

ORIGINAL

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the matter of:

TEXAS UTILITIES ELECTRIC
COMPANY, et al

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

Docket No. 50-445
50-446

Deposition of: Billy Ray Snellgrove

Location: Glen Rose, Texas

Pages: 44,000-44,136

Date: Tuesday, July 10, 1984

*Original to E. Pleasant
#-1149*

TR 01 0/1

1 copy to E. Johnson, Region IV

TAYLOE ASSOCIATES

Court Reporters
1625 I Street, N.W. Suite 1004
Washington, D.C. 20006
(202) 293-3950

B407170041 B40710
PDR ADOCK 05000445
T PDR

1 UNITED STATES OF AMERICA
2 NUCLEAR REGULATORY COMMISSION

3 BEFORE THE ATOMIC SAFETY & LICENSING BOARD
4

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

11 Glen Rose Motor Inn
12 Glen Rose, Texas

13 July 10, 1984

14 Deposition of: BILLY RAY SNELLGROVE,
15 called by examination by counsel for Intervenor,
16 taken before Terri L. Hague Court Reporter,
17 beginning at 9:00 a.m., pursuant to agreement.
18
19
20
21
22
23
24
25

Appearances:

1 FOR THE APPLICANT:

2 MARK L. DAVIDSON, ESQ.
3 Bishop, Liberman, Cook, Purcell & Reynolds
4 1200 Seventeenth Street NW
5 Washington, D.C. 20037

6 FOR THE NRC STAFF:

7 ROY VOEGELI, ESQ.
8 Office of the Executive Legal Director
9 U.S. Nuclear Regulatory Commission
10 Washington, D.C. 20555

11 FOR THE INTERVENOR:

12 LES COCHRAN, ESQ.
13 Barnhart, Mallia, Cochran & Luther
14 16th Floor, 806 Main Building
15 Houston, Texas 77002
16
17
18
19
20
21
22
23
24
25

C O N T E N T S

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

WITNESS:	EXAMINATION BY	PAGE
BILLY RAY SNELGROVE	Mr. Cochran	44,006
	Mr. Davidson	44,064
	Mr. Cochran	44,125
	Mr. Davidson	44,131

REPLACEMENT
COTTON CONTENT

P R O C E E D I N G S

Whereupon,

BILLY RAY SNELLGROVE

was called as a witness by counsel for the Intervenor and, having been first duly sworn, was examined and testified as follows:

MR. DAVIDSON: My name is Mark L. Davidson. I'm a member of the law firm of Bishop, Liberman, Cook, Purcell & Reynolds, counsel for Texas Utilities Electric Company, Applicant in this proceeding.

I appear here today in that capacity, and as attorney for Mr. Billy Ray Snellgrove, a TUGCO employee.

Before proceeding further, I wish to point out that Mr. Snellgrove is appearing voluntarily, and that he is not under subpoena.

Mr. Snellgrove's testimony has been requested from the Applicant by CASE, Intervenor in this proceeding on the topics specified in CASE's letter to Leonard W. Belter, dated June 27, 1984, a copy of which has been marked for identification by the Reporter and appended to the transcript of Mr. Antonio Vege as Exhibit A.

I ask that the June 27th letter addressed to Mr. Belter be incorporated here by reference.

1 The Applicant has already noted its
2 objection to the deposition procedures and schedule
3 ordered by the Board, and it intends no waiver of
4 those objections by Mr. Snellgrove's appearance
5 here today.

6 At this time, I would like to summarize
7 the guidelines established by the Board for this
8 proceeding, and the taking of this deposition.
9 Under the order issued by the Board on March 15,
10 as modified by a series of subsequent telephone
11 conference rulings, the scope of this deposition is
12 limited to the taking of evidence in the making
13 of discovery on harassment, intimidation, or
14 threatening of quality assurance/quality control,
15 that is QA/QC personnel, with one exception,
16 allegations regarding any claimed harassment or
17 intimidation of craft personnel have been specifically
18 ruled by the Board to be beyond the scope of this
19 examination and these proceedings.

20 The Board also has ruled that only
21 evidence based on personal knowledge may be adduced
22 and that hearsay, rumor, innuendo and the like
23 are not proper subjects of the evidentiary portion
24 of this deposition.

25 Finally, the Board has instructed the

j-1-3

1 parties to separate the evidentiary and discovery
2 portions of their examination of the witness. To
3 give effect to the rulings as well as to insure
4 expeditious completion of this deposition, we now offer
5 Mr. Snellgrove as a witness for the evidentiary
6 portion of his deposition.

7 The issues for this portion of the
8 deposition are defined by CASE's letter of June 27
9 a copy of which, as I have already noted, was
10 marked as an exhibit to Mr. Vega's deposition.

11 At the conclusion of this evidentiary
12 deposition, the evidentiary record will be closed
13 and with the opening of the new transcript to be
14 separately bound, the discovery deposition of
15 Mr. Snellgrove would commence should CASE decide
16 to conduct such a deposition.

17 When the transcript are available, the
18 witness will sign the original of each of his
19 depositions on the understanding that should the
20 executed originals not be filed with the Board
21 within seven days after the conclusion of the
22 deposition, a copy of either of the transcripts may
23 be used for the same extent and effect as the original.

24 MR. COCHRAN: In response to the opening
25 statement made by the Applicant, the Intervenors would

1 state for the record that they do not concur in
2 the representations made, nor in the analysis of
3 the meaning of the prior rulings of the Court,
4 nor the limitations on the deposition, and
5 preserve all our rights for ruling at a later time.

6 EXAMINATION

7 BY MR. COCHRAN:

8 Q State your name for the record, please, sir.

9 A Billy Ray Snellgrove.

10 Q Where do you live, sir?

11 A I live in Tolar, Texas.

12 Q Can you spell that town for me, please?

13 A T-o-l-a-r.

14 Q By whom are you employed, sir?

15 A Texas Utilities Generating Company.

16 Q That's sometimes known as TUGCO?

17 A Yes.

18 Q How long have you been employed by TUGCO?

19 A Let's see. Let me think a minute. About
20 a year and nine months.

21 Q Can you give me a month and a year?

22 A October of '82.

23 Q What is your position with TUGCO?

24 A I presently am a QA technician.

25 Q What are the duties and responsibilities

1 of a QA technician?

