of construction at Comanche Peak, Mr.  
10 Atchison was the only employee that had made an allegation  
11 that was terminated?

12 MR. MIZUNO: Objection. That was not -- I  
13 didn't hear that --

14 MR. REYNOLDS: It's also a leading question.

15 MR. MIZUNO: Yes. I did not hear that from  
16 Mr. Taylor's statement.

17 BY MR. HICKS:

18 Q During your employment as senior resident inspector for  
19 construction at Comanche Peak during the time periods you've testified  
20 you were there, were there any other allexers at Comanche Peak?

21 MR. MIZUNO: Objection. The only -- well,  
22 it was asked and answered. I can't do anything at this  
23 point.

24 MR. REYNOLDS: Mr. Mizuno, I would suggest  
25 that you instruct your witness to pause before he answers

4pb3

1 so that you have an opportunity to object.

2 THE WITNESS: Noted.

3 BY MR. HICKS:

4 Q Were you aware of any of these allegeders  
5 having been terminated after having become allegeders?

6 MR. MIZUNO: Objection. The only allegeders  
7 which are at all relevant to this issue are allegeders who were  
8 QC inspectors or other QA personnel, and certainly not  
9 craftsmen, with the exception of Mr. Stiner. So therefore,  
10 any broad questioning regarding the allegeders in general  
11 would not be appropriate.

12 Do you see any way to be witness to answer?

13 BY MR. HICKS:

14 Q Yes. Would you please answer the question?

15 A There were other persons who made allegations  
16 who were terminated. But for the most part, to the best  
17 of my recollection what I would call more routine terminations,  
18 such as reduction in force, transfers from one section to  
19 another, such as within Brown & Root there are other  
20 contracts besides Comanche Peak. And on occasion, a person  
21 would transfer off-site to another job.

22 That is a termination within the Comanche  
23 Peak site.

24 Q Well, did you notify the utility at that  
25 time, or the employer at that time that that person was an

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4pb4

1       alleger?

2                       MR. MIZUNO:  Objection.

3                       MR. REYNOLDS:  That one has been asked and  
4       answered.

5                       BY MR. HICKS:

6               Q        Would you answer it again please?

7                       MR. REYNOLDS:  He's already answered it,  
8       Mr. Hicks.

9                       BY MR. HICKS:

10              Q        Would you answer it again?

11              A        Mr. Hicks, I have said already that the only  
12       time that the divulgence of an alleger's name to the utility  
13       came about was in regard to Mr. Atchison.

14              Q        What was different about Mr. Atchison's  
15       termination that led you to notify the employer that he was  
16       an alleger after he was terminated, than the other allegers  
17       who were terminated?

18              A        An impression of the lack of sincerity on  
19       the part of Mr. Atchison.

20              Q        Did you convey your impression of his lack  
21       of sincerity to Mr. Tolson?

22              A        I did not.

23              Q        Did you convey it to anyone?

24              A        I did not.

25              Q        And you are talking about the lack of sincerity

4pb5

1 in his allegations of 1980?

2 A That is correct.

3 THE WITNESS: Could we take a short break?

4 (Recess.)

5 MR. HICKS: Back on the record.

6 BY MR. HICKS:

7 Q Mr. Taylor, when you told Mr. Tolson on  
8 April 13th about Mr. Atchison, as you've already testified,  
9 did Mr. Tolson say anything to you?

10 A My recollection is no.

11 Q There was no response at all?

12 A No.

13 Q Do you recall during your employment there a  
14 quality control inspector named -- it may have been Susie  
15 Stockdale at that time, now known I think as Susie Neumeyer?

16 A I do.

17 Q Do you recall ever meeting with her in your  
18 office?

19 A I do.

20 Q Do you recall about when you met with her?

21 A Well, I have to put it into a very broad  
22 time frame, but it would have been, we'll say in the fall  
23 of 1983.

24 Q September of '83 would not be an outrageous  
25 guess?

4pb6

1           A           It would not be an outrageous guess.

2           Q           Do you recall the subject of the meeting with  
3 her?

4           A           Yes. I specifically had her sent to my  
5 office. She wasn't, shall we say, voluntarily coming.

6           Q           Let me interrupt for just a second -- I'm  
7 sorry.

8           A           I was in the process of investigating a  
9 concern by the Board in the initial decision of July 1983  
10 regarding an allegation by Henry Stiner relating to his  
11 termination for reporting a gouge in the pipe.

