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TRIAL LAWYERS FOR PUBLIC JUSTICE, P.C.

COUNSELLORS AT LAW
SUITE 611

2000 P STREET, NORTHWEST
WASHINGTON, D.C. 20036

(202) 463-8600

June 27, 1984

Leonard W. Belter, Esquire
Bishop, Liberman, Cook,
Purcell & Reynolds
1200 Seventeenth Street, N.W.
Washington, D.C. 20036

50-445-06-2
50-446-06-2

Dear Mr. Belter:

The attached information is provided in accordance with the agreements between the parties and the Board regarding the production of a final witness list and the identification of the incidents, examples, or results of harassment and intimidation known to identified witnesses.¹

There are, as you know, outstanding document requests which require resolution from your office. We have requested that you provide us with all the information in your possession relevant to the issue of harassment and intimidation. This was articulated in our discovery requests numbers 17 and 18, and further clarified in our April 7, June 4 and June 20, 1984 letters. You have represented that you have provided to us all information that could reasonably be responsive to the requests we have made. That includes all documents regarding any incidents, examples, complaints, etc. as described in the clarification of Question 3 (attached) from TUGCO, Brown and Root, Inc. or any of its contractors. (It should be noted that we have not received any information from any of the other subcontractors at all, a fact we find curious since at least some of the potential witnesses worked for subcontractors other than TUGCO or Brown and Root at the Comanche Peak site.) At the June 25, 1984 meeting at your office you represented that all the information that now exists regarding these matters has been provided, although apparently there was or may have been other documents which would have been responsive to our request, that no longer exist. Based on this representation, which we want in writing, we will consider any

¹ This agreement was first articulated in the June 14, 1984 pre-hearing conference, and has been discussed in detail among the parties subsequent to that time.

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documentation provided or introduced beyond this time period which is within the scope of our Question 3 as "surprise" and therefore a basis for delay.²

As you know the information and witness list attached to this letter does not in any way reflect the information which was made available to CASE at the Dallas QA office last week. That information, approximately two feet thick, appears to have significant additional information regarding incidents of harassment reported internally as well as the results of a 1979 questionnaire of the entire QA/QC department. Counsel for CASE has not yet been able to determine whether or not the information recently provided will require additional witnesses, discovery clarification, or any further responses. We intend to review the material as soon as it is received from your client. It is our understanding from you that there are no further documents relevant to the 1979 questionnaire which your client or contractors can find and thus there is no documented response to the reported incidents of harassment and intimidation.

Finally, we expect that you will provide us with a summary, such as is provided here, as to what you are planning to question CASE witnesses on, as well as the names and a summary of the testimony of your affirmative witnesses not later than twelve days prior to the beginning of the depositions of each of these groups of witnesses. (This coincides with the number of days "lead time" that you are being provided with by CASE assuming that depositions begin on July 9, 1984.)

A problem still pending is the production of information which is now the basis of pending investigations by the Office of Investigations (OI). As you are well aware the problem of the release of information provided to OI which is relevant to issues under litigation in other proceedings is currently facing at least three CASE witnesses in the context of their Department of Labor proceedings.³ A similar problem faces the parties in this proceeding. Although this was discussed during the pre-hearing conference, and it was addressed in briefs by the parties regarding the use of confidential information, the problem remains unresolved. We have identified those items which are

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At this point every available hour of both of CASE's counsel's time is occupied with preparation for the depositions. Any additional information produced will necessitate a delay to incorporate that information into our case, including possible call of witnesses at the hearings.

3

Those cases are Hatley v. Brown & Root, 84 ERA-23; Orr v. Brown & Root, 84-ERA-23; and Neumeyer v. Brown & Root, 84-ERA-26.

relevant to this proceeding, are admittedly subject to your discovery request, yet are apparently the basis of OI investigations. The OI policy to date has been that information derived or obtained during the pendency of an investigation should not be provided to the parties until after completion of its investigations. We understand that this applies to identified documents, as well as to testimony, which reveals the substance of the documentation. CASE wishes to use this information. Rather than release it without regard to OI's desires CASE prefers that the resolution of this matter include the Board. Thus on June 28th we will request the Board to immediately invite OI on the record to state its concerns, to allow the parties to express their views and to resolve the issue.

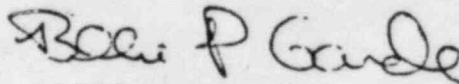
We have completed our contacts with all of those persons who GAP or CASE have contacted or had contact with in the past and have included in the list below those individuals who have information relevant to this issue and have indicated a willingness to testify through the evidentiary deposition process. Where there are restraints, or Counsel has been unable to get in contact with the individual, or there is some other problem, that is so indicated on our witness list.

We have not provided the information or included on the witness list those individuals who we have identified as craft or whose testimony does not substantially bear on the implementation of the QA/QC program.

A very small number of witnesses have indicated they would testify under the terms of a protective order and an affidavit of non-disclosure. We have modified slightly the documents used in the Byron/Catawba proceeding and submit herewith a draft for your comments. As soon as an agreement can be reached on this matter we will provide the names/information relevant to those witnesses.

We note that in a few cases we have what appear to be unresolvable problems with witnesses. Those are explained on the witness list. CASE will continue to attempt to persuade those individuals to testify at least "in camera". Should we fail we will bring the matter to the Board for resolution. In all other cases where a witness refused to testify we have either foregone the information, or believe that the information is independently verifiable.

Sincerely,



Billie P. Garde

cc: Honorable Peter Bloch
Stuart Treby
Renea Hicks

The wording of Question 3 is clarified as follows:

3. Supply for inspection and copying any and all documents between management (including supervisors, foremen, middle management, upper management, etc.) and employees regarding the following:

(a) Any and all management/employee disputes, complaints, differences, and/or discussions pertaining to:

(1) policy disputes, complaints, differences, and/or problems regarding enforcement, application, or interpretation of procedures, instructions, or regulations relating to the job or work of the employee or of employees under his/her supervision (including, but not limited to, overinspecting, "nitpicking," etc.);

(2) intimidation, harassment, threats, pressure to meet production, or other kinds of pressure;

(3) management directives (written or verbal) regarding the reporting of nonconforming conditions);

(4) and the like.

(b) Any and all letters of resignation by employees and responses by management in which such employees indicate concern or dissatisfaction with:

(1) the enforcement, application, or interpretation of procedures, instructions, or regulations relating to the job or work of the employee or of employees under his/her supervision (including, but not limited to, overinspecting, "nitpicking", etc.);

(2) intimidation, harassment, threats, pressure to meet production, or other kinds of pressure;

(3) management directives (written or verbal) regarding the reporting of nonconforming conditions;

(4) and the like.