2 A The duties consist of reviewing
3 documentation and performing inspections.

4 Q Who is your supervisor?

5 A John Maxwell.

6 Q What is his title?

7 A QC supervisor.

8 Q Who were you employed by prior to October
9 of 1982?

10 A Brown & Root.

11 Q In what capacity?

12 A I was a QC level 2 lead hanger inspector.

13 MR. COCHRAN: Let the record reflect
14 that an off-the-record conference is being held
15 between counsel and his client.

16 BY MR. COCHRAN:

17 Q Having conferred with your attorney, do
18 you wish to change any response that you have
19 previously given to the question?

20 A No.

21 Q What were the duties of a QC level 2
22 lead hanger inspector, while you were employed at
23 Brown & Root?

24 A Those duties consisted of assigning of
25 7 to 10 inspectors in the field of inspection of

1 pipe supports, reviewing the documentation for
2 completeness and accuracy.

3 Q It was primarily an administrative job?

4 A Yes.

5 Q And I used the term "administrative" as
6 opposed to actually going out into the plant or
7 field, if you please, and doing the inspections
8 yourself.

9 A I did do some inspections, yes.

10 Q But was your primary responsibility
11 the supervision of other inspectors?

12 A Yes.

13 Q Now, how have your duties changed, just
14 very briefly, between those at Brown & Root as a
15 QC level 2 lead hanger inspector and those at TUGCO
16 as a QA technician? I just want kind of an overview
17 of the differences in what you were doing at
18 Brown & Root, and what you were doing at TUGCO.

19 A Basic difference, really there is
20 not one. It's still the field of reviewing documentation
21 and verifying the -- witnessing work performed
22 by the craft to verify there's been completed procedures.

23 Q Even though you changed employers in
24 the sense that your paycheck came from a different
25 source, did you just pretty much keep on doing the

1 same thing.

2 A Yes.

3 Q And to this day, are you pretty much
4 doing the same thing?

5 A Yes.

6 Q If you were with Brown & Root today,
7 would you still be classified under their
8 classification as a QC level 2 lead hanger inspector?

9 A Today?

10 MR. DAVIDSON: Do you understand the question?

11 THE WITNESS: No, I don't believe I
12 understand it.

13 MR. COCHRAN: Let me rephrase it.

14 BY MR. COCHRAN:

15 Q What I'm trying to determine is whether
16 or not your change in job is one of substance or
17 merely one of form. And so what I'm asking you
18 is, did you in effect just simply change titles
19 when you changed employers but kept on doing pretty
20 much the same thing.

21 A I don't -- I still don't really understand
22 what you're getting at.

23 Q Well, let's not try to anticipate what
24 I'm getting at. Let' just -- you know, if you can,
25 answer the question. There has been prior testimony

1 that there is simply a different type of classification
2 system between the two companies, even though
3 the duties are much the same, and that's what I'm
4 trying to find out.

5 Are your duties much the same?

6 A Yes.

7 Q Do you continue to supervise other
8 inspectors?

9 A Yes, I do.

10 Q How many do you presently supervise?

11 A I believe there is seven.

12 Q Do you continue to be a level 2 inspector
13 as far as your level is concerned?

14 A In some disciplines.

15 Q Are you a level 3 in any discipline?

16 A Yes, I am.

17 Q What disciplines are you presently
18 a level 3 in?

19 A Mechanical.

20 Q What disciplines are you a level 2 in?

21 A VT.

22 Q I'm sorry?

23 A Visual, mag particle, liquid penetrant.

24 Q Anything else?

25 A Housekeeping. I believe that's it.

1 Q Now, in relation to your responsibilities
2 as a level 2 lead hanger inspector at Brown & Root,
3 tell me generally what was actually done, that
4 is, what would a hanger inspector do?

5 A Well, a hanger inspector would be
6 assigned to an area within the structure there.
7 He would work with the appropriate crafts people
8 and they would present him a hanger package,
9 which would contain a drawing, CMC's if applicable,
10 contain a multiple weld data card, material
11 identification log, and the QC checklist and
12 nondestructive test records, if required, and he
13 would simply take the drawing, look at the component,
14 see if it met the criteria, the configuration, the
15 material types, and then he would document these
16 attributes on the appropriate records of the multiple
17 log data card and the QC checklist, and the MIL.

18 Q Let me run over these again.
19 You were talking a little faster than
20 I could write. We start out, the hanger package
21 has a drawing in it.

22 A Yes.

23 Q What's the drawing of?

24 A The drawing is of the particular support.

25 Q A particular support member?

1 A Yes.

2 Q That's what a hanger is, is a support
3 member.

4 A Yes.

5 Q What's the next item? I wrote down
6 CMC, what is CMC?

7 A If applicable.

8 Q What is that?

9 A Component modification card.

10 Q What would a component modification card,
11 was is it that it reflects?

12 A It is to reflect as-built conditions
13 or the changes during the fabrication process.

14 Q If somebody at some point over in the
15 fab shop had decided that this wasn't going to
16 work and needed to be changed, there would be a
17 record of it made; is that what you're telling me?

18 A I would assume, yes.

19 Q And that's what this CMC is, is the
20 record of that change?

21 MR. DAVIDSON: I'm going to object to
22 the form of that question because I think it
23 may create a misleading impression as to how a
24 CMC is initiated and the evaluation process
25 which is required before it can be approved and issued.

1 MR. COCHRAN: I'm not asking him that.
2 I'm just asking him generally what happens when
3 it gets to him.

4 MR. DAVIDSON: I'm sorry.

5 MR. COCHRAN: I'm just asking him
6 generally what happens before it gets to him, and
7 I'm not asking for the details that you're going
8 into.

9 MR. DAVIDSON: Well, the only reason I
10 raised that point --

11 BY MR. COCHRAN:

12 Q All I want to know is at some point
13 somebody documents a change in the component.

14 MR. DAVIDSON: I'm sorry. I didn't realize
15 that's what you were asking.

16 MR. COCHRAN: That's all I'm asking.

17 Is that correct?

18 THE WITNESS: Yep.

19 BY MR. COCHRAN:

20 Q Now, I missed a couple of items after the
21 CMC. What are some of the other items that are in
22 the hanger package.

23 A The multiple weld data card.

24 MR. VOEGELI: What was that?

25 THE WITNESS: Multiple weld data card.

1 Q Now, what is that?

2 A That is a document that has particular
3 hold points to instruct the inspector and the
4 craftsman as far as what may be applicable to a
5 certain type of support. It also documents the
6 welding procedure and any -- it's also a document
7 that records CMC's that are outstanding against
8 the drawing.