12                       The transcript contained Susie Neumeyer's  
13 name. For a period of time, it puzzled me because I had a  
14 roster of the people or inspectors on-site. There was no  
15 Susie Neumeyer in the log of people that were QC inspectors.  
16 I subsequently determined that she had remarried and the  
17 name had previously been Stockdale, which it was indeed in  
18 the roster.

19                       I asked her to come to my office, showed her  
20 the transcript pages that were involved where Henry was  
21 testifying, asked her if she could recollect the gouge  
22 incident. She did. I asked her at that point if she could  
23 help me in locating where that gouge had occurred. She  
24 related that it had occurred in a pump room in safeguards  
25 1 building. To the best of her recollection that it had

4pb7

1       been in the north pump room.

2                       And I asked her to go down and show it to  
3       me. She said that she was wearing a back brace, that she  
4       had recently had back surgery, and that there were only  
5       straight vertical ladders going down into those particular  
6       pump rooms at that point in time, and that she didn't wish  
7       to go down those ladders. At that point she was excused.

8                       Q       Did you ask her during that meeting with  
9       her in the fall of '83 if she had written up a report on the  
10      gouge incident?

11                      A       I did. I asked her for the type of reports,  
12      since there were several available to her. She couldn't  
13      remember whether she had written an non-conformance report  
14      or some other report.

15                      Q       Did you subsequently discover a report relating  
16      to that matter?

17                      A       I did. I found a non-destructive examination  
18      report which described the gouge in detail.

19                      Q       When did you discover that report? The  
20      non-destructive examination report.

21                      A       Within a matter of a few days after I had  
22      talked to Mrs. Neumeyer.

23                      Q       Did you at any time call that to the attention  
24      of the licensing board?

25                      A       I did indeed.

4pb8

1 Q When did you do that?

2 A During one of the hearings, I don't remember  
3 precisely which one, in which Henry was testifying. Some  
4 time in the early part of '84.

5 Q Possibly March of '84?

6 A Possibly.

7 Q Did you feel any need to notify them any  
8 earlier?

9 MR. MIZUNO: Objection. What does notifying  
10 the licensing board of this NDER have to do with Mr. Stiner's  
11 allegation? Or for that matter, Susie Neumeyer's writing  
12 of this NDER?

13 MR. HICKS: Strike the question.

14 BY MR. HICKS:

15 Q To the best of your recollection, does the  
16 NDER relate directly to this one gouge incident?

17 A It does.

18 Q And just to try to get it clear on the  
19 record, what is the difference between an NCR and an NDER?

20 A Mostly one of application. An NDER is  
21 typically used to document the accomplishment of a  
22 non-destructive examination. A visual inspection being one  
23 of those non-destructive examinations.

24 The document can be accepted or it can be  
25 rejected. If it's a reject, there's a description of why

4pb9

1 it is rejected.

2 Q While you were senior resident engineer, did  
3 you --

4 MR. MIZUNO: Excuse me, that's not what he  
5 was at the site.

6 BY MR. HICKS:

7 Q I'm sorry, senior resident inspector for  
8 construction, my apologies.

9 Did you form any opinion from your experience  
10 there as to whether employees on the site were hesitant to  
11 cooperate with the NRC because they were afraid they would  
12 be fired by their employer?

13 MR. MIZUNO: Objection, I will allow Mr.  
14 Taylor to answer the question, but I would state for the  
15 record that the answer to that question is not relevant to  
16 the issues in this proceeding. Mr. Taylor, please answer the  
17 question.

18 THE WITNESS: I was aware that most of the  
19 hourly personnel in particular probably were fearful of  
20 approaching me or coming to my office.

21 BY MR. HICKS:

22 Q For what reason?

23 A Fear of termination.

24 Q So if your co-workers, Mr. Herr and Mr.  
25 Driskill said something to that effect, you would agree with



4pb10

1           them; is that correct?

2                   A           I would.

3                   Q           When you would receive complaints or allegations  
4           from workers, typically how would you go about addressing  
5           them?

6                               MR. MIZUNO:  Objection.  Again, I have a  
7           continuing objection on this line.

8                               THE WITNESS:  Shall I answer?

9                               MR. MIZUNO:  Yes.

10                              THE WITNESS:  Ordinarily, a memorandum for the  
11           record would be prepared.  My Region IV office would be  
12           notified.  And on their direction I would or would not  
13           address them.

14                              Frequently, the allegations would be of a  
15           nature that our investigative arm would be more capable of  
16           addressing them than I would.  And they could be assigned  
17           then.  Also, there would be situations in which I had  
18           eminently higher priority work at that point in time, and  
19           other people from the Region office could be assigned to  
20           investigate them.