(c) Counseling reports, termination reports, and exit interviews regarding (a) and (b) preceding.

(d) Any and all procedures, instructions, regulations, and/or management directives (including those supplied by employees) involved in (a)(1), (a)(3), (b)(1), and (b)(3) preceding.

(e) Internal investigations conducted by management into such disputes, complaints, differences, problems, discussions, concerns or dissatisfaction, including those by the "ombudsman."

(f) Any and all internal files Applicants or their employees have on employees contacted by the NRC.

For purposes of your answer, the following definitions shall apply:

The term "documents" shall be construed in the broad sense of the word and shall include any writings, drawings, graphs, charts, photographs, reports, studies, slides, internal memoranda, handwritten notes, tape recordings, calculations, and any other data compilations from which information can be obtained. (See item 8, page 2, of CASE's 3/14/84 Eighteenth Set)

The term "employees" shall be construed in the broad sense of the word and shall include Quality Control Inspectors, craftspeople, engineers, and any other employees employed by Brown and Root, Gibbs & Hill, Ebasco, any consultants, sub-contractors, and anyone else performing work or services on behalf of the Applicants or their agents or sub-contractors. (See item 2, page 1, of CASE's 3/14/84 Eighteenth Set)

The terms "procedures" and "instructions" shall be construed to include, but not be limited to: the written or verbal procedures or instructions under which the employees work; the written or verbal methods of reporting of nonconforming conditions by means of nonconformance reports (NCRs), inspection reports (IRs), component modification cards (CMCs), design change authorizations (DCAs), nondestructive examination reports (NDRs), field deficiency reports (FDRs), and/or any other method used for reporting nonconforming conditions.

The term "regulations" shall be construed to include, but not be limited to: the Code of Federal Regulations (CFR), especially 10 CFR; Applicant's Final Safety Analysis Report (FSAR); industry codes and practices; industry standards; etc.

CASE's Motion To Compel Applicants To Provide Complete Answers To CASE's Seventeenth, Eighteenth, Nineteenth, And Twentieth Sets Of Interrogatories And Requests To Produce To Applicants (April 16, 1984)

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
)
TEXAS UTILITIES ELECTRIC)
COMPANY, et al.) Docket Nos. 50-445-2
) and 50-446-2
(Comanche Peak Steam Electric)
Station, Units 1 and 2))

PROTECTIVE ORDER

Counsel and representatives of the parties to this proceeding who have executed an Affidavit of Non-Disclosure in the form attached shall be permitted to "protected information"^{1/} upon the following conditions:

1. Only counsel and one technical representative of the parties who have executed an Affidavit of Non-Disclosure may have access to protected information.^{2/} All executed Affidavits of Non-Disclosure or copies shall be provided to the Appeal Board and the parties.

2. Counsel and representatives who receive any protected information (including any documents that contain or otherwise reveal protected information) shall maintain its confidentiality

^{1/} As used in this order, "protected information" has the same meaning as used in the Affidavit of Non-Disclosure, attached hereto. The provisions of this protective order do not apply to Nuclear Regulatory Commission employees; they are subject to internal requirements (see NRC Manual Appendix 2101) concerning the treatment of protected information.

^{2/} That representative will identify those technical issues, if any, which require resolution, and the name of such representative shall be submitted prior to any disclosures to allow for objections, if any.

as required by the attached Affidavit of Non-Disclosure, the terms of which are hereby incorporated into this protective order.

3. Counsel and representatives who receive any protected information shall use it solely for the purpose of participation in matters directly pertaining to this proceeding and any further proceedings in this case and for no other purposes. Nothing in this protective order, however, shall preclude any party from moving the Appeal Board for the release of particular information for appropriate purposes, such as for use before another adjudicatory body.

4. Counsel and representatives shall keep a record of all documents containing protected information in their possession and shall account for and deliver that information to counsel for the staff in this proceeding in accordance with the Affidavit of Non-Disclosure that each has executed.

5. In addition to the requirements specified in the Affidavit of Non-Disclosure, all papers filed in this proceeding that contain any protected information shall be segregated and:

(a) served only on the counsel or other representatives of each of the parties who have executed an Affidavit of Non-Disclosure;

(b) served in a heavy opaque inner envelope bearing the name of the addressee and statement "PRIVATE. TO BE OPENED BY ADDRESSEE ONLY". Addressees shall take all necessary precautions to ensure that they alone will open envelopes so marked.

6. Counsel, representatives, or any other individual who has reason to suspect that documents containing protected information may have been lost or misplaced (for example, because an expected paper has not been received), or that protected information has otherwise become available to unauthorized persons, shall notify this Board promptly of those suspicions and the reasons for them.

IT IS SO ORDERED.

PETER BLOCH

AFFIDAVIT OF NON-DISCLOSURE

I, _____, being duly sworn, state:

1. As used in this Affidavit of Non-Disclosure,

(a) "protected information" is (1) information revealed in connection with in camera hearings in the Comanche peak operating license proceeding, including particularly the names of and identifying facts about in camera witnesses, and any other related information, particularly documents, specifically designated by the Licensing Board; or (2) any information obtained by virtue of these proceedings which is not otherwise a matter of public record and which deals with the in camera hearings.

(b) An "authorized person" is a person who, at the invitation of the Atomic Safety and Licensing Board ("Licensing Board"), has executed a copy of this Affidavit.

2. I shall not disclose protected information to anyone except an authorized person, unless that information has previously been disclosed in the public record of this proceeding. I will safeguard protected information in written form (including any portions of transcripts of in camera hearings, filed testimony or any other documents that contain such information), so that it remains at all times under the control of an authorized person and is not disclosed to anyone else.

3. I will not reproduce any protected information by any means without the Licensing Board's express approval or direction. So long as I possess protected information, I shall continue to take these precautions until further order of the Licensing Board.

4. I shall similarly safeguard and hold in confidence any data, notes, or copies of protected information and all other papers which contain any protected information by means of the following:

(a) My use of the protected information will be made at a place of business.

(b) I will keep and safeguard all such material in a locked facility.

(c) Any secretarial work performed at my request or under my supervision will be performed at the above location by one secretary of my designation who will also execute an affidavit of non-disclosure.

(d) All mailings by me involving protected information shall be made by me directly to the United States Postal Service or by personal delivery.