9 Q It's a guide, in other words, for the
10 inspector to use in performing his job, among other
11 things.

12 A I don't understand what you mean by "guide."

13 Q Well, the inspector can take it and look
14 at it and it's a document that tells him for one
15 thing where he is supposed to inspect, the hold
16 points.

17 A Yes.

18 Q Material I' log, what is that?

19 A That is a document that is generated to
20 reflect all of the material used in building of
21 a support and recording of heat number traceabilities.

22 Q Report numbers, did you say?

23 A Heat numbers.

24 Q Heat numbers. Now, what are the heat
25 numbers and what's their significance? Heat number

1 traceability; is that the term you used?

2 A Yes.

3 Q Tell me what that is.

4 A What that is is it's simply a number
5 that is assigned by the -- I don't know if you
6 want to go back that far, by the steel manufacturer
7 during the process of making the raw steel.

8 Q Does it relate to the actual batch
9 that that particular piece of steel came from?

10 A Yes.

11 Q Let me digress a minute. The reporter
12 has a difficult time taking down more than one
13 person at the same time, so the only way she is
14 going to get an accurate record is if you and I
15 don't interrupt each other, and I promise you I
16 won't try to interrupt your answer if you let me
17 finish my question.

18 So the heat number traceability relates
19 to the batch that the steel came out of, that
20 originated at the manufacturer. Does it relate to
21 anything else?

22 A Heat numbers, just the batch number.

23 Q That was a bad question. Let me ask
24 it another way. Are heat traceability numbers
25 assigned by anyone other than the manufacturer?

1 A Yes, they are.

2 Q What is their origin?

3 A Certain manufacturers or certain suppliers,
4 I will say, of pipe supports have approved unique
5 identifying codes that are documented in their
6 particular programs, and that code is assigned to
7 a certain heat number, and they use the code
8 rather than all the numbers just for simplicity.

9 Q So you would have a number that would
10 originate from a manufacturer and then you might
11 have a supplier that has an intervening code.

12 A Yes.

13 Q What is the importance, as you understand
14 it, of the heat traceability number in relation to
15 the quality control inspector doing his job?

16 A That number is simply as a record of the
17 material type tracing to verify that the correct
18 material called for on the drawing is in fact
19 what was used to fabricate the support.

20 Q How does the QC inspector use that number
21 in doing his job?

22 A Well, he uses that number to reflect
23 back to receiving documentations.

24 Q Just bear with me. I'm just trying to
25 understand the mechanics of how the man on the job

1 does his job. He gets a hanger package
2 which consists of this documentation you've related
3 to us. And one of the documents is the heat
4 traceability number. And --

5 MR. DAVIDSON: Excuse me. I think that
6 that is not one of the documents. I think the heat
7 traceability number is one of the items of
8 information contained on one of the documents in
9 the hanger package. I think that's one of the
10 items on the material identification log, the MIL.
11 BY MR. COCHRAN:

12 Q Is the explanation that your attorney
13 has just given correct?

14 A Yes, that's correct. It is not a
15 document.

16 Q It is not a separate document?

17 A No, it's not. It's simply a number of
18 reference.

19 Q All the other things on the MIL, other
20 information is the material used, that is just a
21 list of the material used; is that correct?

22 A Yes.

23 Q How is that list -- what descriptive
24 terms are used to describe that material? And
25 let me give you an example of the problem that I'm

1 having.

2 I don't know whether it says so many
3 bolts of a certain alloy type or whether it says so
4 many pounds of steel or just what. What descriptive
5 terms are used?

6 A You can see a combination of all of them.

7 Q Both of the two examples I gave?

8 A Yeah, it's very possible.

9 MR. DAVIDSON: Are there other terms of
10 description of material?

11 THE WITNESS: Another avenue that
12 you might see is a length-width avenue.

13 Q Length-width in relation to a particular
14 item?

15 A Yes.

16 Q Base plates, for instance, might be
17 by length with thickness, for instance.

18 A Yes.

19 Q And would it also for a base plate
20 that was described by length, width and thickness
21 have an alloy type designated?

22 A It may, yes.

23 Q Might. Okay.

24 What indicia or what standards does the
25 inspector have in that hanger package, whether it's on

1 the MIL or any other document to help him in his
2 job of determining -- using that heat traceability
3 number, for instance, to determine that the steel
4 in the package is what it's supposed to be?

5 A How about repeating that?

6 Q Here's the problem I'm having. You've
7 got a piece of metal and you've got this piece of
8 paper that has a heat traceability number on it,
9 and you have another piece of paper, I presume, that
10 says it's supposed to be some alloy type, 1020 or
11 1008 or, you know, some AISI rating.

12 Now, the inspector obviously can't run
13 a metallurgical test on that piece of steel. I
14 assume he doesn't.

15 A No.

16 Q Because that would be a destructive type
17 of testing, so what does he do, what does he have
18 to help him determine that if the specs call
19 for AISI 1020, for instance, that it in fact is
20 AISI 1020?

21 MR. DAVIDSON: If I may interpolate. What
22 does the inspector do to verify the material that
23 is identified on the log?

24 MR. COCHRAN: Well, it's a little more
25 than that. What tools are given him in a hanger

1 package to help him verify.

2 A Depends on where the work is being done at.

3 Q Well, just, you know, if we have to start
4 listing all the variables, well, then, we'll list
5 all the variables.

6 A Well, the shortest answer, correct
7 answer I could give you here is simply to state
8 that there is what is called a material requisition
9 MR that is presented to the fab shop inspectors at
10 the initial fabrication.

11 Q Okay.

12 A And it will have a heat number recorded
13 on it and material type, and then this heat number
14 is bumped against the physical plate or material
15 that the part is made from.

16 Q What do you mean bumped against it?

17 A Or compared one to one.

18 Q Two pieces of paper are compared, and
19 if the same numbers are on the same piece of paper,
20 well, then, okay.

21 A One piece of paper --

22 MR. DAVIDSON: I'm sorry, but, Billy, when
23 you shake your head no, the reporter can't get that.
24 You have to say "No."

25 THE WITNESS: I understand.

1 MR. DAVIDSON: I think you may want
2 to just clarify your answer about what you mean
3 by the material requisition as bumped against
4 the component fabricated.