21                              I only investigated allegations when ordered  
22           to by Region IV.

23                   Q           When you were ordered to, what would you do?

24                   A           I can really only take it on a case basis.  
25           It depends on the exact nature of the allegation and how

4pb11

1 much information I have to work with.

2 Q If there was an allegation of intimidation  
3 or harassment, how would you handle that?

4 A I was never assigned to investigate allegations  
5 of intimidation or harassment.

end 4.

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1 Q Were you ever assigned to investigate  
2 any allegations regarding the quality assurance/quality  
3 control program at the plant?

4 A Again you have to take that on a case  
5 basis. In one form or another most allegations related  
6 in some way to the QA/QC program.

7 (Pause.)

8 Q When you were reassigned in January of  
9 '84 that you testified to earlier, was there any  
10 communication to you from the NRC about the reasons for  
11 your reassignment?

12 A I testified to that, Mr. Hicks, already.  
13 The answer is no.

14 Q In no form?

15 A In no form.

16 MR. HICKS: I have no further questions.  
17 Oh, I'm sorry. Strike that. I have one.

18 BY MR. HICKS:

19 Q I am not sure it is clear on the record.  
20 Earlier, when you were testifying about Susie, now  
21 known as Neumeyer, coming to your office in the fall of  
22 '83 you had said something about the voluntariness of  
23 her coming and I am not clear -- I had asked you -- I  
24 intended to ask you what you meant by that and I am not  
25 certain that the answers you gave me were intended as

1 your answer to that question.

2 What did you mean by your reference to the  
3 voluntariness of her coming?

4 A I meant that I instructed -- I don't  
5 recall exactly whom --

6 Q Could it be Mr. Cromeans?

7 A I instructed Cromeans to have her located  
8 and sent to my office.

9 Q Okay. So you meant by not voluntary that  
10 she just had not shown up yet?

11 A No. I had asked her to come to my office.  
12 She didn't ask me to be allowed in for her to come to my  
13 office.

14 Q Okay. I understand now.

15 MR. HICKS: I have no further questions.

16 MR. REYNOLDS: Could we take a 10-minute  
17 recess, Mr. Mizuno?

18 MR. MIZUNO: Yes.

19 (10-minute recess.)

20 EXAMINATION

21 BY MR. REYNOLDS:

22 Q Mr. Taylor, Mr. Hicks asked you earlier  
23 about the location of your office; do you recall that  
24 testimony?

25 A Yes, sir.

XXXXXXX  
XXXXXXX

1 Q In your opinion, did your office location  
2 ever hamper you in the performance of your duties?

3 A I believe it would reflect quite the  
4 contrary. It aided me.

5 Q How so, sir?

6 A Being within the construction administration  
7 building gave me easier access to specification files,  
8 drawing files, management level people than had I been  
9 out in, as an example, the remote building, the office  
10 trailer, or something of this nature.

11 Q Did anyone ever express to you a reluctance  
12 to visit you because of your location?

13 A To me, no.

14 Q Well, to anyone else that you know of?

15 A I have heard by hearsay that that type  
16 of statement has been made to our investigators.

17 Q Did you ever consider the need to move the  
18 location of your office?

19 A I didn't pick the location of the office  
20 and to have moved the office would have required  
21 Region IV direction, assistance and money.

22 Q Did you see any need to move the office?

23 A No, sir.

24 Q Mr. Taylor, you stated earlier that you  
25 perceive that most hourly personnel were fearful of

1 approaching you due to fear of termination. Do you  
2 remember a statement to that effect?

3 A Yes, I do.

4 Q Sir, do you know of anyone who was  
5 terminated for talking to you?

6 A No, sir, I do not.

7 Q Well, do you have any basis for your  
8 observation about most hourly personnel were fearful of  
9 approaching you?

10 A I believe so, a reasonable basis.

11 Q What would that be?

12 A As an example, at one time the Brown & Root  
13 assistant project manager whose name was Charles  
14 Scruggs, had a nickname, "Two-check." The nickname was  
15 derived from a series of events that Mr. Scruggs  
16 accomplished, like walking through the facility, seeing  
17 someone in the craft that he didn't believe was working  
18 to his full performance level, walking up to him, firing  
19 him on the spot, and having his withheld pay check given  
20 to him literally as he walked out the door.