5. If I prepare papers containing protected information in order to participate in further proceedings in this case, I will assure that any secretary or other individual who must receive protected information in order to help me prepare those papers has executed an affidavit like this one and has agreed to abide by its terms. Copies of any such affidavit will be filed with and accepted by the Licensing Board before I reveal any protected information to any such person.

6. I shall use protected information only for the purpose of preparation, including any investigations which may be necessary, for this proceeding or any further proceedings in this case dealing with quality assurance and quality control issues, and for no other purpose.

7. I will avoid disclosure of protected information to the best of my ability. However, it must be recognized that in the course of conducting investigations in connection with this proceeding, certain protected information may be independently discerned incident to that investigation which might result in the inadvertent disclosure of protected information.

8. I shall keep a record of all protected information in my possession, including any copies of that information made by or for me. At the conclusion of this proceeding, I shall account to the Licensing Board or to a Commission employee designated by that Board for all the papers or other materials containing protected information in my possession and deliver them as provided herein. When I have finished using the protected information they contain, but in no event later than the conclusion of this proceeding, I shall deliver those papers and materials to the Licensing Board (or to a Commission employee designated by the Board), together with all notes and data which contain protected information for safekeeping until further order of the Board.

Subscribed and sworn to before me
this ____ day of _____, 1984.

Notary public

WITNESS LIST

* The parties are attempting to reach agreements on the facts involved in the harassment and intimidation testimony of these witnesses, and/or to reach stipulations or admissions on the same. Where possible the previous (or future) testimony of a witness will be agreed upon as a joint narrative by the parties as being the testimony for the purposes of this hearing. CASE anticipates that these matters will be resolved shortly. This effort will, hopefully, eliminate duplication or repetitive testimony of major witnesses surrounding events/incidents relating to identified deponents.

+ Information pertaining to the substantive allegations (i.e., hardware issues or wrongdoing issues) have been turned over to OI.

++ Detailed information has been provided in confidence to GAP investigators and cannot be released without permission of the witness.

WITNESS

INCIDENT

APPLICANT
WITNESS

NRC WITNESS

Henry Stiner*

He will testify about the harassment and intimidation incident listed on page 28 of the OI Report, and listed in his September 15, 1983 statement to the NRC, incorporated as Attachment 7 to the OI Report (supra). Although craft Mr. Stiner's harassment has been included in this hearing by the Board.

Larry Thompson
Fred Coleva
Doug Frankum
Callicut
Liffert
Ronnie Johnson

Brooks Griffin
R. Taylor

WITNESS

INCIDENT

APPLICANT
WITNESS

NPC WITNESS

Darlene Stiner*

She will testify regarding the meetings with Tolson regarding her pregnancy. The effect of the Circuit Breaker, the bus incident, failure of the guard to protect Darlene, office moves, also those incidents recorded in her September 15, 1983 statement to OI, and those listed on page 26 of the OI Report and the results of the harassment and intimidation as described in her affidavit filed in the CASE pleading 11/28/83.

Ron Tolson
Tom Brandt

P.R.
employee re:
Circuit Breaker
Randy Smith

Brooks Griffin

WITNESS

INCIDENT

APPLICANT
WITNESS

NRC WITNESS

Billie Orr

Will testify that she was verbally and physically harassed and intimidated by QC craft "runners" and supervisors during her position as QC Document Control Clerk, specifically she had a staple remover thrown at her and on other occasions was threatened with "getting fired" if she did not turn over documentation out of procedure.+

Tom Ippilito
Brooks Griffin

WITNESS

INCIDENT

APPLICANT
WITNESS

NRC WITNESS

Linda Barnes
(Confirmation of
testimony
pending.)

Document Quality Control Inspector, will testify that on or about April 1984 she was prevented from using proper procedures to complete document review, and that she was therefore in non-compliance with procedural requirements and that the pressure for her to continue to do document review in violation of procedures resulted in her having no choice but to leave the site. She will also testify as to her knowledge of other pressures to violate procedures in QC Document Review.

G. Purdy

Tom Ippilito

WITNESS

INCIDENT

APPLICANT
WITNESS

NRC WITNESS

Witness A
(Requires "in
camera" presenta-
tion.)

"T-shirt incident", (facts to be stipulated),
and the efforts of the employees to secure assistance
from the NRC. (Unable to contact to this point. If
unable to contact we will offer two witness who will
testify as to what this witness told them regarding
this incident.)++

John Collins
Resident Inspe

WITNESS

INCIDENT

APPLICANT
WITNESS

NRC WITNESS

Witness B*
(Has not yet
agreed to testify
in camera, only
ex parte.)

Will testify to the common knowledge among QC employees in one department that refusal to go along with instructions, even if a violation of procedure, will result in termination. Will also testify as to the management attitude on the site regarding employees going to the NRC, GAP, CASE, or others with information of violations of procedures. Also would provide corroborative testimony for several other named witnesses. Finally would testify about personal actions taken, knowingly in violation of established procedures, for fear of loss of job.++

Gordon Purdy

Tom Ippillito
Brooks Griffin

WITNESS

INCIDENT

APPLICANT
WITNESS

NRC WITNESS

Witness C
(Have not been
able to contact
as of yet.)

Has information regarding the use of harassment and
intimidation in the paint QC department which is not
cumulative of the Dunham incident. Will testify
about a meeting on harassment and intimidation with
Harry Williams about being too picky.

Harry Williams

WITNESS

INCIDENT

APPLICANT
WITNESS

NRC WITNESS

Witness D
(Only reached
today; will
decide by Friday
if will partici-
pate.)

Will testify about the continuous attitude of
management to disregard the recommendations of QC
inspectors, also about a meeting at which Harry
Williams said he would pull certification of
inspectors who didn't stop writing NCRs.

Harry Williams

WITNESS

INCIDENT

APPLICANT
WITNESS

NRC WITNESS

Witness E
(Still unable to
confirm whether
or not he will
testify.)

Will corroborate testimony of Witness F and
provide further examples.

WITNESS

Witness F
(name will be
provided)

INCIDENT

Will testify about failure of TUGCO management and QC in the electrical test group/electrical start-up engineering during Spring 1984, and related incidents of harassment, intimidation, pressure to withdraw complaints and questions about STE/ETG procedures. (Affidavit to be submitted to parties upon execution of a protective order and receipt of affidavit.)