5 THE WITNESS: Okay. The material
6 requisition heat number listed as compared to
7 the heat number actually stamped in the raw material.

8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

1 (Short recess was taken.)

2 MR. COCHRAN: Mr. Snellgrove, we were
3 discussing before the break the question of heat
4 traceability numbers.

5 Is there anything affixed to the piece
6 of steel received or the piece of metal received
7 from the vendor that records that heat traceability
8 number, and by that, I mean is it stamped on
9 the metal itself in some manner?

10 MR. DAVIDSON: Mr. Cochran, that was
11 the answer he just gave where he said it was
12 stamped into the metal.

13 MR. COCHRAN: Okay. I missed that answer.

14 MR. DAVIDSON: I'm sorry. It's all right.
15 You can answer the question.

16 MR. COCHRAN: You have said it's stamped.

17 THE WITNESS: The heat number is stamped
18 on the raw material, yes.

19 BY MR. COCHRAN:

20 Q Well, let's just take a hanger and you
21 can pick a hanger of some designation because I
22 don't know enough to designate a specific hanger.
23 Is the hanger fixture itself fabricated in the
24 fab shop on premises there?

25 A Partially.

1 Q As opposed to coming prefabricated
2 from the vendor?

3 A It's about fifty-fifty.

4 Q Well, when you say fifty-fifty, do you
5 mean that in every hanger about 50 percent of it
6 is prefabricated and 50 percent of it is made on
7 premises, or do you mean that half of the hangers
8 are prefabricated and the other half of the
9 hangers are made on premises?

10 A It would be difficult to give you an
11 answer, but due to the configurations --

12 Q Are some hangers totally made on premises
13 and others of that same hanger-type totally vendor
14 fabricated?

15 A Yes.

16 Q And are some hangers partially vendor
17 fabricated and partially on-site fabricated?

18 A Yes.

19 Q For the hangers which are totally on
20 site fabricated, does the heat transferability
21 number that is stamped on the metal by the vendor
22 carry through to the hanger that is fabricated on
23 site?

24 MR. DAVIDSON: Mr. Cochran, I think you
25 mean heat traceability.

1 MR. COCHRAN: That's correct.

2 Can you repeat that?

3 (The reporter read the record as requested.)

4 BY MR. COCHRAN:

5 Q And I do mean traceability number, not
6 transferability.

7 A Yes, it is.

8 Q What form does the metal that is used
9 in the fab shop to fabricate a hanger that is totally
10 fabricated on premises, what form does that metal
11 take when it is received from the vendor, or
12 what form is it in when it's received from the vendor?

13 A What is classed bulk stock.

14 Q Well, the conceptual problem I'm having
15 is an understanding whether you folks received
16 the metal to fabricate a hanger in large pieces
17 of steel that you then in some manner machine,
18 or whether you receive bar stock or whether you
19 receive tubing stock that you just cut and bend
20 into an appropriate shape, or just what the actual
21 -- the process is.

22 Could you educate me a little bit on that?

23 A Okay. The material comes in plates.
24 It comes in beams, bars, so forth, and it's then
25 subdivided to the correct size required.

1 MR. DAVIDSON: Mr. Cochran, I'm not
2 going to lodge any objections at this point in time
3 to this line of questioning, but I'm somewhat
4 concerned that we're going into some extensive
5 detail on the general scope of the operation
6 of the QC/QA program, and there has already been
7 a proceeding on that in which the record has been
8 closed, and we have already exhausted some thousands
9 of pages and I think this is cumulative, but
10 like I say, I will not at this time lodge an
11 objection but just note my concern that we may be
12 spending a good deal more time on this, and not
13 getting to the subject matters that are considered
14 to be relevant.

15 MR. COCHRAN: It's in the record.

16 BY MR. COCHRAN:

17 Q Mr. Snellgrove, in relation to a
18 particular plate or a particular beam or a particular
19 bar, where on that particular item as it's received
20 from the vendor is the heat traceability number
21 stamped?

22 A It could be at any location.

23 Q Is it stamped only one time?

24 A You'll find occasions where it's more
25 than once.

1 Q There would certainly be occasions,
2 then, I take it, when a particular bulk item is
3 subdivided that the finished hanger did not contain
4 on it a heat traceability number.

5 A I'm sorry. You will have to repeat that.

6 Q Would there be occasions when the
7 finished hanger which had been made from a bulk
8 piece of stock, that is, a plate or a beam or a
9 bar, would not actually contain a heat traceability
10 number stamped on it?

11 MR. DAVIDSON: Do you understand the
12 question, Mr. Snellgrove?

13 THE WITNESS: No, I do not.

14 BY MR. COCHRAN:

15 Q Mr. Snellgrove, if a plate which is
16 used for several hangers only contains one heat
17 traceability number stamped on it, would that heat
18 traceability number be found on more than one of
19 the finished plates?

20 MR. DAVIDSON: I'm going to object to
21 the form of that question.

22 MR. COCHRAN: You can go ahead and answer.

23 THE WITNESS: I still don't understand
24 the question.

25 MR. DAVIDSON: Les, I think I do, but I

1 rather -- excuse me, Mr. Cochran, I think I do
2 understand your question, but I think maybe you
3 ought to explain it.

4 If you wish I will, but go ahead.

5 MR. COCHRAN: I think Mr. Snellgrove
6 understands the question, also. Let me rephrase it
7 this way.

8 BY MR. COCHRAN:

9 Q You've testified that the heat traceability
10 number is stamped on the bulk material received
11 from the vendor; is that correct?

12 A Yes.

13 Q And I take it by that that your
14 testimony under oath is it's stamped at least one
15 time on each plate, on each beam, and on each bar
16 received from the vendor; is that correct?

17 A Yes.

18 Q And you testified that hangers are
19 constructed when they are constructed on site from
20 plates, beams and bars which have been subdivided,
21 that is, out of which more than one hanger is
22 constructed?

23 A Yes.

24 Q Is that correct?

25 A Yes.

1 Q And my question to you, then, is, isn't
2 it very possible that the heat traceability number
3 that was originally on the bulk item received from
4 the vendor was either obliterated in the fabrication
5 process or ended up only on one of the hangers?

6 MR. DAVIDSON: I'm going to object to
7 that question. I think the way to get at what
8 you're aiming at is to ask whether there is a
9 procedure when they start to subdivide this metal
10 for insuring that each piece drawn therefrom has
11 the heat traceability number transferred to it,
12 and that's the question you ought to be asking.
13 And then you can get a simple answer.