21 Q Would that relate to QC inspectors?

22 A Negative.

23 Q To whom would it relate?

24 A Only to craft.

25 Q I'm not sure how I understand how that

1 connects up with the basis for your observation that  
2 hourly workers were fearful of approaching you. Could  
3 you help me understand that?

4 A I will try. Only by the fact that the  
5 Comanche Peak site as well as most of the large  
6 construction sites in the South are open shop. There  
7 is no employee protection as in union jobs. A worker  
8 can be terminated on the spot, literally at the whim of  
9 his foreman and general foreman.

10 Q So, in other words, and I don't mean to put  
11 words in your mouth, so please, if I misstate this in  
12 your view, say so.

13 The fear that the hourly personnell may  
14 have had was more related to the fact that if they  
15 approached you they wouldn't be out doing their job  
16 rather than the fact that you were Mr. NRC on site; is  
17 that your point?

18 A No, I'm afraid not.

19 Q Okay. Please help me then.

20 A The craft workers at Comanche Peak and  
21 many otr places have literally no protective mechanisms  
22 that many of us who, as an example, work for the government  
23 or who work for private long-term firms. I don't know  
24 exactly how to say that. But have standardized employment  
25 practices that require multiple levels of review before a

1 person is disciplined or terminated. The cycle in most  
2 of the nonunion construction shops simply involves a  
3 foreman's decision that he wishes to terminate someone for  
4 some reason, and it is accomplished almost immediately.

5 Q Well, would the perceived fear of the hourly  
6 personnel of approaching you be due to the fact that you  
7 were the NRC resident inspector or simply because it was  
8 not within their normal job scope to be talking to someone,  
9 anyone, whether it is an NRC person or someone else?

10 A It could be both. It could in fact be both.  
11 A craft person, as an example, who left his normal work  
12 area, wherever that may be, and journeyed to my office is  
13 out of his work position and upon being noticed out of work  
14 position by a foreman as an example, the man would be  
15 subject to immediate termination.

16 Q Regardless of whether he is talking to you  
17 or going to the head?

18 A That's right.

19 Q I guess that is why the Region IV telephone  
20 number is so important to be posted?

21 A That's correct.

22 Q Do you believe that this fear that you  
23 perceive in hourly personnel was a reasonable fear?

24 A Not entirely. If the craft persons had in  
25 fact contacted the NRC, the NRC and/or me would have to



1 a degree protected the person and he probably could have  
2 lost some of his fear of being terminated.

3 Q I think I asked you this, but I will ask it  
4 again to be sure it is on the record. Do you know of  
5 anyone who was terminated for talking to you?

6 A No, sir, I do not.

7 Q Do you know of anyone who was disciplined  
8 for talking to you?

9 A No, sir, I do not.

10 Q Do you know of anyone who was discouraged  
11 from talking to you by management or applicants?

12 A No, sir, I do not.

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MR. REYNOLDS: I have no further questions.

EXAMINATION

BY MR. MIZUNO:

Q Mr. Taylor, just one question: Did you have any QC inspectors approach you or any other QA personnel approach you and indicated to you that they had been intimidated or harassed?

A No, sir.

MR. MIZUNO: No more questions.

EXAMINATION

BY MR. HICKS:

Q You testified, in answer to a question from Mr. Reynolds, that you didn't pick the location of your office. Who did?

A My management.

Q Did they do it in consultation with the utility?

A Yes, sir.

Q Do you know which actually made the decision as to where they office would be?

A Yes, sir. I was present.

Q Which was it?

A The person?

Q Yes.

A The person at the time was my NRC Branch Chief in Region IV, Mr. Sidell, accompanied by his immediate

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XXXXX

1 subordinate section chief, Mr. Crossman, and by me.

2 Q And who, with the Applicant, did they consult?  
3 Or did you all consult?

4 A My recollection is that it was Joe E. George.

5 Q Also, in answer to a question from Mr. Reynolds --  
6 and tell me if I am paraphrasing this incorrectly, but I  
7 believe you said that you didn't know of anyone who was  
8 discouraged by management from talking with you. Is that a  
9 fair paraphrase of that part of your testimony?

10 A Yes.

11 Q When you say you don't know of anyone that was  
12 discouraged, can you go into a little more detail of what you  
13 mean by "discouraged"?

14 A I was answering your question. I would have to  
15 take the question to mean am I personally aware, by having a  
16 person tell me that he had been discouraged from talking to  
17 me.

18 It isn't likely that management is going to come  
19 and tell me that they discouraged someone. So, the only way  
20 that I could become privy to that information would be from  
21 the party who was discouraged. And this didn't occur.