**APPLICANT
WITNESS**

NRC WITNESS

WITNESS NAME

INCIDENT

APPLICANT
WITNESS

NRC WITNESS

Lester Smith

Smith will testify that he was aware of employee intimidation at Comanche peak. Instances of employees being discouraged from doing work right were revealed by Mr. Smith in an affidavit to CASE. Mr. Smith will testify that instead of responding in an affirmative manner TUGCO QC head, Mr. Vega, questioned his efforts and reacted negatively, leading Mr. Smith to the belief that QC was not interested in finding out about construction errors at Comanche peak. Mr. Smith will further testify that after talking with Mr. Vega he became aware that his termination was imminent as a direct result of his coming forth and that QCs' attempts to encourage employees to report faulty construction was actually an attempt to identify those who might blow the whistle. See Lester Smith Affidavit, 11/18/83 and 10/26/83 Deposition.

A. Vega
R. Tolson

Brooks Griffin
Richard Herr

WITNESS NAME

INCIDENT

APPLICANT
WITNESS

NRC WITNESS

Bob Hamilton*

His testimony will reveal instances of harassment to both himself and others in the form of threats stating that unless Hamilton and others stopped inspecting so meticulously and start "loosening up" specifically on QC coatings inspectors, he would terminate them (pp. 43 & 53). Furthermore, Hamilton's testimony will report general knowledge of various instances of harassment of other QC inspectors. In addition to threats of termination Hamilton's supervisor told him to stop writing NCRs. Finally Hamilton's testimony will reveal that the pattern of intimidation and job emasculation culminated in his procedurally improper termination for refusing to perform an exceedingly dangerous inspection (p. 8) while other inspectors who also refused were not terminated (p. 26). This only slightly expands the testimony of Mr. Hamilton beyond his previously submitted testimony. [References to 7/16/82 testimony of Robert Hamilton before the ASLB.]

Jim Hawkins
Harry Williams

Brooks Griffin

WITNESS

INCIDENT

APPLICANT
WITNESS

NRC WITNESS

Stan Miles

Stan Miles will testify that he was aware of instances of employee intimidation through threats of termination by foremen and superintendents. personal witness to Chuck Atchison's harassment and intimidation and other techniques used to undermine and demoralize the conscientious employee. See Affidavit 11/18/83.

Dale Bullard
W. Simmons
R. Tolson

Brooks Griffin
Robert Taylor

WITNESS**INCIDENT****APPLICANT
WITNESS****NRC WITNESS**

Robbie Robinson

Robinson will testify that it is common knowledge among all personnel at Comanche Peak that when someone goes to TUSI or Brown & Root or the NRC with allegations of deficiencies and illegal work practices they will be given a reduction of force (laid off). Robinson will testify that this intimidation is so pervasive on the jobsite that even those employees who would normally report construction problems to QC refuse to do so because they know that their job and their career would be suddenly terminated without reason. Robinson was himself terminated at Comanche Peak after nearly nine years (almost 5 years as General Foreman of the Structural Fab Shop) after reporting to TUSI's Joe George and Antonio Vega about make-work, mis-use of materials for personal use, ordering and use of rebar eaters, theft of materials, etc. See Affidavit 11/18/83.

A. Vega
J. George
Larry Wilkerson
Wayne Mansfield

Brooks Griffin

WITNESS

INCIDENT

APPLICANT
WITNESS

NRC WITNESS

Robert Messerly

Messerly will testify that he was aware of numerous specific instances of employee intimidation including QC inspectors who have been threatened by Supervision for slowing down production with their inspections (p. 3). Messerly will testify that after making a complaint to QC head Antonio Vega and then to Dave Chapman he was fired. Specific instances of intimidation are referred to in his Affidavit dated Nov. 26, 1983 (p. 2).

A. Vega
D. Chapman
M. Sanders
H. Goodson
D. Frankum

Brooks Griffin
Richard Herr
R. Stewart

WITNESS

INCIDENT

APPLICANT
WITNESS

NRC WITNESS

Joseph Krolak

Krolak will testify that he was aware of various instances of intimidation and of employees being discouraged from doing work properly. Krolak will testify that QC Supervisor Harry Williams caused many improper practices to occur through his instructions to inspectors and intimidated his inspectors by threatening to fire them if they didn't do things his way (p. 5 Affidavit). Mr. Krolak will testify that although he was terminated for refusing to perform an inspection on a narrow rail without scaffolding he believes the actual reason was because he conducted his inspections in accordance with QC procedures thereby holding up production in some cases. (Joe Fazi wouldn't do the inspection either but he wasn't fired (see p. 7, 11/18/83 Affidavit).

Mark Wells
Harry Williams
Tom Brandt

WITNESS

INCIDENT

APPLICANT
WITNESS

NRC WITNESS

Charles Atchison*

There is voluminous material available on this witness in the context of both this proceeding and the DOL proceedings. We do not see a need to present him separately in this hearing, except as to his testimony that the harassment and intimidation that he was subjected to was widespread at the site and had a native impact on the willingness of QC inspectors to do their job. We will however question the named individuals regarding their knowledge of management's response to the specific harassment, intimidation and termination of Mr. Atchison.

Thomas Brandt
R. Tolson
Lou Fikar
Dave Chapman
Mike Spence

EBASCO

Robert Taylor
Don Driscoll
John Collins

WITNESS

INCIDENT

APPLICANT
WITNESS

NRC WITNESS

Robert Bronson+
(Mr. Bronson is
in transit and
has not yet been
contacted by CASE.
We expect to call
him.)

Mr. Bronson was a QC inspector. He will testify to his experiences as a QC inspector at CPSES with harassment and intimidation and pressure. The testimony will be virtually the same as his statement in the CASE 11/28/83 filing. Although his deposition will expand on the results of the constant pressure on his ability to be a good QC inspector there will be no substantive addition to his testimony.

Mr. Snellgrove
J.P. Patton
R. Tolson
A. Vega
G. Purdy

Brooks Griffin
D. Driscoll

WITNESS

INCIDENT

APPLICANT
WITNESS

NRC WITNESS

Jack Doyle*

Like Mr. Atchison there is extensive material on the record of this case from and about Mr. Doyle. However, it is within the context of this proceeding that Mr. Doyle can first present the harassment and intimidation which he received on the job, and subsequent to leaving the job as a result of the problems he identified. Mr. Doyle will also testify as to the inability of the QC program to adequately identify the problems, and the inability of the staff to deal with complex technical issues at the inspector level and the resultant "chilling atmosphere" this breakdown causes. See principally the affidavit submitted by CASE on 11/28/83; also 1/18/83.

