

Official Transcript of Proceedings
NUCLEAR REGULATORY COMMISSION

Title: Georgia Power Company: Vogtle Electric
Generating Plant: Unit 1 and Unit 2

Docket Number: 50-424-OLA-3; 50-425-OLA-3
ASLBP No.: 93-671-01-OLA-3

Location: Rockville, Maryland

Date: Thursday, September 14, 1995

Work Order No.: NRC-322

Pages 13826-14056

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1 UNITED STATES OF AMERICA
2 NUCLEAR REGULATORY COMMISSION

3 + + + + +

4 ATOMIC SAFETY AND LICENSING BOARD

5 HEARING

6 -----X

7 In the matter of: : 50-424-OLA-3
8 GEORGIA POWER COMPANY, et al. : 50-425-OLA-3
9 : Re: License Amendment
10 (Vogtle Electric Generating : (transfer to
11 Plant, Unit 1 and Unit 2) : Southern Nuclear)
12 : ASLBP No.

13 -----X 93-671-01-OLA-3

14 Thursday, September 14, 1995
15 Hearing Room T 3B45
16 Two White Flint North
17 11545 Rockville Pike
18 Rockville, Maryland

19 The above-entitled matter came on for hearing,
20 pursuant to notice, at 9:00 a.m.

21 BEFORE:

22 PETER B. BLOCH Chairman
23 JAMES H. CARPENTER Administrative Judge
24 THOMAS D. MURPHY Administrative Judge

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I N D E X

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DEMONSTRATIVE AID # 13B

UNIT 1 A TRAIN DIESEL GENERATOR

AIR RECEIVER DEW POINT MEASUREMENTS

<u>MWO NO.</u>	<u>DATE</u>	<u>RECEIVER KO1</u>	<u>RECEIVER KO2</u>
190001651	4/8/90	34 F	33 F
	4/7/90	75 F	78 F
	4/7/90	75 F	80 F
	4/6/90	75 F	----
	4/6/90	80 F	----
	4/6/90	80 F	70 F
	4/6/90	85 F	85 F
	4/6/90	85 F	85 F
	4/5/90	83 F	85 F
	4/5/90	78 F	77 F
	4/5/90	86 F	67 F
19001513	3/31/90	80 F	60 F
19000899	3/12/90	48 F	45 F
	3/9/90	61 F	66 F
19000465	2/11/90	37 F	37 F
18906445	1/18/90	44 F	44 F
18906199	12/19/89	40 F	37 F
18905007	11/20/89	40 F	47 F
18904442	10/20/89	38 F	45 F
18903652	9/27/89	45 F	45 F
18903214	8/24/89	37 F	35 F
18902798	7/30/89	45 F	49 F
18902453	6/28/89	48 F	KO2 was tagged out for maintenance
18901066	5/18/89	39 F	78 F
----- 1 year back			
18900984	3/16/89	22.6 F	20.1 F
18901008	3/13/89	-----	53.9 F
	3/3/89	-----	70 F
	3/1/89	-----	78 F
18809080	3/1/89	27.3 F	-----
18806224	10/4/88	17.1 F	12.6 F
18802991	5/10/88	43.9 F	-----
----- 2 years back			

IIT requests
data 4/9/90

DATA KEY: Black : On original Exh. #82 given to IIT
 Blue : On Exh. #26 (Steele Memo)
 Red : Demon. Aid #4

NUCLEAR REGULATORY COMMISSION

Docket No. 50-424/425-OLA-3 EXHIBIT NO. II-240

In the matter of Georgia Power Co. et al., Vogtle Units 1 & 2

Staff Applicant Intervenor Other

Identified Received Rejected Reporter SD

Date 9/15/95 Witness KITCHENS

P-R-O-C-E-E-D-I-N-G-S

(9:05 a.m.)

1
2
3 CHAIRMAN BLOCH: Good morning. The hearing
4 will come to order.

5 Whereupon,

6 KEN STOKES

7 was recalled as a witness by counsel for the NRC and,
8 having been previously duly sworn, resumed the witness
9 stand, was further examined and testified further as
10 follows:

11 CHAIRMAN BLOCH: Welcome back, Mr. Stokes. It
12 isn't in every way a great pleasure for you?

13 THE WITNESS: I figured that you guys came to
14 see me, I'd have to come back and see you.

15 CHAIRMAN BLOCH: I'd like to remind you that
16 the testimony you're about to give should be the truth,
17 the whole truth, and nothing but the truth, and that it is
18 subject to possible penalty for perjury.

19 THE WITNESS: Yes.

20 MR. BLAKE: Judge Bloch, I've distributed to
21 the parties and I've left three copies for the Board of
22 just a half a dozen pages or so. These are extracts from
23 Mr. Stokes' prior testimony on June 3rd, June 5th, and
24 June 6th. And I wanted to make copies for everybody so
25 that he will be able to follow through them and the

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1 parties will be able to as well.

2 DIRECT EXAMINATION

3 BY MR. BLAKE:

4 Q Mr. Stokes, I've provided you a couple of
5 documents to just aid you in following the questioning.
6 The first is extracts from when you previously testified
7 here. If you'd look at the top of each page, you'll see a
8 date. That's the date of the transcript, like the first
9 page says "June 3rd," next one "June 5th."

10 A Yes.

11 Q And these are called minusccripts. Four pages
12 appear on each page. And you read left to right at the
13 top and then left to right at the bottom. And there are
14 page numbers.

15 I've also provided you in a black binder a
16 copy of the complete transcripts from those days so that
17 to the extent you want to read around portions that I cite
18 to you, you'll have an opportunity to do that.

19 Now, let me ask you to review some of these.
20 First, on the first page, take a look at the bottom two
21 pages, 7,021 and 7,021, particularly beginning with the
22 Board examination at Line 17 on 7,020, reading through the
23 end of that page and the top of the next page, through
24 Line 9 if you would, please. You don't have to read it
25 out loud.

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1 A (Perusing document.)

2 Q Okay.

3 A Okay.

4 Q Mr. Stokes, do you see there that Judge Bloch
5 was questioning you and saying, "I'm sorry. I didn't
6 understand that. At no time did you have poor air quality
7 going into the control systems? How did you know that?";
8 your answer being, "I've been in the diesels for a long
9 time. To my knowledge -- maybe too long. But, to my
10 knowledge, there's never been -- I've never witnessed any
11 moisture at or inside the controlled air system at all
12 other than something that I know. There was that one
13 instance I can talk about"?

14 I want you to look at the next page, if you
15 would. This page is dated June 5th, '95. Look at the
16 upper left-hand page, 7,161, and read Lines 4 through 7,
17 your answer there.

18 A (Perusing document.)

19 Q Okay. And you see there that you've said, "I
20 mean, we've never -- we haven't seen water, I mean, in the
21 past, if that's what you're saying. There's not been any
22 indication of water in the control system or anything of
23 that nature"?

24 A That's correct.

25 Q Now, look at the next page, if you would,

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1 please, in this package, which is also dated June 5th.
2 Look at the upper right-hand page, which is transcript
3 Page 7,170, and read through Lines 3 through 22, please.

4 By way of orientation, I believe this is Judge
5 Carpenter asking you questions, Mr. Stokes.

6 A Okay. You said 3 through 6?

7 Q Three through 22, please.

8 A Twenty-two. Okay. (Perusing document.)
9 Okay.

10 Q Now, you see at the end of that where the
11 questioner says, "And you know it's frivolous to sit here
12 and speculate are we talking about 1 milliliter or water
13 or 10 milliliters of water or what have you because we
14 haven't seen any."

15 And your answer, "That's correct."

16 Now, take a look at the next page, if you
17 would, please, also on June the 5th, the bottom right-hand
18 page on this copy, which is transcript Page 7,284. Read
19 the bottom of that, starting the questioning here by Mr.
20 Hull, the NRC counsel, at Line 15, 7,284. And read, if
21 you would, please, onto the next page through transcript
22 Page 7,285 and then 7,286, all the way to the middle of
23 7,286 about Line 14-15.

24 A (Perusing document.) Okay.

25 Q Now, to ensure you understand that portion of

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1 what you were testifying to, Mr. Hull said, "Have you
2 yourself ever found any water in the diesel pneumatic
3 system at Vogtle?"

4 You said, "No, I haven't."

5 Mr. Hull continued, "And have you ever been
6 made aware that anybody else has found any water within
7 that system?"

8 Your answer, "No, I haven't."

9 Mr. Hull continued, "And given your position
10 at Plant Vogtle, would you think it's highly unlikely that
11 there ever was any water found and that you were not made
12 aware of it?"

13 Your answer, "I think that's pretty unlikely,
14 very unlikely."

15 Mr. Hull's question, "Have you ever been made
16 aware of whether any water was ever found within the
17 diesel logic board?"

18 Answer, "No. We -- not to my knowledge. I
19 think I had speculated at one time back during start-up we
20 may have found some water in a logic board. And there may
21 have been some water in there, but we never found any,
22 no."

23 And Mr. Hull continues, "And by 'start-up,'
24 are you referring to the initial plant start-up period in
25 the mid 1980s?"

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1 Your answer, "That's correct."

2 Continuing to the middle of 7,286, where I
3 asked you to read, Mr. Kohn at the end said, "Your Honor,
4 the questions I was asking referred to April 1990."

5 And you indicated, "I've never seen any
6 moisture in 1990."

7 Take a look at the bottom left-hand page
8 reprinted on this copy, which is transcript Page 7,287.
9 See Lines 6 through 8, where there's a question to you and
10 an answer? Read those, please.

11 CHAIRMAN BLOCH: You mean 7,387, sir?

12 MR. BLAKE: Seven-two-eight-seven.

13 THE WITNESS: (Perusing document.)

14 BY MR. BLAKE:

15 Q Do you see that, Mr. Stokes, where you said,
16 "Were you ever made aware of any water ever being found in
17 any of these surveillance tests?"; "Oh, no, absolutely
18 not" was your answer?

19 A Right.

20 Q Look at the last page now, if you would,
21 please, of this document. This is your testimony on June
22 the 6th, '95 transcript. Would you look at the upper
23 left-hand corner on transcript Page 7,385 and read Lines 2
24 through 5?

25 And you see there where you were questioned,

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1 "And I think, as you've reiterated several times already,
2 you never saw any evidence of actual moisture or water in
3 the diesel pneumatic lines, did you?"

4 And your answer, "No, sir. No, sir, I
5 haven't."

6 Mr. Stokes, in the course of working with Mr.
7 Johnston from Cooper, we learned and divulged to the Board
8 and the parties that in February or March of this year
9 during an outage, Mr. Johnston had found water or moisture
10 in one particular portion, a T-fitting inside the control
11 board and inside the control panel. And he's also
12 indicated that he believed you were there.

13 So the questioning today is: What explanation
14 do you have for your prior testimony if, in fact, you were
15 aware of or involved in this disclosure in February or
16 March of this year?

17 And before I ask you more questions, I want to
18 confirm with you that you understand that the company has
19 waived its privilege on this subject. That is, we're not
20 maintaining an attorney-client privilege or confidential
21 communications on this topic.

22 And I believe Mr. Dobby informed you of that,
23 but I want to confirm that you understand that.

24 A Yes.

25 Q And I also want to confirm with you that you

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1 understand that, particularly given that what we're
2 talking about is the accuracy of your prior sworn
3 testimony and your sworn testimony today, I want to
4 confirm again that you have an opportunity to seek your
5 own counsel in this setting.

6 I understand Mr. Dobby talked with you about
7 that, that you opted simply to talk with him and are
8 prepared to talk today about it.

9 A That's correct.

10 Q I don't want to leave any doubt about it
11 because this is serious.

12 A Yeah. That's correct.

13 Q All right. Now, if you would, please, given
14 your past testimony and our review of that -- and if you
15 want more time to review it, go ahead and take that time.

16 If you don't, then, please, if you would, tell
17 us whether or not you were aware of water or moisture
18 being found in some portion of a pneumatic care system in
19 February or March of this year. And then, if you would,
20 describe how you could have given the answers that you did
21 when you previously testified in June of this year.

22 And if you want to take a break, that's fine,
23 too. It's up to you.

24 A No, I don't think I need to take a break. I
25 don't know how to start off on this one other than to --

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1 other than to say, first of all, I mean, obviously I was
2 wrong.

3 Nothing was intentional there. It's this
4 water or moisture that Mr. Johnston had I guess notified
5 myself of in February was -- obviously I was notified of
6 it and considered -- this may sound crazy, knowing all the
7 proceedings here, but it just never entered my mind in the
8 hearings because it was -- to me at that time was so
9 insignificant maybe.

10 It's not that I ignored it, but it just -- I
11 didn't think of it. It really at the time was
12 insignificant and was analyzed as a technical issue and
13 nothing to the rest of the control air system.

14 I mean, it's like we were talking about a
15 normal check of the logic system, its sensors, the
16 receivers inside the panel, where we normally do moisture
17 checks.

18 I guess I had all of that on my mind. And
19 this just didn't even register with me. I mean, all I can
20 say is I apologize for it. But it was in no way a
21 conscious effort to not reveal some knowledge that I had.
22 It was not that at all.

23 So I don't know what else to say at this point
24 other than, you know, I'm sure I'm going to get a lot of
25 questions on it. But it was not intentional.

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1 Q Well, let me carry it back. Now that your
2 memory has been refreshed on this topic, when did this
3 occur?

4 A It was sometime during the past, a Unit 2
5 outage, I guess towards the end of it. I don't really
6 remember.

7 Q Would February or March of this year --

8 A Yeah.

9 Q -- be the correct time frame?

10 A Yes.

11 Q And what was your knowledge at that time or
12 involvement in this detection of water or moisture? Were
13 you involved in it? Were you there?

14 A I think I was out there. I don't -- I think
15 Johnston had actually maybe opened one of the T's or
16 something. I'm not -- I don't actually remember seeing
17 the water myself, but -- or whether he just -- I mean, he
18 notified me.

19 I know Mr. Burr was out there also. But at
20 least I was notified of the water situation. And I know
21 where it was located and where he said he -- you know, how
22 much he said he saw there.

23 The thing that I can possibly recall is that,
24 you know, he may have opened up a little valve or whatever
25 and he said he saw a little fog or something of moisture

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1 to come out of this T line. But that's it.

2 Q Is that the only description that you had of
3 the amount of water, some fog come out?

4 A It's in my recollection that that's what it
5 was.

6 Q And what did you do with this information?

7 A Well, like I said, as I recall it, again, Burr
8 and myself both were aware, made aware, of it. And it was
9 almost like from Johnston's part that they had, you know
10 -- you know, "We noticed something here." It's a "No.
11 Never mind."

12 And once I looked at it and saw where it was,
13 I mean, my opinion is the same thing or was the same thing
14 then. And it is the same thing now. It's really a dead
15 leg, if you will, inside this panel. And going through
16 the whole system and knowing how it should work, there's
17 just no way.

18 You know, I guess my initial thoughts then
19 were the same as they are now, too, that it was introduced
20 by some -- at some point. I'm not saying at this
21 particular outage. I'm saying it could have been several
22 outages ago that this water was in there and introduced by
23 INC personnel during the calibration process. I'm saying
24 they possibly could have used water for the calibration or
25 they could have had -- a little less likely, they could

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1 have had water in the tygon tubing or something of that
2 nature.

3 But it was very small amount of water in --
4 but, yet, large enough that one would think it wouldn't
5 come from the system because there's nothing -- I mean, as
6 I said before, there was still no evidence that at the
7 filter, which is down at the bottom of the panel -- this
8 same air goes right through the filter.

9 And then it tees off and goes about, let's
10 say, four or five feet up the panel and across the panel
11 and over to these particular gauges through
12 one-quarter-inch line. And it's just not -- you know,
13 that's not enough line there to create this much or -- it
14 was only a few drops, two to five drops, I guess, or
15 whatever, but to create pretty much moisture in the lines.

16 Q Did you pass this information on to anyone
17 else in Georgia Power other than you and Mr. Burr
18 discussing it?

19 A Actually, I don't believe we did. I think we
20 took the issue and essentially resolved it and said that,
21 at least among ourselves, there's -- you know, this is not
22 a problem.

23 You know, that was discussed with also the
24 vendor, Mr. Johnston, and that's -- I think that's as far
25 as it went, at least from my -- I didn't discuss it with

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1 anyone else.

2 Q Was there any written analysis or evaluation
3 done of this?

4 A No, not at that time.

5 Q And your analysis of all of this was what,
6 that it was insignificant?

7 A Insignificant.

8 Q No deficiency card, no other kind of paperwork
9 was generated about this?

10 A No.

11 Q And why, given the discovery of water or
12 moisture or vapor in this, was there not a need to
13 generate any sort of paper in your mind to have this
14 further evaluated by people?

15 A It's like I said. We -- I didn't, didn't then
16 and still don't, consider it a deficient condition. I
17 mean, there was a DC written, you know, later this year
18 and some subsequent investigations performed, but, like I
19 said, it's -- it was just something that to me and to
20 Cooper seemed -- I mean, if I wrote a DC, you know,
21 essentially, it would have to be dispositioned not a DC.
22 It's a -- you know, it's effectively not a deficient
23 condition.

24 Q And had you ever seen anything like this
25 previously --

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1 A No.

2 Q -- in the control board system or the control
3 panel or any other portion of the system?

4 A No, sir.

5 Q Now, you just said that subsequent to this
6 there was a DC written, an additional. Tell me about
7 that.

8 A After I spoke to Mr. Domby, I believe it was,
9 at the plant, just immediately after that, I guess our
10 plant management was notified. And a DC was written. And
11 subsequent checks were made on the Unit 2 diesels and the
12 Unit 1 diesels at these particular ports that we're
13 talking about.

14 No water or moisture was found in the Unit 2
15 lines. And we found anywhere from a trace of moisture I
16 think on one of the banks on 1A to like one and a half
17 millimeters or something on one bank on 1B.

18 And so we did that check. And once they found
19 the moisture in those particular gauges, those particular
20 lines, T's, if you will, INC personnel then took dew point
21 measurements at the air receivers.

22 And also I had requested that they take a dew
23 point measurement inside the panel at the -- there's a
24 test connection right there on the downstream side of the
25 pressure regulator on the 60-pound side. So we had them

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1 take dew point measurements there also. And all the dew
2 points on each of the ones with -- that had moisture
3 checked out within spec, you know, just -- there's no
4 problem with dew points.

5 Additionally, not at the same time, but I
6 think it was the week after we -- the NRC had a special
7 representative come down and check out the situation also.
8 And so we went back out with him and repeated the same
9 tasks. I think it was just on 1A and 1B, where we found
10 the water before.

11 And I think they -- I'm not sure what Randy
12 found there. I think he was -- I wasn't with him for
13 these particular tests. But the one he found just like a,
14 if you will, trace of moisture in one that still just had
15 not been blown out, properly blown out. So he noted that.
16 They took additional dew point measurements again, and
17 which again checked out to be within spec.

18 And I suggested to Randy that we also --
19 there's another dead leg there on the pneumatic side,
20 where the pneumatic 60-pound air gauge is located on the
21 same front of the panel. I suggested that they may want
22 to just pull that line off also and take a look in that T
23 or pull the cap off and take a look inside the T and see
24 what it's like on the -- you know, on the 60-pound side.
25 And they did that and found no moisture there.

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1 And also I think they went in and checked the
2 filter again. On each instance I think I forgot to
3 mentioned we actually opened up the petcock on the bottom
4 of the filter and -- to see if we got any moisture coming
5 out of that point. And we did not.

6 So then I had somebody independent, if you
7 will, from our Southern Company Services design group come
8 down and disposition that deficiency card. And that's
9 been completed.

10 Q And what was the disposition?

11 A Essentially it's like I said. I asked him to
12 do a calculation as to how much area I guess it would
13 actually take to produce that amount of moisture in the
14 line. And, you know, I think he came up with something
15 like 1.7 cubic feet or something. These numbers are just
16 a guesstimation on top of my head. I don't have a copy of
17 this DC.

18 And then the amount of line between, say, the
19 filter and these particular gauges, it comes out to like
20 1⁻³ cubic feet. So, you know, you could hardly get a trace
21 of moisture from that amount of air if you were saying
22 it's coming from the system and you don't see any moisture
23 in the filter and you don't see any moisture anywhere
24 else.

25 So his conclusion was that it was very likely

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1 that it was introduced at some point in time during the
2 calibration process.

3 Q Who is "his" in that sentence?

4 A The person doing the disposition? His name is
5 David Lisenby.

6 Q And he's an engineer?

7 A Yes, he's --

8 Q Where?

9 A He works in Southern Company Services now. He
10 has had prior experience with start-up on the diesels
11 also. He helped me as a start-up engineer.

12 But he also now -- I believe he's on the
13 Farley project as of right now. He was transferred over
14 to there in not really a QA position but something
15 relating to QA. But he is a design mechanical engineer.

16 ADMINISTRATIVE JUDGE CARPENTER: Mr. Blake, if
17 I can interrupt?

18 MR. BLAKE: Yes, please.

19 BOARD EXAMINATION

20 ADMINISTRATIVE JUDGE CARPENTER: Twice, Mr.
21 Stokes, you made reference that your thought is that this
22 water got in during a calibration procedure?

23 THE WITNESS: Yes, sir.

24 ADMINISTRATIVE JUDGE CARPENTER: What was
25 being calibrated?

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1 THE WITNESS: Just those gauges, the starting

2 --

3 ADMINISTRATIVE JUDGE CARPENTER: Not the
4 calgons.

5 THE WITNESS: No, sir. I'm sorry.

6 ADMINISTRATIVE JUDGE CARPENTER: So tell us
7 exactly what your thought is.

8 THE WITNESS: That the -- these are 2
9 300-pound gauges that sit on the face of the panel. And
10 my specific thoughts are -- and surely they're just
11 thoughts because the people that calibrated these gauges
12 in those times are long gone, but in start-up.

13 You know, this water could have been -- could
14 have been in there for several outages the way I see it.
15 It doesn't have to be -- it didn't have to be introduced
16 in the previous outage because of the way they do the
17 calibration.

18 The system is always depressurized when they
19 calibrate these gauges. So, you know, you open up the T.
20 And if the T is sloped like this, maybe you get a little
21 water run out if they install water in there.

22 But otherwise if 's like this or, you know,
23 up a little bit, then the small amount of water that we're
24 talking about, it just could stay there. And it could
25 collect over a couple of outages or several outages.

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1 ADMINISTRATIVE JUDGE CARPENTER: How is water
2 involved in the calibration?

3 THE WITNESS: Well, they -- like I said, these
4 are kind of high-pressure gauges. They actually --
5 they're not required by procedure or were not required by
6 then. They may be now from this point on, but they were
7 essentially able to use water for calibration instead of
8 air, you know.

9 So you could actually -- it's just a
10 diaphragm-type fitting in there. In other words, you
11 know, you'd connect the water to the back of the gauge.
12 You're talking about a length of maybe one-quarter or
13 three-eighths-inch tubing that's about like this to go to
14 the back of the gauge so they would just connect on there,
15 isolate from the system here. And they could actually use
16 water there if they wanted to. Now, it's not necessarily
17 usually done on instrumentation systems, but surely they
18 could.

19 And, next of all, which is more than likely, I
20 would say, is that they had moisture, a little bit of
21 moisture, inside the tygon tubing that they would connect
22 to the back of this gauge. But it's still I guess a
23 possibility.

24 So to me and to the guy that dispositioned the
25 DC, these are the most likely methods of the water

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1 entering into the gauges.

2 ADMINISTRATIVE JUDGE CARPENTER: I'm still not
3 clear when you say they "calibrate" the gauge. Do they
4 compare it with a referee gauge or what?

5 THE WITNESS: I don't --

6 ADMINISTRATIVE JUDGE CARPENTER: That's not a
7 deadweight operation, is it?

8 THE WITNESS: No, no. They would -- I haven't
9 witnessed their calibration procedures as to if they
10 connect another -- you know, they'll pump it up to each
11 particular -- you know, they'll probably check it at maybe
12 6 or 8 different locations along the gauge range from zero
13 to 300. I guess it is a comparative type thing, but, you
14 know, with a known calibrated gauge.

15 ADMINISTRATIVE JUDGE CARPENTER: So it's your
16 testimony you don't know?

17 THE WITNESS: Yeah. I'm not the one doing the
18 calibration and I'm not -- I can't really speak as to how
19 they do it.

20 ADMINISTRATIVE JUDGE CARPENTER: Do you happen
21 to bring the procedure with you, a copy of the procedure?

22 THE WITNESS: A copy of the calibration
23 procedure?

24 ADMINISTRATIVE JUDGE CARPENTER: Yes.

25 THE WITNESS: No, sir.

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1 ADMINISTRATIVE JUDGE CARPENTER: Thank you.

2 ADMINISTRATIVE JUDGE MURPHY: Do you know how
3 often those gauges are calibrated?

4 THE WITNESS: Yes. Every 18 months.

5 ADMINISTRATIVE JUDGE MURPHY: Every outage or

6 --

7 THE WITNESS: Yes, sir.

8 ADMINISTRATIVE JUDGE MURPHY: -- every 18
9 months?

10 THE WITNESS: That is every outage, every 18
11 months, every refueling outage.

12 CHAIRMAN BLOCH: Do you know -- I'm sorry. I
13 thought you were done.

14 ADMINISTRATIVE JUDGE MURPHY: Did you talk
15 with anybody to find out how those gauges are calibrated?

16 THE WITNESS: Now I know how they're
17 calibrated. Generally they use a nitrogen bottle to make
18 the connections. We talked to several of the INC people
19 who have done them in the past, maybe at the past outage.
20 And they typically would use a nitrogen bottle.

21 ADMINISTRATIVE JUDGE MURPHY: Were you able to
22 find in your investigation by talking with anyone that
23 they did use water?

24 THE WITNESS: No. No, sir.

25 CHAIRMAN BLOCH: And do you know whether it's

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1 feasible with the equipment that they use to use water?

2 THE WITNESS: Yes, absolutely.

3 CHAIRMAN BLOCH: Would you like them using
4 water in that location?

5 THE WITNESS: To be honest with you, it would
6 not bother me if it was put in there -- if they were
7 controlled in a fashion to make sure that they take it
8 back out; blow it out, in other words, water on this
9 calibration, particular calibration.

10 I guess this is my personal opinion. It would
11 not bother me that much as long as the controls were there
12 to make sure the water is removed because it would be an
13 easy way to calibrate these gauges.

14 CHAIRMAN BLOCH: You wouldn't be concerned
15 about the possibility that a valve could be partially
16 opened?

17 THE WITNESS: No. I mean, the fact is that --
18 it's like I say. If you go through the proper motions of
19 making sure the water is back out of there, which could
20 mean opening a valve and blowing it out after the system
21 is pressurized, then I wouldn't have a problem because the
22 tubing comes up. It comes up, goes over. It goes down
23 and then over to the gauges like this. And, you know,
24 anything that would --

25 CHAIRMAN BLOCH: You might want to redescribe

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1 that because the hand motion isn't even something I can
2 describe.

3 THE WITNESS: This is good for the courtroom.
4 It's just that the tubing will go -- maybe this has no
5 bearing anyway, but --

6 CHAIRMAN BLOCH: If you want, you can draw it
7 on the blackboard behind you. And, with luck, we can
8 print a copy of it.

9 THE WITNESS: Well, I think I can describe it.
10 Just at the bottom --

11 ADMINISTRATIVE JUDGE CARPENTER: Which tubing
12 are you talking about?

13 THE WITNESS: This -- well, the
14 one-quarter-inch tubing that would go up to the back of
15 these pressure gauges, like the 300-pound pressure gauge.

16 MR. BLAKE: May I interrupt just for a minute?
17 We have distributed previously to the parties and I can
18 put in front of Mr. Stokes a schematic. And maybe by
19 reference to the schematic, he can say, "This is going
20 vertically. This is going horizontally. This is going,"
21 et cetera, and we'll have something that the record will
22 be able to follow.

23 CHAIRMAN BLOCH: But we'll have to mark it for
24 the record.

25 MR. BLAKE: Yes. I can mark it as GPC's next

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1 exhibit, which would be II-188.

2 CHAIRMAN BLOCH: How will we find it?

3 ADMINISTRATIVE JUDGE MURPHY: What is it that
4 we're marking?

5 MR. BLAKE: It's the second sheet in the
6 package which was distributed yesterday to the Board,
7 earlier to the other parties. It's an engine control
8 panel schematic by Transamerica Dilavalve. This is
9 actually indicated as --

10 THE WITNESS: Can I --

11 MR. BLAKE: -- a Sheet 2 of 9.

12 THE WITNESS: Can I say something now?

13 MR. BLAKE: Yes.

14 THE WITNESS: This whole thing may be
15 irrelevant anyway, though, because you're asking what my
16 personal feelings were. And they seem to differ from the
17 plant's. So they're not going to be able to use water in
18 the future.

19 The way I understand it on this DC, they have
20 dispositioned part of it to not use water at all. So the
21 -- you know, the proper -- the steps would be added to
22 whatever procedures to require them not to use water.

23 So we probably really don't need to describe
24 this.

25 MR. BLAKE: Judge Bloch, this one-page

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1 document that I'm going to show the witness is a
2 schematic. I understand in the lower right-hand corner of
3 it the number is 09-500-76021. And this is actually Sheet
4 2 of 9 from that drawing.

5 CHAIRMAN BLOCH: I can't tell that it's 21.
6 Are you sure?

7 MR. MICHAEL KOHN: May I ask what the purpose
8 is of showing it to the witness?

9 MR. BLAKE: Simply to determine for sure on
10 this schematic what the T is, that we're all in the same
11 agreement and then, to the extent he can use this, to
12 describe what's a vertical line, what's a horizontal, as
13 he was trying to do earlier.

14 CHAIRMAN BLOCH: I'd point out that this one
15 page is an unusual one page in that it's equivalent to 2 8
16 and a half by 11 pages, just in describing it.

17 MR. BLAKE: I need to make three copies during
18 a break for the court reporter.

19 ADMINISTRATIVE JUDGE MURPHY: What did we mark
20 it as?

21 MR. BLAKE: GPC II-188.

22 CHAIRMAN BLOCH: It may be marked.

23 (Whereupon, the aforementioned
24 document was marked for
25 identification as GPC Exhibit Number

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1 II-188.)

2 FURTHER DIRECT EXAMINATION

3 BY MR. BLAKE:

4 Q Now, Mr. Stokes, if you look at the bottom of
5 this schematic, it was our prior understanding that the T
6 we were talking about appeared, the two T's, actually, for
7 one control panel --

8 MR. MICHAEL KOHN: Excuse me. The witness has
9 testified about numerous times water had been coming out
10 of certain T's. So you said "the two T's we have been
11 talking about." Are you referring to the Johnston -- the
12 initial finding of it or --

13 MR. BLAKE: I don't even know at this point,
14 Michael, whether or not it's Johnston or just our own
15 conversations subsequent to this, but I wanted to just
16 confirm with him that wherever it was found on any of
17 these --

18 MR. MICHAEL KOHN: Thank you.

19 BY MR. BLAKE:

20 Q In the lower portion of this schematic, Mr.
21 Stokes, down, the T's that we believe that were involved
22 here were between the Number 40 in the circle and the
23 gauge symbol just to its right. And the little t that's
24 indicated there we believed was what we're talking about.
25 Is that correct?

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1 A That's correct.

2 Q And so this is actually before the regulator
3 and filter --

4 A Yes.

5 Q -- and in the 250-pound portion of the system?

6 A Yes.

7 Q Now, does this schematic aid you in trying to
8 describe what you were saying to Judge Carpenter about the
9 portions of the lines which run up vertically, where air
10 would be coming into the system by going up vertically,
11 and another portion horizontal run and then a vertical
12 down run to what you described as the gauges.

13 Were you able to say with regard to this
14 schematic what portions of these lines run up and down or
15 sideways?

16 A Yeah. I can try here. These two valves just
17 to the left of where you're looking, speaking about,
18 earlier, they're labeled "81," both of the isolation
19 valves coming from E31L and E31R.

20 Those are the three-eighths-inch lines that
21 come into the panel at the lower left-hand side. Those
22 lines will come up vertically. And the isolation valves
23 will -- it will then go through the isolation valves.

24 And at that point, actually, the lines tee off
25 and the three-eighths-inch line goes over to the filter

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1 regulator. And at the same time a smaller
2 one-quarter-inch line will then go up the side of the
3 panel to a few of these pressure switches that you see
4 along the line and then continue --

5 Q Pressure switches are indicated on this as
6 Number 40s?

7 A The 4Ns, 4N, 4N2, 4, the P5s, those type
8 pressure switches.

9 So, anyway, the quarter-inch line will go up
10 the side of the panel, all the way to the top of it,
11 essentially. Then it will cross, go at a horizontal run
12 across the face of the panel and then up.