14 I think the problem is, you're putting
15 an assumption in it and Mr. Snellgrove is having
16 difficulty dealing with your assumption; that's
17 why he hasn't been able to answer.

18 MR. COCHRAN: And Mr. Snellgrove can
19 certainly explain what he wants to. Would you go
20 ahead and answer the question?

21 MR. DAVIDSON: Mr. Cochran, one of the
22 things that I have instructed the witness, and
23 I will make it plain on the record, is that he does
24 not explain the difficulties in your questions to you
25 and he does not try to give you a response in the hope

1 that he has given you something that you seek,
2 rather, you ask him a question that he understands,
3 and then he responds, and I think therefore the
4 application is on you to explain yourself.

5 MR. COCHRAN: Which is exactly what we
6 are trying to do.

7 MR. DAVIDSON: Exactly, and that's why I'm
8 trying to help.

9 BY MR. COCHRAN:

10 Q Are you able to answer the question, Mr.
11 Snellgrove?

12 A Which one?

13 Q Is it possible for a heat traceability
14 number to not be carried forward into all of the
15 hangers which are constructed from the bulk? It's
16 either yes or no. Is it possible or is it not
17 possible?

18 MR. DAVIDSON: I will object to the form
19 of the question as a hypothetical and calling for
20 speculation.

21 MR. COCHRAN: Okay. Would you go ahead
22 and answer that.

23 THE WITNESS: Do I have to answer that?

24 MR. DAVIDSON: Do you wish to talk with me
25 about the question, Mr. Snellgrove?

1 THE WITNESS: Yes.

2 MR. COCHRAN: Would you explain for him
3 these objections are for the judge to rule on
4 and just because you object doesn't mean you --

5 MR. DAVIDSON: Of course.

6 MR. COCHRAN: I think he's concerned
7 about that.

8 MR. DAVIDSON: That may be. We'll go off
9 the record, Ms. Reporter.

10 (Short recess was taken.)

11 MR. COCHRAN: Would the reporter read
12 the last question back?

13 (The reporter read the record as requested.)

14 THE WITNESS: No, it's not possible.

15 BY MR. COCHRAN:

16 Q Okay. What procedures are taken with
17 the raw material to carry forward the heat
18 traceability number?

19 A The program is that when a piece of material
20 is to be subdivided, that the heat number is transferred
21 to the part that is to be subdivided, and the
22 inspector takes the -- let me rephrase that. The
23 inspector then verifies that the original heat number
24 is in fact the same number that is stamped into
25 the part that's going to be subdivided, and he

1 indicates this by signing on the material identification
2 log.

3 Q Is the inspector present when the
4 transfer process takes place?

5 A Not always.

6 Q If he were not present, then, what --
7 strike that. Let me back up.

8 What devices are used to stamp these
9 heat traceability numbers in house? What is it?
10 Is it cold die or is it some sort of heat process
11 or some sort of liquid etching process, or what?

12 A Die stamp.

13 Q It's a die stamp?

14 A Yes.

15 Q Who has the responsibility and by who,
16 I mean what department has the responsibility for
17 transferring the die stamps from the original bulk
18 material to the subdivided parts?

19 A The hanger department.

20 Q I'm sorry?

21 A The hanger department.

22 Q The hanger department, the craft?

23 A Yes.

24 Q Are you aware of instances where incorrect
25 heat traceability numbers were transferred or

1 were stamped on subdivided hanger material?

2 A Yes. There's been instances.

3 Q And are you aware of instances when
4 inspectors caught this -- well, let me back up a
5 minute. That would be a mistake, would it not, for
6 that to occur?

7 A Yes, it would be a mistake.

8 Q And it would be a mistake of a nature
9 that an NCR should be written, shouldn't it?

10 A Depends on the status of the support.

11 Q Okay. And by status, you mean where in
12 the construction process itself?

13 A Yes.

14 Q If it's early in the construction process,
15 and it's still an ongoing construction item, is
16 a different form used from what is used if it's
17 a finished item?

18 A Somewhat, yes.

19 Q What are the two form designations or
20 titles?

21 MR. DAVIDSON: I object to the form of
22 the question. It assumes there are only two.

23 Q What are the form designations or titles?

24 A You have inspection reports, and you
25 have a nonconformance report.

1 Q Are there only two?

2 A To my knowledge, that's all there is.

3 Q I point out that's a specious objection.

4 Q What are the differences in usage
5 between an IR and an NCR?

6 A Inspection report could be used during
7 the in-process inspection to report unsatisfactory
8 conditions.

9 Q Okay. And what about an NCR?

10 A NCR would be used as a finished product-type
11 affair to report unsatisfactory conditions.

12 Q Now, are you aware of instances where
13 inspectors determined that the wrong heat transfer
14 number has been -- heat traceability number had
15 been transferred to hangers that were being
16 fabricated and was instructed or was influenced not
17 to report that or not to do anything about it?

18 MR. DAVIDSON: I'm going to object to
19 the form of the question as being compound. It's
20 really two questions, first, whether he's aware
21 of such instances, and secondly, whether these
22 people were dissuaded and discouraged from reporting it.

23 I would appreciate it if you would break
24 the question into the two pieces.

25 MR. COCHRAN: Counsel, he has already

j-2-13

1 answered the first part that he was aware of such
2 instances. Now, having said he is aware of such
3 instances, I'm asking is he also aware of such
4 instances where inspectors, to use your terminology,
5 were dissuaded from doing anything about it.

6 THE WITNESS: No, I'm not.

7 BY MR. COCHRAN:

8 Q Has any inspector ever come to you and
9 said or made any complaint about being interfered
10 with in his job of reporting heat traceability
11 numbers that had been improperly transferred?

12 A No.

13 Q Have you ever attempted to dissuade an
14 inspector under your supervision from writing
15 either IR's or NCR's on improperly transferred
16 heat traceability numbers?

17 A No.

18 Q Now, what is your understanding of how
19 the quality control program at Brown & Root -- at
20 TUGCO is to be implemented? Just tell me what you
21 understand the philosophy behind that program to be.

22 A It's simply to verify that the best
23 possible plant is built that can be built using
24 all the known approved standards and specifications.

25 Q Now, to do that, would you agree that

1 the quality assurance program has to be real,
2 that is, qualified people, qualified inspectors have
3 to be free to do their job?