Gary Krishnan
Doug Frankum
M. Spence
R. Tolson
P. Britton

Brooks Griffin
Robert Taylor
John Collins

WITNESS

INCIDENT

APPLICANT
WITNESSES

NRC WITNESS

George Clancy
(Have not been
able to contact
to confirm his
continued
willingness to
testify.)

Former TUGCO inspector. He will testify to the
breakdown of the QC department during the time of
his employment at CPSES (1977-1978). His testi-
mony will be essentially repetitive of the affi-
davit submitted in the 11/28/83 CASE pleading
(supra) and his interview with OI which was
released in the OI report on harassment and
intimidation.

Robert Murray
R. Tolson
P. Clark

Brooks Griffin
Robert Taylor

WITNESS

INCIDENT

APPLICANT
WITNESS

NRC WITNESS

Ernest Hadley
Tom Carpenter

Investigators of the Government Accountability Project who have investigated allegations of wrongdoing by the workforce at the Comanche peak site. Their testimony will report the information brought to them by former employees at the site about fear of reprisals or "blackballing," their mistrust of the Nuclear Regulatory Commission, and their lack of knowledge of their rights under Section 210 of the Energy Reorganization Act. They will testify as to the truth of what they have been told by those workers they have contacted regarding harassment and intimidation.

WITNESS

INCIDENT

APPLICANT
WITNESS

NRC WITNESS

Dobie Hatley*

Will testify about atmosphere of intimidation and harassment from craft and QC supervisors to pressure document control clerks, including herself and her supervisor, to violate existing procedures regarding issuance of documents. She would also testify about the pre-notification audit rigging as a result of fear of the consequences of failing the audit. Finally she would testify about personal information regarding harassment and intimidation of others on the site, including employees being forced to use illegal drugs on the site by their supervisors, and the failure of management to take any action. Ms. Hatley would also testify about her termination as supervisor of document control satellite stations.

Frank Strand
H. Hutchison
Ray Yockey

Brooks Griffin
Paul Check

WITNESS

INCIDENT

APPLICANT
WITNESS

NRC WITNESS

Freddie Ray
Harrell

Will testify about his lay-off following the reporting of information to Antonio Vega. See Statement of 11/28/83.

A. Vega

Brooks Griffin

WITNESS

INCIDENT

APPLICANT
WITNESS

NRC WITNESS

Cordelia Hamilton

Will testify about Fall 1980 meeting in Jim Hawkins office in which inspectors were told to stop nitpicking. Also about the lack of support QC inspectors in Harry Williams department received. See pre-filed testimony of Hamilton, 7/16/82, and OI Interview (p. 18).

Harry Williams
Jim Hawkins

Brooks Griffin

WITNESS

INCIDENT

APPLICANT
WITNESS

NRC WITNESS

Jerry Artrip

FBASCO QC inspector, currently employed at South Texas. Will testify about harassment and intimidation in the paint department and the management attitude toward identification of problems by supervisors in that department. He will also testify about the results of such treatment on implementation of the QC program.

Harry Williams
Jim Hawkins

WITNESS

INCIDENT

WITNESS

NRC WITNESS

Bill Dunham*

paint QC Inspector, who was fired for alleged misconduct at a group paint QC meeting. His testimony will be about the attitude at the site regarding the raising of questions by QC inspectors. His testimony, except as to the results of harassment and intimidation throughout the site, is contained within the Department of Labor record of his discrimination complaint.

R. Tolson
C. Kristemer
T. Brandt

F. Hawkins
L.D. Gilbert

WITNESS**INCIDENT****APPLICANT
WITNESS****NRC WITNESS**

Sue Ann Neumeyer

Welding QC Inspector. Resigned in February 1984. She will testify that she believes she was harassed, intimidated, and pressured into accepting work which was not acceptable, and in some cases not legal, at times throughout the entire course of her employment at CPSES, and that personal knowledge that the NRC is not interested in examples or evidence of harassment, intimidation, pressure. Also her knowledge of the meeting discouraging workers to talk to GAP.+

Jack Stanford
Fred Evans
Dwight Woodyard
Ted Blixt
Bob Seever
Gordon Purdy
A. Vega
R. Tolson
M. Spence

R. Taylor
Brooks Griffin

WITNESS

INCIDENT

APPLICANT
WITNESS

NRC WITNESS

Betty Brink

Former intervenor, currently reporter. Will testify regarding the breach of confidentiality by the NRC after providing names of workers to OI representatives. See Brink letter to NRC Commissioner Palladino, May 1984.

Brooks Griffin

WITNESS

INCIDENT

APPLICANT
WITNESS

NRC WITNESS

Dennis Culton
(Has not yet
agreed to testify.)

Will testify that the NRC interview and inspection/
investigation process was so hostile and intimi-
dating that he wants nothing further to do with
the NRC, and that his treatment, if known to
others, would convince them not to turn to the
NRC for help in raising or identifying a problem.
(See Culton Affidavit, 6/29/83).

Robert Stewart
Dan Tomlison
Richard Herr

WITNESS

INCIDENT

APPLICANT
WITNESS

NRC WITNESS

Richard Hubbard
(Mr. Hubbard has
been previously
used as an expert
in the South Texas
proceedings about
B&R competency, in
part regarding
their QA/QC
program.)

Will testify to the generic significance of inde-
pendent inspection efforts on a plant. Will also
comment on the appropriateness of the Applicant's
response to the individual and collective problems
raised by the CASE witnesses. (Mr. Hubbard will
have to read the testimony of the CASE and
Applicant witnesses prior to being able to
present that testimony.)

WITNESS**INCIDENT****APPLICANT
WITNESS****NRC WITNESS**

Eddie Snyder*
Jack Pitts
D.T. Oliver
A. Ambrose
M. Barfield
Lon Davis
Bruce Hearn
Ron Jones
Gerald Prior
Jerry Staplin

Eight QC employees in the electrical department reported to work wearing "T-shirts" that said "NIT PICKERS PICK NITS." These employees were rounded up and taken to the office of Ron Tolson where they were questioned by management, their personal materials taken from their desks, and then interviewed by the site ombudsman. Efforts to attempt to get the NRC to stop the detention failed. CASE will demonstrate that the T-shirts were worn as an expression of the frustration of site QC inspectors, that the response by management was oppressive, and that the lack of response by NRC was nonfeasance. Further that instead of there being no reprisal against those who wore the T-shirts the employees were first cut down to 40 hours per week, some were transferred, some quit, and most recently some were laid off. Of all the inspectors only a few remain on the job.+

Ron Tolson
Boyce Grier
A. Vega
D. Chapman
M. Welch

Site Resident
Brooks Griffin
John Collins

WITNESS

J.J. Lipinsky

INCIDENT

He will testify about the pressure he was put under following the writing of the October 1983 memo regarding paint findings. Specifically about the comments and information from TUGCO/Brown & Root management to him regarding the consequences of his writing the memo.