13 There's a little collection box in the back of
14 -- in the back of the panel that houses some of the oils
15 and waters that may come into the panel so that if you
16 were to spring a leak, then it would kind of collect in
17 this little box.

18 So then this run would kind of go up and over
19 that box, if you will, and then back down vertically
20 downward, on the other side of the panel face, and then
21 across, horizontally across to these two pressure gauges,
22 one for the right bank and one for the left bank, through
23 their own isolation valves, if that helps at all.

24

BOARD EXAMINATION

25

CHAIRMAN BLOCH: These physical descriptions

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1 are not on this table, which this is a schematic and
2 doesn't show the physical changes. Is that correct?

3 THE WITNESS: Correct. That's correct.

4 CHAIRMAN BLOCH: I take it pressure switches
5 are "PS"?

6 THE WITNESS: Yes, sir.

7 CHAIRMAN BLOCH: Mr. Blake?

8 MR. MICHAEL KOHN: Your Honor, we have an
9 understanding of the witness' testimony that the line went
10 by the pressure switches. On the diagram that we're
11 looking at, the line does not go by the pressure switches.
12 It taps off before the pressure switches.

13 THE WITNESS: Yeah. It's -- I was going to
14 say this is a schematic, you know, and it's -- as they go
15 up the side, you can't -- I mean, as they go up, then
16 they're going to tap off to these pressure -- as that one
17 particular line will go up, then it will tap off.

18 VOIR DIRE

19 BY MR. MICHAEL KOHN:

20 Q So, then, you're saying the schematic is
21 wrong?

22 A No, I'm not. I'm saying the schematic doesn't
23 show you precise runs of how equipment is connected. This
24 is not an ISO. An ISO would show you precisely.

25 Q I understand that. My question is: Is the

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1 tap before the pressure switch or after the pressure
2 switch?

3 A That particular tap that goes to these lines,
4 if you want to call it that way -- this is just a
5 convenient place to put it on the drawing. None of this
6 stuff lines up as it is in the panel. I mean, this is
7 just a schematic drawing.

8 BOARD EXAMINATION

9 CHAIRMAN BLOCH: If it comes off there, the
10 schematic isn't useful at all. The only thing I think you
11 can get from a schematic is where things come off the
12 line. You don't get the physical condition.

13 But I don't understand how this seems to tap
14 before the pressure switches. If it taps after the
15 pressure switches, it's just wrong.

16 THE WITNESS: Yeah. What would it matter if
17 it tapped after the pressure switches?

18 CHAIRMAN BLOCH: I have no idea except that
19 it's not an accurate schematic if it does.

20 THE WITNESS: Sure. I mean, pressure is
21 pressure, pressure before or pressure after. I mean, what
22 does it matter?

23 CHAIRMAN BLOCH: Well, I imagine we could find
24 some problem for which it would matter, but I don't know
25 one right now.

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1 THE WITNESS: I'm just saying now it's
2 irrelevant. You're not trying to place particular tap-off
3 connections or for anything on these schematics.

4 I mean, it doesn't show you either that it
5 taps off and goes over to the reg to the filter.

6 ADMINISTRATIVE JUDGE MURPHY: Well, can we
7 confirm that the T that we're talking about --

8 THE WITNESS: I thought that's what we were
9 doing.

10 ADMINISTRATIVE JUDGE MURPHY: -- is, in fact,
11 between the gauge and the isolation valve?

12 THE WITNESS: Yes.

13 ADMINISTRATIVE JUDGE MURPHY: And the gauge
14 isolation valve?

15 THE WITNESS: Yes.

16 ADMINISTRATIVE JUDGE MURPHY: That's a fact
17 true?

18 THE WITNESS: That's a fact.

19 ADMINISTRATIVE JUDGE MURPHY: Okay.

20 FURTHER DIRECT EXAMINATION

21 BY MR. BLAKE:

22 Q And they tap off after the isolation valve,
23 which is indicated to be Number 81 on the schematic, and
24 before the pressure regulator, before the filter and the
25 pressure regulator, which are indicated to be 19 and 20?

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1 The tap-offs to these gauges, which include the T's in
2 question, come between Isolation Valve 81 and Filter and
3 Regulator 19 and 20?

4 A Yes.

5 Q Mr. Stokes, the disposition --

6 ADMINISTRATIVE JUDGE MURPHY: Just a second.

7 (Pause.)

8 ADMINISTRATIVE JUDGE MURPHY: Okay.

9 BY MR. BLAKE:

10 Q Your disposition of this initially with regard
11 to Mr. Burr's involvement and yourself was to describe it
12 as insignificant. Did Mr. Johnston play a role in that
13 determination?

14 A Well, obviously it's our determination, but
15 yes, we -- you know, we would obviously consult his
16 opinion also. And he -- to me the way I remember it --
17 and I don't remember his words, but it's like -- well, to
18 him it was a "No. Never mind" also.

19 Q Did he also play a role in the subsequent
20 inspection of the additional T's that were done more
21 recently or the evaluation that followed?

22 A Mr. Johnston?

23 Q No, sir.

24 MR. BLAKE: Okay. I don't have any more
25 questions, Judge Bloch, on this. I don't know what order

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1 to suggest to you.

2 BOARD EXAMINATION

3 ADMINISTRATIVE JUDGE MURPHY: I have a quick
4 one. Earlier when you were talking about the NRC doing
5 their inspection, you mentioned a person by the name of
6 Randy?

7 THE WITNESS: Yes.

8 ADMINISTRATIVE JUDGE MURPHY: Is he an NRC
9 inspector?

10 THE WITNESS: I don't know what his title is,
11 but he's out of Atlanta.

12 ADMINISTRATIVE JUDGE MURPHY: Do you know what
13 his name, full name, is?

14 THE WITNESS: Yes, Randy Moore.

15 ADMINISTRATIVE JUDGE MURPHY: Mailor?

16 THE WITNESS: Moore.

17 ADMINISTRATIVE JUDGE MURPHY: Moore?

18 THE WITNESS: Uh-huh.

19 ADMINISTRATIVE JUDGE MURPHY: Thank you.

20 CHAIRMAN BLOCH: Mr. Kohn?

21 MR. MICHAEL KOHN: First, the witness has
22 testified about the disposition of the deficiency card
23 and, further, engineering analysis, none of which has been
24 produced to intervenor. And I request that that be
25 produced at this time.

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1 MR. BLAKE: I don't understand what you're
2 talking about. I thought we had already given you the
3 deficiency card.

4 MR. MICHAEL KOHN: Yes, but not the final
5 disposition of the deficiency and/or --

6 MR. BLAKE: Well, okay. We can look and see
7 if there's more paper. I had understood that we had
8 provided whatever paper we had received. If there's
9 something more, I'll take a look.

10 MR. MICHAEL KOHN: I think there's also
11 documentation from a Mr. Lisenby. And the witness has
12 also mentioned an engineering analysis, I believe, none of
13 which has been produced.

14 MR. BLAKE: I understand the request. I
15 thought we had given whatever we had received.

16 ADMINISTRATIVE JUDGE CARPENTER: Would you
17 expect to provide this in this proceeding?

18 MR. BLAKE: Yes. I had anticipated, Judge
19 Carpenter, providing materials on this topic as soon as we
20 received them and just pass them on to the other parties.
21 And I thought we had done that. If there's something more
22 that was learned from this, then I'll obtain it and pass
23 it out.

24 ADMINISTRATIVE JUDGE CARPENTER: I might
25 apologize for my lack of attendance, but I'm not aware of

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1 seeing any of these papers, the engineering analysis.

2 MR. MICHAEL KOHN: No. Intervenor is certain
3 we have not seen copies of this material.

4 CROSS-EXAMINATION

5 BY MR. MICHAEL KOHN:

6 Q Mr. Stokes, can you go over with me now how
7 you originally learned that Mr. Johnston had provided
8 information about water being found in February or March
9 that was brought to the attention of this Licensing Board?

10 A How Mr. Johnston had --

11 Q How you learned that that issue had been
12 brought to the Board or had been detected.

13 A I don't -- my first knowledge of that I guess
14 was with my meeting with Mr. Dombay on site.

15 Q What did Mr. Dombay tell you?

16 A Again, from my recollection, I think he just
17 went over again some of my previous testimony and then
18 asked had I -- again, had I noticed or ever noticed or
19 been made aware of moisture inside the control panels.
20 And he said at any time, you know, including this year.

21 And then I forth came. I mean, I said, "Yes."
22 So we then went through the whole situation that we went
23 through here as to how I became aware of it.

24 Q And did Mr. Dombay take notes of that meeting?

25 A I believe so.

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1 MR. MICHAEL KOHN: Intervenor also requests
2 that those notes be produced.

3 BY MR. MICHAEL KOHN:

4 Q Mr. Stokes, you said "then" you "forth came."
5 Did something happen between the time Mr. Domby confronted
6 you and that made you realize this or is it something that
7 Mr. Domby told you?

8 A I don't know, to be honest with you. I really
9 don't remember what spurred it.

10 Q You don't remember the triggering event?

11 A I don't.

12 Q Well, could it have been the fact that Mr.
13 Burr called you up?

14 A No.

15 Q Mr. Burr didn't call you and tell you what was
16 happening?

17 A No.

18 MR. BLAKE: You may be misremembering my
19 report. I hope that's what it is and that you're not
20 trying to mislead the witness. But what I reported was
21 that when Mr. Domby talked with Mr. Stokes, which was
22 first, and then he intended to go and talk with Mr. Burr
23 --

24 THE WITNESS: It was the other way around.

25 MR. MICHAEL KOHN: Thank you.

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1 MR. BLAKE: -- just simply by coincidence that
2 --

3 THE WITNESS: That's correct.

4 BY MR. MICHAEL KOHN:

5 Q So, then, Mr. Burr called you --

6 A No. Well --

7 Q -- after your conversation with Mr. Domby?

8 A Yeah, either one or the other. I don't
9 remember if I called him or he called me, but it wasn't
10 about this. It's just that, you know, we're constantly
11 exchanging information throughout the day in our normal
12 work process.

13 And, as an "Oh, by the way," I slipped out and
14 made the mistake of telling him about our conversation or
15 my conversation with Mr. Domby. So I was at fault there.

16 Q As I understand it, then, Mr. Domby came into
17 the room and said, "Can you tell me whether essentially
18 you have any recollection of finding water at any time,
19 including up to the present?"

20 And when he asked you that, you said, "Yes."

21 A Yes.

22 BOARD EXAMINATION

23 CHAIRMAN BLOCH: Is the way that Mr. Kohn told
24 it -- this is Judge Bloch. Is that a full version or did
25 he give you any preface as to why he was coming to speak

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1 to you before that?

2 THE WITNESS: I don't believe he did.

3 FURTHER CROSS-EXAMINATION

4 BY MR. MICHAEL KOHN:

5 Q You've had previous conversations with Mr.
6 Burr about whether water had been found in the system,
7 hadn't you?

8 A Oh, yes. Yes.

9 Q You had conversations with Mr. Burr about
10 whether he had recollection of fluid being drained out of
11 the system, out of the pneumatic system, hadn't you?

12 A Yeah. I mean, I don't remember the specific
13 conversations, but yeah, we, I mean, obviously talked
14 about had he any recollection of water in the system, in
15 the receivers, or, you know, anywhere else, like I said,
16 anywhere in the system.

17 Q And that happened back in -- when is the first
18 time you recall having that conversation with Mr. Burr?

19 A Well, at least before the -- I guess my
20 previous -- well, it's been off and on for five years, but
21 -- I mean, I don't know. I guess the last time is just
22 prior to my last testimony.

23 Q And did Mr. Burr -- as I understand, you
24 talked to Mr. Burr after I played a tape for him where
25 there was that segment that water poured out of it?

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1 A Uh-huh.

2 Q All right. And did you recall Mr. Burr
3 telling you at that time that he could hear the phrase
4 "Water poured out of it"? Did you discuss that with him?

5 A Yeah. I think this was prior testimony like
6 we went through before. If I remember right, I think at
7 first he had said that he remembered that when it was
8 suggested to him.

9 And then later when he listened to it, he
10 wasn't sure. It was just something that -- you know, it's
11 just kind of garbled. And you can't really, really
12 understand it.

13 Q And what date did Mr. Burr tell you it was
14 garbled and he couldn't hear it?

15 A I don't remember. Sometime earlier this year.
16 That may not be his specific words, but, you know, I guess
17 what I'm trying to say is that he was unsure. You know,
18 the more you listen to it, he just became unsure.

19 Q So your understanding from Mr. Burr is the
20 more he listened to it, the less sure he became of what
21 was on the tape?

22 A The way I remember it. And it seems like he
23 said that it -- well, I don't remember his specific words.

24 Q Did you review --

25 A You should probably ask him.

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1 Q -- the portion of Mr. Burr's deposition where
2 he went over what he heard on the tape?

3 A Yes, I remember going through that.

4 MR. MICHAEL KOHN: Okay. Your Honor, I would
5 like to mark as Intervenor's II-241 a segment of Mr.
6 Burr's deposition.

7 MR. BLAKE: Well, Judge Bloch, I'm really
8 quite troubled by taking advantage of this difficult
9 recall of Mr. Stokes to go back into an entirely different
10 substantive subject area, which has been subject of a good
11 deal of cross-examination, both when Mr. Stokes was
12 previously here and when Mr. Burr was here, this business
13 of water poured out and what that was all about, an
14 entirely different topic, covered previously and in my
15 view not appropriate for today's questioning.

16 CHAIRMAN BLOCH: Mr. Kohn, a question I want
17 to ask -- I'd like you to reflect before you answer -- is
18 whether the argument you're making is an argument for the
19 Board or whether you really need testimony about this in
20 order to make the argument later in findings --

21 MR. MICHAEL KOHN: No.

22 CHAIRMAN BLOCH: -- new testimony.

23 MR. MICHAEL KOHN: No. I guess we could
24 simply just mark the document and admit it as an exhibit.

25 MR. BLAKE: Oh, no. We're not going to go

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1 along with that either. This is Mr. Burr's deposition.
2 Mr. Burr was here. Mr. Burr appeared as a witness. He
3 could have asked him about it at that point, but he ducked
4 asking Mr. Burr about his deposition and what the subject
5 was. He's now trying to put it into evidence through
6 another witness.

7 MR. MICHAEL KOHN: Mr. Blake is wrong.
8 Intervenor did not call Mr. Burr. Intervenor reserved his
9 rights to call Mr. Burr. And we said the reason we
10 weren't calling Mr. Burr was because right now, as we saw
11 our case, it was dealing with the Ajluni admissions and we
12 weren't sure whether we needed him for any other reason.

13 We have not rested our case. We still have
14 the right to call Mr. Burr. And the fact of the matter is
15 that Mr. Burr signed his deposition, corrected his
16 deposition. And Georgia Power submitted these portions of
17 it in the motion for summary judgment, I believe.

18 So it's not that there's any surprise or
19 anything else. It's a fact.

20 CHAIRMAN BLOCH: You haven't addressed why
21 it's related to this matter.

22 MR. MICHAEL KOHN: It's related because the
23 witness has testified that he didn't remember about water.
24 And now he's testified that he's had repeated
25 conversations with Mr. Burr about water and how did it --

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1 you know, what about this jar. And he said for the past
2 five years he's had repeated conversations about water.

3 All of a sudden he and Mr. Burr find water and
4 it's not -- there's no testimony. He can't remember it.
5 And now we go and say Mr. Burr calls him up and says,
6 "Yeah. I listened to a tape, and I heard 'just poured out
7 of it.' And I think it might be water or something."

8 And now this witness testifies that Mr. Burr
9 is now changing his mind and that he can't hear "just
10 poured out of it." It goes to the credibility of the
11 witness with respect to the introduction and detection of
12 water in the system.

13 CHAIRMAN BLOCH: So you think your strategic
14 position has changed because of this new testimony? And
15 that tape is not in evidence?

16 MR. MICHAEL KOHN: The portion of the
17 deposition is not in evidence.

18 CHAIRMAN BLOCH: The portion of the deposition
19 shows what in your opinion?

20 MR. MICHAEL KOHN: That Mr. Burr heard "poured
21 out of it" on the tape.

22 CHAIRMAN BLOCH: He said that?

23 MR. MICHAEL KOHN: Yes, on three separate
24 occasions, and also submitted a signed correction to his
25 deposition, sworn under oath, and did not correct any of

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1 those statements.

2 MR. BLAKE: Why does he have to correct it?
3 If that's what he said in his deposition in 1994, before
4 any of this occurred, what do you mean "correct" it?

5 CHAIRMAN BLOCH: We believe that intervenor
6 has demonstrated enough so that he could call Mr. Stokes
7 if he chooses -- excuse me -- Mr. Burr if he chooses to do
8 so or the parties could arrange an agreement to have this
9 portion of the deposition admitted.

10 MR. MICHAEL KOHN: Thank you, Your Honor. I
11 guess we can discuss that during a break.

12 CHAIRMAN BLOCH: That's an excellent idea.

13 ADMINISTRATIVE JUDGE CARPENTER: Mr. Blake, I
14 think I misspoke. There's a large bunch of papers in my
15 office which I need to go retrieve.

16 MR. BLAKE: But I think you didn't entirely
17 misspeak because I don't know that we have seen the
18 evaluation which Mr. Stokes talked about today either,
19 Judge Carpenter. There are --

20 ADMINISTRATIVE JUDGE CARPENTER: I looked
21 through them because I thought maybe Mr. Stokes was going
22 to lead me. I'm surprised.

23 MR. BLAKE: I think we still have some more
24 work to do.

25 CHAIRMAN BLOCH: Take a 10-minute break now.

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1 (Whereupon, the foregoing matter went off the
2 record at 10:08 a.m. and went back on the
3 record at 10:20 a.m.)

4 CHAIRMAN BLOCH: While we were off the record,
5 Georgia Power has distributed a document to the parties
6 and the Board consisting of the notes of Art Dobby, the
7 meeting he had with Mr. Stokes.

8 BOARD EXAMINATION

9 CHAIRMAN BLOCH: Mr. Stokes, before we go any
10 further, I'd like to clarify the extent of your memory of
11 what happened when Mr. Johnston first came to tell you
12 about the moisture. Do you have much recollection of
13 those events?

14 THE WITNESS: You mean after he told me or the
15 whole process?

16 CHAIRMAN BLOCH: Yeah, the process of his
17 telling you.

18 THE WITNESS: I just think we were out there
19 working on --

20 CHAIRMAN BLOCH: Well, I just asked you if you
21 had much memory of it.

22 THE WITNESS: Very little. I mean, it's like,
23 like I said, we were out working on something. And he
24 says, "Oh, by the way," you know, "we found a little fog"
25 or whatever "coming out of the --" you know, these

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1 particular gauges, that type thing.

2 So as far as having a lot of memory around
3 that, I guess that's about as --

4 CHAIRMAN BLOCH: Did he say anything about why
5 he came to you about that fog?

6 THE WITNESS: He didn't say why he came, but,
7 I mean, it's just something out of the ordinary that --
8 you know, that they don't -- first of all, I don't know
9 why he was checking that particular point, but -- because
10 I don't think it's a standard place. But, anyway, I guess
11 the fact that they did and he found something there in the
12 way of moisture. So I guess he let it be known to Georgia
13 Power personnel.

14 CHAIRMAN BLOCH: So did you have any
15 discussion about the possible significance of this find?

16 THE WITNESS: Like I said, I don't recall that
17 particular discussion other than the fact that he didn't
18 seem to think very much of it himself either the way I
19 remember it. And I --

20 CHAIRMAN BLOCH: Did you have to do at least a
21 little mental gymnastics of whether or not the moisture
22 had come from within the control system?

23 THE WITNESS: Yes.

24 CHAIRMAN BLOCH: And what at that time led you
25 to believe that there was no possibility that the moisture

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1 could have come from within the control system?

2 THE WITNESS: As I stated sort of before, the
3 location of the filter down at the bottom of the panel,
4 that's where the air is going to enter. Nothing was found
5 there. No evidence of moisture, no evidence of anything
6 was -- related to moisture was found in the filter through
7 the blowdown process or through the inspection process
8 that occurred during the 18-month outage.

9 And it's -- like I was saying earlier, it's
10 just a short run of tubing, one-quarter-inch tubing, from
11 that point. By the way, that is the low point at the
12 filter. And that's just maybe four or five feet of
13 one-quarter-inch tubing from that point up and over to
14 those gauges.

15 It's very unlikely that -- I mean, why would
16 moisture tend to want to form in one place and not the
17 other place, surely the higher place and not the lower?
18 It's just it made no sense.

19 And the rest of the system, our normal checks,
20 checked out fine. We had no evidence of moisture-related
21 problems in the rest of the system, where we always check.
22 And this is a dead leg. And so it was introduced by we
23 felt the most likely thing, as we still do, is it was
24 introduced by calibration.

25 It's not going anywhere. It's just going to

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1 sit there, I mean, until somebody blows it out. There's
2 no way for it to travel throughout the system.

3 CHAIRMAN BLOCH: So you were so confident of
4 that at the time that you were convinced that a deficiency
5 report was not required?

6 THE WITNESS: Yes.

7 ADMINISTRATIVE JUDGE CARPENTER: Before we
8 resume, Mr. Blake, in this stack of papers which Mr.
9 Lamberski had provided to the Board, can you tell me
10 whether this engineering analysis of the yield of water
11 from some particular volume of air is included in there?

12 MR. BLAKE: I do not believe it is there. We
13 have just placed a call to the plant to find out about
14 this engineering evaluation that Mr. Stokes referred to
15 and whether or not there are any other pieces of paper
16 related to this event, Judge Carpenter. And I'll be able
17 to report back to you.

18 ADMINISTRATIVE JUDGE CARPENTER: Then I'll
19 stop looking for them.

20 FURTHER CROSS-EXAMINATION

21 BY MR. MICHAEL KOHN:

22 Q Mr. Stokes, can you tell me what documents you
23 reviewed -- let's break it into discrete areas -- since
24 you learned that you were going to be a witness and
25 testify again in this proceeding? Since you learned that

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1 the issue of water had been -- Mr. Johnston had identified
2 finding water and you knew that you were going to be
3 testifying again in this proceeding, can you tell me what
4 documents from that point forward you reviewed related to
5 this issue?

6 A The only thing that I did in relation to that
7 issue was to go through the actual inspections of the
8 other engines and then work with the disposition of the
9 deficiency card.

10 Anything related to that particular issue
11 you're talking about? That's all that I -- I didn't do
12 any other special reviews that I recall.

13 Q Do you have the completed deficiency card?

14 A Not with me, no.

15 Q And do you have the engineering report?

16 A No. I didn't bring any documents with me.

17 Q Did you know you were going to be testifying
18 about those documents?

19 A I knew I was going to be just testifying.
20 Nobody -- I mean, I can't anticipate what all documents
21 that may be required.

22 Q Did you talk about your testimony with anyone
23 before you took the stand today?

24 A No, sir.

25 Q Are you aware that Mr. Dobby took notes during

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1 his interview with you?

2 A Yes. He seemed to be taking notes.

3 Q Did you ever review those notes?

4 A No, sir.

5 Q Can you tell me now whether you recall Mr.
6 Johnston telling you about finding water in the pneumatic
7 system and then bringing you over to another portion of
8 the pneumatic system where he thought he may also find
9 water and opening it in your presence?

10 A Another portion of --

11 Q Another T, a similar location as to the
12 initial location where Mr. Johnston had observed the
13 water.

14 A No. I mean, I don't recall it being exactly
15 that way. I mean, I'm not saying that it wasn't. I mean,
16 he -- no. I guess the bottom line is I don't recall that.

17 Q And you don't recall -- do you recall Mr. Burr
18 being at the plant site that time?

19 A Yes.

20 Q Do you recall if Mr. Burr -- did you hear that
21 Mr. Burr went out with Mr. Johnston and witnessed the
22 opening of the T?

23 A Maybe. I'm not sure if he actually witnessed
24 it or not.

25 Q Did you in any way indicate to Mr. Johnston

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1 that you were not pleased with the observation of water
2 being found in the system?

3 A Yes. Initially. You know, obviously it was
4 kind of, you know, before thinking or paying attention to
5 where it is coming from, I'm sure my initial reaction was
6 of surprise.

7 Q And so if your initial action was surprise,
8 you were sort of startled by the revelation?

9 A I wouldn't say startled, but, I mean, it's --
10 like I say, it's a place that's not normally checked.
11 It's realizing almost immediately it's a deadhead area,
12 you know, once thoughts are, you know, quite calm.

13 But initially, I mean, it's something that
14 obviously was new to me. And I hadn't noticed it before
15 or been made aware of it before nor was he at our plant.

16 Q Focusing on the initial reaction, then, you
17 would call it as being startled? Is that the word you
18 used?

19 A No.

20 Q But the initial reaction that you had to the
21 observation was striking until you checked further?

22 A Yeah. I mean, as any other new, something
23 you're unfamiliar with, I guess, it's just different, you
24 know. So you have to let it soak in and then make an
25 engineering judgment on it.

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1 Q Would you -- I don't have much experience in
2 engineering matters, but I know if I went to the doctor's
3 and I'm going to get a test, I'm apprehensive. I get the
4 test results. I'm happy.

5 Is that the type of emotional range that was
6 going on?

7 A No, no. It wasn't very emotional, I mean, to
8 put it bluntly, I guess.

9 Q Did you take dew point measurements that day?

10 A I don't know that it was -- at what point the
11 dew point measurements came. You know, I don't think we
12 requested any special, you know, immediate measurement of
13 dew points at that particular time, but, you know, it's
14 part of our process. And it occurred.

15 So I don't think, you know, we requested
16 anything special at that point.

17 Q On transcript Page 7,281 you were asked, the
18 question was, on Line 6 -- do you have that in front of
19 you, sir?

20 A Let me --

21 Q Seven-two-eight-one.

22 A Yes, I have it.

23 Q And the question was, "And would documentation
24 be required if water was obtained in the air receiver?"

25 And your response is, "Yeah. One would expect

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1 them to document any finding of water in the air
2 receiver."

3 A Uh-huh.

4 Q In this same frame of mind, should I expect
5 anyone who found water in the pneumatic air system further
6 downstream than air receiver would document those
7 findings?

8 A I mean, to me I would still say I would expect
9 people to document what they find. Now, this one I'm not
10 so sure was documented. It's not a usual place they
11 check.

12 It's something that was handled immediately
13 and Georgia Power people were notified of. So maybe they
14 felt that there was not a need to document it. I can't
15 speak for the vendor.

16 Q So you were personally involved in the
17 decision not to document it, weren't you?

18 A Oh, no.

19 Q You didn't --

20 A You mean specifically tell somebody not to
21 document it?

22 Q Well, are you aware of it being documented
23 anywhere?

24 A I think I've looked at the work orders, work
25 packages. Some of them I hope -- I think -- well not all

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1 of them, but I think the ones from the last outage of Unit
2 2. And I didn't see any documentation of it.

3 Q So might it be, then, that other persons would
4 find water and not document it?

5 A I can -- I mean, obviously I can't speak for
6 everyone. I think I've provided an explanation for this
7 particular case, though.

8 Q Did you inform the shift supervisor of the
9 finding of water?

10 A No, sir.

11 Q Did you inform your boss of the finding of
12 water?

13 A No, sir.

14 BOARD EXAMINATION

15 CHAIRMAN BLOCH: Did you call in Mr. Burr?

16 THE WITNESS: Pardon me?

17 CHAIRMAN BLOCH: Did you call in Mr. Burr?

18 THE WITNESS: Call in Mr. Burr?

19 CHAIRMAN BLOCH: Did you speak to Mr. Burr
20 about it?

21 THE WITNESS: It may have been the other way
22 around. I'm not sure if it was -- you know, both of us
23 were essentially there. And we were on the same shift
24 working this outage.

25 So, I mean, we discussed it, if that's what

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1 you're saying. Ken and I discussed it in the resolution
2 of the matter. But he's not my boss.

3 FURTHER CROSS-EXAMINATION

4 BY MR. MICHAEL KOHN:

5 Q And who was your boss at the time the water
6 was in February-March of '85?

7 A Robert Moye.

8 Q Is there any reason you felt Mr. Moye should
9 not have institutional knowledge of what you found?

10 A You know, it's as I said, and maybe not
11 comprehensible to anybody that's not working there, but
12 it's -- it just was handled like any other -- I don't tell
13 him of every particular technical issue that goes on or
14 comes up out at the diesel.

15 I mean, if we have a problem with the -- you
16 know, an inspection on a cylinder line or an inspection
17 on, you know, what other -- any other piece of equipment
18 out there is not my -- I don't have time and no desire to
19 go and tell him of every last problem or should I say is
20 not a problem finding or anything that may come up.

21 We handle it and make a judgment from there as
22 to whether -- you know, if it was a situation where we
23 found water in the receiver or we found water in the
24 control air system or at an obvious place that we thought
25 could create a problem, then, you know, obviously, you

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1 know, a DC would be written and Mr. Moyer would be notified
2 and that type stuff.

3 But this particular case was just handled as
4 another technical issue and was handled. There's no
5 reason to go tell him, in our estimation.

6 Q Did you isolate the diesel and take any type
7 of corrective action the day you learned of the water?

8 A No.

9 Q On transcript Page 7,066 on Lines 6 through 8
10 --

11 A I don't think I have that.

12 MR. BLAKE: You may have to look in the black
13 binder I gave you, which is all the transcripts for those
14 days.

15 THE WITNESS: Okay. What date was that on?

16 MR. MICHAEL KOHN: This is June 3.

17 MR. BARTH: Which lines, Mr. Kohn?

18 MR. MICHAEL KOHN: The question begins on Line
19 3, and the answer ends on Line 8.

20 THE WITNESS: Okay.

21 BY MR. MICHAEL KOHN:

22 Q And I asked you, "And if I understand what
23 you're saying, then, if water is found within the diesel
24 air system, then the diesel is not operable?"

25 And your response is, "If we find water, we

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1 would isolate the diesel and then take steps to correct
2 it. But we have not found water."

3 This testimony, then, would not be accurate
4 because -- is that true because when, in fact, you did
5 find water, you've now testified that you did not take
6 steps to isolate it?

7 A Not entirely true. I think we still stick
8 with this in relation to where we normally -- I shouldn't
9 say even "normally" check it. I should even say where it
10 should be considered to create a problem, you know, within
11 the diesel system. And this one was not considered to be
12 in that type of location.

13 BOARD EXAMINATION

14 CHAIRMAN BLOCH: Just a minute. Mr. Stokes,
15 when you say "we," you're referring to yourself?

16 THE WITNESS: Myself and Mr. Burr, I think.
17 You know, we both discussed this issue and --

18 CHAIRMAN BLOCH: Okay.

19 THE WITNESS: -- made our decisions together.

20 CHAIRMAN BLOCH: All right.

21 FURTHER CROSS-EXAMINATION

22 BY MR. MICHAEL KOHN:

23 Q So if you find --

24 A Can I -- but, obviously, I'm speaking for
25 myself. I'm not -- I can't speak for Mr. Burr. So --

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BOARD EXAMINATION

1
2 CHAIRMAN BLOCH: You're recalling that you
3 agree with that?

4 THE WITNESS: Yes.

5 CHAIRMAN BLOCH: And Mr. Burr you think also
6 agrees with you?

7 THE WITNESS: That's the way I recall it, yes.

FURTHER CROSS-EXAMINATION

8
9 BY MR. MICHAEL KOHN:

10 Q So if I understand how you think your answer
11 would more accurately be stated here: If we found water
12 in a portion of the pneumatic system that we thought was
13 significant, then we would isolate it?

14 A I think this particular testimony was -- well,
15 I don't know. I shouldn't say. You know, we have our
16 normal places for checking dew point. And I believe
17 that's what this was in relation to, checking dew point at
18 the receiver and checking dew point in the panel.

19 If it comes to that condition, yeah, if we
20 found water there, obviously there's steps to be taken for
21 diesel isolation and then correction of the problem.

22 In this case the diesel was already isolated.
23 The diesel was out of service. It was during an 18-month
24 inspection. You know, obviously there's a lot of leak
25 checks and other checks that we go through before putting

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1 A Yeah, yeah, the lines where the water was
2 found.

3 Q Well, I thought you told me that subsequent to
4 this you found more water in other lines of the various
5 diesels?

6 A It was just this particular diesel I'm talking
7 about, these two. It was a one diesel or two, I guess,
8 maybe both of them. I really don't remember, but, yeah,
9 the ones in question.