4 MR. DAVIDSON: I'm going to object to
5 the form of that question. You may answer it, however.

6 THE WITNESS: Would you repeat it, please?

7 MR. COCHRAN: Would you repeat it?

8 (The reporter read the record as requested.)

9 THE WITNESS: Yes.

10 BY MR. COCHRAN:

11 Q And by free, I mean free of any fear of
12 intimidation or harassment.

13 A Yes.

14 Q And free of any intimidation or
15 harassment from not only those whom their inspecting,
16 that is, the crafts, but also from their own
17 supervisors.

18 A Yes.

19 Q If they were not free of such intimidation
20 and harassment, then would you agree it's not
21 really a quality assurance program at all?

22 MR. DAVIDSON: I'm going to object.
23 That's an argument and I'm going to tell the witness
24 not to bother to answer it.

25

1 BY MR. COCHRAN:

2 Q From your knowledge and your experience
3 and your position, what did you observe -- let
4 me back up and ask a base question.

5 While you were employed at Brown & Root
6 and since you've been employed at TUGCO, are you
7 aware of complaints by inspectors either under your
8 supervision or in the department generally that
9 they were being intimidated or harassed about
10 doing their job?

11 MR. DAVIDSON: Clarification, Mr. Cochran.
12 Do you mean complaints that were brought
13 to Mr. Snellgrove by inspectors?

14 MR. COCHRAN: No, I'm asking if he was
15 aware of complaints generally.

16 MR. DAVIDSON: I think unless you're
17 prepared to establish this is not hearsay, we'll
18 have to insist this not be a part of the examination
19 for evidentiary purposes.

20 MR. COCHRAN: No, I'm not asking him
21 for the truth of the matter. I'm asking him if he
22 is aware of any such instances, any such complaints,
23 and it will not be offered for the truth of the
24 matter.

25 MR. DAVIDSON: So you're merely asking him

1 for what he has heard as scuttlebutt and
2 unsubstantiated rumor about complaints?

3 Q No. Are you aware of any such complaints
4 by inspectors in the quality assurance department?

5 MR. DAVIDSON: Complaints to whom, Mr.
6 Cochran?

7 MR. COCHRAN: My question stands. Are
8 you aware of any complaints of intimidation or
9 harassment by inspectors in the quality assurance
10 program?

11 THE WITNESS: I can't answer you. It's
12 too wide open.

13 BY MR. COCHRAN:

14 Q You don't know whether you're aware of any
15 such complaints?

16 A Well, it's too wide open. I can't
17 pinpoint a condition.

18 Q Let me try to help you with that. Are
19 you aware of any complaints by inspectors in the
20 quality assurance program or department, rather,
21 at either Brown & Root or TUGCO that they were --
22 that they felt intimidated or harassed to do
23 their job as an inspector?

24 MR. DAVIDSON: Again, object to the question.
25 I don't think it's the purpose of our examination,

1 Mr. Cochran, to ask what he may be aware of
2 without the source, without the basis, what time.

3 MR. COCHRAN: I'm going to ask him all
4 that.

5 MR. DAVIDSON: I would suggest you ask
6 him that in pieces. I'm going to tell him until
7 you give him a narrow gauge of questions he can
8 deal with effectively, and he knows what you're
9 asking so he can be responsive -- I don't think
10 it's fair to the witness, Mr. Cochran. I'm
11 really being quite candid.

12 I have no desire to keep you from inquiring
13 into his personal knowledge as to complaints
14 made to him by inspectors either under his
15 supervision or not under his supervision with respect
16 to harassment, intimidation, or threatening.

17 That is after all a subject that is clearly
18 within the scope of these proceedings, but to just
19 say anywhere in the universe is there any kind
20 of unsubstantiated rumor or innuendo of which you
21 may become aware through an open window about
22 something I think that's totally unfair and I
23 don't think with the kind of witnesses that we have
24 in this kind of proceeding that that is the kind
25 of question that can be tolerated. And I'm simply
going to insist that you approach this in an

1 appropriate manner.

2 I'm sorry.

3 MR. COCHRAN: I'm approaching it in an
4 appropriate manner, and I'm going to ask the
5 witness please answer the question. And I asked
6 it simply, as you just gave your stamp of approval
7 on.

8 MR. DAVIDSON: In that case, I think
9 you can best ask the question. I don't want
10 anybody to accuse me of putting words in their mouth.

11 MR. COCHRAN: I have no objection to him
12 answering the question as you phrased it, and I would
13 be happy to have the reporter read it and please
14 answer.

15 MR. DAVIDSON: Do you want to adopt my
16 question as your question?

17 MR. COCHRAN: I will be happy to. I
18 thought it was a good question. I thought it
19 was synonymous to the question I asked. Would
20 the reporter please read counsel's question?

21 MR. DAVIDSON: Thank you.

22 (The reporter read the record as requested.)

23 MR. DAVIDSON: That is the question.

24 BY MR. COCHRAN:

25 Q Are you able to answer that question?

1 A Personal knowledge? None.

2 Q You have never had an inspector come
3 to you whether under your supervision or not,
4 and complain that he was being kept from doing his
5 job because of fear of intimidation or harassment?

6 A No, I have not.

7 Q Now, have you ever kept an inspector
8 from doing his job?

9 A No, I have not.

10 Q You know Mr. Bronson, don't you?

11 A I've heard of him.

12 Q Well, you know him personally, don't you?

13 A I know the man.

14 Q He was under your supervision at one
15 point, was he not?

16 A Yes, he was.

17 MR. DAVIDSON: Off the record.

18 (Discussion off the record.)

19 BY MR. COCHRAN:

20 Q Mr. Bronson was under your supervision
21 for several months in 1982, was he not?

22 A Yes, he was.

23 Q He was one of your seven inspectors,
24 seven to ten inspectors, I believe you said?

25 A Yes, sir.

1 Q Did you and Mr. Bronson have discussions --
2 have any discussions at any time regarding whether
3 or not the crafts were cleaning their welds
4 properly prior to inspection?

5 A Yes, I remember discussions.

6 Q Did you say to Mr. Bronson during one
7 of these discussions, "You don't have to be so
8 critical, kind of back off, give the people a break
9 out there"?

10 A I do not remember ever saying such,
11 no.

12 Q Is it simply that you don't remember one
13 way or the other?

14 A The answer is no.

15 Q The answer is no, you didn't say it,
16 or no, you don't remember saying it?

17 A I did not say it.

18 Q Did you indicate through different
19 words that he should not be so critical?

20 A No.

21 Q Did you -- let me back up a minute.
22 Was Mr. Bronson coming to you complaining that
23 the welds were not cleaned properly?