APPLICANT
WITNESS

M. Spence
G. Purdy
R. Tolson
T. Brandt

NRC WITNESS

F. Hawkins*
(deposition)

WITNESS

INCIDENT

APPLICANT
WITNESS

NRC WITNESS

(An industrial
psychologist
confirmation of
our retention of
this expert is
pending.)

Will testify that the morale problems, and subsequent lowering of the willingness of the QC force to identify problems and comply with procedures which they are constantly undermined in becomes fruitless. Futher he will testify about the effects of "example discipline."

WITNESS

INCIDENT

APPLICANT
WITNESS

NRC WITNESS

Walter Elliott*
Don Davis
R. Euline
Corey Allen
Tom Miller

These employees of the paint Coatings QC department testified in the Department of Labor hearing of Bill Dunham. They will testify to the harassment and intimidation in the paint coatings department, both as to their personal experience and as to the effect the Dunham incident had on them in the performance of their job.

Harry Williams

D. Driscoll
Brooks Griffin
F. Hawkins

APPLICANT WITNESSES

NAME	INCIDENTS REQUESTED TO BE PREPARED FOR DEPOSITION	REFERENCE
Mike Spence Perry Britton Lou Fikar	CPSES policy regarding intimidation, harassment or threats, December 20, 1983	
	The establishment of a CPSES "hot-line"	
	The 1979 interviews of QA QC personnel	
	The management response to the August 1983 Report on Allegations of Cover-Up and Intimidation by TUGCO, Dallas Quality Assurance	
	Communications with the NRC regarding problems at CPSES of harassment, intimidation. Specifically surrounding the creation and implementation of the "task force" in March 1984.	
	All management meetings or discussions regarding complaints of harassment or intimidation or lack of support of QC program at CPSES	
	Harassment and intimidation and termination of Charles Atchison	Charles Atchison
	Harassment and intimidation and blacklisting of Jack Doyle/Mark Walsh	Jack Doyle
	Harassment and intimidation and pressure to accept sub-quality work on Sue Ann Neumeyer	Sue Ann Neumeyer
	Harassment and intimidation and pressure of J.J. Lipinsky after Lipinsky wrote a 1983 memo re: paint	J.J. Lipinsky
	(Generic items listed in Appendix A to Witness List)	

NAME	INCIDENTS REQUESTED TO BE PREPARED FOR DEPOSITION	REFERENCE
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Ron Tolson	His experience as QA/QC personnel management	
	His performance ratings at TUGCO	
	His past job descriptions	
	The 1979 QC interviews and reasons for and results/recommendations thereof	
	His interaction with craft supervision	
	His speech given to QC inspectors	
	Any other group presentations regarding QA/QC	
	The Charles Atchison firing	
	The termination of Dobie Hatley	
	The resignation of Susie Neumeyer	
	The termination of Bill Dunham	
	The harassment of Lester Smith	
	The harassment of Stan Miles	
	The harassment of Darlene Stiner	
	The harassment of Robert Bronson	
	The harassment of Jack Doyle	
	The harassment of George Clancy	
	The reason for his removal as QA in February 1984	
	His new job description	
	Any new performance ratings since the change	
	His role in the "T-shirt incident"	

NAME	INCIDENTS REQUESTED TO BE PREPARED FOR DEPOSITION	REFERENCE
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Ron Tolson	<p>His role in the preparation of response to the Eisenhut letters, re: harassment and intimidation issues</p> <p>His interaction with the cost and schedule for the plant</p> <p>His relationship with R. Taylor, NRC</p> <p>His relationship with the current NRC resident inspector</p> <p>His knowledge of the speech given in February by Gordon Purdy</p> <p>His knowledge of the use of NRC Form 3 at CPSES</p> <p>His knowledge regarding the development of the December 1983 policy on harassment and intimidation</p> <p>Any other information he has about incidents of harassment and intimidation and of management actions taken to cope with harassment and intimidation incidents or surrounding attitudes</p> <p>(Generic items listed in Appendix A to Witness List)</p>	
Antonio Vega	<p>His experience in QA/QC management</p> <p>His experience as personnel management</p> <p>His performance ratings at TUGCO</p> <p>His past job descriptions</p> <p>The 1979 QC interviews and reasons for and results/recommendations thereof</p> <p>His interaction with craft supervision</p> <p>His instructions given to QC inspectors regarding reporting of non-conformance</p>	

NAME	INCIDENTS REQUESTED TO BE PREPARED FOR DEPOSITION	REFERENCE
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Antonio Vega	<p>Any other group presentations regarding QA/QC</p> <p>The Charles Atchison firing</p> <p>The termination of Dobie Hatley</p> <p>The resignation of Susan Neumayaer</p> <p>The termination of Bill Dunham</p> <p>His role in the T-shirt incident</p> <p>His role in the repeated pressuring of Bob Bronson</p> <p>His role in the harassment, intimidation and pressure of Sue Ann Neumeyer</p> <p>His role in the intimidation of Lester Smith.</p> <p>Termination of Robbie Robinson</p> <p>Termination of Robert Messerly</p> <p>His knowledge of QC/QA problems in the paint coatings department</p> <p>The reason for Tolson's removal as QA in February 1984</p> <p>His new job description</p> <p>Any new performance ratings since the change</p> <p>His role in the "T-shirt incident"</p> <p>His role in the preparation of response to the Eisenhut letters, re: harassment and intimidation issues</p> <p>His interaction with the cost and schedule for the plant</p>	
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NAME	INCIDENTS REQUESTED TO BE PREPARED FOR DEPOSITION	REFERENCE
Antonio Vega	<p>His relationship with R. Taylor, NRC</p> <p>His relationship with _____, SRI</p> <p>His knowledge of the speech given in February by Gordon Purdy</p> <p>His knowledge of the use of NRC Form 3 at CPSES</p> <p>His knowledge regarding the development of the December 1983 policy on harassment and intimidation</p> <p>Any other information he has about incidents of harassment and intimidation and of management actions taken to cope with harassment and intimidation incidents or surrounding attitudes.</p>	
Jim Hawkins	<p>Threats to Bob Hamilton about over strenuous inspections</p> <p>His knowledge of the QA/QC program requirements regarding identification of problems</p> <p>Any conversations/meetings he had with management regarding the Hamilton incident</p> <p>His knowledge of the reputation of Mr. Harry Williams as an oppressive supervisor</p> <p>(Generic items listed in Appendix A to Witness List)</p>	B. Hamilton
J. George	<p>The termination of Robbie Robinson after his reporting "make-work," etc.</p> <p>The statements and actions of Mr. Vega and himself in response to Mr. Robinson's complaints.</p> <p>Any conversations with management regarding Mr. Robinson's termination</p>	R. Robinson