10 Q Then you said you took dew point measurements?

11 A Dew point measurements are always taken prior
12 to returning the diesel to operability.

13 Q And the dew point measurements are taken at
14 the receiver?

15 A Normally at the receiver.

16 Q And so those dew point measurements normally
17 taken at the receiver wouldn't tell you what the air was
18 on the other side of the receiver, would they?

19 A They should. That's where it's coming from.

20 Q Well, if you find water on the other side past
21 the receiver, could it be that the air in the receiver
22 could be less humid, more dry than the air on the other
23 side?

24 A Why would it be that way?

25 Q Well, is it possible that there may have been

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1 the diesel back into service, including dew point.

2 And if the dew point checked out fine, as it
3 did in this case, and also that the logic test was
4 completed satisfactorily, if we determined this to be a
5 dead leg, the water's not going anywhere.

6 So we felt that all of the -- essentially, we
7 would cover these statements in our actions, if you will.

8 Q I have some -- first, the scope of the
9 testimony on Page 7,066, I think you're not looking at it
10 carefully. If you look at 7,065, the Board asks you, "Do
11 you understand that the absence of moisture when you check
12 it does not assure a determinant dew point?"

13 And your response is, "That's right."

14 And then I ask you, "If I understand what
15 you're saying, then, if water is found within the diesel
16 air system, then the diesel is not operable?" And your
17 response is that you would isolate it and take steps to
18 correct it.

19 A The diesel was isolated. It was out of
20 service.

21 Q But you took no steps to correct it?

22 A They blew the lines down.

23 Q Every line --

24 A No.

25 Q -- that water would have been in the system?

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1 a malfunction or something or the dryer had been turned
2 off and had been turned back on?

3 A During an outage, to try to explain it to you
4 carefully, during an outage, they are turned off. And
5 maintenance are -- maintenance is performed on the dryers.
6 And then the receiver is pressed up and verified to be in
7 good condition prior to emitting air into the system. So
8 no, you wouldn't really expect that.

9 Q Well, hasn't there been a problem with dryers
10 being found turned off?

11 A Yes.

12 Q Has that been a continuing problem since 1990?

13 A We've had an occurrence this past year is the
14 only one I know of in recent -- I mean, I don't know when
15 it was, a couple of months -- oh, probably in July, I
16 think. But that's all I know of for quite some time.

17 Q But wouldn't you say finding a dryer turned
18 off and turning a switch to turn it back on would be a
19 "Oh, never mind. We fixed the problem" in somebody's mind
20 in the organization?

21 A If the dryer was turned off and turned back
22 on?

23 Q If a person walked in and saw the dryer off
24 and said, "Oh, we must have left it off since our last
25 PM," or whenever, "Let's just turn it back on, wouldn't

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1 that be just an "Oh, never mind"?

2 A No, not at all.

3 Q So, as you would understand the way the
4 organization works, a technician who turns on a dryer --
5 let's say it had been off for a day. The next day they
6 had turned it on. That would be a big issue and some
7 paperwork would be written about it?

8 A At least now there is --

9 Q Well, let's go back to 1990.

10 A You know, in 1990, of course, I'm talking for
11 other people here. And I can't -- you probably are asking
12 the wrong person, but, I mean, I know there have been
13 instances where the dryers were left off for some period
14 of time.

15 And obviously dew points were taken and
16 checked and the system verified to be either operable or
17 inoperable. But, you know, I can't really speak
18 personally to what the plant would think.

19 Q What steps did you take to determine whether a
20 water was in the operating diesel in February and March of
21 1985?

22 A We didn't take any steps there.

23 Q Did you have any discussions about the
24 follow-up of the discovery of water?

25 MR. BLAKE: Excuse me. What was that

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1 question?

2 MR. MICHAEL KOHN: Let me rephrase it. It was
3 poorly asked.

4 BY MR. MICHAEL KOHN:

5 Q After your initial discussion, were there any
6 subsequent discussions or did all the discussions that you
7 recall happen on the same day?

8 A Between myself and who?

9 Q Between yourself, Mr. Johnston, and Mr. Burr.

10 A I didn't talk to Mr. Johnston following my
11 conversation with Mr. Dobby.

12 Q No. I'm talking the day the water was
13 detected.

14 A Oh. Discussions with anyone else? No.

15 Q And how many discussions do you recall
16 occurring that day?

17 A Just that one as far as I know.

18 Q One discussion?

19 A And you solved the -- and you answered the
20 question. And then it's answered.

21 Q So the discussion you're referring to, if I
22 understand it, was one where you, Mr. Burr, and Mr.
23 Johnston participated?

24 A That's the way I remember it.

25 Q Do you remember a Mr. Pesout?

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1 A Yeah, I know Mr. Pesout.

2 Q Was he there that day?

3 A He -- I'm not saying he wasn't. He could have
4 been. It just -- I think Johnston was our main point of
5 contact. Pesout was probably there. I think they had
6 overlapping shifts. So --

7 Q Do you remember any conversations you had with
8 him?

9 A I'm not saying I didn't, but I don't recall a
10 particular conversation with Mr. Pesout.

11 Q And, if I understand it, no engineering
12 analysis was performed to determine how the fluid got into
13 the system back in February or March of 1995?

14 A That's -- you're correct, I mean, no
15 documented DC or MWO.

16 Q What triggered the engineering analysis that
17 followed? At some point you testified --

18 A Just the -- oh, the following, the one that
19 just recently occurred?

20 Q Yes.

21 A The visit by -- I don't know who triggered the
22 plant personnel because I didn't initiate the process, but
23 it all occurred after my conversation with Mr. Domby. So
24 other plant personnel initiated the actions.

25 Q Would you consider finding water in the

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1 pneumatic air supply system a condition adverse to
2 quality?

3 A Water in the wrong place. It could cause some
4 problems.

5 Q So in order to be adverse to quality, the
6 water would have to have been found in the wrong place,
7 not just anywhere within the pneumatic system?

8 A In my opinion, it has to be able to get there,
9 and it has to be noticed within a portion of the system
10 where it could get into the Calcon sensors, into the logic
11 elements, or whatever else. This was not in that
12 location.

13 MR. MICHAEL KOHN: Your Honor, the next
14 questions I have would be based on Mr. Dobby's notes,
15 which I have not completed reading yet. And I'm not
16 opposed whether -- Staff may want me to complete before we
17 do that -- before they start questioning. But I would
18 need sometime to review his notes.

19 BOARD EXAMINATION

20 CHAIRMAN BLOCH: I could ask a few questions
21 before we take a break for that. Mr. Stokes, how
22 carefully did you consider the possibility that there
23 could be some mechanism by which moisture could have
24 gotten into the dead end from the system itself -- the
25 control air system?

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1 THE WITNESS: How carefully?

2 CHAIRMAN BLOCH: Yeah.

3 THE WITNESS: I mean, I'll just put it that --

4 CHAIRMAN BLOCH: At the time you first heard
5 about it.

6 THE WITNESS: Yeah, I know. I can only say
7 that in our minds it's -- I shouldn't say it's simple, but
8 it seemed obvious really -- I mean, looking at the system
9 and knowing the fact that, you know, we didn't find
10 moisture in the other places where you would expect to
11 find moisture. It just seemed obvious to me, and
12 something that was quickly and easily put to bed in my
13 opinion.

14 CHAIRMAN BLOCH: If there were, let's say, 80
15 degree dew point air in the system but it wasn't
16 condensing, do you know whether or not it would be caught
17 in the filter?

18 THE WITNESS: If there were 80 degree dew
19 point air and it wasn't condensing?

20 CHAIRMAN BLOCH: Yeah, it could be 80 degrees
21 in the room.

22 THE WITNESS: It's normally -- I don't know.

23 CHAIRMAN BLOCH: Do you know --

24 THE WITNESS: -- even hot or in the panel
25 because you have a heater inside there that keeps it --

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1 CHAIRMAN BLOCH: So let's assume that somehow
2 on the 60 degree side you had 80 degree dew point air. On
3 the 60 pound side, sorry.

4 THE WITNESS: I understand.

5 CHAIRMAN BLOCH: You're at 80 degree dew point
6 air, and the room was at 85 degrees, so there's no
7 condensation taking place -- would anything get trapped in
8 the filter?

9 THE WITNESS: No.

10 CHAIRMAN BLOCH: All right, now under those
11 circumstances, if the valve to the dead end was opened and
12 then closed, would that trap some moisture in the dead
13 end?

14 THE WITNESS: Why are we -- I guess I don't
15 understand the line of this.

16 CHAIRMAN BLOCH: Why what? What's the
17 question?

18 THE WITNESS: I guess I'll try to answer it
19 the best I can. Now, what you're saying at that point in
20 time if we open the cap -- there's a cap actually at the
21 T, is that what you're asking?

22 CHAIRMAN BLOCH: No, I thought there was a
23 valve that made it a dead end.

24 THE WITNESS: There's an isolation valve that
25 comes in like this. There's an isolation valve, then goes

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1 into a T connection. This side goes to the gauge, and
2 this side has a cap on it. So you'd have to remove the
3 little cap, and then they would connect their test
4 instrumentation there to actually pump up the gauge while
5 it's isolated from the system.

6 CHAIRMAN BLOCH: Okay, is there any way in
7 which the isolation from the system would be broken?

8 THE WITNESS: No.

9 CHAIRMAN BLOCH: No.

10 THE WITNESS: That's always open.

11 CHAIRMAN BLOCH: So it's always -- it always
12 is a dead end key, and there's no communication ever
13 between the inside of the system and that dead end?

14 THE WITNESS: That's right.

15 CHAIRMAN BLOCH: And there's no way that could
16 happen by accident either?

17 THE WITNESS: No.

18 CHAIRMAN BLOCH: Thank you. You mentioned dew
19 point measurements on the 60 pound side. Under what
20 circumstances are those measurements taken?

21 THE WITNESS: If you find moisture in the air
22 receiver and -- well, first of all, you have to find a
23 high dew point in the air receiver, and then actually
24 identify moisture in the receiver. Then, I believe,
25 they're instructed to isolate the receiver and then go to

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1 the control panel on the 60 pound side and make some
2 measurements there also to make sure if you've got -- to
3 see if you've got water on the 60 pound side or not.

4 CHAIRMAN BLOCH: Moisture or water?

5 THE WITNESS: Even moisture. I mean, you want
6 to see if you have a higher than normal dew point, which
7 it runs normally about what, 17 degrees or so, 20 degrees
8 on the 60 pound side.

9 CHAIRMAN BLOCH: Do you know what the history
10 of dew point measurements has been on the 60 pound side?

11 THE WITNESS: I've never found any -- well,
12 there's not much call to go there, except in special
13 request situations. Generally we don't -- I mean, because
14 we haven't -- we've never found water in the receiver.
15 But you know, in certain requests, certain times just like
16 this one, for instance, the past time, we would ask them
17 to go in there and take a special measurement on the 60
18 pound side.

19 So there's no history of out of the ordinary -

20 -

21 CHAIRMAN BLOCH: Can those records be
22 retrieved?

23 THE WITNESS: You'd have to know at what
24 instances they occurred, you know. I mean, you're talking
25 huge amounts of documentation that you may just have to

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1 shuffle through to see if it ever occurred or not.

2 CHAIRMAN BLOCH: You can't retrieve it by a
3 machine?

4 THE WITNESS: Well, if you did retrieve it by
5 a machine, I mean, there's still a lot of documentation to
6 filter through on the machine necessarily just to get to
7 that point. And then once you got to the point of
8 identifier a work order where it may be -- you know, where
9 they may have taken this measurement, then you'd have to
10 go and pull the actual document to make sure that there's
11 no discrepancies between what the operator typed in on the
12 computer and what's actually recorded on the work order.

13 So you're talking -- it's like searching
14 through a -- for a needle in a haystack really. It's so
15 few occurrences where they would actually take a
16 measurement on the inside of the panel that it's just --

17 CHAIRMAN BLOCH: So that also is an advantage
18 if you have a Boolean search technique. I mean, if there's
19 so few of them, you can find it fast. Are your records
20 searchable by Boolean search techniques?

21 THE WITNESS: I don't know. I don't know.

22 CHAIRMAN BLOCH: And what do you know about
23 special requests for measurements on that side? How often
24 do the special requests happen?

25 THE WITNESS: You could probably count them on

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1 your hand. It's not -- there's not very many.

2 CHAIRMAN BLOCH: Do you recall any specific
3 instances of it?

4 THE WITNESS: Well, this past one is the most
5 recent, obviously.

6 CHAIRMAN BLOCH: But how about during 1990, do
7 you recall that happening during 1990?

8 THE WITNESS: Like I said, if we didn't find
9 anything at the receiver, you know, we may or may not have
10 gone in and checked inside there. I don't remember, to be
11 absolutely honest. I don't remember.

12 CHAIRMAN BLOCH: I remember in particular
13 there was a conversation about how the dew point would be
14 lower on the 60 pound side. Did anyone take measurements
15 at that point?

16 THE WITNESS: Would they or did they?

17 CHAIRMAN BLOCH: Did they, when they were --

18 THE WITNESS: Well, if you don't -- I guess
19 what I'm saying is if you --

20 CHAIRMAN BLOCH: Well, after April 6th, for
21 example, when you found high dew points at the receiver on
22 all eight receivers. Did anyone take measurements on the
23 60 pound side?

24 THE WITNESS: They may have.

25 CHAIRMAN BLOCH: I didn't see them on the

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1 MWO's.

2 THE WITNESS: Yeah, I'm not saying they did.
3 They may have. Like I said, that process -- that whole
4 process there was as we exhaustively (sic) went through
5 the -- is more of a personnel problem using their
6 equipment and possibly even an erroneous or a bad piece
7 of equipment in one case. But mostly it's -- I mean, it's
8 just purely not knowing how to use your equipment.

9 CHAIRMAN BLOCH: I'd like to know if we have
10 any records of dew points taken on the 60 pound side after
11 April 6th in order to follow up on the high readings --
12 whether anyone thought to check on the 60 pound side.

13 MR. BLAKE: I will check -- double check. I
14 think that that --

15 CHAIRMAN BLOCH: I think you probably could
16 find it within a week of the event. I don't know how easy
17 it is for you to search your records either. That's not
18 something --

19 MR. BLAKE: I don't know the answer either,
20 Judge Bloch. I would guess at this point that all those
21 records have been provided in one way or another and
22 somebody would have come across it if it exists. But we
23 can double check.

24 CHAIRMAN BLOCH: It's not on the MWO's. But
25 it sounds like there may be a special -- would there be

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1 any record made of these readings on the 60 pound side?

2 THE WITNESS: You know, if it's not documented
3 on the MWO, the only other place could be the rounds sheet
4 or the control room log. But I mean, obviously the
5 normal places -- if you've got a work order, you're going
6 out to do a check on the receiver, then you would document
7 whatever other steps someone may have told you to do
8 outside of that on there too. So I would expect it to be
9 there.

10 CHAIRMAN BLOCH: I have no further questions.

11 MR. BLAKE: I think you miscommunicated with
12 Mr. Stokes in some of your questions and answers.

13 CHAIRMAN BLOCH: Maybe you can straighten him
14 out.

15 MR. BLAKE: It had to do with the degree to
16 which this leg is isolated or not isolated, and I would
17 like to ask him a couple of questions.

18 CHAIRMAN BLOCH: Please do that.

19 REDIRECT EXAMINATION

20 BY MR. BLAKE:

21 Q Do you have that schematic still before you?

22 A Yes.

23 Q Is the isolation valve number 40 indicated on
24 that normally open or closed?

25 A It's open.

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1 Q So when the system is in normal operation,
2 that isolation valve is open, and this entire dead end,
3 including the gauge, is open to the control system?

4 A Yes.

5 CHAIRMAN BLOCH: It was a miscommunication.

6 MR. BLAKE: Yes, that's what I thought. But
7 when the gauge is calibrated, is that isolation valve 40
8 closed?

9 THE WITNESS: Yeah, it's closed.

10 BY MR. BLAKE:

11 Q And there's no way to translate anything -- if
12 there were any water introduced in the course of
13 calibrating gauge nine, there would not be a way for it to
14 get back into the normal control system?

15 A That's right.

16 MR. BLAKE: I think, Judge Bloch, that it was
17 that miscommunication between the two of you.

18 CHAIRMAN BLOCH: I was actually looking for
19 the possibility that when it's closed there could be
20 moisture trapped from the system on that side.

21 THE WITNESS: That's what I thought you were
22 looking for.

23 CHAIRMAN BLOCH: And you're saying that can't
24 happen because of what?

25 THE WITNESS: When it's closed? Then how

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1 would you --

2 CHAIRMAN BLOCH: All right, when it's closed,
3 it will trap a sample of air from the control air system,
4 isn't that correct?

5 THE WITNESS: Correct.

6 CHAIRMAN BLOCH: And if there was high dew
7 point in that sample of air, that would be trapped in the
8 dead end, right?

9 THE WITNESS: Correct.

10 CHAIRMAN BLOCH: Now how do you know that
11 that's not the source of the moisture that was found by
12 Mr. Johnson?

13 THE WITNESS: Well, because there's -- I mean,
14 you can't isolate it and then have wet air on one side and
15 not on the other side. I mean, you've got to -- you know
16 what I'm saying? The air has got to come through the
17 filter and, you know, if you find moisture -- if it's
18 going to precipitate out on this side, then it's going to
19 precipitate out on the other side, is all I'm saying. So
20 -- and plus there's such a little volume of air there that
21 it could hardly produce anything visible.

22 BOARD EXAMINATION

23 ADMINISTRATIVE JUDGE CARPENTER: Mr. Stokes,
24 you just make this qualitative statement. Have you ever
25 calculated how much water you could get trapped in there?

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1 THE WITNESS: Yeah.

2 ADMINISTRATIVE JUDGE CARPENTER: How much?

3 THE WITNESS: I didn't calculate it. I was
4 saying it was calculated on that DC. And like I was
5 saying, it would take -- well, estimating the whole line,
6 not just that little bit, but the while line --

7 ADMINISTRATIVE JUDGE CARPENTER: No, the
8 question relates to the volume down -- between the
9 pressure gauge and this isolation valve.

10 THE WITNESS: It's not calculatable. I mean,
11 it's not -- it's so small that you couldn't -- I mean,
12 there's -- I mean, you couldn't get any essentially --
13 squeeze enough moisture out of there to see it. There's
14 just no volume there.

15 ADMINISTRATIVE JUDGE CARPENTER: Well, you
16 know, if there's a chance that what you're saying is the
17 truth, it just would be nice to make a straightforward
18 calculation.

19 THE WITNESS: Well, we took it a step farther
20 though and took it from the filter, you know, from the
21 whole line from the filter all the way up to there. And
22 there's -- I mean, even from that, it's like one to the
23 minus -- times ten to the minus three.

24 MR. BLAKE: Ten to the minus three what?

25 THE WITNESS: Pounds -- I'm sorry, cubic feet,

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1 if I remember right. I mean, in other words, you could
2 produce -- it takes --

3 ADMINISTRATIVE JUDGE CARPENTER: Mr. Stokes,
4 let's just wait until we get the piece of paper. That's
5 why we need the piece of paper.

6 THE WITNESS: That's right.

7 CHAIRMAN BLOCH: Let me finish up the
8 stupidity I started with before, because I want to know
9 that it's stupid. In the testing of the gauge, does the
10 process necessarily clear out any moisture that would be
11 in there before the testing?

12 THE WITNESS: No.

13 CHAIRMAN BLOCH: So after the testing is done,
14 the line is then opened. Do you know what would happen to
15 moisture that had been in the gauge area during the
16 testing?

17 THE WITNESS: It would stay there.

18 CHAIRMAN BLOCH: It would stay there. Now,
19 could there be a cycling effect where over several cycles
20 of testing there would be an increment of moisture each
21 time? Now why is that?

22 THE WITNESS: Well, that's what I was trying
23 to say. It's so small that it's just very -- I don't
24 intend to say unlikely. I guess we should go with what
25 Dr. Carpenter said and let's wait and see your

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1 calculations on this other thing. But you know, and then
2 you guys can read it and let it sink in as far as what
3 we're trying to say without me confusing you here.

4 But it was determined from that that it's
5 really not possible.

6 CHAIRMAN BLOCH: But intuitively, when you saw
7 this the first time, you were sure that there couldn't be
8 any accumulation of moisture in this dead end?

9 THE WITNESS: Very small. I mean, --

10 CHAIRMAN BLOCH: Other than being introduced
11 during the testing process?

12 THE WITNESS: Yes.

13 CHAIRMAN BLOCH: All right, Mr. Kohn, how much
14 time will you need for the break to look at those notes?

15 MR. MICHAEL KOHN: Twenty minutes. There's
16 also -- I'm going to discuss some technical matters with
17 my client, so there will be questions on technical matters
18 as well.

19 CHAIRMAN BLOCH: So if there's no objection,
20 we'll recess until 11:25.

21 (Whereupon, the proceedings went off the
22 record from 11:07 a.m. until 11:30 a.m.)

23 CHAIRMAN BLOCH: Morning again. Mr. Kohn?

24 MR. MICHAEL KOHN: Thank you, Your Honor.

25

CROSS EXAMINATION

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1 BY MR. MICHAEL KOHN:

2 Q Mr. Stokes, did you have a discussion with Mr.
3 Johnson how to figure out how the water got into the
4 system that was detected in February/March of '95?

5 A I don't recall specifically our discussion.

6 Q And did Mr. Johnson tell you this was the
7 first of a kind observation at Georgia Power at Plant
8 Vogtle?

9 A Yeah.

10 Q Is the low point of the -- we were looking at
11 the schematic diagram, and the 250 pound air supply to the
12 control system would be the low point -- excuse me.
13 Between the -- starting where the starting air begins
14 until the T, isn't it true that the low point in the
15 system would be the lines running through the trench?

16 A Yeah, the absolute lowest point are the lines
17 going through the trench, yeah. But as it comes in from
18 the trench -- what I was saying earlier, as it comes in to
19 a measurable point there to the trench and to the filter,
20 then that's just, you know, several inches above the
21 trench obviously.

22 Q Okay, and the filter is higher than the
23 trench?

24 A Yes.

25 Q It's higher than the lines on the trench?

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1 A Yes.

2 Q And if you would look at the diagram, the tap
3 identified --

4 CHAIRMAN BLOCH: We're talking about GPC II-
5 188.

6 MR. MICHAEL KOHN: Thank you, Your Honor.

7 BY MR. MICHAEL KOHN:

8 Q The tap identified on the bottom portion
9 between B81 and the 31 pressure switch -- the tap
10 identified on this drawing between that is lower in
11 elevation than the filter, correct?

12 A Yes.

13 Q Now --

14 CHAIRMAN BLOCH: Is that independent
15 knowledge, or is that somehow on this diagram?

16 THE WITNESS: No, you can't tell on the
17 diagram. Maybe from your pictures that you have.

18 BY MR. MICHAEL KOHN:

19 Q Have you reviewed Mr. Dombey's notes during the
20 break?

21 A Yeah, I just briefly went over them a few
22 minutes ago.

23 Q I guess we've will mark -- did you review the
24 handwritten and the typed or just the typed?

25 A No, just the typed.

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1 Q We will mark the typed notes as Intervenor's
2 II-242.

3 CHAIRMAN BLOCH: Granted. They are unnumbered
4 notes. The first page says meeting minutes, August 17,
5 1995; meeting with Bill Burmeister, Kenny Stokes, 7:50
6 a.m. They're all neatly typed, double spaced, with an
7 extra space between paragraphs. And some of the pages are
8 numbered. The pages are numbered after the first page.
9 The last typed page is page ten. And after that, there
10 are four unnumbered pages of handwritten notes.

11 (Whereupon, the above-referenced
12 document was marked as Intervenor's
13 Exhibit II-242 for identification.)

14 MR. MICHAEL KOHN: We're not including the
15 handwritten notes at this time.

16 CHAIRMAN BLOCH: Handwritten notes are being
17 ripped off.

18 MR. BARTH: Mr. Kohn, if you're going to use
19 them later, wouldn't it be more convenient just to make
20 them part of this exhibit, which is all together?

21 MR. MICHAEL KOHN: Certainly. All right,
22 let's remark it with the four pages of handwritten notes
23 as well.

24 CHAIRMAN BLOCH: Done.

25 BY MR. MICHAEL KOHN:

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1 Q I thought earlier you mentioned to me that Mr.
2 -- you and Mr. Johnson did not talk about how the moisture
3 ended up at the location, is that --

4 A At the time of the discussion?

5 Q Yeah.

6 A Like I say, I don't remember exactly, you
7 know, how that conversation went, to be honest with you,
8 you know, back during that time.

9 Q All right, then on -- so on page five of these
10 type written notes, the third paragraph down where you're
11 explaining what Mr. Johnson said, this is a sense more
12 speculative? It's not -- you don't really remember what
13 was said?

14 A That's -- really I don't have a real good
15 recollection of what was said.

16 Q And this is just some postulated
17 reconstruction in your mind right now?

18 A About what specific in response for the
19 question stated?

20 Q Excuse me?

21 A What part are you talking about here?

22 Q That Mr. Johnson explained the location at
23 issue was a stagnant place, and t his whole conversation.
24 You don't really recall what the conversation was?

25 A Well, yeah, I mean, as far as that portion of

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1 it being stagnant and that type situation, yes. But what
2 his speculations were on how it got there, I guess I don't
3 have a clear recollection of what he may have speculated.

4 BOARD EXAMINATION

5 CHAIRMAN BLOCH: Mr. Stokes, at the time of
6 the incident, what was the best explanation you had of how
7 the water got there?

8 THE WITNESS: A couple of things. The best
9 explanation was like I said, I still felt within myself
10 that it was introduced through the calibration process.
11 But that didn't rule out the possibility like you guys are
12 saying or Dr. -- I think it was you that was saying that
13 yeah, maybe over a period of time, you know, the way they
14 calibrate this thing and they isolate the valve and then
15 they open it up and you know, maybe you could introduce
16 some moisture in there.

17 But it's just very highly unlikely I thought
18 at the time because of the amount of tubing that was
19 involved. I didn't do a calculation of sorts at that
20 time, but it just didn't seem very likely. The bottom
21 line was at least it was in a dead head area and not going
22 to go anywhere, and it was a very small amount of
23 moisture.

24 CHAIRMAN BLOCH: I noticed in your discussion
25 with Mr. Domby on page seven you said you didn't know

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1 where the moisture comes from, and then you speculated
2 about a small leak to the atmosphere in the pressure
3 gauge. But I don't see anything -- you didn't say that?

4 THE WITNESS: But that's -- I said that. I
5 said that. And at that time, when I was talking to him, I
6 was speculating again. I guess off of my head at that
7 point in time, not that that's what I thought back then.
8 It's just -- I guess I was kind of taken off -- I didn't
9 say off guard, but you know, realizing that I had left
10 something out of my testimony unintentionally. I was a
11 little bit taken off guard here by the situation.

12 So I was speculating of how else right off the
13 top of my head that it might get there. But obviously
14 that's not a very good speculation, because you know, we'd
15 notice some sort of problem with the gauge if we were
16 having a leak there.

17 CHAIRMAN BLOCH: When was the first time you
18 speculated about the introduction of water through the
19 testing of the gauge?

20 THE WITNESS: Well, actually that's my initial
21 thought way back when. I don't guess it's documented
22 anywhere, but it's my initial thought when we first
23 discovered it.

24 CHAIRMAN BLOCH: Did you tell that thought to
25 Mr. Johnson?

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1 THE WITNESS: I don't recall.

2 CHAIRMAN BLOCH: Johnston.

3 THE WITNESS: Johnston, yes.

4 MR. BLAKE: I want to go back, Mr. Kohn, to
5 your questioning on five uninformed by Mr. Domby that the
6 he's in that paragraph -- he explained the location --
7 those he's were Mr. Stokes.

8 ADMINISTRATIVE JUDGE MURPHY: Does that change
9 your understanding of his answer?

10 MR. MICHAEL KOHN: Your testimony is now that
11 your initial reaction was that the cause of the water was
12 probably due to this testing of the gauge -- that's what
13 you thought when you first learned about the water?

14 MR. BARTH: Excuse me, I didn't hear the
15 answer to the Judge's question. Perhaps I wasn't paying
16 close enough attention. The Judge's question, Mr.
17 Murphy's question, Judge Murphy's question.

18 MR. MICHAEL KOHN: Yes, he said does --

19 CHAIRMAN BLOCH: It was a general question.

20 ADMINISTRATIVE JUDGE MURPHY: I was just
21 trying --

22 MR. BARTH: Yes, I was waiting for the answer,
23 Your Honor.

24 ADMINISTRATIVE JUDGE MURPHY: I was asking
25 that of Mr. Kohn. And I presume that he is going to

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1 clarify it with his questions.

2 MR. BARTH: Thank you, Your Honor.

3 MR. MICHAEL KOHN: I hope so.

4 BY MR. MICHAEL KOHN:

5 Q Your initial thought was that you had water
6 that must have gotten in there through this testing of the
7 300 pound gauge, is that correct -- the calibration of the
8 300 pound gauge?

9 A That's the way I recall it, yeah. And that's
10 still my thought now.

11 Q And then you sat down with Mr. Dombay to go
12 over, it looks, in a fair amount of detail what happened.
13 But it's my reading of these notes -- I didn't see
14 anything mentioned about this speculation about water
15 getting in through the 300 pound gauge. Did I miss it
16 when I read through this?

17 A Yeah, I mean, you know, I thought I had said
18 that, but I guess apparently I didn't. But obviously I
19 didn't. It's not here. But I mean, I don't have an
20 explanation for why it's not on here. It still was my
21 initial thought, and I went through another process of
22 here possibly how water may have gotten in there. And
23 that's it. I mean, to the best of my recollection.

24 Q So you can't explain then why your
25 speculations as to the source of the water did not include

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1 in these notes what you believe at the time was the
2 speculation which you apparently still believe today could
3 be the reason.

4 A I don't know why they're not in here, if
5 that's what you're asking.

6 Q There are plant records, are there not, that
7 you could look at to determine the process used to
8 calibrate the gauges? There's a procedure that was
9 employed at the time, wasn't there?

10 A Yes.

11 Q Did you ever bother to look at those
12 procedures?

13 A You mean during the last outage?

14 Q Back to '90, at any point to look at your
15 theory to see if it --

16 A It may not necessarily tell what medium they
17 used to pressurize it with.

18 CHAIRMAN BLOCH: Well, that's true; but it
19 may. If you haven't looked at it, you don't know whether
20 it --

21 THE WITNESS: I actually did look -- I mean, I
22 looked at some sheets, but I'm trying now to -- I don't
23 think it says. Like I say, I'm pretty sure it doesn't say
24 on there. At least on the data sheets that -- their
25 procedures leaves them open to use whatever they want to

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1 use. And their data sheet doesn't -- as I recall, it
2 doesn't specify what they used or you know, if it's a
3 nitrogen bottle or what.

4 BY MR. MICHAEL KOHN:

5 Q The M&TE -- the equipment used during these
6 procedures would all be M&TE equipment, correct?

7 A I don't know if they tagged the bottles of
8 nitrogen or what.

9 Q Well, not necessarily the bottle of nitrogen,
10 but the apparatus and assembly used would be M&TE
11 equipment, correct?

12 A The other gauges or whatever that --

13 Q And all that would be logged in these work
14 orders or in the -- when they were performing the
15 procedures?

16 A Maybe. It should.

17 Q And based on the actual equipment and
18 apparatus used, don't you think you could determine
19 whether it was water or air?

20 CHAIRMAN BLOCH: Or some other gas.

21 MR. MICHAEL KOHN: Nitrogen.

22 THE WITNESS: I mean, you're speculating. I
23 don't know if you can or not.

24 BY MR. MICHAEL KOHN:

25 Q Is it true that when you testified here in

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1 this proceeding concerning water and the moisture that you
2 had a personal bent in slanting things away from moisture
3 because you were afraid that Mr. Mosbaugh was just going
4 to blow it out of proportion if you said something?

5 A Absolutely not. I mean, if there was -- if
6 there's moisture out there and moisture into a place where
7 we thought it was a problem in 1990 or today, then I'd be
8 the first to stand up and say yeah, it's there. I mean, I
9 have no reason -- I mean, if I thought he was right about
10 what he's speculating in 1990, I mean, I don't care. It
11 means nothing to me. If he's right, he's right. But he's
12 not.

13 I mean, we went through an exhausted process
14 and we found the actual root cause of what happened in
15 1990. And I think that's proven out. So no, I don't have
16 anything against Mr. Mosbaugh or -- at all.

17 Q On page eight of the notes when you were asked
18 again why you didn't recall the event during the hearings,
19 in response to that question you state that this event is
20 irrelevant, but they'll (referring to Mr. Mosbaugh) --
21 they'll take it as highly relevant. Maybe is the
22 "they'll" Mr. Mosbaugh and his counsel? Who is the
23 they'll?