24 A Mr. Bronson stated that he was -- that
25 he felt the welds were not being cleaned properly

1 but he revealed that he simply did not understand
2 his instructions, the procedure QIQAP11.1-28 plainly
3 states that prior to welding the welds should
4 be cleaned mechanically one-half inch each side
5 of the weld, and if there's grease or dust or
6 minute surface interferences or things of
7 this nature, that it will be cleaned by chemical
8 process or wiping two inches.

9 Q Now, when you say he revealed that he
10 didn't understand the procedures, was this your
11 conclusions after the conversations that he didn't
12 understand the procedures?

13 A After the conversation, yes.

14 Q He never said to you, well, I didn't
15 understand the procedures, did he?

16 A No.

17 MR. DAVIDSON: Do you remember, Mr.
18 Snellgrove, what he did say to you? I think it
19 would be better if it would reflect that he remembers.

20 MR. COCHRAN: You can ask him on cross-
21 examination.

22 MR. DAVIDSON: All right. It's your
23 examination, Mr. Cochran. I wouldn't attempt to
24 interfere.

25 MR. COCHRAN: All right.

1 BY MR. COCHRAN:

2 Q Now, did you have a discussion with
3 Mr. Bronson regarding the use of butt welds versus
4 flare bevel welds?

5 A Yes, we did.

6 Q Do you remember the occasion of that
7 conversation?

8 A Explain your occasion, please.

9 Q Do you remember when it took place or
10 where it took place?

11 A Comanche Peak.

12 Q I said Comanche Peak was a very large plant.
13 Was it in your office, was it down in the shop
14 somewhere?

15 A I don't remember the exact locations, no.

16 Q Do you remember what the circumstances
17 were, that is, what brought up the issue of
18 using butt welds versus flare bevel welds?

19 MR. DAVIDSON: I'm going to object to
20 the form of the question because it presumes that
21 the discussion was related to the use of one weld
22 rather than another, rather than the procedures
23 applicable to such welds.

24 MR. COCHRAN: Are you able to answer the
25 question?

1 or the answer would not relate nor be offered
2 for the truth of it, but merely whether he has
3 knowledge of it.

4 THE WITNESS: Would you repeat it, please?
5 (The reporter read the record as requested.)

6 THE WITNESS: Something is missing there.
7 Read it one more time, please.

8 (The reporter read the record as requested.)

9 MR. DAVIDSON: Mr. Snellgrove, is your
10 difficulty with the words "such instructions"/

11 THE WITNESS: Yes.

12 MR. DAVIDSON: Do you want to know what
13 those instructions are?

14 THE WITNESS: Yes.

15 MR. DAVIDSON: I would say for ease,
16 let's just rephrase the question and include the
17 instructions.

18 BY MR. COCHRAN:

19 Q Many times, Mr. Snellgrove, one question
20 will be asked, and depending on that answer, a
21 follow-up question will be asked which relates to
22 the previous one, and that's what happened. So I
23 didn't realize you weren't relating it to the
24 previous question and answer.

25 Are you aware of any person in the

1 quality control department in a supervisory position
2 giving instructions to an inspector that they were
3 not to write NCR's on any violations which they
4 witnessed unless it was on a hanger package they
5 were actually inspecting?

6 A No.

7 Q You're not aware of Mr. Patton issuing
8 such instructions, then?

9 MR. DAVIDSON: I object to the form
10 of that question. Once again, it's clearly calling
11 for hearsay unless, of course, it's prefaced by a
12 statement, "Did you witness Mr. Patton giving
13 that instruction?"

14 MR. COCHRAN: You can answer that question.

15 MR. DAVIDSON: Not unless you state for
16 the record that you are not seeking this answer
17 for the truth of the matter asserted but really for
18 a statement of general unfocused knowledge.

19 MR. COCHRAN: I'm asking whether or not
20 he is aware of such an order being given, and I'm
21 entitled to know whether he is aware of it.

22 MR. DAVIDSON: I do not believe you're
23 entitled to this hearsay, and I believe this is.
24 I believe it should be voir dire.

25 MR. COCHRAN: Without telling us what

1 the answer is, are you able to answer the question?

2 A Yeah, I can answer the question.

3 MR. DAVIDSON: Well, my objection stands,
4 but if you can answer the question, Mr. Snellgrove,
5 please go ahead.

6 MR. COCHRAN: Please do so.

7 THE WITNESS: The answer is no.

8 BY MR. COCHRAN:

9 Q Did you require every NCR initiated
10 by Mr. Bronson to be initialed by you?

11 A No, I did not.

12 Q What was the paper flow track or the
13 procedure that an NCR issued by an inspector
14 under your supervision would take?

15 A The program is --

16 MR. DAVIDSON: One second. At what time,
17 Mr. Cochran?

18 MR. COCHRAN: Well, let's start it from
19 the beginning of Mr. Bronson's employment. What
20 was the paper flow path at that time?

21 THE WITNESS: The program was that if
22 an inspector was out performing his job, and he
23 detected a nonconforming condition, that he would
24 call in what was called the NCR coordinator to
25 obtain a number for the said description or defect,

1 nonconformance condition, let's put it that way.
2 Then he would fill out the actual nonconformance
3 report, documenting his findings, applying this
4 number that he had obtained, and then it always
5 came through, any of the leads as well as the
6 superintendents, because they have to be aware
7 of what's going on in the plant. Then the NCR
8 was processed on back through to the NCR
9 coordinator dispositioning by the appropriate
10 engineering departments.

11 BY MR. COCHRAN:

12 Q Did that procedure ever change?

13 A Ever change? That's a bad question.

14 Q Well, my next question -- it either did
15 or didn't. If it did, I'm going to ask when and
16 what the changes were. If it didn't, then it didn't.

17 A I'd say no.

18 Q When an NCR from an inspector under
19 your supervision reached your desk, did you require
20 or did you -- strike -- did you require, did you
21 verify for your own satisfaction that you agreed
22 with the grounds for the NCR?

23 A I did review the NCR for completeness,
24 detail. It was not up to me to say that I agreed
25 with what a person documented or not. It was just

1 up to me to see that the form was filled out.