NAME	INCIDENTS REQUESTED TO BE PREPARED FOR DEPOSITION	REFERENCE
	<p>His knowledge of the QA/QC program requirements regarding identification of problems</p> <p>Any conversations/meetings he had with management regarding the Hamilton incidents</p> <p>(Generic items listed in Appendix A to Witness List)</p>	
Robert Murray	<p>The testimony of Mr. George Clancy regarding his instructions to Mr. Clancy</p> <p>Any conversations with management regarding Mr. Clancy's termination</p> <p>His knowledge of the QA/QC program requirements regarding identification of problems</p> <p>Any conversations/meetings he had with management regarding the Hamilton incident</p> <p>(Generic items listed in Appendix A to Witness List)</p>	G. Clancy
Wayne Simmons	<p>Termination of Chuck Atchison</p> <p>(Generic items listed in Appendix A to Witness List)</p>	
Mark Wells	<p>Ordering employees, along with Harry Williams, to disregard safety requirements</p> <p>(Generic items listed in Appendix A to Witness List)</p>	
Jack Stanford	<p>Harassment and intimidation and pressure to accept faulty work on Sue Ann Neumeyer</p> <p>(Generic items listed in Appendix A to Witness List)</p>	

NAME	INCIDENTS REQUESTED TO BE PREPARED FOR DEPOSITION	REFERENCE
Larry Wilkerson	Termination of Robbie Robinson (Generic items listed in Appendix A to Witness List)	
Wayne Mansfield	Termination of Robbie Robinson (Generic items listed in Appendix A to Witness List)	
Doug Frankum	Harassment and intimidation and blacklisting of Jack Doyle and R. Messerly (Generic items listed in Appendix A to Witness List)	Jack Doyle R. Messerly
Dale Bullard	Harassment and intimidation and threatened termination of Stan Miles and others (Generic items listed in Appendix A to Witness List)	Stan Miles
Fred Evans	Harassment and intimidation of and pressure to accept faulty work, put on Sue Ann Neumeyer (Generic items listed in Appendix A to Witness List)	Sue Ann Neumeyer
Fred Coleman	Ordering H. Stiner to perform impro- per melds in February, 1980, while Coleman watched for QC (Generic items listed in Appendix A to Witness List)	H. Stiner
Ken Liffert	Threatening H. Stiner, R. Johnson and others with termination in September, 1980, unless that per- formed sub-quality melds quickly (Generic items listed in Appendix A to Witness List)	H. Stiner

NAME	INCIDENTS REQUESTED TO BE PREPARED FOR DEPOSITION	REFERENCE
Jimmy Green	Instructing H. Stiner in July 1981 to make improper melds	H. Stiner
	H. Stiner's subsequent termination (Generic items listed in Appendix A to Witness List)	H. Stiner
Larry Thompson	Ordering H. Stiner to violate procedures re: I-beams in April 1981	H. Stiner
	(Generic items listed in Appendix A to Witness List)	
Ronnie Johnson	Threatened along with H. Stiner and others with termination unless they performed sub-quality welds.	H. Stiner
	Threatened by Frankum, Callicutt, Liffert, and Heabart (September 1980)	
	(Generic items listed in Appendix A to Witness List)	
Callicutt	Threatening Ronnie Johnson and his crew (including H. Stiner) with termination unless they completed a weld quickly (with consequent sub-quality standard) (September 1980)	H. Stiner
	His knowledge of pressure on QC Document Review/Document Control Clerks	L. Bamas Dobie Hatley
	(Generic items listed in Appendix A to Witness List)	
PR Dept. Representative	Production of "Circuit Breaker" and inclusion in some of worker allegations	Darlene Stiner and others
	(Generic items listed in Appendix A to Witness List)	
Randy Smith	Harassment and intimidation of Darlene Stiner, especially during and relating to her pregnancy	Darlene Stiner
	(Generic items listed in Appendix A to Witness List)	

NAME	INCIDENTS REQUESTED TO BE PREPARED FOR DEPOSITION	REFERENCE
Snellgrove	Harassment and intimidation and pressure on Bob Bronson (Generic items listed in Appendix A to Witness List)	Bob Bronson
J.P. Patton	Harassment and intimidation and pressure on Bob Bronson (Generic items listed in Appendix A to Witness List)	Bob Bronson
Gary Krishnan	Harassment and intimidation of Jack Doyle (Generic items listed in Appendix A to Witness List)	Jack Doyle
Dwight Woodard	Harassment and intimidation and pressure to approve faulty work, on Sue Ann Neumeyer; meeting discouraging workers from talking to GAP (Generic items listed in Appendix A to Witness List)	Sue Ann Neumeyer
Ted Blixt	Harassment and intimidation of Sue Ann Neumeyer to approve faulty work; meeting discouraging workers from talking to GAP (Generic items listed in Appendix A to Witness List)	Sue Ann Neumeyer
Bob Sievers	Harassment and intimidation of Sue Ann Neumeyer; pressure on Sue Ann Neumeyer to approve faulty work; meeting discouraging workers from talking to GAP (Generic items listed in Appendix A to Witness List)	Sue Ann Neumeyer
Hal Goodson	Intimidation of R. Messerly Termination of H. Stiner (Generic items listed in Appendix A to Witness List)	R. Messerly H. Stiner