24 A Yeah, I mean exactly. I mean, after sitting
25 through four and a half days of these proceedings in the

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1 past, I mean, I know how things are blown out of
2 proportion. And that's -- those are my remarks, and
3 that's what I meant by them.

4 Q And you knew that -- you knew the significance
5 of moisture and water to this licensing proceedings when I
6 deposed you. We had significant amount of discussion
7 about it, didn't we?

8 A Yes.

9 Q Okay. And I'm trying to get your mind set.
10 You now are told there is water found in the pneumatic
11 system. Do you believe that part of your motivation,
12 maybe subconsciously, was that Mr. Mosbaugh would blow
13 that fact out of proportion and it would just cause undue
14 havoc for your employer?

15 A No. I mean, no, not at all.

16 Q And so your sole motivation, as I understand
17 what you're telling me, for not testifying about it is you
18 simply forgot?

19 A Yeah, I don't have the motivation -- personal
20 motivation to sway -- to say anything that would help the
21 company or hurt the company. I'm just trying to basically
22 tell the truth and the way I remember it. And this was,
23 as I state here -- the best I can say, it just was not
24 something that stood out in my mind. I wasn't try to
25 conceal anything from you or anyone else.

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1 Q Can you tell me whether the truth of the
2 matter is with respect to the blow down of the air
3 receiver that the air receivers are -- let me rephrase it.

4 (Laughter.)

5 Is it true, to the best of your knowledge,
6 that all the air receivers were blown down after the
7 original high dew point readings were obtained?

8 MR. BLAKE: Objection.

9 CHAIRMAN BLOCH: You're going to have to tie
10 it into this event. We'll give you a couple of questions.

11 MR. MICHAEL KOHN: Okay, Your Honor, it's
12 relevant to the new documentation -- the last supplement
13 to their interrogatory responses that was received
14 yesterday.

15 MR. BLAKE: So we've shifted gears. Are we
16 done now --

17 CHAIRMAN BLOCH: Are you done with this aspect
18 first?

19 MR. MICHAEL KOHN: Yes, I'm done with this
20 aspect.

21 MR. BLAKE: Okay, and I think it is fair for
22 him to ask -- this is what we distributed yesterday on the
23 interrogatory response. Mr. Stokes is the supporter of
24 that. And therefore, to the extent there are questions
25 about it, I think it would be appropriate. So I don't

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1 have an objection to this as long as I understand we're
2 moving to a new area.

3 BOARD EXAMINATION

4 CHAIRMAN BLOCH: Before we do that, I just
5 want to ask a couple of questions I've been thinking
6 about, the speculation here about the moisture in the test
7 and the calibration of the gauge. After the calibration
8 is done and the equipment is taken away, at that point the
9 valve is opened, isn't it?

10 THE WITNESS: It should be open, yes.

11 CHAIRMAN BLOCH: And how often are these
12 calibration tests done?

13 THE WITNESS: Every refueling outage -- every
14 18 months.

15 CHAIRMAN BLOCH: 18 months. Do you know what
16 would happen to moisture that was left in that dead end
17 over an 18 month period? It's a modeling question, isn't
18 it?

19 THE WITNESS: Yeah.

20 CHAIRMAN BLOCH: It could go back into the
21 system, right?

22 THE WITNESS: Well, I wouldn't expect it to go
23 back into the system. I mean, the way this thing is
24 located -- I mean, once you pressurize it, it's -- I mean,
25 there's essentially no flow to take any of that air or --

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1 CHAIRMAN BLOCH: There's no molecular mixing
2 over 18 months? Do you know whether there's normal
3 processes of the movement of the molecules would get that
4 air -- that moisture out of there or not?

5 THE WITNESS: I mean, it shouldn't. I don't
6 think it would thoroughly mix.

7 CHAIRMAN BLOCH: So your opinion is that it
8 wouldn't go out? Are you an expert on that kind of
9 situation?

10 THE WITNESS: I wouldn't call my expert on --
11 I wouldn't call myself an expert on that, no.

12 CHAIRMAN BLOCH: Well, I know I'm not also,
13 but --

14 THE WITNESS: I wouldn't call myself an
15 expert.

16 CHAIRMAN BLOCH: Mr. Kohn, on the other
17 matters?

18 MR. MICHAEL KOHN: Okay. I've marked as
19 Intervenor's II-230 -- I think it was previously marked --
20 excuse me, it was not marked on the record, but I think
21 this number was reserved. It is Georgia Power Company's
22 3rd Supplemental Response to Allen Mosbaugh's 3rd set of
23 interrogatories and request for documents. It is a nine
24 page document dated August 8, 1994.

25 CHAIRMAN BLOCH: It may be marked II-230 for

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1 Intervenor. Did you say the length of it?

2 (Whereupon, the above-referenced
3 document was marked as Intervenor's
4 Exhibit II-230 for identification.)

5 (Whereupon, the proceedings went off the
6 record briefly.)

7 CROSS EXAMINATION (continued)

8 MR. MICHAEL KOHN: Do you recall seeing this
9 document before?

10 THE WITNESS: Yes.

11 CHAIRMAN BLOCH: The witness was handed a copy
12 of Intervenor's Exhibit 230.

13 BY MR. MICHAEL KOHN:

14 Q I want you to look at page two of the
15 document, Interrogatory 6. Do you see that?

16 A Yes, sir.

17 Q And it says attached is a table which
18 identifies instances where Georgia Power obtained
19 unsatisfactory dew point readings on the Vogtle emergency
20 diesel generator air supply system. Then it says the
21 table also notes the corrective actions taken of which GPC
22 is aware. Do you see that?

23 A Yes.

24 Q Okay, and your name appears in brackets above
25 that answer. Do you know what that means? Your and Mr.

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1 Burr's name appears.

2 A I guess that's an -- maybe that I'm a sponsor
3 for that?

4 Q Well, do you remember reading this response?

5 A Yes, yes. I mean, I read the table, reviewed
6 the table, and updated some information on it.

7 Q Did you prepare the table?

8 A Oh, no.

9 Q Do you know who prepared it?

10 A The initial table?

11 Q Yes.

12 A Yeah, it was some other plant personnel. If I
13 remember, at the time when it was initially presented,
14 actually quite a few requests for information at that
15 time. And I, myself, was pretty overloaded, so we had a
16 meeting and dispersed some of the work out to other
17 individuals. So -- and then I reviewed the table to make
18 sure that it had the -- at least the pertinent stuff in
19 there.

20 Q And the table is attached to this exhibit --

21 A Yes.

22 Q -- on page six.

23 A Yes.

24 Q And during the high dew point measurements
25 taken after the site area emergency in April of 1990, if

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1 you would look at the first page under MWO 19001651 on the
2 left, you'll see a notation of corrective actions taken --
3 blew down the air receivers, do you see that?

4 A Yes.

5 Q And I've gone through this now and every time
6 the high readings were taken during that time period as
7 reflected in this chart, the corrective actions taken
8 always indicate that you blew down the air receivers. Is
9 that your best understanding of what occurred during that
10 time period?

11 A Well, you know, that would be a natural
12 response. I mean, that's something that they would do if
13 they had a suspected high dew point. So then they would
14 try to blow the receiver down and bring the dew point
15 down.

16 BOARD EXAMINATION

17 CHAIRMAN BLOCH: The question is, is that what
18 you expected was done during the time period?

19 THE WITNESS: I don't have specific memory of
20 everything, but I would expect at least through a portion
21 of it that they would do some blow downs. Now, if you at
22 some point in time realized you got a faulty
23 instrumentation or you got a faulty method, then you
24 correct those and you can go on. But it's -- I mean,
25 it's a natural practice.

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1 ADMINISTRATIVE JUDGE MURPHY: But the question
2 is, does the MWO say that that's what happens?

3 THE WITNESS: Some of them do and some of them
4 don't. They are not consistently documented to say that
5 they blew them down.

6 ADMINISTRATIVE JUDGE MURPHY: And so the
7 corrective actions column in this table does not
8 necessarily reflect what's in the MWO?

9 THE WITNESS: Yeah. In this particular table
10 here, if it says blew down the air receivers, then that's
11 either documented on the work order or in some rounds
12 sheet. If it doesn't say anything over there, then you
13 could find no documentation of a blow down. So you should
14 be able to go back to that work order or to the round
15 sheet and find that documentation somewhere for this
16 particular work order.

17 ADMINISTRATIVE JUDGE MURPHY: Now, does that
18 comment in the corrective actions column apply to all of
19 the dates under that work order -- all of the data? Let
20 me put it this way: does it apply to all of the data
21 under that work order?

22 THE WITNESS: I can't say that, that it
23 applies to each and every -- you're talking about each and
24 every instance that they took dew point readings -- that
25 they blew it down every time?

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1 ADMINISTRATIVE JUDGE MURPHY: That's what I'm
2 trying to understand, what that means.

3 THE WITNESS: Well, all I'm saying is here is
4 that it's documented on the work order that it was blown
5 down. And this -- let's see. It was retested on 4/8. So
6 I don't think it's repeatedly stated in there, as I
7 recall, that they blew down a receiver on 4/6 at, you
8 know, 10:00, or 4/7 at whatever time. I think it's just
9 generally stated that they blew down the air receiver, as
10 I remember. You may want to just check that one.

11 CROSS EXAMINATION (continued)

12 BY MR. MICHAEL KOHN:

13 Q On the next page under MWO 19001770, again
14 these are the high dew point readings obtained between
15 April 6th and April 7th, the corrective action says blew
16 down air receiver. Do you see that?

17 A Yes.

18 Q And is that currently still your best
19 recollection of the corrective action taken?

20 A If it's stated here in this column, then it
21 was apparently documented somewhere on the work order or
22 the round sheet.

23 MR. BLAKE: Is the witness looking at the
24 original response or the corrected response?

25 MR. MICHAEL KOHN: The original response.

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1 MR. BLAKE: That's what you gave him?

2 THE WITNESS: Oh, this is the original
3 response?

4 MR. MICHAEL KOHN: Yes, sir.

5 THE WITNESS: Oh.

6 CHAIRMAN BLOCH: I didn't understand that
7 either.

8 ADMINISTRATIVE JUDGE MURPHY: Yeah, it's two
9 different responses to the same question.

10 MR. MICHAEL KOHN: On the column you're
11 looking at, 19001770, on the MWO it states in Intervenor's
12 II-230 that you blew down air receivers as a corrective
13 action. Is that your best understanding of the corrective
14 action you took?

15 THE WITNESS: Well, knowing that this is the
16 original response and not the corrected version, I guess I
17 have to back up on what I was saying because apparently --
18 you know, we found some errors when we went back and
19 looked at this because it's kind of apparent that the
20 individuals that put this together were using the computer
21 readout instead of some of the actual work orders.

22 And so we went back and I guess really
23 compared that to one of the Intervenor's interrogatories
24 and also the actual work orders. And we in a sense made
25 some corrections mainly to this particular thing, when the

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1 receivers were blown down, and also to some of the actual
2 people taking the readings and some of the actual dates
3 were somewhat different.

4 BOARD EXAMINATION

5 CHAIRMAN BLOCH: Could you explain so I can
6 understand it what the difference is between the computer
7 record and the physical record so that there would be
8 discrepancies between them?

9 THE WITNESS: Yeah, well, I mean, it's kind of
10 obvious if you've got an operator that's entering in
11 information from a series of documents, I mean, there's
12 always chances that she's going to make errors --
13 typographical errors or even just leave out some
14 information or whatever.

15 So -- and also, if you look at the NPMIS, a
16 lot of times the guy who originally put this together, he
17 may just look at the bottom line where it says person
18 performing the work, and he may just put that date down
19 versus going through each particular section either on the
20 computer printout or the work order and saying well, this
21 dew point was taken on this particular date and time by
22 this person, and this dew point was taken at another time
23 by another person rather than -- and that could be a
24 different individual than the person that actually signed
25 the work order off.

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1 and route it by my desk. So I actually do use the work
2 order. You know, you can get --

3 CHAIRMAN BLOCH: But suppose you wanted to
4 look at this history of dew point measurements and their
5 resolution. You'd have to go back to the actual documents
6 because your computer system is unreliable, isn't that
7 right?

8 THE WITNESS: No, and most of the errors
9 really that were in this were not of dew point errors as
10 you'd see if you went back and made the comparison. Most
11 of them were just -- some of them were errors made by the
12 person putting this together and comparing the NPMIS and
13 the work order itself. And some of them were possibly the
14 process of not finding -- or not blowing down the
15 receiver. But you know, most of them were not actual
16 readings that were mistyped.

17 CHAIRMAN BLOCH: If a blow down occurred and
18 was documented on a round sheet rather than an MWO, is
19 there some difference in what you'd conclude about that
20 blow down?

21 THE WITNESS: I really don't know why they
22 would record it on a round sheet versus a -- other than
23 the fact that it's maybe taking place over some period of
24 time. You know, it's --

25 CHAIRMAN BLOCH: You mean --

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1 THE WITNESS: -- two shifts or something of
2 that nature.

3 CHAIRMAN BLOCH: Well, my understanding was
4 there was some regular procedure of blow downs in some of
5 these time periods, isn't that correct?

6 THE WITNESS: Well, their PM procedure now
7 would require them to do particular blow downs, you know,
8 when they do dew point measurements if the -- excuse me,
9 if the dew point reading was high. Now at that time in
10 the 1990 frame, I don't remember exactly how the procedure
11 was written. It's very specific right now in that area.

12 CHAIRMAN BLOCH: Was there ever a time where
13 there were just blow downs being done periodically without
14 being connected to a work order?

15 THE WITNESS: Should not have been. Not to my
16 knowledge. I mean, I'm not saying that there wasn't, but
17 really -- actual occurrence.

18 ADMINISTRATIVE JUDGE MURPHY: When you
19 testified earlier, or at least earlier in the proceeding,
20 there was a set of terminology which we were trying to
21 keep straight. We were talking about bleeding -- bleed
22 and feed of the receivers, and we were talking about blow
23 down of the receivers --

24 THE WITNESS: Okay.

25 ADMINISTRATIVE JUDGE MURPHY: -- as two

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1 different activities, I thought. And now I'm a little bit
2 confused because it's not clear to me what these words in
3 this column mean.

4 THE WITNESS: I hope I didn't mislead you in
5 that -- or at least I didn't hopefully not say that in
6 the past, but I mean, blow down is simply bleed and feed
7 to me. I mean, it's the same process. I mean, if you
8 blow the receiver down, then obviously you're feeding it
9 and the compressor is going to come on, and that's the
10 whole process. You're pumping hopefully drier air in
11 there if you do actually have a bad dew point. So it's
12 all a feed and bleed process.

13 ADMINISTRATIVE JUDGE MURPHY: Well, I guess
14 the record will speak for itself. I thought that there
15 was some discussion about a daily blow down in order to
16 check for moisture in the receivers as opposed to bleed
17 and feed, which was --

18 THE WITNESS: Yeah, I know what you're talking
19 about.

20 ADMINISTRATIVE JUDGE MURPHY: -- what you used
21 to reduce the moisture in the receiver if the dew point
22 was high.

23 THE WITNESS: Yeah, but I think they tend to
24 use it interchangeably. What you're talking about is on
25 the operator's rounds where they would just go open the

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1 receiver drain and verify there's no moisture there. You
2 know, obviously they probably call that a blow down. But
3 you know, it's a loosely used term, I'm afraid. And you
4 know, blow down would -- in this particular case, means
5 bleed and feed.

6 CROSS EXAMINATION (continued)

7 BY MR. MICHAEL KOHN:

8 Q That is with respect to how it's used in the
9 interrogatory response?

10 A Yes.

11 Q The interrogatory -- first, is it my
12 understanding that every time a blow down or a bleed and
13 feed occurs it's not documented in the MWO's?

14 A It's not documented.

15 CHAIRMAN BLOCH: I think the question will
16 turn out to be ambiguous in the record. Could you reask
17 the question?

18 BY MR. MICHAEL KOHN:

19 Q It's my understanding that bleed and feed or
20 blow down as it's referred to when high dew point readings
21 are obtained are not always documented in the work orders.

22 A That's correct.

23 Q And in response to the interrogatories marked
24 as Intervenor's II-230, on page two it says the table also
25 notes a corrective action taken of which GPC is aware.

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1 Now, GPC could be aware of bleed and feed and blow downs
2 that did not -- that were not put into the MWO's, correct?

3 A GPC could be aware of blow downs that were not
4 put in the MWO's.

5 Q And you knew that at the time you were
6 preparing and reviewed Intervenor's II-230, correct?

7 A Well, I mean, if they knew it, they would put
8 it in there, I guess. But I'm just saying I think this
9 documents everything that's known about this particular --
10 these particular situations.

11 Q Right. And then if you'd look now at MWO
12 19001770, it states that you blew down the air receivers
13 as a corrective action.

14 A Is this the original?

15 Q Yes, the original. Can you tell me what steps
16 you took --

17 CHAIRMAN BLOCH: Sorry, I don't know what that
18 dialogue was about, is this the original. You're talking
19 about the first -- the third set?

20 MR. MICHAEL KOHN: Yes, the original --

21 CHAIRMAN BLOCH: This is the exhibit, Exhibit
22 230?

23 MR. MICHAEL KOHN: Correct.

24 MR. BLAKE: The only document that's been
25 provided to the witness to date is the original response

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1 to this interrogatory, which has since been corrected. He
2 never has asked -- he's never given any copy yet to the
3 witness of the corrected interrogatory. That's why the
4 answers were mush, and that's why he got answers which
5 were not responsive to the questions he thought he was
6 asking. That's the way he's approaching it, so --

7 MR. MICHAEL KOHN: The record will speak when
8 the witness is aware as to what document we were looking
9 at. What I'm saying -- if you're looking at the original
10 response to the interrogatories, Intervenor's Exhibit 230,
11 at MWO 19001770, it states in there that the air receivers
12 were blown down, is that correct?

13 THE WITNESS: That's correct.

14 BY MR. MICHAEL KOHN:

15 Q And what factual review did you do to
16 determine whether or not the air receivers had or had not
17 been blown down after you submitted that interrogatory
18 response?

19 A Like I said earlier, on this particular one
20 some other plant personnel actually came up with most of
21 the stuff that was in here -- the information that's in
22 here, and I didn't go back personally and verify every
23 last bit of it after they did it. It looked like, you
24 know, they had done the right process and all. The
25 pertinent information appeared to be there. It's just

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1 that I physically didn't have time to go back and do every
2 last thing myself.

3 Q Well, are you suggesting that in the data base
4 that the words blew down the air receivers were typed into
5 the data base and that's how they got this?

6 A Either that or someone possibly in this case
7 told him that it was a normal practice, I would have to
8 suggest. If it's not in the NPMIS data base, then I would
9 have to say that well, this guy that put it together
10 worked with an I&C person and he said well, yeah, normally
11 if -- that's what we would do is go blow down the air
12 receivers if we get a high -- indication of a high dew
13 point.

14 BOARD EXAMINATION

15 CHAIRMAN BLOCH: Mr. Stokes, if I hear you
16 correctly, you don't know the source of the errors in this
17 first filing, is that correct? You don't know what the
18 source of the errors was?

19 THE WITNESS: What do you mean?

20 CHAIRMAN BLOCH: Well, initially you stated
21 that the source was because of a comparison between the
22 computer records and the actual records, is that correct?

23 THE WITNESS: That's mostly it. In this
24 particular case, I think the guy said that most probably
25 it came from someone telling him that that was the most --

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1 that's the general thing that they did. And that's
2 probably why he put it in there.

3 CHAIRMAN BLOCH: So some --

4 THE WITNESS: As he recalled.

5 CHAIRMAN BLOCH: So some of it came from
6 someone told me, is that right?

7 THE WITNESS: This particular -- the blow down
8 portion of this, as I understand it, that's how he
9 remembers it.

10 CHAIRMAN BLOCH: Now to what extent are errors
11 in the third supplemental filing, the one you've got
12 before you, the result of incorrect collection of
13 information from individuals around the plant?

14 THE WITNESS: Yeah?

15 CHAIRMAN BLOCH: To what extent was that the
16 source of the error? We found one here where you think
17 that the person was just told wrong, is that right?

18 THE WITNESS: Yes.

19 CHAIRMAN BLOCH: To what extent is that true
20 in other places on the table that people were told the
21 wrong thing?

22 THE WITNESS: Other places where?

23 CHAIRMAN BLOCH: In this chart.

24 THE WITNESS: I think this was the only one.

25 CHAIRMAN BLOCH: That's the only one where

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1 people were just told the wrong thing?

2 THE WITNESS: I believe so. The others were -
3 - as I went through before, just discrepancies in either
4 the way he put it together or he understood it was
5 supposed to go together or the fact that the NPMIS data
6 base differed from the actual work order.

7 CROSS EXAMINATION

8 MR. MICHAEL KOHN: Well, I'm confused now.
9 The original interrogatory response signed by you said
10 Georgia Power's -- the corrective actions Georgia Power is
11 aware of is that they blew down -- when you look under the
12 corrective action column -- they blew down the air
13 receivers every time they had -- during this April time
14 frame when they got high dew point readings.

15 That was the corrective action taken.

16 MR. BARTH: Objection, Your Honor, both to
17 the question and to the line of questioning which does not
18 seem to comport with the reason Mr. Stokes was brought
19 back, which was to explain the Johnston find of water in
20 February or March --

21 CHAIRMAN BLOCH: Mr. Barth, you missed that.
22 We're talking now also about the supplement to the --

23 MR. BARTH: Your Honor, the original was not
24 questioned by Mr. Stokes. It was just identified today.
25 This is not part of any kind of testimony of Mr. Stokes.

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1 CHAIRMAN BLOCH: Well, the line of questioning
2 is I take it to bring out differences between the fourth
3 supplemental response and the third supplemental response.

4 MR. BARTH: The third was not introduced and
5 was not questioned about Mr. Stokes originally. This is
6 all new.

7 CHAIRMAN BLOCH: But that doesn't matter.
8 It's being questioned because of the fact that the fourth
9 is now introduced, which raises the new question of
10 differences between the two.

11 MR. BARTH: I was unaware that that was
12 related to Mr. Johnston find water and reporting it and

13 CHAIRMAN BLOCH: It's not. But Mr. Blake said
14 he was willing to have this other matter gone into because
15 it had been introduced and Mr. Stokes was part of that.

16 MR. BARTH: Withdraw the objection, Your
17 Honor.

18 CHAIRMAN BLOCH: But I only ask him about
19 timing, because the five minutes is now 20. So timing?

20 MR. MICHAEL KOHN: I'd like to spend another
21 five to ten minutes just to wrap this up.

22 CHAIRMAN BLOCH: Given the -- you think you
23 can wrap it up in five to ten minutes?

24 MR. MICHAEL KOHN: Or take lunch now? Is that
25 the --

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1 CHAIRMAN BLOCH: Well, you said you'd like to
2 take five to ten minutes to wrap it up. Do you mean that,
3 five to ten minutes?

4 MR. MICHAEL KOHN: It may take longer, Your
5 Honor. I was hoping -- (laughter) -- I know that was
6 startling.

7 CHAIRMAN BLOCH: Let's take a break until
8 1:45.

9 MR. MICHAEL KOHN: Thank you, Your Honor.

10 (Whereupon, the proceedings were recessed for
11 lunch at 12:20 p.m.)

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1 A-F-T-E-R-N-O-O-N P-R-O-C-E-E-D-I-N-G-S

2 1:53 p.m.

3 CHAIRMAN BLOCH: Good afternoon. Mr. Kohn.

4 CROSS EXAMINATION

5 MR. MICHAEL KOHN: Mr. Stokes, we left off
6 talking about the interrogatory response and the
7 differences in the responses.

8 We marked as an Intervenor Exhibit 243, excuse
9 me. There it is, earlier response to Georgia Power's -- I
10 think it was the third supplemental response of Georgia
11 Power's response to Mr. Mosbaugh's third set of
12 interrogatories. My question I want to ask --

13 MR. BLAKE: It was exhibit 230.

14 MR. MICHAEL KOHN: Thank you. After you
15 signed off on the response to 230, can you tell me who you
16 talked to between that point and September 13, 1995, when
17 the amended responses were issued about the content of
18 your response?

19 MR. BLAKE: Are you looking into content other
20 than communications with counsel?

21 MR. MICHAEL KOHN: I wanted to know the entire
22 factual information this witness is relying upon to issue
23 these responses.

24 MR. BLAKE: Are you asking about
25 communications with counsel?

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1 MR. MICHAEL KOHN: If that's what he relied
2 upon to issue these responses, yes.

3 MR. BLAKE: Then I object.

4 BOARD EXAMINATION

5 CHAIRMAN BLOCH: First let's ask without
6 counsel. Other than counsel. Whom did you discuss the
7 content of the third supplemental response with prior to
8 the time it was revised?

9 THE WITNESS: There's another plant employee
10 whose name is Bill Gabbard, G-A-B-B-A-R-D, who I believe
11 put this together originally with some help from an INC
12 person.

13 MR. MICHAEL KOHN: Who was the INC person?

14 THE WITNESS: I believe it was Mike Duncan.

15 BOARD EXAMINATION

16 ADMINISTRATIVE JUDGE MURPHY: Did you discuss
17 it with Mr. Burr?

18 THE WITNESS: No.

19 MR. MICHAEL KOHN: Now what new factual piece
20 of information, was there any new factual information that
21 was brought to your attention?

22 THE WITNESS: Between the first and the
23 original?

24 MR. MICHAEL KOHN: Yes.

25 THE WITNESS: There were several.

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1 MR. BLAKE: Again, other than with counsel,
2 correct?

3 MR. MICHAEL KOHN: All right we'll limit these
4 right now to other than with counsel.

5 THE WITNESS: Yes. I mean the fact that he
6 used NPMIS and that he instead of the actual work order
7 and the fact that he took a general statement from someone
8 who he believed or he remembered to be Mike Duncan in the
9 way they would handle high dew point measurements, which
10 would be to blow down the air receiver. Basically that's
11 it from Bill until we did the actual reviews.

12 MR. MICHAEL KOHN: Did anyone tell you that
13 the air receivers were not blown down as part of the
14 corrective action?

15 THE WITNESS: No.

16 MR. MICHAEL KOHN: So when the supplement
17 comes out, the fourth supplemental response which we can
18 mark as Intervenors II-243, Your Honor.

19 CHAIRMAN BLOCH: Please describe it

20 MR. MICHAEL KOHN: It is September 13, 1995,
21 fourth supplemental response to Mosbaugh's third set of
22 interrogatories. It is three pages in length, followed by
23 an attached affidavit of Mr. Stokes, followed by two
24 separate charts.

25 CHAIRMAN BLOCH: Motion to mark is granted.

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1 (Whereupon, the exhibit was marked
2 for identification as Intervenor's
3 Exhibit No. II-243.)

4 MR. MICHAEL KOHN: I have copies if anyone
5 needs one at this time.

6 CHAIRMAN PLOCH: I do need one. Thank you.

7 MR. MICHAEL KOHN: Did anyone tell you --
8 first, you can see that this is the supplemental response
9 that you signed. Correct?

10 THE WITNESS: Yes.

11 MR. MICHAEL KOHN: And in preparing the
12 supplemental response, did anyone tell you that the air
13 dryers were not blown down with respect to if you look
14 through the charts, you will see that -- you are aware
15 that some statements concerning blow down of the air
16 dryers where it's deleted. Correct?

17 THE WITNESS: That's right.

18 MR. MICHAEL KOHN: With respect to any of
19 those deletions, did anyone tell you that they now had a
20 recollection that the blow down did not occur?

21 THE WITNESS: No. It just was not on the
22 documentation available.

23 MR. MICHAEL KOHN: Did you ask the technicians
24 involved with the readings whether they or any other
25 person at the plant, whether blow downs occurred in that

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1 time period?

2 THE WITNESS: No.

3 MR. MICHAEL KOHN: The following question, I'm
4 sure is going to be objected to. Did counsel provide you
5 with any information concerning whether or not blow downs
6 occurred during that time period?

7 MR. BLAKE: Good prediction. I object.

8 CHAIRMAN BLOCH: I don't see any basis for
9 asking him about counsel communications.

10 MR. MICHAEL KOHN: So then your only basis for
11 removing the statement is that it was not contained in the
12 NWO?

13 THE WITNESS: Or other documentation that we
14 could find.

15 CHAIRMAN BLOCH: Does that mean that when we
16 look at this and it doesn't say that a blow down was
17 performed, we can assume it wasn't performed?

18 THE WITNESS: I mean I don't know what you can
19 assume. It's just that it wasn't documented. It may have
20 been performed.

21 CHAIRMAN BLOCH: Where it has been crossed
22 off, there's no document to show that it existed?

23 THE WITNESS: I'm sorry?

24 CHAIRMAN BLOCH: But you said that before it
25 came either from the NWO or the rounds document.

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1 THE WITNESS: No. I said also, if you
2 remember, that a guy -- the guy said that he took a
3 general statement from the INC person that said well, yes,
4 that's our normal practice. So that's why he put it in
5 there, assuming that it was most likely done, if it's
6 their normal practice. But it wasn't documented that we
7 could find.

8 CHAIRMAN BLOCH: What is the meaning of the
9 crossing out of the name of the person assigned to take
10 readings?

11 THE WITNESS: Well, I tried to explain that
12 earlier too. What the guy did in certain cases is just
13 put the guys name that actually signed the work order off,
14 when in fact, it may have been two or three other people
15 that actually performed the work throughout the process.
16 So that was just his mistake initially in putting that
17 down. So we tried to clarify that a little bit and put
18 the precise person who was recorded as taking the data.

19 MR. MICHAEL KOHN: We would look at the last
20 chart contained in Intervenors II-243, the chart that has
21 the annotated corrections, if I might refer to them that
22 way. It's the chart which shows the differences from the
23 original chart. If I start at the beginning, I look at
24 air receivers being taken. Let's look at like the
25 18901008MWO. There is no mention about blow downs

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1 occurring at that time. Correct?

2 THE WITNESS: Which work order again, 90 --

3 CHAIRMAN BLOCH: It's the first line? Is that
4 what you are looking at?

5 MR. MICHAEL KOHN: It's actually the second
6 line, the March 1, 1989 date, MWO 18901008.

7 THE WITNESS: Okay.

8 MR. MICHAEL KOHN: There's no blow downs
9 identified there. Correct?

10 THE WITNESS: It looks like that was a
11 corrective work order, where they actually did some work
12 on the compressor or fan.

13 MR. MICHAEL KOHN: If you would -- let's look
14 at the third page in, a NWO 19004257, dated 11-8-90.
15 Again, there's no blow downs occurring there. Do you
16 think one would have occurred there?

17 THE WITNESS: Again, that looks like a
18 corrective type of work order. So they may defer back to
19 maybe an open PM work order or following this one there
20 could have been some sort of blow down. It is hard to
21 say. Obviously it didn't record it on the work order.

22 MR. MICHAEL KOHN: And the next one below it,
23 19004394, there is no blow down noted there. Is there?

24 THE WITNESS: No, sir.

25 MR. MICHAEL KOHN: And the dew points

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1 beforehand were 60, .2 and 70.8. Then on the corrective
2 actions list they eventually got --

3 CHAIRMAN BLOCH: Mr. Kohn, why are we reading
4 a written document?

5 MR. MICHAEL KOHN: I'm just trying to
6 establish that in this particular case, there had to have
7 been a blow down and it's not recorded here.

8 MR. BLAKE: Which one are you looking at now?

9 MR. MICHAEL KOHN: 19004394, MWO.

10 MR. BLAKE: I don't understand why you are
11 representing it that way. It doesn't use the term blow
12 down, but why don't you ask him what the control comments
13 indicate.

14 MR. MICHAEL KOHN: I won't follow this line of
15 questioning, Your Honor. I think your observation was
16 well taken.

17 MR. BLAKE: Thank you. I take it the Board
18 understands as well.

19 CHAIRMAN BLOCH: Yes. I thought it was
20 humorous that he said, "Thank you, Your Honor" and you
21 said, "Thank you."

22 MR. BLAKE: Oh I didn't hear, "Your Honor." I
23 apologize.

24 CHAIRMAN BLOCH: Anything to keep the mind
25 alive.

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1 MR. MICHAEL KOHN: Does the INC Department
2 perform calibrations in their shop often?

3 THE WITNESS: Yes.

4 MR. MICHAEL KOHN: Versus doing them in the
5 field?

6 THE WITNESS: They do them both ways.

7 MR. BLAKE: Could I just inquire, Michael,
8 what is the purpose now of these questions? Are we done
9 now with the interrogatory one?

