



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

*Paton*

December 2, 1980

MEMORANDUM FOR: Chase R. Stephens, Chief  
Docketing and Service Branch  
Office of the Secretary of the  
Commission

FROM: William D. Paton  
Office of the Executive  
Legal Director

SUBJECT: INFORMATION RE COURT REPORTER REQUESTED OVER PHONE  
BY BRADLEY JONES ON 12/2/80

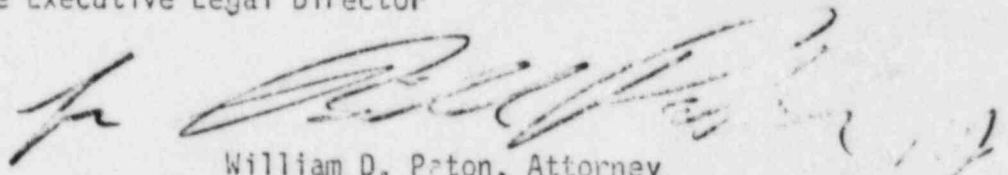
Depositions

December 9, 10 and 11

December 9 - 1:00 pm - 5:00 pm  
December 10 - 9:00 am - 5:00 pm  
December 11 - 9:00 am - 5:00 pm

At: Bechtel Associates Professional Corporation  
777 East Eisenhower Parkway  
Ann Arbor, Michigan

For: William D. Paton  
Office of the Executive Legal Director  
Ext. 27543



William D. Paton, Attorney  
Office of the Executive Legal Director

\* Note: There is a possibility that the depositions could run over into  
December 12.

8406070215 840517  
PDR FOIA  
RICE84-96 PDR

Subject: Midland - Suggested Witnesses for Deposition

no long - too lack of change  
meet with  
off

Name                      Position                      Purpose                      Est. of Time for Deposition

①  
Walter Ferris  
Tentative  
Prepare Dec. 8 & 9  
Deposition Dec. 10

Chf., Geot. Engr.  
(S. Afifi, Supervisor)  
San Francisco Office

- Determining performance criteria of proposed remedial measures
- Understand Bechtel's recommendations for meeting NRC request of June 30, 1980.
- Determining actual involvement of Bechtel Consultant.
- Understanding Bechtel's former plans for rearch samples in cooling pond area.
- Bechtel's previous experience w/ surcharging.

1 1/2 day

James Wanzek

Coordinator between  
Construction & Geot. Services  
of Bechtel Corp.  
(Ann Arbor Office)

- ~~Attempt to understand why fill was poorly compacted & why compaction criteria issue was unresolved for so long a period of time.~~

1/2 day

③-

②  
B. Dahr

Civil Engineer (Structural)  
Bechtel - Ann Arbor

- Is responsible for grouting voids below foundations
- Responsible for problems of conduit & pipe settlements
- Responsible for input into dynamic analysis
- Knowledge of settlement calculations on pile & caisson fndns.

1 1/2 days  
- about an  
when

Bej

We have  
conceptual  
only

~~Bechtel will have~~ Structural

- Knowledge of settlement calculations on pile & caisson fndns. How handled in structural analysis
- Should be knowledgeable on structural analysis that evaluate effect of cracking

They are moving  
doing - but  
old no  
we

③  
P.A. Martinez

Project Manager  
Bechtel - Ann Arbor

- Responsible for assuring that loose natural sands were removed as committed to in the PSAR
- Understand why input provided by S. Afifi (e.g. resolution of compaction criteria, shear wave velocity) was not incorporated into Bechtel design

1 day  
- would done

former  
"Bechtel's soul"

- Understand Bechtel's system for determining what soil parameters are needed and who determines
- ~~Understand position of responsibility only to questions & not freely meeting~~

affiliated  
reports

Dahl questions.

has attended all NRC depositions so far

Name Position Purpose Est. Time for Deposition

Joe Kane - Thiru-Thiruvengadam Civil Engr. Cons. Power Co

Understand his involvement in not accepting Bechtel's recommendation for fulfilling NRC request

1 1/2 day

Consumers Joe Kane

~~at Bechtel's Super site~~  
~~Thiru-Thiruvengadam Super site~~  
~~Cons. Power Co.~~  
(Stephen Howell?)

Understand CPCo position to respond only to NRC request rather than SRP & R.G.

1/2 day

END

top management nuclear

Understand his involvement not to accept Bechtel's recommendations

Legal status between Bechtel + Consumers + impact

TEAM  
Ralph Peck - surcharge + pressure oil fixes  
Bechtel Consultants  
Alfred J. Hendron Jr. - surcharge "

- Understand their involvement with each remedial fix

1 day each

M. Thomas Davison - service water structure piles design

- Determine their expert opinions on adequacy of proposed fixes

C.H. Gould - gas-die Co. incense

- Establish the basic geot. engr & fldm. engr. information that is needed for each of the fixes & determine if & when this information is to be provided to the NRC

1/2

R.D. Woods - general  
FIRST  
most adverse comments on the fill

1/2

1/2

order hrs. (circled)

~~Howell (Joe K depositions)~~

~~120 hrs~~

8 1/2 hrs

P.D.  
possible top management (only for specific) 1/2 day