NAME	INCIDENTS REQUESTED TO BE PREPARED FOR DEPOSITION	REFERENCE
M. Sanders	Intimidation of Messerly; intimidating Messerly into loaning out "re-bar eaters" without documentation (Generic items listed in Appendix A to Witness List)	R. Messerly
Curly Krishner	Termination of Bill Dunham (Generic items listed in Appendix A to Witness List)	Bill Dunham
Boyce Grier	His role in the T-shirt incident His knowledge of the incidents of harassment and intimidation His knowledge of the Sue Ann Ann Neumeyer investigation His knowledge of the Dobie Hatley investigation His knowledge of other investigations His job's objective (Generic items listed in Appendix A to Witness List)	Eddie Snyder; Jack Pitts; D.T. Oliver; A. Ambrose; M. Barfield; Lon Davis; Bruce Hearn; Ron Jones; Gerald Prior; Jerry Staplin
D. Chapman	His role in the T-shirt incident His knowledge of the 1979 interviews His knowledge of internal investigations in harassment and intimidation His interface with management on harassment and intimidation Harassment and intimidation of Charles Atchison Termination of Robert Messerly (Generic items listed in Appendix A to Witness List)	Eddie Snyder; Jack Pitts; D. T. Oliver; A. Ambrose; M. Barfield; Lon Davis; Bruce Hearn; Ron Jones; Gerald Prior; Jerry Staplin Charles Atchison R. Messerly

NAME	INCIDENTS REQUESTED TO BE PREPARED FOR DEPOSITION	REFERENCE
M. Welsh	His role in T-shirt incident (Generic items listed in Appendix A to Witness List)	Eddie Snyder; Jack Pitts; D. T. Oliver A. Ambrose; M. Barfield; Lon Davis; Bruce Hearn; Ron Jones; Gerald Prior; Jerry Staplin
Thomas Brandt	Harassment, intimidation, and ter- mination of Charles Atchison Termination of Bill Dunham Termination of Joseph Krolak Pressure and intimidation of J.J. Lipinsky Harassment and intimidation of Darlene Stiner, especially during and relating to her pregnancy (Generic items listed in Appendix A to Witness List)	C. Atchison Bill Dunham Joseph Krolak J.J. Lipinsky Darlene Stiner
Harry Williams	Harassment and intimidation of Bill Dunham; effects of that harassment and intimidation on other inspectors Harassment, intimidation and termina- tion of Bob Hamilton Intimidation of J. Krolak, and orders to Krolak and others to do sub-quality work (Generic items listed in Appendix A to Witness List)	
Gordon Purdy	Interference with Barnes' attempts to use proper document review procedure Harassment and intimidation of J.J. Lipinsky following Lipinsky's 1983 memo (re: paint)	

NAME	INCIDENTS REQUESTED TO BE PREPARED FOR DEPOSITION	REFERENCE
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Harassment of Bob Bronson

Harassment and intimidation of Sue Ann Neumeyer; pressure on Sue Ann Neumeyer to approve faulty work; meeting discouraging workers from talking to GAP

Gordon Purdy

Knowledge of discontent among the QA/QC inspectors regarding use of NCRs

(Generic items listed in Appendix A to Witness List)

Gil Keeley
R. G. Spangler
R. E. Kahler

Report on Allegations of Cover-Up and Intimidation by TUGCO, Dallas Quality Assurance, August 19, 1983

(Generic items listed in Appendix A to Witness List)

F. Strand
H. Hutchison

The constant pressure on Document Control by craft and QC to issue incomplete and incorrect packages

L. Barnes
D. Hatley

(Generic items listed in Appendix A to Witness List)

Bill Clements

Will testify about the preparation of TUGCO response to the Eisenhut letters regarding allegations, including harassment and intimidation

Should also be prepared to testify about items of which he has knowledge listed for Mike Spence, et al.

(Generic items listed in Appendix A to Witness List)

Ray Yockey

Will testify about the termination policies and practices at CPSES, as well as the employee rights and responsibilities as contained in any relevant employee manual

(Generic items listed in Appendix A to Witness List)

NRC STAFF WITNESSES

NAME	INCIDENTS REQUESTED TO TESTIFY ABOUT
John Collins (all regula- tory actions except OI on CPSES)	Requested to testify about the policy of NRC staff regarding harassment and intimidation; the decision to issue a \$40,000.00 civil penalty regarding Mr. Atchison's issues, the decision to postpone the fine; the attitude of the NRC regional staff toward reports of harassment and intimidation.
Robert Taylor also current esident insp.	Requested to testify about the policy of NRC staff, regarding harassment and intimidation; the decision to issue a \$40,000.00 civil penalty regarding Mr. Atchison's issues, the decision to postpone the fine; the attitude of the NRC regional staff toward reports of harassment and intimidation.
	The T-shirt incident
	Harassment and intimidation of George Clancy
	Harassment and intimidation and pressure to accept faulty work on Sue Ann Neumeyer
	Harassment and intimidation of H. Stiner
	Harassment and intimidation of Charles Atchison
	Harassment and intimidation of Jack Doyle
	His knowledge of Sue Ann Neumeyer's cooperation with an NRC investigation into Henry's concerns
	The findings of the OIA Report
	His policies regarding her on the site that includes harassment and intimidation complaints
	His specific knowledge of the allegaton of harassment and intimidation by those CASE witnesses listed below. The expectation of the NRC from an applicant about an QA/QC program
D. Driscoll Brooks Griffin Richard Hers Paul Check	Requested to testify about actions taken in response to allegations of harassment and intimidation, his judgment as to the seriousness of harassment and intimidation on the Comanche peak site; his understanding of the NRC's policies regarding harassment and intimidation; his investigation of the complaints of all named witnesses. The release of names provided by Betty Brink.
F. Hawkins	His inspection efforts into the allegations of J. J.

Lipinsky and the allegations made by Bill Dunham

Robert Stewart Interview of Dennis Culton and his interview techniques employed to determine Mr. Culton's allegation

Dan Tomlison Interview of Dennis Culton

Richard Herr Interview of Dennis Culton

Tom Ippilito The ongoing "task force efforts", how the task force would deal with the problems resulting from the prevailing attitude of harassment and intimidation; the importance of harassment and intimidation; his understanding of NRC policies regarding harassment and intimidation

APPENDIX A

Generic Items For Witnesses To Be Prepared To Testify About

- Basic background and experience prior to going to work at CPSES (Provide resume if one exists).
- Work history at CPSES, positions, supervisors, duties, etc.
- The witness' understanding of policies of TUGCO, B&R, and other contractor regarding reporting of non-conforming items.
- Specific incidents of harassment and intimidation on CPSES site known to each individual
- Any knowledge about management actions taken to cope with harassment and intimidation, pressure on QC inspectors, pressure to not write non-conformance reports or to ignore construction problems.
- Management procedures to insure that QA/QC programs are being implemented.