10 MR. MICHAEL KOHN: Yes.

11 MR. BLAKE: We're done with 95, now what are
12 we doing?

13 MR. MICHAEL KOHN: We're -- a few follow-up
14 questions left on the -- no, this is back on 95.

15 CHAIRMAN BLOCH: You're going back to the
16 other matter?

17 MR. MICHAEL KOHN: Yes, the 1995.

18 CHAIRMAN BLOCH: Now you had rested on that.
19 Could you explain to me why it is that you need to go back
20 to it?

21 MR. MICHAEL KOHN: Yes, Your Honor. A
22 technical documentation was provided to me over the break.
23 During communications with my client --

24 CHAIRMAN BLOCH: Okay. You are going to
25 continue with the technical documentation.

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1 MR. BLAKE: And I think the record probably
2 should reflect that during the lunch hour in response to
3 our request this morning, we had telecopied to us what we
4 believed to be these technical evaluations Mr. Stokes
5 referred to. We have distributed that to the Board and
6 the parties. I take it that's what now prompts the
7 additional questions. Correct?

8 MR. MICHAEL KOHN: After reviewing those with
9 my client, additional questions arose.

10 Do you believe whether the pressure gauges
11 would have been calibrated in the shop or in the field?

12 THE WITNESS: No. It's generally done in the
13 field.

14 MR. BLAKE: Can I have a reference to the
15 documentation that we gave you that leads to this?

16 CHAIRMAN BLOCH: It's general. The
17 supposition is that water was introduced into the line in
18 the field. If it was not in the field, they couldn't
19 have. They have introduced it into the line, it would
20 have had to be done in the field I assume. They didn't
21 remove the pressure gauge. Well I'm testifying.

22 Mr. Blake, would you like to renew your
23 question?

24 MR. BLAKE: No. Hopefully we'll just get by
25 it more quickly.

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1 MR. MICHAEL KOHN: And can you tell me in the
2 deficiency -- I'd like to mark as Intervenors II-244, I
3 believe. It is a one page document from the deficiency
4 card package. It is actually from the work order,
5 attached to the deficiency card package, work order number
6 19502428. It has on the top a number appearing 14846,
7 which is printed on the top.

8 CHAIRMAN BLOCH: Off the record.

9 (Whereupon, from 2:10 p.m. until 2:12 p.m. the
10 proceedings went off the record.)

11 CHAIRMAN BLOCH: Motion to mark is granted.

12 (Whereupon, the exhibit was marked
13 for identification as Intervenor's
14 Exhibit No. II-244.)

15 MR. BLAKE: This would have been the third
16 from the last page in the deficiency card package that we
17 handed out I think now a couple weeks ago. The top page
18 would have been the actual deficiency card at that point,
19 not yet completed. This would have been the third from
20 the last page in that package.

21 MR. MICHAEL KOHN: All right, Mr. Stokes, if
22 you would look at the document in front of you, you will
23 see after the MWO number, there's a systems/tags/component
24 ID number.

25 THE WITNESS: Yes.

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1 MR. MICHAEL KOHN: The number that appears
2 there, that's 1PI9053, correct?

3 THE WITNESS: Yes.

4 MR. MICHAEL KOHN: What does that refer to?

5 THE WITNESS: That's the plant instrument tag
6 number for one of these gauges.

7 MR. MICHAEL KOHN: One of the gauges where the
8 water was found?

9 THE WITNESS: Yes.

10 MR. MICHAEL KOHN: Can you tell me what the
11 comment under inspection means?

12 THE WITNESS: What it means? It simply stated
13 that the valve couldn't isolate completely.

14 MR. MICHAEL KOHN: All right. If the valve
15 could not isolate completely, then if you hooked up a --
16 if you're doing the test in the field, do you think water
17 could be introduced in the system if this valve isn't
18 sealing correctly?

19 THE WITNESS: If it had been that way at that
20 time, it possibly could have.

21 MR. MICHAEL KOHN: If the valve -- this
22 statement goes on to state that when attempting to bleed
23 pressure and -- a small amount of liquid was released and
24 captured, unable to determine total amount in line due to
25 inability to isolate pressure. Does that mean that there

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1 was more fluid left in the system that you could not
2 capture, due to the valve not sealing?

3 THE WITNESS: No. I think they actually got
4 surprised by it when they started to take the cap off.
5 They had the valve isolated and they had a capturing
6 device, whatever it was, a bag or something underneath
7 there.

8 When they started to take the cap off, the
9 pressure was still there. So it actually blew some of the
10 water out that they were unable to -- however much, who
11 knows, but just a little bit out that weren't able to
12 catch initially. So they caught it immediately and put
13 the cap back on and then isolated the system down upstream
14 with this valve, and then repeated the process and
15 captured the water. I believe that's what this means.

16 MR. MICHAEL KOHN: Do you know if this valve
17 was ever replaced?

18 THE WITNESS: I don't think it has been
19 replaced yet.

20 CHAIRMAN BLOCH: Mr. Stokes, isn't this valve
21 open when the system is operating?

22 THE WITNESS: Yes.

23 MR. MICHAEL KOHN: If they did an in-place
24 calibration, how could you do it if the valve was leaking?

25 THE WITNESS: I didn't do the calibration. I

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1 don't know.

2 MR. MICHAEL KOHN: Well, you understand what
3 I'm saying. If it was done in the field rather than at
4 the shop, could they have done the calibration if the
5 valve was leaking?

6 THE WITNESS: It depends on how much it was
7 leaking, I guess.

8 CHAIRMAN BLOCH: Well, how could you know
9 that?

10 THE WITNESS: You should ask the INC people.
11 I don't know. I don't know how much it was leaking. I
12 haven't tried to do a calibration on it in its current
13 condition. It may not have been in that condition when
14 they calibrated it. I don't know.

15 MR. MICHAEL KOHN: I do not have any further
16 questions in these areas, but I would like to ask
17 everyone's indulgence for a second. In order to make a
18 complete and accurate record there's a fact concerning Mr.
19 Stoke's log and the numbering system and when those
20 numbers began, which I don't think is in the record. We
21 would like to put that in the record at this time with Mr.
22 Stokes.

23 MR. BLAKE: Are you talking about the diesel
24 generator start log?

25 MR. MICHAEL KOHN: The start logs, when the

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1 log --

2 MR. BLAKE: And the fact that he happens to be
3 here, let's go back and --

4 MR. MICHAEL KOHN: Basically, it deals with
5 the start numbering system, the starts are numbered
6 sequentially.

7 MR. BLAKE: Why don't we just talk about this
8 off the record during the next break. Ask me what it is.
9 We'll see if we can work our way and the staff can go on
10 with our cross. If there's something -- why don't we just
11 talk about it. Just let me know during the next break.

12 MR. MICHAEL KOHN: Okay.

13 MR. BLAKE: We'll see if we can work it out.

14 CHAIRMAN BLOCH: Staff.

15 CROSS EXAMINATION

16 MR. BARTH: Good afternoon, Mr. Stokes. I am
17 Charles Barth. I am counsel with the NRC. I have some
18 questions to ask you.

19 I believe you have a copy of your testimony
20 available to you.

21 THE WITNESS: A copy of my testimony?

22 MR. BARTH: Your pre-filed testimony. It is
23 immediately before transcript page 7020, and was given on
24 June 3, 1995 in Loblolly (phonetic).

25 THE WITNESS: Hang on a second. 7022?

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1 MR. BARTH: 7020.

2 THE WITNESS: 7020. Okay.

3 MR. BARTH: Could I ask you to turn to page
4 three of your testimony, sir.

5 MR. BLAKE: Wait. What he has are the
6 manuscripts, so that the pre-filed testimony which is
7 incorporated into the transcript would not be in front of
8 him. We'll see if we can get him a copy.

9 MR. BARTH: We will.

10 MR. BLAKE: You are going to ask him about his
11 pre-filed testimony back in June. Correct?

12 MR. BARTH: Yes, sir.

13 MR. BLAKE: He doesn't have it.

14 ADMINISTRATIVE JUDGE CARPENTER: Do you have a
15 cross examination plan, Mr. Barth?

16 MR. BARTH: No. Mr. Chairman, I am going to
17 provide Mr. Stokes with a copy of his pre-filed testimony.

18 Mr. Stokes, I would refer you to page three,
19 line 17 through 20.

20 THE WITNESS: Okay.

21 MR. BARTH: The question is are you aware of
22 water ever being found in the diesel instrument air
23 sensing lines. You answered, "No, I am not." Given
24 reflection on all that's transpired, is that a true and
25 correct statement?

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1 THE WITNESS: In the sensing lines, it depends
2 on how you want to define it, I guess.

3 MR. BARTH: How would you define it? Are the
4 sensing lines the 60 psig lines?

5 THE WITNESS: Yes. They are 60 pounds.

6 MR. BARTH: And in those lines, to the best of
7 your knowledge, has water ever been found outside of the
8 bubble test?

9 THE WITNESS: No. Not to my knowledge.

10 MR. BARTH: So this statement on page three is
11 correct. Is that right?

12 THE WITNESS: Defined that way, it is correct.

13 MR. BARTH: I would refer you to transcript
14 page 7055. It is possible that Mr. Kohn may have covered
15 some of this. If so, I ask indulgence of counsel to let
16 me re-ask the question.

17 Do you have transcript page 7066?

18 THE WITNESS: Okay.

19 MR. BARTH: There is a question on line three,
20 and your answer commenced on line six. If you possibly
21 can, can you think back to Augusta, Georgia, and tell me
22 were you thinking of the 250 psig line or the 60 psig
23 lines? You talk about diesel ware system. What did you
24 have in your mind when you answered this question?

25 THE WITNESS: Ultimately it's the 60 pound.

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1 Now obviously if we found moisture in the air receivers
2 though, then we would probably take -- I mean, the way
3 it's written now we would take steps to isolate the
4 receiver from the diesel and then take moisture checks
5 within the 60 pound air supply also to make sure that it
6 doesn't have moisture inside it.

7 MR. BARTH: Back when you were requested to
8 prepare testimony, were you concerned with addressing
9 pneumatic lines going to the sensors on the diesel or
10 diesel ware systems throughout the facility, which are
11 different? What was your concern about -- what were you
12 going to write about?

13 THE WITNESS: When you say these -- could you
14 repeat that again?

15 MR. BARTH: Was the purpose of your testimony
16 to address principally the instrumentation and the air
17 lines leading to it to the diesel. Nods will not do. The
18 reporter can't see. I wish you would answer yes or no.

19 THE WITNESS: Yes.

20 MR. BARTH: Was that the general framework you
21 had when you wrote your testimony and testified?

22 THE WITNESS: Yes, sir. I believe so.

23 MR. BARTH: I would refer you to transcript
24 page 7162, if you please.

25 MR. MICHAEL KOHN: What page, excuse me?

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1 MR. BARTH: 7162, line 16. This is a response
2 to a question by Chairman Bloch. On line 17, you refer to
3 our air system in general. On line 18, you refer to
4 retesting of the logic systems. Are the logic systems
5 hooked onto the pneumatic air lines, Mr. Stokes?

6 THE WITNESS: Yes.

7 MR. BARTH: What is the pressure at those
8 lines?

9 THE WITNESS: Sixty pounds.

10 MR. BARTH: That is not the 250 pound psig
11 air?

12 THE WITNESS: No, sir.

13 MR. BARTH: So if we go down to page 21 and
14 you say if there had ever been moisture in the system --

15 MR. MICHAEL KOHN: Page 21 of what?

16 THE WITNESS: Line 21.

17 MR. BARTH: Going to line 21, where you start,
18 if there had ever been moisture in the system, were you
19 referring there to the logic system lines to which you
20 refer to in the same paragraph which are 60 psig lines?

21 THE WITNESS: I would have to say so. It
22 looks like.

23 MR. BARTH: Do you recall at the present time
24 whether you were concerned with those 60 psig lines at
25 this time?

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1 THE WITNESS: During the 1990 events?

2 MR. BARTH: During the testimony given in
3 Augusta, Georgia, in response to Judge Bloch's question.

4 THE WITNESS: Ultimately that is the concern,
5 is the 60 pound supply system.

6 MR. BARTH: Had moisture been found in those
7 60 pound lines as of the date you gave testimony in
8 Augusta, Georgia?

9 THE WITNESS: No, sir.

10 MR. BARTH: I would like to refer you to
11 transcript page 7385, if you please. There's a question
12 that starts on line one, and your answer on line four.
13 The question is, actual moisture of water in the diesel
14 pneumatic lines. You answered that you had not seen
15 evidence.

16 THE WITNESS: Right.

17 MR. BARTH: If that encompasses the 250 psig
18 lines as well as the 60 psig lines, the answer is not
19 correct, is it?

20 THE WITNESS: No.

21 MR. BARTH: Do you have any idea at this time
22 whether your concern with the instrumentation and
23 instrumentation lines would have inclined you to have
24 answered in those terms, in spite of the fact that the
25 words are quite general here?

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1 THE WITNESS: I think that is probably what I
2 was doing, to not actually remember of have it entered my
3 mind as to finding moisture in those two lines or those
4 two gauges, I really don't know. Surely it was
5 concentrated and focused on the pneumatic system in our
6 normal checkpoints and that type stuff.

7 MR. BARTH: Let me refer you to the next page
8 7386 of the transcript, in which the question is, what
9 lines were you talking about. That's the question on page
10 three. Your answer on line five is what, of transcript
11 page 7386? The question is on line five.

12 THE WITNESS: Line six it says, is that what
13 you are referring to? Well, let's talk about the diesel
14 pneumatic lines and sensor lines.

15 MR. BARTH: To your recollection, is that the
16 framework with which you answered these questions, talking
17 about sensor lines which are 60 psig lines?

18 MR. MICHAEL KOHN: I have an objection to the
19 questions. I think the transcript indicates that the
20 lines they are talking about are the lines where corrosion
21 was found. If you look on page 7385 lines 24 and 25.

22 The framework of the question seems that Mr.
23 Barth is trying to encompass more than is indicated in the
24 transcript.

25 MR. BARTH: I've not asked about corrosion,

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1 Your Honor.

2 CHAIRMAN BLOCH: What kind of an objection is
3 that?

4 MR. MICHAEL KOHN: The foundation to the
5 question. He's been asking as to what is meant by lines
6 in prior portions of the transcript. It's my
7 understanding of what's occurring, he's trying to derive
8 what is meant. But in between, there's changes of
9 discussion. I don't know if --

10 CHAIRMAN BLOCH: To the extent that we are
11 interpreting the transcript, I'm not sure we're going to
12 get that much out of the witness, but if you really want
13 to interpret the transcript, I'd suggest less leading
14 questions.

15 MR. BARTH: I have done neither, Your Honor.
16 I have asked him if he can recall whether he was
17 discussing 60 psig lines or 250 psig lines in this line of
18 questioning.

19 CHAIRMAN BLOCH: Okay. I think the last
20 question to which this objection was raised was somewhat
21 leading. Why don't you try it again?

22 MR. BARTH: Having looked at transcript page
23 7385 and 7386, to the best of your recollection, were you
24 discussing 60 psig instrumentation lines?

25 THE WITNESS: Yes. I would have to say so.

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1 MR. BARTH: And the further question, as of
2 the time you answered that question, had water been found
3 in those lines?

4 THE WITNESS: No, sir.

5 MR. BARTH: Here I ask you to recall your
6 questions by Mr. Kohn. Will you turn to transcript page
7 7520, if you please.

8 THE WITNESS: Okay.

9 MR. BARTH: Is the discussion at the top of
10 the page a discussion relating to the --

11 MR. MICHAEL KOHN: Excuse me. Is that not in
12 the Georgia Power handout? I have to find it.

13 CHAIRMAN BLOCH: The date, sir?

14 MR. BARTH: June 6, 1995.

15 MR. MICHAEL KOHN: 75 --

16 MR. BARTH: 20.

17 ADMINISTRATIVE JUDGE CARPENTER: What line?

18 MR. BARTH: Top of the page, Your Honor.

19 Is the discussion at the bottom of page 7519
20 and the top of page 7520 relating to the eight ounces of
21 water allegedly found in a jar coming out of diesel lines?
22 It's a question. Does that discussion relate to the eight
23 ounces of water allegedly found in a jar coming out of the
24 lines?

25 THE WITNESS: Yes.

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1 MR. BARTH: Do you recall Mr. Kohn asking you
2 questions about this earlier today?

3 THE WITNESS: Yes.

4 MR. BARTH: And you were questioned in
5 Augusta, Georgia, about this obviously from the
6 transcript.

7 Do you now have any present recollection that
8 there is any error in your response in Augusta, as set
9 forth in this transcript here?

10 THE WITNESS: About that eight ounces of
11 water? No.

12 MR. BARTH: Having refreshed your recollection
13 about the water found in 1995 by Mr. Johnston, I ask you
14 to jog your memory and see if you can remember any more
15 about the alleged eight ounces of water allegedly found on
16 diesel lines, other than you have testified to previously.

17 THE WITNESS: No, sir.

18 MR. BARTH: Earlier, you mentioned an NRC
19 employee which I believe you referred to as Randy. Was
20 that Randy Moore?

21 THE WITNESS: Yes.

22 MR. BARTH: I would refer you, if I may, to
23 transcript page 7669. Let me know when you have the page.

24 THE WITNESS: Okay, I have it.

25 MR. MICHAEL KOHN: What's the date?

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1 MR. BARTH: The date is June 5, Mr. Kohn.

2 MR. MICHAEL KOHN: 7669?

3 ADMINISTRATIVE JUDGE CARPENTER: June 7.

4 THE WITNESS: Yes, sir.

5 MR. BARTH: You're right, June 7. It's hard
6 to see my blue pages.

7 There's a question starting on line four as to
8 whether there's any evidence of moisture that was ever
9 actually found in the logic system. On line eight you
10 replied, "No, sir, not to my recollection."

11 Do you have any change to make in that
12 testimony now in view of the water discovered by Mr.
13 Johnston in February or March of 1995?

14 THE WITNESS: No, sir.

15 MR. BARTH: That statement is correct? Is
16 that correct?

17 THE WITNESS: Yes, it's correct.

18 MR. BARTH: I would refer you to transcript
19 page 7706.

20 CHAIRMAN BLOCH: The date of this one?

21 MR. MICHAEL KOHN: Same date.

22 MR. BARTH: I'm advised it's the same date,
23 Your Honor.

24 There's a truncated question that starts at
25 the beginning, but it indicates in the question, was water

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1 or moisture found in control air systems. What was your
2 answer on line seven?

3 THE WITNESS: No.

4 MR. BARTH: Is that answer still true and
5 correct to the best of your knowledge and belief?

6 THE WITNESS: Like I said before, if you are
7 talking control air, it's still true.

8 MR. BARTH: The if is bothersome. The
9 question is, any signs of water or moisture were found in
10 the control air systems.

11 THE WITNESS: It's still true.

12 MR. BARTH: That is true. Thank you.

13 Your Honor, this is going to take a bit of
14 assistance from you. I have a picture provided by the
15 licensee to the licensing board. I have picture frame 26.
16 This has not been marked, it has not been introduced. I
17 would like to show the picture to the witness and ask
18 permission of the licensing board to substitute a
19 photocopy for the picture. The photocopy of course could
20 be born into the record in the long run. Therefore, I
21 would --

22 CHAIRMAN BLOCH: Do we have any idea how good
23 the quality of a photocopy will be?

24 MR. BARTH: The photocopy's quality is
25 sufficient for the purposes of the questions.

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1 CHAIRMAN BLOCH: Then we can do what you said.

2 MR. BARTH: I believe the number of the staff
3 exhibit will be II-69, Your Honor. I ask that the
4 reporter mark it for identification with your permission.

5 CHAIRMAN BLOCH: Granted.

6 (Whereupon, the exhibit was marked
7 for identification as Staff Exhibit
8 No. II-69.)

9 MR. BARTH: I also move the bench to allow me
10 to substitute a photocopy for the original, if I may have
11 your permission.

12 CHAIRMAN BLOCH: Granted. So you are going to
13 mark the photocopy, isn't that right?

14 MR. BARTH: Yes, Your Honor. That would be
15 the most successful way to handle this.

16 CHAIRMAN BLOCH: Let the record show that the
17 Board will keep one set of photographs with the record,
18 colored photographs.

19 MS. YOUNG: Judge Bloch --

20 CHAIRMAN BLOCH: I'd note for the record that
21 the only part of this that is hard to see is the knob on
22 the valve.

23 MS. YOUNG: Judge Bloch.

24 CHAIRMAN BLOCH: Yes.

25 MS. YOUNG: Will the Board be retaining those

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1 photographs in some file so that the Commission will have
2 access to them? Because I don't believe those photographs
3 were given to the Board using any documentation. It was
4 just something handed to the Board. Copies were not
5 provided to the parties. I am just concerned about
6 extraneous materials being in the Board's hand.

7 CHAIRMAN BLOCH: You don't have those copies?

8 MS. YOUNG: No. We do not.

9 MR. BLAKE: That is the onliest set. They
10 were first shown to the parties before I divulged them to
11 the Board. I showed them to the Board to the extent it
12 might be helpful for the Board's use in avoiding the need
13 for it to work. We've never gotten them back, but I take
14 it that you were still looking through them.

15 CHAIRMAN BLOCH: My thought was that with this
16 exhibit, it would be handy to have a copy of that picture
17 available if the Commission wanted to see it or if your
18 group wanted to see it.

19 MS. YOUNG: But traditionally, it is available
20 for the public record, what information has been submitted
21 to the Board. You talked about cross examination plans
22 being placed in a file afterwards. Will these photographs
23 also be placed somewhere so there is a record of what was
24 given to the Board in the midst of this proceeding?

25 CHAIRMAN BLOCH: In fact, that generally is

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1 the case. But if we were to have taken a tour of the
2 plant, it would not necessarily be in the public record.

3 MS. YOUNG: This is something that there is a
4 physical manifestation of, and it would be available for
5 public review. It's not the same thing as taking a trip.

6 CHAIRMAN BLOCH: Well, we also are permitted
7 to read freely in the literature about the plant. That is
8 never in the record. We'll take this under advisement.

9 MR. BARTH: Mr. Stokes.

10 THE WITNESS: Yes.

11 MR. BARTH: We're back together again. Would
12 you look at both the color photograph and the photocopy,
13 which is monochromatic and which is marked as Staff
14 Exhibit II-69.

15 THE WITNESS: Okay. Mine is not marked.

16 MR. BARTH: To the best of your vision, is the
17 photocopy an accurate depiction of the color picture
18 itself?

19 THE WITNESS: Yes, sir.

20 MR. BARTH: I have provided you with a ruler.
21 I would ask you to measure on the color photograph the
22 diameter of the line leading to the valve.

23 CHAIRMAN BLOCH: We have no idea what the
24 scale is of the photograph.

25 MR. BARTH: We will. We will, Your Honor.

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1 That is the purpose of asking him this question.

2 MR. MICHAEL KOHN: Your Honor, maybe the
3 parties can just stipulate to something. I mean --

4 CHAIRMAN BLOCH: Off the record.

5 (Whereupon, from 2:44 p.m. until 2:46 p.m. the
6 proceedings went off the record.)

7 MR. BARTH: Mr. Stokes, would you please take
8 a ruler which I provided to you and measure the outside
9 diameter of the line leading to the valve, color
10 photograph.

11 THE WITNESS: It actually looks just over
12 somewhere between three-sixteeths and a quarter.

13 MR. BARTH: Is it approximately a quarter of
14 an inch?

15 THE WITNESS: Approximately.

16 MR. BARTH: And I believe you previously
17 testified that it's a quarter inch line leading in, but I
18 will ask you to reiterate for the License Board, is that a
19 quarter inch line leading in to the best of your knowledge
20 ability?

21 THE WITNESS: It is a quarter inch line.

22 MR. BARTH: Then do you conclude that the
23 scale is a full scale reproduction of the --

24 CHAIRMAN BLOCH: Wait a second, Mr. Barth. Is
25 that the outside diameter, the quarter inch? Does the

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1 quarter inch line mean that the outside diameter is a
2 quarter of an inch?

3 MR. BARTH: He can't measure it inside, Your
4 Honor.

5 BOARD EXAMINATION

6 CHAIRMAN BLOCH: Is that what it is?

7 THE WITNESS: Yes. Actually.

8 CHAIRMAN BLOCH: If you know.

9 THE WITNESS: I'm not sure. Witness doesn't
10 know. He could say actually inside, but I'm not sure.

11 MR. BARTH: Does the photograph show the
12 inside of the pipe leading to it?

13 CHAIRMAN BLOCH: No. We'll note that it
14 doesn't show the inside of the pipe.

15 MR. BARTH: Then I again ask you to make an
16 effort to approximate the outside diameter of the pipe
17 leading into the valve.

18 THE WITNESS: It's approximately a quarter of
19 an inch, but it's not quite there with the measurement.

20 MR. BARTH: Fine. Could you measure the
21 distance between the valve which shuts off the flow and
22 the dead end of the pipe.

23 CHAIRMAN BLOCH: So which part of the valve do
24 you want him to start with?

25 MR. BARTH: I would like him to start with the

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1 middle of where the valve comes down. There's a square
2 where the valve seats.

3 CHAIRMAN BLOCH: So you want him to start on
4 the right side of the seat?

5 MR. BARTH: I would like him to start in the
6 middle.

7 CHAIRMAN BLOCH: In the middle of the seat.

8 MR. BARTH: In the middle of the seating,
9 which is a square.

10 MR. MICHAEL KOHN: Is that -- are we assuming
11 the middle of this W?

12 MR. BARTH: That's approximately it, Mr. Kohn.

13 MR. MICHAEL KOHN: Okay.

14 MR. BARTH: I'd like you to measure to the end
15 of where the piece of pipe sticks out from beyond the
16 valve.

17 MR. MICHAEL KOHN: I'm not sure where that is.

18 MR. BARTH: It's nice that you don't have to
19 testify then.

20 MR. MICHAEL KOHN: But I have to follow it.

21 CHAIRMAN BLOCH: He's going to go to the
22 middle of what? From there to where?

23 MR. BARTH: To where the pipe ends, dead ends.
24 This has been wagged as a dead end pipe, Your Honor.

25 CHAIRMAN BLOCH: Is that before or after it

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1 makes the bend?

2 MR. BARTH: It does not a bend. It has a T,
3 but it goes to the end. We're trying to get approximate
4 figures.

5 THE WITNESS: In other words, you don't want
6 to go to the center of that pipe over there. You want to
7 go to just where the pipe goes into the --

8 MR. BARTH: Yes, sir. We would like to
9 calculate the volume that is between the -- that is left
10 in that valve. When the valve is closed, we want to
11 calculate the volume that is left.

12 THE WITNESS: Looks like about pretty close to
13 one and a half inches, maybe a little less than that.

14 MR. BARTH: That comes to my calculations.
15 Approximately one and a half inches. Is that correct?

16 THE WITNESS: Yes.

17 MR. BARTH: Now then if you assume, I know
18 this is fanciful, if you assume that the pipe leading in
19 has no walls, is a quarter inch thick, could you calculate
20 the volume that is left in that pipe when that valve is
21 closed? This is easily done by raising four to the minus
22 one times pi times the distance between the pipe, which
23 you say is one and a half inches.

24 The square and the pi are in the lower
25 lefthand corner.

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1 THE WITNESS: Okay. I've got the pi and I've
2 got the square.

3 MR. BARTH: You divided the diameter by two, I
4 hope. Then squared that for the radius times five.

5 MR. MICHAEL KOHN: Your Honor, I'd like to
6 make an objection. I think NRC staff can call their own
7 witness to do the calculation. We don't need to do it
8 here on approximations.

9 Second, I don't believe it's within the scope
10 of what the witness has actually testified to. I might be
11 wrong, but I think there's a more expeditious way of doing
12 it than at this hearing.

13 MR. BARTH: There is. The Judge suggested by
14 stipulation. That was declined.

15 Could you calculate the volume?

16 THE WITNESS: If you've got it there, can you
17 just -- have you already done it?

18 MR. BARTH: Certainly, but I can't testify,
19 and I can't get a stipulation. Will you please take a
20 quarter inch.

21 THE WITNESS: Okay.

22 MR. BARTH: Convert it to a decimal.

23 CHAIRMAN BLOCH: Could you state what you
24 believe the volume is?

25 MR. BARTH: .049087385 cubic inches.

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1 CHAIRMAN BLOCH: Do you think it's less than
2 .05 cubic inches. Is that right?

3 MR. BARTH: Yes, sir, .049.

4 CHAIRMAN BLOCH: Are the parties willing to
5 stipulate to that?

6 MR. BARTH: That is per inch of line. That
7 has to be multiplied by one and a half, which is the
8 distance.

9 CHAIRMAN BLOCH: So it's less than .075.

10 MR. MICHAEL KOHN: He can't ignore the wall
11 thickness in the calculation.

12 MR. BARTH: If we ignore the wall thickness,
13 we help you, Mr. Kohn. If we take the wall thickness we
14 go against you. This is in your favor.

15 MR. MICHAEL KOHN: I don't read it that way,
16 Charles.

17 CHAIRMAN BLOCH: The more the volume, the more
18 moisture is possible in that line.

19 Why don't we take our 10 minute break, and at
20 the end, we'll have a solution to this I'm sure.

21 MR. BARTH: The answer is quite simple, as you
22 pointed out, Your Honor. It's .073 cubic inches are in
23 that thing. But I am going to have to get Mr. Stokes to
24 calculate. This is simple arithmetic. Pi R squared times

25 --

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1 CHAIRMAN BLOCH: You can also get a
2 stipulation that the upper bound is .01 or even .02, and
3 you are just as well off.

4 MR. BARTH: No, .07 comes a lot closer.
5 There's a lot of difference.

6 CHAIRMAN BLOCH: .1 or .2 and you are still
7 just as well off.

8 ADMINISTRATIVE JUDGE CARPENTER: And both are
9 smaller than a bread box.

10 CHAIRMAN BLOCH: We'll go off the record.

11 (Whereupon, from 2:52 p.m. until 3:06 p.m. the
12 proceedings went off the record.)

13 CHAIRMAN BLOCH: We've received a copy of
14 Intervenor's Exhibit II-240 in color. The reporter has
15 been given three copies to bind in, in the official
16 transcript. I would suggest that they be bound at the
17 beginning of today's volume, since they relate to
18 yesterday's volume.

19 Let us continue. First of all, I understand
20 there was a stipulation as to the upper bound of the
21 volume in the dead end of .07 --

22 MR. BARTH: May I make the statement.

23 CHAIRMAN BLOCH: Yes, sir.

24 MR. BARTH: And see if we can all agree. That
25 if this dead end piece of pipe were valve shut, the volume

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1 that the stub beyond the valve would be less than .07
2 cubic inches. Does that sound reasonable to the
3 Intervenor, to the Power Company?

4 CHAIRMAN BLOCH: I see nods, indicating yes.

5 MR. BARTH: I will continue, Mr. Stokes. Mr.
6 Stokes, --

7 ADMINISTRATIVE JUDGE MURPHY: Before we go on,
8 is the photograph that we're working from or the copy of
9 the photograph that we're working from, has that been
10 marked?

11 MR. BARTH: Yes, Your Honor. That has been
12 marked as Staff Exhibit No. II-69. I appreciate your
13 comment. I move the bench to accept this as evidence in
14 this case.

15 CHAIRMAN BLOCH: Granted.

16 (Whereupon, the exhibit previously
17 marked for identification as Staff
18 Exhibit No. II-69 was received into
19 evidence.)

20 CROSS EXAMINATION

21 MR. BARTH: Mr. Stokes, are you familiar with
22 the piping beyond the valve that we have been discussing
23 in the diesel room?

24 THE WITNESS: Yes.

25 MR. BARTH: Is there any conceivable way, in

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1 your professional judgement, that this .07 cubic inches of
2 water if the valve were opened could back track through
3 that system and get into the instrument lines?

4 ADMINISTRATIVE JUDGE MURPHY: Mr. Barth, did
5 you mis-speak?

6 CHAIRMAN BLOCH: He said .07 cubic inches of
7 water. Is that what you meant to say?

8 MR. BARTH: Yes. What did I say?

9 CHAIRMAN BLOCH: That's what you said.

10 ADMINISTRATIVE JUDGE MURPHY: Are you saying
11 this piece of pipe is full of water?

12 MR. BARTH: We're making a hypothetical
13 assumption, the worst case assumption. My place always
14 makes worst case assumptions. This is a class 9 accident.
15 We'll get back to that.

16 THE WITNESS: No.

17 MR. BARTH: By now the question is lost.

18 CHAIRMAN BLOCH: To clarify the record, this
19 was --

20 Just a second, Mr. Barth. I just want to
21 clarify this was not a class 9 accident. Now you may
22 continue.

23 MR. BARTH: Is there any possible way that
24 this .07 cubic inches of water if the valve were opened,
25 could backtrack through that system and get into the

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1 instrument lines?