22 Q That answer was not based on your observation of  
23 management actions; is that correct?

24 A No, sir, it was not.

25 MR. HICKS: I have no further questions.

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## EXAMINATION

BY MR. REYNOLDS:

Q Mr. Taylor, what is your perception as to management's attitude towards someone who might come to you?

A My perception is that management, in many ways, was more fearful of how I might react if they took retaliative measures on a person than they would be fearful of the allegations themselves.

Q That implies that management has a hands-off policy only because they feared you. Is that what you mean to imply?

A Not entirely. Realistically, however, I cannot predict how management would have reacted under different circumstances, because the circumstances were never different.

Did I make myself clear?

Q Yes, I think I understand what you're saying.

MR. REYNOLDS: Nothing further.

## EXAMINATION

BY MR. MIZUNO:

Q Mr. Taylor, have you ever observed any utility manager, supervisor, or any of the subcontractors of the utility at Comanche Peak discouraging a QC inspector or other QA Department personnel from going to the NRC?

A No.

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1 MR. MIZUNO: That's all.

2 MR. HICKS: I have another question.

3 EXAMINATION

4 BY MR. HICKS:

5 Q Again, in answer to a question from Mr. Reynolds,  
6 you said that it was your perception -- and I'm going to have  
7 a difficult time, I think, paraphrasing this, so please  
8 correct me if I do it incorrectly -- it was your perception  
9 that management was more fearful of NRC's reaction to --

10 A May I help you? I used the word "retaliation."

11 Q Okay.

12 Can you paraphrase your testimony on that once  
13 again?

14 A I will try.

15 Redo what I said, or exp'ain what I said?

16 Q Explain what you said, because that's going to  
17 be ultimately my question.

18 A Okay, we'll just get down to the bottom line then.

19 Any retaliative measures that, generally speaking,  
20 the contractors would have made against one of their  
21 employees, barring the knowledge of the NRC, would ordinarily  
22 be a very private affair between the company and the person.

23 With the NRC knowledge of the item, two courses  
24 could have taken place: One, NRC management could have,  
25 publicly or through legal measures, taken action; or the

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1 other measure is that an inspector documents the condition  
2 that he has observed, and it goes into the public record.  
3 And ordinarily, our Licensees -- and I don't necessarily want  
4 to pick on the Licensee at Comanche -- don't like the NRC  
5 putting in the public record negative declaratory information  
6 of that nature. It damages their regulated image.

7 Q That is your perception of the situation?

8 A Yes, sir.

9 Q And it's based, I take it, on your experience at  
10 this plant and other plants?

11 A Yes, sir.

12 Q Is this your perception based on anything else?

13 A No.

14 Q Were there any specific incidents or comments made  
15 to you?

16 A No, not by the utility; no, sir.

17 MR. HICKS: I have no further questions.

18 EXAMINATION

19 BY MR. REYNOLDS:

20 Q Mr. Taylor, I'm a little confused by your answer.  
21 Do you mean to say that the regulated companies  
22 would rather take care of their own problems than have the  
23 NRC cite them for something; is that the point?

24 A If they can, yes, sir.

25 Q In other words, they would rather have it

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1 documented on an NCR and address the issue internally than  
2 have the NRC come swooping in and say, "You have a problem  
3 here"?

4 A Yes, sir.

5 Q That is logical.

6 Sir, do you know of any retaliation by management  
7 against anyone who sought you out or sought anyone from the  
8 NRC out?

9 A I do not.

10 MR. REYNOLDS: I have no further questions.

11 MR. MIZUNO: No questions.

12 MR. REYNOLDS: Mr. Hicks, this is your last round.

13 MR. HICKS: I have no further questions.

14 (Whereupon, at 10:48 a.m., the taking of the  
15 deposition was concluded.)

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16  
17 Robert R. Taylor  
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CERTIFICATE OF PROCEEDINGS

1  
2  
3 This is to certify that the attached proceedings before the  
4 NRC COMMISSION

5 In the matter of: Texas Utilities Electric Company, et al  
Deposition of Robert R. Taylor

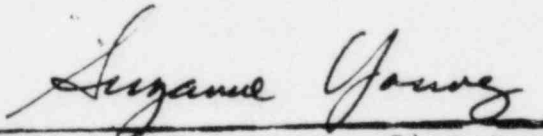
6 Date of Proceeding: Tuesday, July 17, 1984

7 Place of Proceeding: Glen Rose, Texas

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

10  
11 Suzanne Young

12 Official Reporter - Typed

13   
14 Official Reporter - Signature