2 THE WITNESS: No.

3 ADMINISTRATIVE JUDGE MURPHY: Why do you say
4 that?

5 MR. BARTH: That's a question for the Judge,
6 Mr. Stokes, which you should answer. That was my next
7 question.

8 THE WITNESS: I mean you get the solid water
9 down at the end of the tube and you get constant pressure
10 there with the 60 pounds of air supply. It's not turning
11 over. It's not depressurizing. It's constant pressure
12 there. I just don't see how it can, it's going to
13 levitate or go anywhere from that.

14 CHAIRMAN BLOCH: I thought we established this
15 morning in discussion with me that you are not sure what
16 will happen to that water sitting there, because of the
17 molecular action at the surface.

18 THE WITNESS: I just do not believe it will go
19 anywhere. That is just my opinion. That is what you
20 asked for.

21 MR. BARTH: We'll continue with the Judge's
22 question.

23 Between the valve and the instrument lines,
24 does this quarter inch line have any rise at all? Does it
25 go up?

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1 THE WITNESS: Yes. Like I was saying
2 initially or earlier this morning, it comes out
3 horizontally, and then it goes up to -- I don't know how
4 far, maybe six inches or so, above the gauge block-out
5 that I was talking about earlier, and then goes across and
6 then back down.

7 MR. BARTH: Again with the hypothetical. If
8 we assume that this seven one-hundredths of a cubic inch
9 of water could somehow travel to where the tube goes up,
10 is there any way that that seven hundredths of a cubic
11 inch of water could travel up the six inches of pipe?

12 THE WITNESS: Not in my opinion.

13 MR. BARTH: Are the facts I have give you, for
14 a hypothetical, somewhat unrealistic in that they do not
15 take into account the wall thickness, the coefficient of
16 adhesion, the water to the pipe, the coefficient of
17 cohesion of the water to itself to form droplets. Have I
18 given you an extreme example that is almost foolish?

19 THE WITNESS: Right.

20 MR. BARTH: As my counsel has well advised me,
21 she often does, is my assumption not overly conservative,
22 is the question.

23 THE WITNESS: Right.

24 MR. BARTH: It's a better word than foolish.
25 May I have a moment, Your Honor, to check my

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1 notes?

2 CHAIRMAN BLOCH: Granted

3 (Whereupon, the proceedings went briefly off
4 the record.)

5 CHAIRMAN BLOCH: Back on the record.

6 MR. BARTH: Thank you, Your Honor.

7 Mr. Stokes, if I mischaracterize your
8 testimony, please tell me. I believe you testified that
9 you really didn't think a great deal about the water found
10 by Mr. Johnston in March or April because you thought it
11 was insignificant, it was not meaningful. Is that
12 correct?

13 THE WITNESS: Yes.

14 MR. BARTH: Can you be very certain, and I ask
15 you to think back, that there have not been other
16 incidents of water being found that you thought were
17 insignificant or significant that might have escaped your
18 judgement and memory at this moment? How certain are you?

19 THE WITNESS: I'd say uncertain at this point,
20 that there are no other occurrences like this.

21 MR. BARTH: When Mr. Johnston or whoever --

22 BOARD EXAMINATION

23 CHAIRMAN BLOCH: I'm sorry, but you qualified
24 the answer at the end. Are you certain that there are no
25 incidents involving water?

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1 THE WITNESS: To my recollection today, there
2 are no other instances. Like I think I testified on this
3 other one, the only reason I didn't bring it up is it just
4 did seem insignificant. I guess placed in that manner
5 now, I'd have to say no, this is the only one.

6 MR. MICHAEL KOHN: Does that include starting
7 error?

8 MR. BARTH: Another question.

9 CHAIRMAN BLOCH: The question that was just
10 asked can be reserved.

11 MR. BARTH: Did you observe the removal of the
12 cap on this deadend pipe by Mr. Johnston or whoever did it
13 -- Johnston was there, in February or March, 1995.

14 THE WITNESS: I don't recall specifically
15 seeing his removal of the cap. Mr. Burr may have, I don't
16 know. I do not recall that specifically.

17 BOARD EXAMINATION

18 CHAIRMAN BLOCH: Ultimately he wound up
19 removing more than one cap. Did you see the removal of
20 any of the subsequent caps?

21 THE WITNESS: No.

22 MR. BARTH: You may have to correct me. My
23 recollection is that you testified that the water came out
24 in the form of mist. Is that --

25 THE WITNESS: A fog. Yes. I think that's

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1 what Mr. Johnston had said. I just don't recall.

2 MR. BARTH: Mr. Stokes, is water compressible
3 in ordinary terms?

4 THE WITNESS: Is water compressible in
5 ordinary terms?

6 MR. BARTH: That's 60 psig.

7 THE WITNESS: I'm not sure what you are
8 leading to. At 60 psig, no.

9 MR. BARTH: Is water compressible at 250 psig,
10 significantly compressible?

11 THE WITNESS: No.

12 MR. BARTH: If the blocked off piece of pipe
13 with the valve closed were completely full of water and
14 the cap were removed, would that water come out in fog?

15 THE WITNESS: Yes. If it were completely
16 full?

17 MR. BARTH: Completely filled.

18 THE WITNESS: No.

19 MR. BARTH: Is it your conclusion that this is
20 a reasonable conclusion then from your professional
21 judgement, that if it came out in a fog, that it was less
22 than completely filled?

23 THE WITNESS: Oh yes.

24 MR. BARTH: Does that make my prior
25 assumptions even more conservative?

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1 THE WITNESS: Yes.

2 MR. BARTH: As to the volume of water
3 contained there.

4 THE WITNESS: Yes.

5 MR. BARTH: I have no more questions, Mr.
6 Stokes. I appreciate your having come here. The
7 arithmetic has been fun.

8 CHAIRMAN BLOCH: Mr. Kohn, how much more do
9 you estimate?

10 MR. MICHAEL KOHN: 10 or 20 minutes.

11 CHAIRMAN BLOCH: Okay. Let's begin. It's
12 always a mystery to find out what that means.

13 RE CROSS

14 MR. MICHAEL KOHN: Mr. Stokes, do you know if
15 the valves were leaking?

16 CHAIRMAN BLOCH: For the purpose of the
17 record, it might be helpful to specify a particular valve.

18 MR. MICHAEL KOHN: Yes. I think it might.
19 Mr. Barth was asking you about a fog coming out and
20 whether that would indicate that it was less than
21 completely filled. Could it also indicate that the valve
22 was leaking?

23 THE WITNESS: Where are you talking about,
24 which instance? Any instance?

25 MR. MICHAEL KOHN: Well, the one that Mr.

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1 Barth asked you about was the one that Mr. Johnston was
2 involved with, where you call it a fog coming out.

3 THE WITNESS: That he was probably
4 manipulating the valve I would say. For safety purposes I
5 would have to say that. I don't know what he did, but I
6 imagine you would loosen the little cap and possibly --

7 BOARD EXAMINATION

8 CHAIRMAN BLOCH: I'm sorry. What was he doing
9 that would require that he open the valve?

10 THE WITNESS: I don't know. I don't remember.

11 CHAIRMAN BLOCH: So if you don't know, don't
12 speculate.

13 THE WITNESS: I'm not. I don't know what he
14 was --

15 CHAIRMAN BLOCH: So is there any reason to
16 believe that the valve was being opened at the time that
17 the cap came off the end of the pipe?

18 THE WITNESS: There's no reason to speculate
19 either way. I would say if I were doing it, I would
20 isolate the valve just for safety purposes.

21 CHAIRMAN BLOCH: Well, you wouldn't want it to
22 blow in your face, would you?

23 THE WITNESS: No. I wouldn't it to blow the
24 cap off in my face.

25 MR. MICHAEL KOHN: Mr. Johnson was taking the

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1 valve off -- excuse me. Taking the cap off to bleed down,
2 to vent the system. That's what he was doing at that
3 time.

4 THE WITNESS: I don't know what he was doing.
5 You are telling me that then, okay?

6 MR. BLAKE: I will stipulate that in order to
7 make the connection, he would had to have taken the cap
8 off from that T.

9 MR. MICHAEL KOHN: So then would he have
10 closed the valve?

11 MR. BLAKE: Can I help, Mr. Kohn. Whether the
12 isolation valve was closed or not, there would have been
13 pressure in that little segment when he removed the cap,
14 there would have been pressure released, just a small
15 amount if the isolation valve were closed. A much larger
16 amount, of course, if it weren't. Presumably shut the
17 isolation valve, bled the pressure down in, made his test
18 connection after he removed the top.

19 When he bled it down, that is presumably when
20 he got the fog. If that helps, I'd be happy to try to
21 reach an agreement.

22 CHAIRMAN BLOCH: Mr. Kohn, do you need a brief
23 recess? I am waiting for a question and I'm getting his
24 conversation. How much time do you need for your
25 conversation?

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1 MR. MICHAEL KOHN: I just need five minutes,
2 Your Honor.

3 CHAIRMAN BLOCH: We'll be here. We'll take a
4 recess of up to five minutes.

5 (Whereupon, from 3:22 p.m. until 3:29 p.m. the
6 proceedings went off the record.)

7 CHAIRMAN BLOCH: There has been a discussion
8 off the record about the difficulty Intervenor is having
9 in deciding how to present further technical issues about
10 the matters before us.

11 Mr. Barth for the staff stated that we're at
12 Recross. The only question is, how to follow up on the
13 rather elementary matters that Mr. Barth has raised in
14 cross examination.

15 Mr. Blake has stated that in his opinion, the
16 95 matter, the matter involving the discovery of water at
17 these deadend valves, is not necessarily a part of this
18 case at this point, because there has never been a motion
19 to make it a part of the case.

20 We do not know specifically what technical
21 issues Intervenor wishes to raise about this matter. When
22 it knows what those technical issues are, they should
23 inform us in a motion, which could be either a motion to
24 add a new contention or a motion to ensure the adequacy of
25 the record. The other parties may respond and we'll

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1 decide at that point whether there's something here that
2 needs to be subject to discovery or whether this matter
3 will be at an end.

4 At this point, it is up to Intervenor to
5 pursue recross based on the staff's cross examination.
6 Would Intervenor like to continue?

7 MR. MICHAEL KOHN: Yes.

8 Mr. Stokes, there was a discussion starting
9 about water that Mr. Barth asked you. I asked a question
10 at that time whether you were referring to starting. Do
11 you recall that exchange?

12 THE WITNESS: Yes.

13 MR. MICHAEL KOHN: Are you aware of water
14 being found in the starting air system at any time since
15 you testified or at any time?

16 THE WITNESS: You mean outside of what we were
17 discussing here in the unit two time frame?

18 MR. MICHAEL KOHN: Since you have been working
19 at Plant Vogtle, are you ever aware of water being found
20 in the starting air system?

21 THE WITNESS: The last outage, unit two
22 outage, Mr. Johnston discovered some moisture in the
23 starting air system, 150 pound.

24 MR. MICHAEL KOHN: In what portion?

25 THE WITNESS: The 250 pound supply.

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1 MR. MICHAEL KOHN: Supplying where in the
2 supply?

3 THE WITNESS: At the gauges, at the starting
4 air pressure gauges on the front of the panel.

5 MR. MICHAEL KOHN: Is that what we are talking
6 about now?

7 THE WITNESS: Yes.

8 MR. MICHAEL KOHN: Other than the instance
9 with Mr. Johnston, are you aware of water being found in
10 the starting air, the diesel system anywhere else or at
11 any other time?

12 THE WITNESS: Not outside of my previous
13 testimony, which was the bubble test events.

14 CHAIRMAN BLOCH: Mr. Stokes, are you aware
15 that Mr. Kohn's question is broader than the question that
16 Mr. Barth asked? He is asking the whole diesel system,
17 not just control air.

18 THE WITNESS: Right.

19 CHAIRMAN BLOCH: So that would include
20 starting air.

21 THE WITNESS: Yes.

22 CHAIRMAN BLOCH: Okay. I'm sorry. Continue.

23 MR. MICHAEL KOHN: Could the water that
24 formed, that was found in 1995 be a remnant of an earlier
25 event, as a result of earlier water condensation forming

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1 in the trench?

2 CHAIRMAN BLOCH: Forming in the what?

3 MR. MICHAEL KOHN: In the line in the trench.

4 THE WITNESS: I think our analysis of where we
5 think the water came from is documented in this DC that
6 you have distributed. So I'd have to stick with --

7 CHAIRMAN BLOCH: Okay. We've got a problem.
8 It has been distributed, but it has not been marked. Wait
9 a second. We need it marked, because he has referred to
10 it. It is not in evidence, but it still has to be marked.

11 MR. BLAKE: I can give it a Georgia Power
12 number. Georgia Power II-189. It's a document, the first
13 page of which is a PRB meeting minutes continuation sheet,
14 PRB 95-94 page two of two. The next page is a deficiency
15 card. This is card number 1-95077. The third page is the
16 next page of that deficiency card.

17 Attached to it are root cause and corrective
18 action report procedure form 00058-C Rev. 10. This
19 specifically, this event investigated is related to the DC
20 1-95077.

21 Attached to that finally is a three page
22 attachment to the root cause and corrective action report,
23 which is the evaluation earlier described or discussed on
24 the record today, the three-page engineering discussion of
25 what may have led to this water, ending with the

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1 conclusion on the last page of this document.

2 CHAIRMAN BLOCH: The motion to mark is
3 granted, GPC II-189.

4 (Whereupon, the exhibit was marked
5 for identification as Licensee's
6 Exhibit No. II-189.)

7 ADMINISTRATIVE JUDGE CARPENTER: Mr. Blake.

8 MR. BLAKE: Yes, Judge.

9 ADMINISTRATIVE JUDGE CARPENTER: On this first
10 page which is page two of two, I can't find any date for
11 when the PRB meeting occurred. Maybe I'm just not looking
12 carefully enough.

13 MR. BLAKE: I didn't refer to one. You are
14 absolutely right. I do not know what the date of this PRB
15 meeting was, which was the reason that I cited.

16 ADMINISTRATIVE JUDGE CARPENTER: You don't
17 have page one?

18 MR. BLAKE: No. At 9564, so it will be
19 identified for sure as to what PRB meeting it was.

20 CHAIRMAN BLOCH: Let's continue.

21 MR. MICHAEL KOHN: Is the document attached to
22 Licensee's II-189 and the analysis attachment of RCC for
23 DC 1-95077, page three of five, four of five, and five of
24 five. Is that the technical analysis that you testified
25 about during your direct examination?

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1 THE WITNESS: Yes.

2 MR. MICHAEL KOHN: Do you agree with this
3 technical analysis?

4 THE WITNESS: I believe so, yes.

5 MR. MICHAEL KOHN: Is there any part of it you
6 don't agree with?

7 THE WITNESS: No.

8 MR. MICHAEL KOHN: This technical analysis,
9 that sets forth no evidence as to how the water was
10 actually introduced. Does it?

11 THE WITNESS: No evidence, that is correct.

12 MR. MICHAEL KOHN: So it only provides some
13 speculation of how it was introduced. Correct?

14 THE WITNESS: Yes.

15 MR. MICHAEL KOHN: Do you think people could
16 speculate as to additional reasons of how it was
17 introduced other than the speculation contained in this
18 document?

19 THE WITNESS: I think we consider it to be
20 complete the way it is.

21 CHAIRMAN BLOCH: You don't think it's
22 necessary to examine the possibility of a leak in the
23 gauge?

24 THE WITNESS: No, sir.

25 MR. MICHAEL KOHN: Could someone speculate

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1 that it was a remnant from 1990, from portions of water
2 that were in the system in 1990?

3 THE WITNESS: In the system or in that
4 particular little piece of the line?

5 MR. MICHAEL KOHN: In the system, and ended
6 up.

7 THE WITNESS: No.

8 MR. MICHAEL KOHN: Why couldn't someone
9 speculate as to that?

10 THE WITNESS: Why would they speculate to
11 that?

12 MR. MICHAEL KOHN: To find the root cause.

13 THE WITNESS: The root cause of the water
14 being in there?

15 MR. MICHAEL KOHN: Yes.

16 THE WITNESS: I don't see how it can be there
17 if it's coming from the system. I think if you read this,
18 it gives you an idea or pretty much says that it can't
19 come from the system over the period of time.

20 MR. MICHAEL KOHN: If the water was in the 250
21 supply pipe and there was a leak by the gauge, wouldn't
22 the water flow up through there?

23 THE WITNESS: A leak by the gauge?

24 MR. MICHAEL KOHN: Yes.

25 THE WITNESS: Why would it precipitate there

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1 and not through the filter or any of the other --

2 MR. MICHAEL KOHN: Well maybe a remnant. It's
3 before the filter, correct?

4 THE WITNESS: What's before it?

5 MR. MICHAEL KOHN: The tap.

6 THE WITNESS: No, it's not before the filter.
7 They diverge there. In other words, like I was saying
8 before, the lines come up and they split off at that
9 point. One line goes to the filter. The other line goes
10 up to the gauges. They are all 250 pound.

11 MR. MICHAEL KOHN: The drawing shows the tap
12 before the filter. Correct?

13 MR. BLAKE: There's agreement. The line
14 feeding the gauges taps off before the line goes to the
15 filter. It's just a misunderstanding. He's talking about
16 the little tap for the T. You are talking about the
17 entire line.

18 CHAIRMAN BLOCH: Sorry. Is counsel saying
19 that the T comes before or after the filter?

20 MR. BLAKE: He said that in fact it isn't in
21 the same line because it branches off. One goes to the
22 filter, and one goes to this T. That is what the man's
23 testimony was. I am trying to just shorten it.

24 BOARD EXAMINATION

25 CHAIRMAN BLOCH: Is that true, Mr. Stokes?

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1 THE WITNESS: Yes. That's right.

2 CHAIRMAN BLOCH: So therefore, the absence of
3 water in the filter would have nothing to do with whether
4 or not there might be water in the T. Is that right?

5 THE WITNESS: No. They all come -- you've got
6 two lines that come into the panel, and then they split.
7 One line goes up to the filter. The other line goes up to
8 the gauges. Why would this line choose to have water and
9 this line choose not to have water?

10 MR. BLAKE: It depends on the supply, Judge.
11 That was the question.

12 MR. MICHAEL KOHN: Well, isn't it lower in
13 elevation?

14 THE WITNESS: What lower?

15 MR. MICHAEL KOHN: The T as compared with the
16 filter, the tap which comes off the gauges, isn't it lower
17 in elevation than the filter?

18 THE WITNESS: The filter is lower than the
19 gauges.

20 MR. MICHAEL KOHN: I thought you testified
21 that where it branches off it is lower in elevation than
22 the filter.

23 THE WITNESS: The branch itself would probably
24 be lower than the filter, which is also lower than the
25 gauges.

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BOARD EXAMINATION

1
2 CHAIRMAN BLOCH: Let's see. Mr. Stokes, to
3 know whether one line might prefer to collect water over
4 the other, wouldn't we also have to know the temperature
5 distribution?

6 THE WITNESS: Not for small amounts of water.

7 CHAIRMAN BLOCH: The witness said I wouldn't
8 think so.

9 MR. MICHAEL KOHN: Isn't there a possibility
10 that the water could have gone up to the T to the tap off
11 rather than to the filter?

12 THE WITNESS: I wouldn't think so.

13 MR. MICHAEL KOHN: Your Honor, I'm going to
14 raise an objection to what has actually unfolded here
15 today, which is basically Mr. Stokes was called to state
16 whether his prior testimony was false or not. We spent
17 most of the time discussing technicality and the technical
18 nature of the water.

19 On direct examination, Mr. Blake said that --
20 elicited from the witness that there was a technical
21 report. Throughout the course of the day --

22 CHAIRMAN BLOCH: Counsel, I agree. Your
23 objection is not timely, because you participated in it
24 along with everybody else. We are not going to go back
25 and uncreate the record.

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1 MR. MICHAEL KOHN: I didn't mean to uncreate
2 the record, Your Honor.

3 CHAIRMAN BLOCH: What's your objection? What
4 are we going to do if we don't uncreate the record?

5 MR. MICHAEL KOHN: The remedy that we're
6 looking for is the discovery needed to respond to the
7 technical matter that comes onto the record. I think what
8 we've done is put the cart before the horse for
9 intervenor. We don't have the data and documentation we
10 need to conduct the examinations of the witnesses that we
11 need. The witness was allowed to testify on direct about
12 documentation that has never been provided. We think it's
13 just fundamentally unfair.

14 MR. BLAKE: Judge Bloch, in all fairness, this
15 is I think the fourth time we've talked about this. What
16 he has, he has the deficiency card. He has the
17 documentation related. He now has a staff report on it.
18 He is far ahead of the game in terms of trying to make a
19 motion that this ought to be a part of the affair.

20 CHAIRMAN BLOCH: I already did rule. There
21 are two kinds of motions you have been invited to file.

22 MR. MICHAEL KOHN: Thank you, Your Honor.

23 CHAIRMAN BLOCH: Does this mean you're
24 resting?

25 ADMINISTRATIVE JUDGE CARPENTER: I have a

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1 question.

2 MR. MICHAEL KOHN: Yes.

3 BOARD EXAMINATION

4 ADMINISTRATIVE JUDGE CARPENTER: Mr. Stokes,
5 in looking at this document that begins with the second
6 page of the PRB meeting minutes that's labeled GPC II-189,
7 I want to ask if it was concluded that the most probable
8 source of the water was the so-called calibration
9 procedures. Did you go over to I&C and talk to people and
10 find out whether they did use water or did not use water?

11 THE WITNESS: Yeah. The guy that actually did
12 this -- and I know you see my name there, it just means
13 that I reviewed it -- but it's --

14 ADMINISTRATIVE JUDGE CARPENTER: Oh.

15 THE WITNESS: -- somebody else came in to do
16 this particular thing, and he -- he did consult with the
17 I&C people directly, some I&C techs., and also I&C
18 supervision. But their comment was, actually, that no, we
19 use a -- at least now, you know, we had to speak for the
20 present, and that's -- that's all they could do in saying
21 that they used nitrogen bottles now to calibrate them.
22 Nobody would admit to using water, at least recently, and
23 none of the other guys are here anymore that did the ones
24 back in the start-up time.

25 ADMINISTRATIVE JUDGE CARPENTER: I'm having a

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1 hard time. I can imagine having a small tank of high
2 pressure nitrogen and some fittings and lines, and so on,
3 going up with either a referee gauge or something and
4 calibrating it. An installed gauge, I'm having -- what
5 would the man do if he -- or the lady do if she had water?
6 And so have a hose some place or --

7 THE WITNESS: It's just a little short line
8 with essentially a little pump on it --

9 ADMINISTRATIVE JUDGE CARPENTER: Oh.

10 THE WITNESS: -- that they would use.

11 ADMINISTRATIVE JUDGE CARPENTER: Do you have

12 --

13 THE WITNESS: I haven't seen it personally,
14 but that's -- that's what they tell me.

15 ADMINISTRATIVE JUDGE CARPENTER: You know
16 there are such devices that they do use?

17 THE WITNESS: Oh, yes.

18 ADMINISTRATIVE JUDGE CARPENTER: Well, you
19 couldn't get anybody to say, "Yeah, I remember."

20 THE WITNESS: No.

21 ADMINISTRATIVE JUDGE CARPENTER: Thank you.

22 ADMINISTRATIVE JUDGE MURPHY: Mr. Stokes, can
23 you help me read this document?

24 THE WITNESS: I can try.

25 ADMINISTRATIVE JUDGE MURPHY: How about going

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1 to page 2 of 5, which is the root cause and corrective
2 action report.

3 THE WITNESS: Okay.

4 ADMINISTRATIVE JUDGE MURPHY: Do you know who
5 did this analysis?

6 THE WITNESS: Yes. My signature is down
7 there, and -- but actually David Lisenby, he's -- he was
8 supposed to have his signature over on this other page.
9 But, anyway, I -- I reviewed the document after it was
10 done, I -- after David performed the analysis and
11 essentially concurred with it, and I signed as the
12 investigator.

13 ADMINISTRATIVE JUDGE MURPHY: So you signed as
14 the investigator, but you didn't do the investigation?

15 THE WITNESS: No. No, sir, not all of it.
16 Like I said, I reviewed what he did and essentially agreed
17 with it.

18 ADMINISTRATIVE JUDGE MURPHY: And can we tell
19 from looking at this document that David Lisenby did it?

20 THE WITNESS: Like I was saying, I -- no.

21 ADMINISTRATIVE JUDGE MURPHY: Okay. Thank
22 you.

23 CHAIRMAN BLOCH: Staff, do you have any
24 further recross?

25 MR. BARTH: Yes, Your Honor. Give me about

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1 one minute. I would like to commence.

2 CHAIRMAN BLOCH: You have permission to
3 commence.

4 MR. BARTH: Do I have permission for one
5 minute?

6 Thank you, Your Honor. I'm ready.

7 CHAIRMAN BLOCH: Charge.

8 RECROSS EXAMINATION

9 BY MR. BARTH:

10 Q Mr. Stokes, does the air pass through the
11 filter before it gets to this blocked valve that we've
12 been discussing all day? I can rephrase the question if
13 you think the question is poorly done.

14 A Do the --

15 Q We've discussed the valve where the -- the
16 pipe where water was found in February/March. Is that
17 downstream from the filter?

18 A It's -- like I said, the line splits off and
19 they go in two different directions.

20 BOARD EXAMINATION

21 CHAIRMAN BLOCH: Within a parallel path, is
22 that right?

23 THE WITNESS: Yeah, essentially a parallel.

24 RECROSS EXAMINATION (Continued)

25 BY MR. BARTH:

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1 Q I would like to show you a picture of a filter
2 which we have taken.

3 Again, Your Honor, I would move the Court for
4 permission to mark a photocopy of the picture as Staff
5 Exhibit Number 70 for identification. Mr. Mosbaugh has
6 seen the original color photograph. I do not believe
7 other people have seen the copies of the photocopy of it.

8 CHAIRMAN BLOCH: Permission to mark is
9 granted.

10 (Whereupon, the above-referred to
11 document was marked as Staff Exhibit
12 No. II-70 for identification.)

13 BY MR. BARTH:

14 Q I'm showing a copy of the photograph to the
15 witness and a copy of the xerox, Your Honor, of Staff
16 Exhibit 70, marked for identification purposes only.

17 Mr. Stokes, when you've familiarized yourself
18 with the picture, will you please let me know, and get the
19 idea of where it is in the plant and how it looks?

20 A I'm ready.

21 Q What is the object in the middle of the
22 picture that does not have a gauge on it?

23 A That's the filter we've been discussing.

24 Q And could you tell me where this blacked piece
25 of pipe that we've been discussing all day is located in

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1 relation to the filter and the pipes? And please make
2 your description so that it's understandable from the
3 written record.

4 A The lines going up to the gauges, you're
5 talking about? Yeah. Okay. That's the -- you can see
6 the little bit of -- a glimpse, I guess, of the black
7 isolation valve down there, just below and to the right of
8 the filter. That's one of the lines coming in from the
9 starting air header, and the other one is just to the left
10 of it.

11 Well, you can see those lines go up, and then
12 they T off, essentially, the lines going to the left would
13 go up to the filter, and then the two one-quarter inch
14 lines on either side of the filter continue on up past the
15 filter, and then make a right horizontal turn and then
16 turn again to go up the side of the panel, and then on to
17 the gauges eventually.

18 Q To get up to the gauges, would our famous .07
19 cubic inches of water have to take one of these two lines
20 that goes up past the filter?

21 A Yes.

22 Q Can you estimate for the bench what kind of
23 distance that is? I don't have a scale here.

24 A Yeah. I think I said previously something
25 like maybe five feet. As a matter of fact, I believe five

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1 feet, maybe an inch, and then the -- our disposition of
2 the DC. It's an estimated five feet anyway.

3 Q And you're telling me that for our water to
4 back up this .07 cubic inches, it would have to rise at
5 least five feet past this filter?

6 A Yes.

7 Q Is there a further rise in the piping past the
8 filter, the filter -- the two lines above the filter going
9 to a hole in the wall? There's no -- or it goes as a
10 blank in my picture. Are you cognizant of where the lines
11 go after they disappear from this picture?

12 A Yes, they go straight up the side of the panel
13 into a couple of the -- as I said earlier, a couple of
14 pressure switches and -- and then on up near the top of
15 the panel, and then across, and then up and over the
16 little box. It's --

17 Q Is the five feet --

18 A -- quite a few turns.

19 Q Is the five feet you discussed from the bottom
20 of the photograph to these cabinets, or is it to the top
21 of the filter? So I have a perspective of how much rise
22 our .07 cubic inches of water has to go.

23 A No, we're probably just -- just trying to get
24 the actual volume inside the complete stretch of tubing,
25 if it was just stretched out. It's not a rise of five

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1 feet, essentially. It's just a -- we're thinking it's the
2 whole length of tubing is five feet, estimated.

3 Q How high is the tubing from the top to the
4 bottom?

5 A Maybe, I don't know, three -- three feet,
6 something like that.

7 Q I'm sorry. I did not hear your answer.

8 A Maybe three feet. Yeah, something like that,
9 three feet.

10 Q So, at a minimum, our water would have to
11 travel up at least three feet. I have no further
12 questions, and thank you.

13 Your Honor, I --

14 CHAIRMAN BLOCH: On that one, I think you
15 asked the question, but I didn't hear an answer.

16 THE WITNESS: Three feet, yes.

17 CHAIRMAN BLOCH: Okay.

18 MR. BARTH: Thank you, Your Honor. I would
19 move that the Board accept Staff Exhibit 70, marked for
20 identification purposes, the photo -- the xerox of the
21 photograph, into evidence at this time.

22 CHAIRMAN BLOCH: Granted.

23 (Whereupon, the above-referred to
24 document, previously marked as Staff
25 Exhibit No. II-70 for

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1 identification, was received into
2 evidence.)

3 BOARD EXAMINATION

4 ADMINISTRATIVE JUDGE MURPHY: Mr. Stokes, just
5 to make the record clear, and so that Judge Carpenter and
6 I can follow this, would you get out GPC 188, which is
7 this schematic? The filter -- and I'm going to be looking
8 both at Staff II-70, which is the photograph that you were
9 just looking at and the schematic, and I want to try and
10 correlate the two.

11 THE WITNESS: I believe your pictures kind of
12 lay this out in a sequence if you add those.

13 ADMINISTRATIVE JUDGE MURPHY: Yeah.

14 THE WITNESS: I'll try --

15 ADMINISTRATIVE JUDGE MURPHY: Well, let's just
16 do it with this photograph.

17 THE WITNESS: Let's do it.

18 ADMINISTRATIVE JUDGE MURPHY: The regulator is
19 item number 20 on the schematic, and the regulator is in
20 the left center of the picture, right?

21 THE WITNESS: Yes.

22 ADMINISTRATIVE JUDGE MURPHY: The filter is
23 item number 19?

24 THE WITNESS: That's correct.

25 ADMINISTRATIVE JUDGE MURPHY: The two valves

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1 that are on either side of the filter, underneath the
2 filter, are they isolation valves 81?

3 THE WITNESS: Yeah, they both are numbered 81
4 coming out of E31L and E31R.

5 ADMINISTRATIVE JUDGE MURPHY: And the pressure
6 switches are off to the side of the filter? Can we see
7 them on this?

8 THE WITNESS: No, the pressure switches are
9 actually above, where the lines go up. The lines by the
10 filter will turn across and then go up. Along that
11 vertical line is where you'll find the pressure switches,
12 just for your future reference.

13 ADMINISTRATIVE JUDGE MURPHY: Along which
14 vertical lines?

15 THE WITNESS: The two lines going up to the
16 gauges.

17 ADMINISTRATIVE JUDGE MURPHY: I see. Okay.
18 Thank you. All right. That's all.

19 CHAIRMAN BLOCH: Mr. Kohn, further?

20 RECROSS EXAMINATION (Continued)

21 BY MR. MICHAEL KOHN:

22 Q At the T's in NRC II-70 at the bottom of the
23 page, right below the bottom of the filter where the lines
24 branch off to the gauges -- are you with me?

25 A Yes, I am.

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1 Q If there's a mixture of water or air and water
2 at that point, and there was a leak by the gauge, would
3 the 250-pound pressure be sufficient to push the water up
4 to where it was found?

5 A Of course, if there's a leak in the -- and
6 this is just my -- I mean, my answer to that. If there's
7 a leak in the gauge, I mean, I think -- I think we would
8 have noted it and had to write a corrective work --

9 Q Or a fitting by the gauge?

10 CHAIRMAN BLOCH: That wasn't the question.
11 The question was, if there was a leak, would it be
12 sufficient to cause movement of water and moisture along
13 that line, up towards the place where water was found?

14 THE WITNESS: I mean, I guess if it was large
15 enough.

16 BY MR. MICHAEL KOHN:

17 Q Is that a yes?

18 MR. BLAKE: That's a hypothetical without any
19 basis in the record.

20 BOARD EXAMINATION

21 ADMINISTRATIVE JUDGE CARPENTER: If it were
22 large enough, it would simply blow out, wouldn't it?

23 CHAIRMAN BLOCH: Well --

24 ADMINISTRATIVE JUDGE CARPENTER: Mr. Stokes,
25 are you qualified to talk about a mixed flow of gas and

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1 water?

2 THE WITNESS: Well, in this hypothetical
3 situation -- well, no, I don't have a mechanical
4 engineering degree or instrumentation degree either. So
5 I'm not --

6 ADMINISTRATIVE JUDGE CARPENTER: This is not
7 the kind of question that you're normally used to doing a
8 technical analysis of.

9 THE WITNESS: That's absolutely right.

10 ADMINISTRATIVE JUDGE CARPENTER: I think you
11 should make the record show that.

12 CHAIRMAN BLOCH: Are Mr. Dobby's notes in the
13 record or not

14 MR. MICHAEL KOHN: They are -- no one has
15 moved for their admission at this time yet.

16 CHAIRMAN BLOCH: So, then, Mr. Blake's comment
17 is correct, right?

18 MR. MICHAEL KOHN: What was -- I didn't follow
19 Mr. Blake.

20 CHAIRMAN BLOCH: He said that the hypothetical
21 has no basis in the record, and he is correct.

22 MR. MICHAEL KOHN: I'm not following.

23 ADMINISTRATIVE JUDGE CARPENTER: Mr. Johnston
24 didn't tell us there was a leak when he found the water.
25 Period.

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1 MR. MICHAEL KOHN: Well, there could have --
2 Mr. Johnston has testified that there were leaks in --
3 Your Honor, the record is clear that Mr. Johnston
4 testified that many of the tubings and fittings were
5 leaking in the 1990 timeframe. That is in the record.

6 CHAIRMAN BLOCH: Let's continue. I won't
7 strike the question.

8 RECROSS EXAMINATION (Continued)

9 BY MR. MICHAEL KOHN:

10 Q If there was water found below the filter in
11 the lines where we were looking at previously, could the
12 250-pound pressure push the water up to where it was later
13 detected in 1995 by Mr. Johnston?

14 MR. BLAKE: Well, where is the evidentiary
15 basis for if there is water found at that spot?

16 CHAIRMAN BLOCH: Repeat the question again,
17 please.

18 MR. MICHAEL KOHN: Okay.

19 MR. BLAKE: Judge, I'll withdraw it, but let's
20 just -- let's just simply get on and see if we can get
21 this behind us.

22 THE WITNESS: I'm not going to speculate on
23 that. I don't know.

24 ADMINISTRATIVE JUDGE CARPENTER. Mr. Blake,
25 I'm not very comfortable with this question, because it

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1 oversimplifies the very complicated physics of what would
2 occur, and agreeing to that -- I don't know if anybody has
3 testified that water was found, but you'd have to say how
4 much water, and you have to look at the velocity, the
5 magnitude of the leak, as to whether the water would move
6 as a slug or a bubble, bubble, bubble, or what would
7 happen.

8 MR. BLAKE: Judge, I appreciate that. The
9 reason for my withdrawing it was --

10 ADMINISTRATIVE JUDGE CARPENTER: I'm flinching
11 from this oversimplification of the question.

12 MR. BLAKE: My --

13 ADMINISTRATIVE JUDGE CARPENTER: If you want
14 to specify a particular size leak and a particular volume
15 of water, then it might be tractable.

16 CHAIRMAN BLOCH: One second, please.

17 MR. BLAKE: Sure.

18 CHAIRMAN BLOCH: Mr. Kohn, continue.

19 BY MR. MICHAEL KOHN:

20 Q Can you tell me whether it is possible that
21 water --

22 CHAIRMAN BLOCH: I think you might want to
23 rephrase the question.

24 MR. BLAKE: Don't help him, Judge.

25 CHAIRMAN BLOCH: Of course, anything is

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1 possible. Come on.

2 MR. BLAKE: Thank you, Your Honor.

3 BY MR. MICHAEL KOHN:

4 Q If water was located in the lines below the
5 filter that we've previously identified, could 250-pound
6 pressure force that water up to the location where it was
7 -- where water was found by Mr. Johnston if there was a
8 leak in -- at the -- at the gauge?

9 MR. BARTH: I object to the question, Your
10 Honor, not because it's a hypothetical with insufficient
11 facts, but without describing the kind of water the
12 question makes no sense. If the water were a form of
13 vapor, it's one thing. If it were in the form of small
14 particles, it would be another. Or the form of a drop or
15 a cohesion, it would be an adhesion, it would be another
16 kind of -- we just have no facts here which make any
17 answer sensible. If the question makes no sense, it
18 should be stricken.

19 BOARD EXAMINATION

20 CHAIRMAN BLOCH: I have a problem with the
21 whole area, not necessarily with the questioning. And
22 that is that, in fact, it's -- there's speculation going
23 on of a variety of kinds as to where this water came from.
24 So I don't see that we can rule that one kind of
25 speculation is allowed and other kinds are not.

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1 Ultimately, somehow you've got to demonstrate that there's
2 plausibility to it.

3 Mr. Blake, you had a comment about that? No,
4 you just sat forward.

5 So we'll -- do you know, Mr. Stokes, whether
6 or not there are conditions under which water could move
7 up that line because there was flow caused by a leak in
8 the gauge?

9 MR. MICHAEL KOHN: Or a fitting by the gauge.

10 CHAIRMAN BLOCH: Or a fitting by the gauge.

11 THE WITNESS: Do you want to know if there
12 were instances?

13 CHAIRMAN BLOCH: No. No, we're not asking you
14 whether it happened in fact. But do you know, as an
15 engineering matter, whether there could be movement of
16 water up the line as a result of a leakage either in the
17 gauge or in the fitting by the gauge?

18 THE WITNESS: Yes.

19 CHAIRMAN BLOCH: It could happen, okay.

20 Mr. Kohn?

21 MR. MICHAEL KOHN: No further questions.

22 ADMINISTRATIVE JUDGE CARPENTER: Mr. Stokes,
23 given your answer to that question, when this hypothetical
24 water got to the point of the leak, why would the water
25 say, "I don't want to go out that hole; I'm going to stay

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1 right here"?

2 THE WITNESS: It wouldn't.

3 ADMINISTRATIVE JUDGE CARPENTER: This is
4 silly.

5 THE WITNESS: I just answered the question.
6 (Laughter.)

7 ADMINISTRATIVE JUDGE CARPENTER: If mean, if
8 the air leaks, why doesn't the water leak?

9 THE WITNESS: That's right.

10 ADMINISTRATIVE JUDGE CARPENTER: I just --

11 MR. BLAKE: Are we done?

12 CHAIRMAN BLOCH: That's what I'm trying to
13 find out.

14 RECROSS EXAMINATION (Continued)

15 BY MR. MICHAEL KOHN:

16 Q Mr. Stokes, air flows more freely out of the
17 system than would water from a leak, isn't that true, due
18 to its density and viscosity?

19 A That's true.

20 MR. MICHAEL KOHN: No further questions.

21 MR. BARTH: I have one question, Your Honor.

22 RECROSS EXAMINATION (Continued)

23 BY MR. BARTH:

24 Q Mr. Stokes, I'd like to follow Dr. Carpenter.
25 If the water were in the form of gas, would it flow

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1 equally out with the air, out of the leak in our gauge?

2 A Yes.

3 Q Have you made any kind of calculations in your
4 own mind as to what size of molecule, if we were talking
5 about free available water, would have been inhibited by
6 the flow of the air as versus air without -- without the
7 water being solid?

8 CHAIRMAN BLOCH: We'll take notice that he
9 hasn't calculated the size of molecule. Go on. He hasn't
10 done that.

11 THE WITNESS: And I don't have the calculators
12 to --

13 (Laughter.)

14 MR. BARTH: Touche. I quit.

15 ADMINISTRATIVE JUDGE CARPENTER: I protest.
16 This is so technically trivial, we just --

17 CHAIRMAN BLOCH: Mr. Kohn, anything further?

18 MR. MICHAEL KOHN: No, Your Honor.

19 CHAIRMAN BLOCH: Mr. Blake?

20 MR. BLAKE: I have just one area to follow up
21 on on Judge Murphy's question.

22 REDIRECT EXAMINATION

23 BY MR. BLAKE:

24 Q Would you take a look at GPC II-189?

25 A Okay.

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1 Q The third page in in the top section under
2 "Disposition." It has -- hello?

3 A I see it.

4 Q Okay. It has apparent two signatures there.
5 Can you read those?

6 A Yes. Dave Lisenby and Ken Stokes. I'm sorry.
7 I missed that myself.

8 Q And would that help in identifying that
9 Mr. Lisenby played a role in dispositioning this?

10 A Yes.

11 MR. MICHAEL KOHN: Sorry. I can't find what
12 page you're on.

13 MR. BLAKE: I'm in GPC II-189, and I'm on the
14 third page into the document at the top, in Section 4,
15 where it says, "Hardware not affected. Use as is,"
16 etcetera.

17 MR. MICHAEL KOHN: Okay. Thank you.

18 MR. BLAKE: That's all I had, Judge.

19 THE WITNESS: I had actually been looking on
20 page 5, because we had signed that previously. I missed
21 that. I'm sorry.

22 CHAIRMAN BLOCH: Are there any questions based
23 solely on the signature? There being none, Mr. Stokes,
24 it's a great pleasure to dismiss you once again. Thank
25 you for joining us.

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1 THE WITNESS: It's my pleasure to accept.

2 (Whereupon, the witness was excused.)

3 MR. BLAKE: I think maybe we can take a short
4 break and then we'll be able to put on Mr. Chenault for
5 the remainder of the day.

6 CHAIRMAN BLOCH: We'll take a 10-minute break
7 right now.

8 (Whereupon, the proceedings were off the
9 record from 4:10 p.m. until 4:27 p.m.)

10 CHAIRMAN BLOCH: Mr. Chenault, I'd like to
11 welcome you to our hearing.

12 Could you please identify yourself by full
13 name and present position?

14 MR. CHENAULT: My name is William Hall
15 Chenault, III. I'm a Senior Engineer with Intercom
16 Services in Atlanta.

17 CHAIRMAN BLOCH: And this is a Licensing Board
18 for the Nuclear Regulatory Commission, and it's a formal
19 hearing. I'd like to advise you that the testimony you're
20 about to give should be the truth, the whole truth, and
21 nothing but the truth, and the testimony is subject to
22 possible penalty for perjury. Do you understand?

23 MR. CHENAULT: Yes.

24 WHEREUPON,

25 WILLIAM HALL CHENAULT, III

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1 was called as a witness by Counsel for the Licensee and,
2 having first been duly sworn, assumed the witness stand,
3 was examined and testified as follows:

4 DIRECT EXAMINATION

5 BY MR. BLAKE:

6 Q Mr. Chenault, this is Mr. Blake. Do you have
7 before you a document entitled "Rebuttal Testimony of
8 William H. Chenault, III," on diesel generator air quality
9 statements, dated August 14, 1995, and comprised of some
10 four and a half pages of text?

11 A Yes.

12 Q And were you involved in the preparation of
13 this document?

14 A Yes, I was.

15 Q And can you describe your involvement? What
16 role did you play?

17 A I answered questions for John Lamberski, and
18 over the phone we discussed the questions and he wrote
19 down my answers, and then I reviewed it.

20 Q And as written down now and reviewed by you,
21 is it accurate, to the best of your knowledge and belief?

22 A Yes, it is.

23 Q And are you prepared to adopt it as your
24 testimony in this proceeding?

25 A Yes.

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1 Q And do you so adopt it?

2 A Yes, I do.

3 MR. BLAKE: Judge Bloch, I would ask that the
4 testimony of Mr. Chenault, the rebuttal testimony, be
5 accepted into evidence and physically incorporated into
6 the record just as though read.

7 BOARD EXAMINATION

8 CHAIRMAN BLOCH: Mr. Chenault, you understand
9 that when we bind testimony into the record, it's the same
10 as if you had said it in the hearing yourself?

11 THE WITNESS: Right.

12 CHAIRMAN BLOCH: The motion is granted.

13 DIRECT EXAMINATION (Continued)

14 BY MR. BLAKE:

15 Q Mr. Chenault, is there attached to your copy
16 of this rebuttal testimony a three-page document, which
17 would be your curriculum vitae?

18 A Yes, there is.

19 Q And in the upper right-hand corner, does it
20 indicate Chenault Exhibit A?

21 A Yes, it does.

22 Q Are you familiar with this three-page
23 description of your qualifications?

24 A Yes, I am.

25 Q And are you prepared to answer questions about

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August 14, 1995

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	:	
GEORGIA POWER COMPANY, <u>et al.</u>	:	Docket Nos. 50-424-OLA-3
	:	50-425-OLA-3
	:	
(Vogtle Electric Generating Plant,	:	Re: License Amendment
Units 1 and 2)	:	(Transfer to
	:	Southern Nuclear)
	:	
	:	ASLBP NO. 93-671-OLA-3

REBUTTAL TESTIMONY

OF

WILLIAM HALL CHENAULT, III

ON

DIESEL GENERATOR AIR QUALITY STATEMENTS

1 TESTIMONY OF WILLIAM HALL CHENAULT, III

2 Q: PLEASE STATE YOUR NAME AND POSITION.

3 A: My name is William Hall Chenault, III and I am employed by
4 Enercon Services in Atlanta, Georgia.

5 Q. WHAT ARE YOUR PROFESSIONAL QUALIFICATIONS?

6 A. A summary of my professional qualifications is attached hereto
7 as Exhibit A.

8 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

9 A. The purpose of my testimony is to address Intervenor's
10 testimony that I observed water pouring out of the Vogtle
11 diesel generator control air trip lines in the days following
12 the March 20, 1990 site area emergency. I also address
13 Intervenor's assertion that high dew point readings recorded
14 during this time frame support his claim that water
15 accumulated in the control air system.

16 Q. WHAT ROLE DID YOU HAVE IN THE INVESTIGATION OF THE MARCH 20,
17 1990 FAILURE OF THE PLANT VOGTLE 1A DIESEL GENERATOR?

18 A. In March and April of 1990, I was employed by Enercon Services
19 and had performed consulting services for Georgia Power on an
20 as-needed basis in connection with the Plant Vogtle diesel
21 generators. Following the March 20, 1990 site area emergency,
22 I was contacted by Mr. Ken Burr and asked to come to Plant
Vogtle to assist in the investigation of the 1A diesel

1 failure. Based on my time records, I arrived at Plant Vogtle
2 on March 26, 1990 and left the site on April 1, 1990.

3 Q. WHAT DID YOU CONCLUDE DURING YOUR VISIT TO THE PLANT?

4 A. Initially, I believed that pneumatic leaks in the 1A diesel's
5 instrument air system could have been the cause of the diesel
6 failure. However, I dismissed this theory after reviewing the
7 design of the system and concluding that observed air leakage
8 was insufficient to cause a diesel trip. I concluded that the
9 cause of the 1A diesel failure was the Calcon jacket water
10 temperature sensors. Before I left the Vogtle site, I
11 believed that concern had been raised about the Calcon sensor
12 calibration procedure and that steps had been taken with
13 respect thereto to ensure proper Calcon sensor set points. I
14 do not remember whether, by the time I left the site, foreign
15 material had been discovered in some of the Calcon sensors.

16 Q. WHILE YOU WERE AT VOGTLE, DID YOU OBSERVE THE DISASSEMBLY OF
17 ANY DIESEL CONTROL AIR SENSING LINES?

18 A. Although I do not have a specific recollection of this, I
19 believe that I did observe functional testing and bubble
20 testing of the diesel control systems during which the sensing
21 lines would have been disassembled.

- 1 Q. WHILE YOU WERE AT VOGTLE, DID YOU EVER HEAR OR OBSERVE THAT
2 THERE WAS WATER OR MOISTURE FOUND IN THE VOGTLE DIESEL
3 PNEUMATIC CONTROL SYSTEM?
- 4 A. No.
- 5 Q. DO YOU THINK YOU WOULD REMEMBER IF THERE HAD BEEN WATER OR
6 MOISTURE FOUND IN THE PNEUMATIC CONTROL SYSTEM?
- 7 A. Yes. I believe that would have received considerable
8 attention and discussion.
- 9 Q. HAVE YOU LISTENED TO THAT PORTION OF MR. MOSBAUGH'S TAPE NO.
10 24 WHICH IS TRANSCRIBED ON INTERVENOR'S EXHIBIT II-85?
- 11 A. Yes. I listened to a copy of the tape provided to me by
12 counsel for Georgia Power. I also listened to that same tape
13 recording in the Summer of 1994 when I was interviewed by OI
14 investigator Mr. Larry Robinson. I believe the tape that Mr.
15 Robinson played for me was a micro-cassette size.
- 16 Q. DO YOU BELIEVE THAT IT IS YOU SPEAKING ON THIS TAPE?
- 17 A. When I listened to the tape in the Summer of 1994, I told Mr.
18 Robinson that I wasn't sure that it was me on the tape, and I
19 believed that the speed of that tape was off-normal. After
20 listening to the tape copy provided to me by Georgia Power
21 counsel, I believe that it is me speaking on the tape.
- 22 Q. WHAT DO YOU BELIEVE IS BEING DISCUSSED ON THE TAPE?

- 1 A. It is hard to decipher this conversation because it sounds
2 like Ken Burr and I are having a conversation with Mr.
3 Mosbaugh while Ken Stokes is talking on the telephone in the
4 same room. In any event, I believe we were talking about air
5 leakage from the diesel trip lines.
- 6 Q. HAVE YOU REVIEWED MR. MOSBAUGH'S PREFILED TESTIMONY AT PAGE
7 94?
- 8 A. Yes.
- 9 Q. DO YOU AGREE WITH MR. MOSBAUGH'S CHARACTERIZATION THAT THIS
10 CONVERSATION INVOLVED THE PRESENCE OF LIQUID IN THE DIESEL
11 TRIP LINES?
- 12 A. No.
- 13 Q. HAVE YOU EVER HEARD THAT HIGH DEW POINT READINGS WERE OBTAINED
14 ON THE VOGTLE DIESEL AIR RECEIVERS?
- 15 A. I recall that over the course of all my visits to Plant Vogtle
16 there were some dew point readings taken which were out of
17 specification high. However, I don't believe that either Ken
18 Stokes or myself ever concluded there was an actual moisture
19 problem in the diesel control system. I recall believing that
20 there were problems with the way the technicians took the dew
21 point readings such that neither Ken nor I had confidence in
22 the accuracy of those particular readings.

1 Q. WHEN YOU RECEIVED REPORTS OF HIGH DEW POINT READINGS DID YOU
2 TAKE ANY ACTION TO ENSURE THERE WAS NOT AN ACTUAL HIGH
3 HUMIDITY CONDITION IN THE DIESEL PNEUMATIC CONTROL SYSTEM?

4 A. Yes. I recall checking for water in the blowdown of the air
5 receivers and checking the bowl of the five-micron filter in
6 the diesel engine control panel.

7 Q. IF WATER DID ACCUMULATE IN THE VOGTLE DIESEL CONTROL SYSTEM
8 WHERE WOULD YOU EXPECT TO FIND IT?

9 A. I would expect it to appear in the diesel control panel
10 filter, which has a bowl for the purpose of trapping any water
11 or debris that might find its way into the system. In my
12 opinion, if water were in the system it could not get out
13 unless it were removed manually.

1 them?

2 A Yes, I am.

3 MR. BLAKE: Judge Bloch --

4 CHAIRMAN BLOCH: Speak directly into the mike.
5 You might want to pull the mike closer to you. That's a
6 two-jointed mike. It does not bend in the middle, just at
7 either end.

8 THE WITNESS: Okay.

9 MR. BLAKE: Judge Bloch, I would ask that this
10 three-page document, Mr. Chenault's qualifications, be
11 marked as GPC Exhibit II-190, it's Chenault Exhibit A, and
12 be accepted into evidence, and, in fact, bound right with
13 his testimony at this point in the proceeding.

14 CHAIRMAN BLOCH: Granted.

15 (Whereupon, the above-referred to
16 document was marked as GPC Exhibit
17 Number II-190 for identification,
18 and was received into evidence.)

19 MR. BLAKE: I have no more questions of
20 Mr. Chenault.

21 CHAIRMAN BLOCH: Mr. Kohn?

22 MR. MICHAEL KOHN: Thank you, Your Honor.

23 CROSS EXAMINATION

24 BY MR. MICHAEL KOHN:

25 Q Are you or your employer receiving any

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William H. Chenault, III

Experience Summary

- Over twenty years commercial nuclear power experience including extensive experience at Boiling Water and Pressurized Water Reactor Plants
- Extensive Standby Electrical Power Systems experience
- Experienced in Licensing and Regulatory Requirements
- Experienced Technical Support Staff Engineer

Experience Description

Bill Chenault is a Senior Engineer with Enercon Services, Inc., located in Atlanta, Georgia. He provides support for utility and engineering companies for a variety of engineering, licensing, training, operations and maintenance projects. This experience includes procedure development, licensing, technical specification procedure reviews, lesson plan development and diesel generator maintenance and operation. Since joining Enercon, he has worked on projects for Entergy (Grand Gulf, Arkansas Nuclear One, River Bend), Westinghouse Savannah River (Savannah River Site), Southern Nuclear Operating Company (Georgia Power Company's Vogtle), Baltimore Gas and Electric (Calvert Cliffs), Carolina Power and Light (Brunswick & Robinson), Northern States Power (Prairie Island) and Houston Power and Lighting (South Texas Project). In addition to his engineering responsibilities, Mr. Chenault is the Quality Assurance Auditor for Enercon's Atlanta Office.

Mr. Chenault has been directly and continually involved with Enterprise Diesel Generators for fifteen years. He was a Startup Engineer for the Enterprise Diesel Generators at Grand Gulf Nuclear Station for four years and a Startup Engineer for the Enterprise Diesel Generators at Vogtle Electric Generating Plant for five years. Since its inception in 1984, he has been involved in varying degrees with the TDI (Enterprise) Diesel Generator Owners Group. He participated in the initial review and approval process of the Maintenance/Surveillance Matrix (part of the Owners Group Design Review/Quality Revalidation (DR/QR) program). He has assisted Georgia Power in maintaining Vogtle's Diesel Generator maintenance program in compliance with the M/S Matrix requirements by reviewing subsequent revisions and revising the Diesel Generator maintenance procedures as required and developing a database of commitments, regulatory requirements and industry recommendations for the Enterprise DGs.

He has also performed other diesel generator related consulting activities such as: technical support to Southern Nuclear Operating Company in analysis of a station blackout event at Vogtle Unit 1 (NUREG-1410); a detailed technical review of the ANO Units 1 and 2 diesel generator systems' design basis documents at the AP&L offices in Little Rock; and assistance to Westinghouse-Savannah River Co. with the analysis of connecting rod bearing failures of one of the emergency diesel generators at the Savannah River Site.

NUCLEAR REGULATORY COMMISSION
Docket No. 50-424/425-OLA-3 EXHIBIT NO. II-190
In the matter of Georgia Power Co. et al., Vogtle Units 1 & 2
 Staff Applicant Intervenor Other
 Identified Reviewed Rejected Reporter SD
Date 9/14/95 Witness William Chenault

Mr. Chenault was as an Issue Evaluator in the Reactor Safety Improvement Program at the Savannah River Site. He was responsible for review of issues involved with the diesel generators and electrical systems related to reactor safety which were submitted by outside contractors, plant operating contractors (Dupont & Westinghouse), plant employees and the DOE to determine their impact on restart of the reactors at the site. The issues were reviewed against criteria developed from DOE Safety Performance Criteria, Technical Specifications and Safety Analysis Report.

As an Engineer in the both the Maintenance and Startup Departments at Vogtle during initial startup of Units 1 and 2, Mr. Chenault prepared work packages for the detailed inspection of Diesel Generator components to ensure compliance with specified design requirements of the TDI Diesel Generators Owners Group. He interfaced with outside agencies involved with testing and inspecting system components, directed craft personnel in the initial checkout of individual system components, and scheduled and coordinated the construction effort for the installation of the Unit 2 DGs and auxiliary equipment. Mr. Chenault prepared and performed procedures for verification of the performance of the DGs and their auxiliaries. He also initiated and implemented design changes to correct and enhance system operation and developed and reviewed plant surveillance and maintenance procedures for the DGs. He also participated in the development of draft through final versions of the electrical section of the Vogtle Technical Specifications, including direct meetings with the NRC to resolve items of contention.

Mr. Chenault was the Enterprise Diesel Generator Startup Engineer at Grand Gulf. He participated in the review of the diesel generator system for design adequacy and directed craft personnel for the initial checkout of individual system components. He also prepared and performed test procedures to verify system performance per design specification for the Enterprise diesel generators. While at Grand Gulf, Mr. Chenault assisted in the performance of the plant's first Diesel Generator/Engineered Safety Features integrated transient response and design verification test.

Mr. Chenault participated in the development of the first lesson plan for the Standby Diesel Generators at Grand Gulf and assisted in the classroom presentation. The class was tailored for mechanics, electricians and instrument technicians for the purpose of augmenting their understanding of the system's operation, inter-system relationships and trouble shooting the electrical and pneumatic controls of the engine and generator.

Mr. Chenault has recently been involved with the following diesel generator projects:

1. Revised the Grand Gulf Diesel Generator Maintenance Standard, which is used for governing maintenance activities on the Diesel Generators, to incorporate the latest Cooper-Enterprise Clearinghouse Preventative Maintenance Plan.
2. Reviewed newly developed diesel generator (Cooper) surveillance procedures at the South Texas Project.
3. Developed safety related design functions for the pumps and valves for the Enterprise and EMD Diesel Generators at Grand Gulf to support the ten year update effort of the plant's Inservice Test Program.

4. Responsible for resolving Diesel Generator related open items associated with Grand Gulf's submittal of the Improved Technical Specifications to the Nuclear Regulatory Commission (NRC) and updating the plant's Lubrication Manual to latest diesel generator vendor requirements.
5. Performed an audit of the design and testing of the Station Blackout Project at Prairie Island Units 1 & 2 on behalf of Northern States Power Corporate Quality Assurance Department. The audit included a detailed review of the design and installation of two new SACM Diesel Generators (French manufacturer) installed for Unit 2 and the dedication of the two existing Diesel Generators to Unit 1. The design was evaluated against applicable industry standards and regulatory requirements. Following completion of the installation of equipment, reviewed the diesel generator testing program to verify that design specifications, industry standards and regulatory requirements had been complied with.
6. Verified the technical adequacy of the surveillance test procedures for Calvert Cliffs. This work involved reviewing applicable Technical Specifications to ensure specific design basis requirements were reflected in the surveillance program, and development of a surveillance requirement licensing and design basis document for the onsite AC and DC electrical power sources and distribution systems, including the Diesel Generators and battery systems.
7. Assisted in the preparation and resolution of issues for an NRC Electrical Distribution System Functional Inspection (EDSFI) at Grand Gulf. Performed tasks that included the review and revision of the System Design Criteria for the Diesel Generators and preparation of UFSAR changes, including verification documentation and safety evaluations, for the Electrical and Auxiliary System sections of the UFSAR.

While attending college, Mr. Chenault was employed full time at Georgia Power Company's corporate office where he was a draftsman/designer responsible for mechanical layouts, P&ID's and electrical schematics. He also designed fluid transfer systems, procured equipment for design projects, and performed field inspections of design projects.

Education

B.S., Mechanical Engineering, Georgia Institute of Technology, 1976

1 compensation for your testimony today?

2 A Yes.

3 Q Are you personally receiving compensation?

4 A Yes.

5 Q And can you tell me what that compensation is?

6 A I'm not exactly sure, but it would be
7 comparable to what I would normally charge to Georgia
8 Power for doing work for them.

9 CHAIRMAN BLOCH: I'm sorry. I could not hear.
10 It might be the mike, but --

11 THE WITNESS: Okay. I said I was -- I'm being
12 compensated for the same amount that I would normally
13 charge Georgia Power for doing work for them.

14 CHAIRMAN BLOCH: Thank you.

15 MR. MICHAEL KOHN: Is this witness -- a
16 technical question of Georgia Power -- being presented as
17 an expert witness, Mr. Blake?

18 MR. BLAKE: You know, he is like many, many
19 witnesses in NRC proceedings, where they have expertise
20 and they talk. If you look at his testimony, he is
21 talking about what he saw and what he observed during his
22 role post-site area emergency in 1990.

23 And I think although his qualifications would
24 qualify him to be an expert, I think it's a fairer
25 characterization to say he is really a fact witness in

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1 this juncture, but certainly qualified to talk about the
2 topics that he observed.

3 MR. MICHAEL KOHN: I guess I'm not aware of
4 any custom to pay fact witnesses, and I do have an
5 objection to that practice that has been employed in this
6 proceeding.

7 MR. BLAKE: Well, fine.

8 CHAIRMAN BLOCH: Is there a motion pending
9 before me?

10 MR. MICHAEL KOHN: Not presently, Your Honor.

11 BY MR. MICHAEL KOHN:

12 Q Can you tell me what documents you were
13 provided before you testified today?

14 A A copy of my testimony.

15 Q In your conversations with Mr. Lamberski, did
16 he provide you any factual information?

17 MR. BLAKE: Are you asking about
18 communications now or documents?

19 MR. MICHAEL KOHN: I'm sorry. Now I'm asking
20 about communications.

21 BY MR. MICHAEL KOHN:

22 Q When you were working on your testimony, did
23 he provide you some factual background and some factual
24 information that you had forgotten over the time?

25 A No, I reviewed the tape that was the subject

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1 of this testimony.

2 Q Yes, sir.

3 A I listened to that, and I listened to his
4 transcripts. I mean, I read the transcripts, saw the
5 tape.

6 Q And did you agree with the transcript of the
7 tape that you had read?

8 A I couldn't totally agree with it, because I --
9 I couldn't make out all of the conversations myself.

10 Q And other than the tape, was there other
11 documentation that you looked at?

12 A No, not that I recall.

13 Q On page 2, line 7, you state that you observed
14 air leakage. Can you tell me what you were told about
15 this air leakage that you -- what did you observe?

16 A Which sentence are you referring to?

17 Q Line 7, you say, "However, I dismissed this
18 theory after reviewing the design of the system and
19 concluding that observed air leakage was insufficient to
20 cause the diesel trip."

21 A Okay. This was at the time when I arrived at
22 Vogtle, and I arrived there I think six or seven days
23 after the event. And I was going over what had been
24 stated had occurred, and the subject of air leaks came up.
25 And at the time, like I said here, that I believe that air

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1 leaks could have been contributing to the particular
2 diesel failure that they had.

3 BOARD EXAMINATION

4 CHAIRMAN BLOCH: Mr. Chenault, the question
5 was, what was your basis for believing that the observed
6 air leakage was insufficient to cause the diesel trip?
7 What was the information you had on which you reached that
8 conclusion?

9 THE WITNESS: That it was not involved with
10 the diesel trip, was that your question?

11 CHAIRMAN BLOCH: That observed air leakage was
12 insufficient to cause a diesel trip. What did you know
13 about observed air leakage, so that you could reach that
14 conclusion?

15 THE WITNESS: Well, after I got there and we
16 had been there several days, some of the Cooper employees
17 -- I believe it was Sheldon Owyong and Bob Johnston --
18 conducted a systematic troubleshooting method of
19 determining what the trip was. And as I said in the
20 testimony here, that originally I believed that air
21 leakage may have contributed to the particular trip they
22 had. But after seeing the Cooper personnel go through it
23 step by step, and essentially recreating the type of trip
24 they had seen, that convinced me that the problems they
25 had found were the cause for the trip.

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1 CROSS EXAMINATION (Continued)

2 BY MR. MICHAEL KOHN:

3 Q Were you aware that the leaks had been
4 tightened by the time Mr. Owyong and Mr. Johnston had
5 done that?

6 A I don't think that was really relevant to what
7 I believed. What -- what I had --

8 Q Well, I'm saying you -- you say you observed
9 -- air leakage was insufficient to cause a trip. I'm
10 asking you whether you knew that the -- that leaks had
11 been tightened.

12 A I really don't think that is important,
13 because what -- in my opinion, what I said was not
14 sufficient that -- because of the design of the system.
15 We had added -- Ken Stokes and I had, when we were there
16 as start-up engineers, added some more pneumatic lines
17 into the system to compensate for leakage. And just
18 leakage from the system would not cause the trips.

19 And as I said here, I initially believed that
20 air leaks may have been involved. But since I've been
21 away from the site for a couple of years, I had forgotten
22 about that design change, for instance, and my scenario I
23 had worked out in my own mind did not correspond to what
24 the -- was described to me.

25 BOARD EXAMINATION

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1 CHAIRMAN BLOCH: Mr. Chenault, I'm having a
2 problem. This is Judge Bloch. The testimony says
3 something about insufficient. Do you want to focus on
4 that line? Does it matter -- did you -- why did you reach
5 the conclusion that the leaks were insufficient to cause
6 the trip?

7 THE WITNESS: Because on those particular trip
8 lines, it has built in pneumatic lines that make up for
9 leakage.

10 CHAIRMAN BLOCH: So regardless how large the
11 leaks would be, they couldn't have contributed to the
12 event, is that correct?

13 THE WITNESS: That's my understanding, right.

14 CHAIRMAN BLOCH: So you really didn't reach
15 any conclusion about the leaks being insufficient. No
16 leaks, in your opinion, could possibly have contributed to
17 the event.

18 THE WITNESS: Well, I couldn't say that. But
19 as well as I remember, as I reviewed it here recently in
20 my mind, is that the design of the system was such that
21 leakage that -- that was described to me, or that I
22 remember talking about when I first came on the site,
23 would not have caused the leaks.

24 CHAIRMAN BLOCH: No, that's the problem.
25 Obviously, there is some upper bound to how much leakage

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1 is permitted without causing problems, isn't that correct?

2 THE WITNESS: For those particular lines, I'm
3 not sure what that would be.

4 CHAIRMAN BLOCH: But there is some upper
5 bound, isn't there?

6 THE WITNESS: Well, the pneumatic system works
7 on the method of venting off a particular sensor to create
8 a trip. So there would be some upper bound, which would
9 be equivalent to whatever it would take to trip the
10 sensor.

11 CHAIRMAN BLOCH: And if you're not sure how
12 much that would be, how did you reach the conclusion that
13 the leakage was insufficient?

14 THE WITNESS: Just based on, really, the --
15 the bases for my belief that it was insufficient was, like
16 I say, the troubleshooting method we went through and
17 reviewed the drawings at that time, when I was on site,
18 and then leakage would not have produced the results that
19 they had obtained.

20 CHAIRMAN BLOCH: Did you rely on the testing
21 by Mr. Johnston and Mr. Owyong?

22 THE WITNESS: Yes.

23 CHAIRMAN BLOCH: Did you know that testing had
24 been conducted before their testing?

25 THE WITNESS: I think I do recall that.

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1 CHAIRMAN BLOCH: Snoop testing.

2 THE WITNESS: Right.

3 CHAIRMAN BLOCH: And did you know the results
4 of the snoop testing?

5 THE WITNESS: I believe they found some leaks.

6 CHAIRMAN BLOCH: Well, what size leaks?

7 THE WITNESS: I can't remember.

8 CHAIRMAN BLOCH: Did you know at the time what
9 size leaks were found in the --

10 THE WITNESS: I think they described them to
11 me as -- as they poured the snoop on them, they described
12 some -- they didn't quantify it.

13 CHAIRMAN BLOCH: They didn't quantify it?

14 THE WITNESS: No. I mean, I don't know how
15 you'd quantify --

16 CHAIRMAN BLOCH: So how would you reach your
17 conclusion based on a report of unquantified snoop testing
18 that the leaks weren't large enough?

19 THE WITNESS: As well as I remember, the
20 leakage was not conducive to the type of trip that I saw.
21 In other words, leakage would be lines that are intact but
22 leaking from the fittings. I'm not talking -- when I --
23 if you had a line that was totally disconnected, that
24 wouldn't be leakage. That would be a failure of the
25 system.

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1 CHAIRMAN BLOCH: So anything short of the
2 disconnecting of a line would not be sufficient to cause a
3 trip?

4 THE WITNESS: I would define it as nominal
5 leakage, which would not have caused the trip. I can't
6 quantify a leakage, but I would say nominal leakage.

7 CHAIRMAN BLOCH: So how did you conclude that
8 the leakage was nominal?

9 THE WITNESS: Well, I don't know where the
10 leakage was. As I said, it --

11 CHAIRMAN BLOCH: So do you want to change your
12 testimony about having concluded that it was insufficient
13 to cause a trip? If you don't know what the leakage is,
14 and you don't know what nominal is, and you don't know how
15 much it would take to cause a trip, how could you conclude
16 that it was insufficient leakage?

17 THE WITNESS: After reviewing the scenario,
18 what had happened, and talking with the people involved at
19 that time, that was my conclusion, that the leakage was
20 not the problem.

21 CHAIRMAN BLOCH: Okay.

22 THE WITNESS: Maybe the quantity was --

23 CHAIRMAN BLOCH: Is that based on things other
24 than knowing how much leakage there is? Did it not depend
25 at all on how much leakage there was? Did you have other

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1 reasons?

2 THE WITNESS: As I said before, the basis for
3 my determination that it may have been the trip sensors
4 was the troubleshooting method we went through and was
5 able to reproduce that. And I was basing -- when I
6 initially said that I thought leaks may have had something
7 to do with the problem, is my experience at other
8 installations. And the other installation I was thinking
9 back on did not have this particular design change that
10 was implemented to make up for leakage.

11 So for leakage to have caused the problem
12 would have been -- I mean, that was the whole reason we
13 put the design change in, which is to compensate for
14 leakage.

15 CHAIRMAN BLOCH: Mr. Kohn?

16 CROSS EXAMINATION (Continued)

17 BY MR. MICHAEL KOHN:

18 Q Was anyone assigned responsibility to assess
19 the magnitude of the leaks?

20 A Not that I know of.

21 Q Do you know -- there was bubble testing
22 performed on the diesel, correct?

23 A Right.

24 Q And prior to the bubble testing, do you know
25 whether there was any additional testing done to detect

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1 leaks?

2 A I'm not sure.

3 Q Do you know if snoop was used before the
4 bubble testing?

5 A I'm not sure.

6 Q Were you aware that I&C -- that a leak at --
7 one leak at least was detected that was sufficient to blow
8 snoop in the face of an I&C technician?

9 A No, I'm not aware of that.

10 Q I'm going to --

11 BOARD EXAMINATION

12 CHAIRMAN BLOCH: Would that have changed your
13 conclusion?

14 THE WITNESS: No.

15 CHAIRMAN BLOCH: How can you tell so quickly
16 that it wouldn't have changed your conclusion?

17 THE WITNESS: Because, as I said before, the
18 -- due to the testing process that we went through, that
19 to me the leakage was not the issue.

20 CHAIRMAN BLOCH: Oh. But the testing process
21 was on a system when it may have been tightened up. Does
22 that change your position?

23 THE WITNESS: No.

24 CHAIRMAN BLOCH: No matter how much it was
25 tightened up?

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1 THE WITNESS: No.

2 CROSS EXAMINATION (Continued)

3 BY MR. MICHAEL KOHN:

4 Q Were you aware of any discussions at the site
5 as to whether it was anybody's guess whether a leak was
6 sufficient enough to cause a trip of the diesel generator?

7 A Say that again?

8 Q Were you aware of discussions at the site of
9 whether the diesel generator failure could have -- that
10 resulted in the site area emergency could have been the
11 cause of leakage? Are you aware of specific discussions
12 around that fact?

13 CHAIRMAN BLOCH: I couldn't understand the
14 question.

15 MR. MICHAEL KOHN: All right.

16 BY MR. MICHAEL KOHN:

17 Q You were mentioning earlier about some design
18 change to make up for leakage. Is that through the 006
19 orifices?

20 A I don't recall the size, but there were some
21 orifices, right, involved.

22 Q And were any added to the jacket water
23 temperature switch lines?

24 A I can't recall specifically.

25 Q Were any added to lube oil?

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1 A I can't recall specifically. I think they
2 were -- I would have to look at the drawing to say.

3 BOARD EXAMINATION

4 CHAIRMAN BLOCH: Well, Mr. Chenault, do you
5 know whether the makeup system that you were depending on
6 is enough to make up regardless of where the leaks might
7 be in the system?

8 THE WITNESS: No. As well as I remember,
9 without having the drawing here, I can't say for sure that
10 they were installed for specific trips. I could say that
11 I believe they were, for instance, the low temperature
12 jacket -- I mean, jacket water pressure, low jacket water
13 pressure, trips of that nature. But without seeing the
14 drawing, I couldn't say.

15 CHAIRMAN BLOCH: You changed the question a
16 little bit.

17 THE WITNESS: Did I?

18 CHAIRMAN BLOCH: I wanted to know whether you
19 are generally assured that the makeup system was adequate,
20 regardless of where the leak might be.

21 THE WITNESS: The design change was made for
22 specific trips.

23 CHAIRMAN BLOCH: Please answer the question
24 I've asked.

25 THE WITNESS: But I don't believe it -- it was

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1 not intended to make up for all leaks in the pneumatic
2 system.

3 CHAIRMAN BLOCH: So do you know whether or not
4 the makeup system for air was enough to compensate for any
5 leak, no matter where it might be?

6 THE WITNESS: No, it was not installed to make
7 up for any leak, no matter where it was.

8 CHAIRMAN BLOCH: Thank you.

9 CROSS EXAMINATION (Continued)

10 BY MR. MICHAEL KOHN:

11 Q On page 2 of your testimony, lines 14 through
12 15, you say you don't remember whether, by the time you
13 left the site, foreign material had been discovered in
14 some of the Calcon sensors. Did you know about the
15 foreign material before the Wiley report came out?

16 A I don't recall exactly when I learned about
17 it, but I do recall the foreign material and the trip
18 switches. But I'm not sure at what point in time that I
19 knew about it.

20 Q You are aware that Wiley looked at those
21 switches?

22 A Yes.

23 BOARD EXAMINATION

24 CHAIRMAN BLOCH: Mr. Chenault, do you remember
25 from whom you learned about the contamination in those

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1 switches?

2 THE WITNESS: No, I don't remember in
3 particular.

4 CHAIRMAN BLOCH: Was it some person on the
5 site?

6 THE WITNESS: I really have no recollection of
7 how I learned that.

8 CHAIRMAN BLOCH: But you do know it wasn't
9 from Wiley?

10 THE WITNESS: Wiley directly to me, no. I
11 never was involved with Wiley.

12 CROSS EXAMINATION (Continued)

13 BY MR. MICHAEL KOHN:

14 Q Did you ever read the Wiley report?

15 BOARD EXAMINATION

16 CHAIRMAN BLOCH: Excuse me. When did you
17 leave the site?

18 THE WITNESS: I was there about six days. I
19 think I left on April 1st.

20 CHAIRMAN BLOCH: Okay. And before you left,
21 you had -- you believe you had some knowledge about
22 foreign material?

23 THE WITNESS: As I said, I couldn't really
24 remember at what point in time I knew about it.

25 CROSS EXAMINATION (Continued)

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1 BY MR. MICHAEL KOHN:

2 Q Mr. Chenault, you mention on the top of page 2
3 that you have time records. Did you review your time
4 records in preparing your testimony?

5 A It was a timesheet, yes.

6 Q Timesheet. Did you have any other notes or
7 other documentation that you're aware of that you or your
8 company maintained associated with your involvement during
9 the site -- or following the site area emergency?

10 A As far as I know, there is no written notes of
11 any kind.

12 Q Are you aware of whether -- when you say you
13 learned about foreign material, is it -- did you learn
14 that sensors had been disassembled and foreign material
15 had been found? Or what was your understanding about the
16 foreign material?

17 A As well as I remember, the sensors had been
18 disassembled and foreign material was found inside the
19 sensors.

20 Q Can you tell me, were you at the Vogtle
21 facility in February and March of 1995?

22 A February and March of 1995?

23 Q I believe there was an outage during that time
24 period.

25 A No, I was not there during the outage.

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1 Q Can you tell me what timeframes you had been
2 at the Vogtle site since -- let's start since 1990?

3 MR. BLAKE: Judge Bloch, is there some
4 relevance to other than the period in question? I'm
5 unaware of any, and I'd object to it unless there is some
6 showing.

7 MR. MICHAEL KOHN: Yes, Your Honor. On page
8 3, at the top of the line, the witness states, "While" --
9 the question reads, "While you were at Vogtle," and I am
10 trying to determine what the witness meant by that. So
11 maybe if I actually rephrase the question we may even get
12 to it quicker.

13 BY MR. MICHAEL KOHN:

14 Q Can you tell me what you mean by -- how you
15 interpret the question, "While you were at Vogtle," what
16 time period are you referring to?

17 A I interpret that to mean during the incident
18 of the station blackout and prior to that time.

19 Q The six days you were at the site?

20 A Or -- that's right. Right.

21 Q Were you at the site before that?

22 A Yeah, I was. I worked there for five years.

23 Q In 1990, you had worked there for five years?

24 A I left there in '89 and came back, just for
25 this one incident for that week.

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1 THE WITNESS: I couldn't tell you who in
2 particular, but just, I guess, the history of working with
3 pneumatics I've been told by somebody that moisture was
4 bad for pneumatic controls. I have never observed
5 moisture in the controls, so I can't say off hand what the
6 effect would be on those particular pneumatics. But it
7 was impressed upon us that you needed dry air.

8 CHAIRMAN BLOCH: So is this a matter of rumor
9 or professional opinion?

10 THE WITNESS: That it was told to me?

11 CHAIRMAN BLOCH: Do you accept the statement
12 you just made as one that "I heard it from somebody," or
13 is it a professional opinion and it's true?

14 THE WITNESS: I believe I heard it from a
15 professional-type person that relayed it to me as guidance
16 on pneumatic systems. But I couldn't tell you
17 specifically who told me. It may have been 15 years ago.
18 I've been working with pneumatics for 15 years, and it was
19 someone along -- somewhere along that line, somebody had
20 impressed upon me the importance of it.

21 CROSS EXAMINATION (Continued)

22 BY MR. MICHAEL KOHN:

23 Q And in your professional judgment, that is
24 true, that water -- moisture could cause a malfunction?

25 A I believe it to be true, but I've never

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1 Q And, since then, have you returned to the
2 site?

3 A Yes, I have.

4 Q And when did you last return? Well, let me
5 rephrase it. Since the site area emergency, when did you
6 return the next time?

7 CHAIRMAN BLOCH: That's what the objection was
8 about before. What is the relevance of that? It's late,
9 but let's try to stay awake.

10 MR. MICHAEL KOHN: Thank you, Your Honor.

11 BY MR. MICHAEL KOHN:

12 Q What's your basis to conclude that Georgia
13 Power would get considerable attention and discussion
14 should water be detected in the pneumatic control system?

15 A Because in a pneumatic system moisture is a
16 major concern, and --

17 Q What could it do?

18 A It could get inside the pneumatic system and
19 cause some problems if it was in sufficient -- I would
20 suppose sufficient quantities.

21 Q It could cause malfunction and trips?

22 A That's what I've been told.

23 BOARD EXAMINATION

24 CHAIRMAN BLOCH: Who told you that,
25 Mr. Chenault?

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1 observed it myself.

2 Q And have you ever observed water in a diesel
3 generator system at a nuclear facility?

4 A In a diesel generator?

5 Q Excuse me. In the pneumatic system.

6 A I vaguely recall, during the construction-type
7 activities, finding water in a particular component of a
8 pneumatic system. As far as I can remember, it might have
9 been at Grand Gulf rather than at Vogtle, and a particular
10 section of that, due to storage conditions.

11 BOARD EXAMINATION

12 CHAIRMAN BLOCH: So are you confident that it
13 wasn't Vogtle?

14 THE WITNESS: No, I'm not confident. But I am
15 confident that it was during the construction-type
16 activity.

17 CROSS EXAMINATION (Continued)

18 BY MR. MICHAEL KOHN:

19 Q Now, you listened to tape 24, which is
20 Intervenor's Exhibit 85. Let's -- Your Honor, that -- I
21 think that section will probably take a little longer than
22 -- so maybe I'll move to another section and come back to
23 that.

24 CHAIRMAN BLOCH: No objection.

25 BY MR. MICHAEL KOHN:

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1 Q On page 4, line 13, of your testimony, through
2 page 5, line 6, you have a discussion about high dew
3 points. And I'm at a loss to understand what timeframe
4 you're talking about in this section. Can you tell me the
5 dates that you're referring to?

6 A This was prior to the 1990 incident.

7 Q All right. So this -- your answer is limited
8 to your observations prior to March of 1990?

9 A Right.

10 BOARD EXAMINATION

11 CHAIRMAN BLOCH: Well, do you know how much
12 prior? Is it months? Is it years?

13 THE WITNESS: Well, I left there in '89, and
14 the incident was in the early part of '90, and I was there
15 for five years before that. So during that five years of
16 startup is what I'm talking about there.

17 CHAIRMAN BLOCH: Do you know how to operate a
18 dew point instrument?

19 THE WITNESS: Yes.

20 CHAIRMAN BLOCH: Would you be able to instruct
21 a technician on how to do it properly?

22 THE WITNESS: Probably not today, without --

23 CHAIRMAN BLOCH: Well, in that time period.

24 THE WITNESS: Yes.

25 CHAIRMAN BLOCH: How long would it have taken?

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1 THE WITNESS: I would guess 15 to 20 minutes
2 to -- to instruct somebody on how to do it?

3 CHAIRMAN BLOCH: Yes.

4 THE WITNESS: Probably 15 or 20 minutes.

5 CHAIRMAN BLOCH: So if that's the case, why
6 would you and Mr. Stokes be concerned about improper use
7 of dew point instruments?

8 THE WITNESS: We had seen some cases where
9 maybe an inexperienced technician had been using the
10 instrumentation, and typically Ken Stokes and myself was
11 not present when they were taking the dew point.

12 CHAIRMAN BLOCH: And so what did you do about
13 the fact that inexperienced people were making readings at
14 a nuclear power plant?

15 THE WITNESS: Well, the intent was that, as a
16 technician would take a reading, they would -- if they had
17 an -- or a reading that was not good, they would contact
18 the engineer for resolution.

19 CHAIRMAN BLOCH: Oh. So when they read it as
20 good, there was no check, but only when it was not good.
21 Do you like that system?

22 THE WITNESS: Well, all readings were
23 reviewed, as far as I know. But as with most things, only
24 the negative things were reported as far as I know.

25 CHAIRMAN BLOCH: Did anyone talk to I&C to

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1 make sure that people were properly trained to do it
2 properly every time?

3 THE WITNESS: Yeah, we worked with I&C to make
4 sure that they would use the instrument correctly. They
5 did use several types of instruments, which may have been
6 contributing to it. They had different types of dew point
7 instruments, as far as I remember.

8 CHAIRMAN BLOCH: Do you mean they were able to
9 train people in some of them but not all of them?

10 THE WITNESS: I don't know what the training
11 --

12 CHAIRMAN BLOCH: Why wasn't this straightened
13 out? It's so simple, isn't it?

14 THE WITNESS: I don't recall the specifics.

15 CHAIRMAN BLOCH: Was it straightened out?

16 THE WITNESS: As far as I know.

17 CHAIRMAN BLOCH: Well, your testimony suggests
18 that it wasn't straightened out. You said, "I recall
19 believing that there were problems." It doesn't say you
20 solved them. It says you believed there were problems.
21 So they must not have been solved, isn't that correct?

22 THE WITNESS: Periodically, we would have a
23 negative reading, which we would investigate.

24 CHAIRMAN BLOCH: Well, that shouldn't happen,
25 should it, at a nuclear power plant?

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1 THE WITNESS: Yeah, I think mistakes could be
2 made.

3 CHAIRMAN BLOCH: Was there something wrong
4 with the training?

5 THE WITNESS: I couldn't really answer on
6 that.

7 CHAIRMAN BLOCH: Was there something wrong
8 with the certification for use of an instrument?

9 THE WITNESS: Couldn't say.

10 CHAIRMAN BLOCH: Was this thoroughly checked
11 into, so it wouldn't happen?

12 THE WITNESS: I couldn't -- couldn't say.

13 CHAIRMAN BLOCH: Do you feel personally
14 responsible when you're working at a plant to follow up to
15 make sure it is done?

16 THE WITNESS: Yes, I do.

17 CHAIRMAN BLOCH: Why didn't you follow up?

18 THE WITNESS: I didn't say I didn't follow up.

19 CHAIRMAN BLOCH: You didn't follow up, did
20 you?

21 THE WITNESS: Yes, I would say I did follow
22 up.

23 CHAIRMAN BLOCH: Did you file a deficiency
24 card, so it would be followed up and resolved?

25 THE WITNESS: I don't recall if I filed any

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1 deficiency cards or not.

2 CHAIRMAN BLOCH: Could you have?

3 THE WITNESS: I don't recall.

4 CHAIRMAN BLOCH: You don't recall if you could
5 have?

6 THE WITNESS: No, I don't.

7 CHAIRMAN BLOCH: Were you permitted to?

8 THE WITNESS: As far as I know, if a
9 deficiency card was the right tool to use.

10 CHAIRMAN BLOCH: Do you know whether it was
11 the right tool to use?

12 THE WITNESS: I don't recall.

13 CHAIRMAN BLOCH: So you were working on the
14 site and you didn't know what paper to file to correct the
15 deficiency?

16 MR. BLAKE: Judge Bloch, the man's response
17 was he doesn't remember. He doesn't know now today. He
18 didn't say that he --

19 CHAIRMAN BLOCH: Did you know at the time what
20 card you were supposed to file if there was a deficiency?

21 THE WITNESS: Yes, I was probably aware of all
22 of the procedures that were required of me.

23 CHAIRMAN BLOCH: And did you have the
24 responsibility of filing deficiency cards?

25 THE WITNESS: If that was one of the tools

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1 that was to be used at that particular phase of the
2 construction, startup, or operation.

3 CHAIRMAN BLOCH: And do you recall what tool
4 you were supposed to use if you saw a problem with the use
5 of instruments, and you wanted to make sure it was solved?

6 THE WITNESS: I was involved with all phases
7 of construction, startup, testing, operation. I couldn't
8 really say exactly when the dew point readings in question
9 occurred, so I don't know what paper would necessarily go
10 along with the deficiency.

11 CHAIRMAN BLOCH: But in any event, you could
12 have found out and made sure that there was something
13 filed and it would have been corrected, is that right?

14 THE WITNESS: I can only say that I'm sure
15 that I took whatever action was necessary.

16 CHAIRMAN BLOCH: Well, it looks like from your
17 testimony it didn't solve the problem. How did that
18 happen if you filed -- took the action necessary, that it
19 didn't solve the problem?

20 THE WITNESS: I really couldn't say how
21 somebody else would solve a problem.

22 CROSS EXAMINATION (Continued)

23 BY MR. MICHAEL KOHN:

24 Q Do you believe the problem was solved by the
25 time you left the site? That is, the problem of taking

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1 accurate dew point measurements?

2 A By the time I left in 1989?

3 Q Yes.

4 A I really don't know.

5 Q Had you made sure that your feelings about the
6 accuracy of taking these readings had been conveyed to I&C
7 personnel?

8 A Say that one more time.

9 Q Did you convey your understanding that
10 additional training was needed to I&C, the I&C Department?

11 A As well as I recall, any time we had a reading
12 that we thought may have been in error, that we would
13 immediately get with the technicians responsible and
14 resolve the problem, whether it be an error in taking the
15 method, whether it be an instrument out of calibration,
16 whether it be somebody not familiar with the
17 instrumentation. All I can say is that, in general, we
18 would try to resolve the problem.

19 Q So by the time you left, your knowledge about
20 proper use of the instruments had been conveyed to the I&C
21 personnel involved?

22 A As far as I knew, we had -- we did have
23 confidence in routinely them going out and taking dew
24 point measurements. And --

25 Q Excuse me. Did you say "we did"? Did you say

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1 "we did have confidence" by the time you left?

2 A In some cases, they would get inaccurate
3 readings which we questioned on particular occasions. But
4 we didn't necessarily have no confidence in the people
5 overall doing the job.

6 Q Would you question the readings on the spot as
7 soon as you heard about them?

8 A If they -- like I said before, normally, if
9 they had a negative type reading, they would come to us
10 for resolution. Not necessarily coming to us to help them
11 fix the problem, but to report that a negative reading was
12 found.

13 Q If an I&C -- would I&C technicians, to your
14 knowledge, train that when they detected a problem that
15 they would go to management and report it immediately?

16 A Yes.

17 Q Do you believe an I&C technician, or more than
18 one I&C technician would use a piece of dew point test
19 equipment in the field if they believed it was defective?

20 A No, I don't believe they would normally do
21 that.

22 BOARD EXAMINATION

23 CHAIRMAN BLOCH: Sir, you mentioned that, as
24 just an example, that if you found someone using an out of
25 calibration piece of equipment, you'd handle it right

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1 away. Is that correct?

2 THE WITNESS: If I found somebody using out of
3 calibrated, would I handle it?

4 CHAIRMAN BLOCH: Yes. That's what I think you
5 said. Is that correct?

6 THE WITNESS: I don't remember saying those
7 exact words, no.

8 CHAIRMAN BLOCH: That if someone was either --
9 as I recall, what you said was if they were using it
10 improperly or the instrument was out of calibration, you'd
11 handle it. If you don't recall it that way, you can state
12 what you meant to say about that.

13 THE WITNESS: Okay. As I thought I said, was
14 that if dew point errors were found -- I mean, if a
15 negative dew point was found, the investigation was made
16 to see if the dew point was actually bad dew point, or
17 whether it was the method of taking the dew point, or if
18 it might be the instrument that caused the erroneous
19 reading. And we would work with the technician to resolve
20 the problem, whatever the -- whether it was a bad dew
21 point or a bad reading, or whatever the case may have
22 been. We would have worked with the technician to resolve
23 it.

24 CHAIRMAN BLOCH: Now, when you say "worked
25 with them," what would that look like?

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1 THE WITNESS: Either going through another
2 reading of the dew point. and -- or maybe getting another
3 instrument to measure the same value. Things of that
4 nature.

5 CHAIRMAN BLOCH: Well, if you made another
6 reading, how would you know whether the first one was
7 wrong?

8 THE WITNESS: Well, we used other
9 observations, not -- if we -- if we had a bad dew point
10 reading, we may use some other observation, such as
11 blowing down the air receiver to see if there is any water
12 in the air receiver, or we may have verified the proper
13 operation of the air dryer to see if it was actually
14 dispelling water. So we wouldn't necessarily rely
15 strictly on a good reading. We would investigate the
16 system to see if we found any signs of moisture or water.

17 CHAIRMAN BLOCH: And would a high dew point
18 reading necessarily be reflected in signs of water?

19 THE WITNESS: If -- I think there would be
20 signs of water, or either malfunction of the air dryer.

21 CHAIRMAN BLOCH: So if you had a 60-degree dew
22 point, and the temperature was 70, would there be signs of
23 water?

24 THE WITNESS: There could be, if the air is
25 compressed to 250.

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1 CHAIRMAN BLOCH: So if there's a 60-degree dew
2 point, and compressed air at 250 pounds, you would expect
3 to see signs of water?

4 THE WITNESS: I would think you would probably
5 see it if there was a long-term problem with the dew
6 point. You know, if you just found one particular
7 incident where the air dryer wasn't working for a short
8 period of time, then it might not show up in the other
9 tell-tale signs.

10 CHAIRMAN BLOCH: You would not, however, be
11 verifying whether or not the dew point was 60 degrees if
12 you checked for water, would you be?

13 THE WITNESS: No, you could not tell what the
14 dew point was by checking for water. But typically, we
15 would also look at the air dryer to see if -- if it was
16 functioning correctly, it had the correct indications on
17 it, whether it was discharging water from its drain
18 system.

19 CHAIRMAN BLOCH: Do you know if you suspected
20 that an instrument was out of calibration, what would be
21 done with respect to the instrument?

22 THE WITNESS: If it was out of calibration,
23 that would be handled by the Instrument Department.

24 CHAIRMAN BLOCH: And do you know what they
25 would be expected to do under their procedures?

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1 THE WITNESS: I don't recall what they were.

2 CHAIRMAN BLOCH: And I said if it was
3 suspected to be out of calibration, because you wouldn't
4 necessarily know that right away, would you?

5 THE WITNESS: No, you wouldn't.

6 CHAIRMAN BLOCH: Would you expect that it
7 would be sent out for a calibration check, so you would
8 know what the calibration was?

9 THE WITNESS: I don't know if they sent it
10 out, but I would expect it to be checked.

11 CHAIRMAN BLOCH: And if it wasn't checked,
12 could you be sure that it was out of calibration?

13 THE WITNESS: For a suspect instrument, I
14 wouldn't think you would know unless you had it checked.

15 CHAIRMAN BLOCH: Thank you. It is 5:04.

16 Mr. Kohn --

17 MR. MICHAEL KOHN: I can stop at this point.
18 There's no -- nothing pending.

19 CHAIRMAN BLOCH: Okay. And how much time do
20 you expect to take tomorrow morning?

21 MR. MICHAEL KOHN: Based on the speed that
22 we've been going through the questioning, I'd say about an
23 hour.

24 CHAIRMAN BLOCH: Okay. So we may have sped up
25 things a little bit today?

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1 MR. MICHAEL KOHN: Right. Your Honor?

2 CHAIRMAN BLOCH: Mr. Kohn? Mr. Blake? You
3 said -- who was speaking? Oh.

4 MR. MICHAEL KOHN: There is -- the exhibits
5 that Intervenor presented to the witnesses today we'd like
6 to move into evidence. We can do it tomorrow morning, but
7 I'd just like to --

8 CHAIRMAN BLOCH: Well, do you want to mention
9 the numbers? It helps to mention the numbers.

10 MR. BLAKE: And tell me -- remember what they
11 were.

12 CHAIRMAN BLOCH: Why don't you do it in the
13 morning? If you can present the list to the other parties
14 so they'll know what to expect, that would be helpful.
15 We'll be ending tomorrow, because it's a Friday, at about
16 4:00. We'd like to start at 8:30 -- well, we're either
17 end at 4:00 or taking a lunch break, or we'll end at 1:00,
18 depending on how the thing -- how the schedule goes, with
19 no lunch break.

20 So we'll begin at 8:30 in the morning. We'll
21 begin at 8:30 in the morning, and we're adjourned.

22 (Whereupon, the proceedings were off the
23 record briefly.)

24 CHAIRMAN BLOCH: We're back on the record.

25 MR. BLAKE: I have available, and Mr.

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1 Lamberski is compiling the copies, of what is referred to
2 as the corporate concerns file. Do you recall you asked
3 us, I think, for -- to see if we could locate that. Mr.
4 Kohn has asked us about it over the last couple of days,
5 and we have that, and we'll distribute it to the parties.

6 The second item is the remainder of the
7 Hill/Ward documents. Mr. Hill is back now in this
8 country. He has gone through the documents and has sent
9 us the documents that he relied on in connection with the
10 preparation of his testimony that he has submitted. And I
11 have before me the only set of those.

12 There are a large number of very large
13 drawings and all that are not very easily reproduced. I'm
14 going to make them available for inspection. To the
15 extent people want copies of particular items, then we'll
16 undertake to coordinate that with, for example, the
17 Intervenor and/or the Staff. That's what I have as of
18 today, and I didn't want to hesitate in making them
19 available simply because we hadn't made copies of all of
20 these difficult documents to make copies of.

21 CHAIRMAN BLOCH: Do the other parties
22 understand the mechanics of how this can be done?

23 MR. BLAKE: No. I just got the documents. We
24 just got them this afternoon by Federal Express from
25 California and went through them, so --

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1 CHAIRMAN BLOCH: Okay. I hope the Staff and
2 Intervenor can work out the mechanics, so that they can
3 both gain access to the documents they need.

4 We are adjourned until 8:30 tomorrow.

5 (Whereupon, at 5:10 p.m., the proceedings in
6 the above-entitled matter were adjourned, to reconvene at
7 8:30 a.m., the following day.)

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C E R T I F I C A T E


This is to certify that the attached proceedings before the United States Nuclear Regulatory Commission in the matter of:

Name of Proceeding: GA POWER CO. ET AL.
VOGTLE UNITS 1 & 2

Docket Number: 50-424/425-OLA-3

Place of Proceeding: ROCKVILLE, MARYLAND

were held as herein appears, and that this is the original transcript thereof for the file of the United States Nuclear Regulatory Commission taken by me and, thereafter reduced to typewriting by me or under the direction of the court reporting company, and that the transcript is a true and accurate record of the foregoing proceedings.



SCOTT DILDINE
Official Reporter
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