2 Q Your testimony is that your only
3 function, then, was one of making sure that all the
4 lines that were supposed to have words in them in
5 fact had words in them?

6 MR. DAVIDSON: I will object to the form
7 of the question. I think he meant he reviewed it
8 also for accuracy.

9 MR. COCHRAN: I'll get to that. That
10 is the first step, that is, that all the blanks
11 were filled out properly; is that correct?

12 A Yes.

13 Q And then when you say that you reviewed
14 it for accuracy, what do you mean? Do you mean to see
15 that the words were spelled correctly, or -- just
16 define what you mean by accuracy.

17 A To me, that simply means that I reviewed
18 what the person had written to see if I could
19 understand what he was describing, because if I
20 felt that if you understand it, somebody else that
21 did not know anything about the particular incident
22 would not understand it either.

23 Q Did you ever take one of the NCR's and
24 go out into the area, wherever it was, and check
25 for yourself to satisfy yourself that there was a

1 basis for the NCR?

2 A No.

3 Q Did you ever call the inspector into
4 your office to question him on his basis or his
5 reason for writing the NCR?

6 A No.

7 Q At all times, you simply processed
8 the paperwork?

9 A Yes.

10 Q Were you ever acquainted with Rose Klinist?

11 A Rose Klinist?

12 Q Klinist. Is that how you pronounce it?

13 A I believe it's Klinist.

14 Q How did you spell it?

15 A I would be guessing. I wouldn't even
16 attempt.

17 MR. DAVIDSON: For your information, I
18 think it's Klinist, K-l-i-n-i-s-t.

19 MR. COCHRAN: That's what I had, is
20 K-l-i-n-i-s-t. I was mispronouncing it.

21 BY MR. COCHRAN:

22 Q Were you acquainted with Rose Klinist?

23 A Yes, I was.

24 Q What position in the organization did she
25 hold?

1 A She was the QA/QC manager.

2 Q Was she ever your supervisor?

3 MR. DAVIDSON: Do you mean direct supervisor,
4 Mr. Cochran?

5 MR. COCHRAN: Is that what you're
6 hesitating about, Mr. Cochran, the term "direct
7 supervisor"?

8 THE WITNESS: Yes.

9 BY MR. COCHRAN:

10 Q Was she ever in your chain of command
11 in a superior position?

12 A Yes.

13 Q How many levels above you was she?

14 A Two.

15 Q Do you have personal knowledge of the
16 circumstances of her transfer out of that position?

17 A No, sir, I do not.

18 Q How long did she occupy the position of
19 QC manager?

20 A Estimated six months.

21 Q Were the policies of operation of the
22 QC department, as far as strict adherence to
23 procedures and code versus lax adherence to
24 procedures and code any different while she was
25 the QC manager than either before or after?

MR. DAVIDSON: I object to the form of

1 that question, but you may answer it, if you can.

2 A No.

3 BY MR. COCHRAN:

4 Q You're familiar with the new hotline
5 and ombudsman program, are you not?

6 A Yes.

7 Q Would you just describe to me generally
8 your understanding of that program and how it operates.

9 A The program is set up so that if anyone
10 feels they are not getting proper response
11 from their immediate supervision, their immediate
12 plant supervision, that they can go around them or
13 over them, if you will, to the corporate office
14 to report their feelings or findings.

15 Q Are you aware of the circumstances
16 leading to setting up that program?

17 MR. DAVIDSON: Objection to the form of
18 the question.

19 MR. COCHRAN: You can answer, if you know.

20 THE WITNESS: No, I don't.

21 BY MR. COCHRAN:

22 Q Tell me what a Hilte bolt is.

23 A A Hilte bolt -- it's a stud, a partially
24 threaded stud that has a couple of retainers on one
25 end that is driven into a concrete base, and then

1 a nut and washer is applied to the threaded
2 portion of the bolt, and tension which pulls the bolt
3 through those retainers causing an expansion which
4 freezes the bolt into the concrete base.

5 Q Is it important or not for a Hilte
6 bolt to be the proper length, that is, the length
7 that is shown on the drawings or specified by the
8 specifications?

9 A Yes.

10 Q Why is it important?

11 A You're really asking me to make an
12 engineering decision here.

13 Q No, I'm just asking for your understanding
14 of what different it makes.

15 Let's use a specific example. Suppose
16 a drawing called for a three-inch Hilte bolt. What
17 difference would it make, based on your knowledge
18 and your experience, as to whether it's three inches
19 or two and a half inches?

20 MR. DAVIDSON: I think the problem is
21 that Mr. Snellgrove believes you're asking as
22 to what is the significance or the importance
23 from an engineering standpoint to using a particular
24 length which is an area beyond the scope of his
25 responsibilities.

MR. COCHRAN: That's not my question.

1 MR. DAVIDSON: I take it, and I assume
2 this to be helpful, what you're really asking him
3 is, is a Hilte bolt or any other component that
4 has a specification or is drawn to a particular
5 design, isn't it proper and important for it to
6 conform and the answer is, that's his job, that
7 it is important. That is his job. So, therefore,
8 following the procedures is important.

9 BY MR. COCHRAN:

10 Q My question to you is, Mr. Snellgrove,
11 based upon your knowledge and your experience
12 and your training as a quality control inspector,
13 do you know why it's important for a Hilte bolt
14 to be the proper length, that is, to be what
15 it's specified to be?

16 A Yes, I know.

17 Q Tell me.

18 A The reason for it to be the proper length
19 is because of it's structural holding ability.

20 Q Okay. And I take it by that, then,
21 that a Hilte bolt which was of an improper length
22 would at least have a differene structural holding
23 ability than one that was called for by the plans
24 or specifications?

25 A Yes.

1 Q No. How does -- what procedures were
2 set up within the quality assurance department,
3 quality control department to ensure that Hilte
4 bolts were in fact the proper length?

5 A Well, first of all, you have vendor
6 audits of suppliers, naturally, and then you have
7 receiving on-site inspections. Then you have the
8 in-process inspections.

9 Q The end process or in-process?

10 A In, i-n.

11 Q I-n. What do the in-process inspections
12 consist of?

13 A That simply consists of an inspector
14 taking the drawing, defining the part number of the
15 Hilte bolt, the bill of materials which will
16 define a length and diameter of the said Hilte bolts,
17 and then the inspector physically measures the
18 diameter of the bolt, of the exposed bolt after
19 installation, and on the end of this Hilte bolt
20 there is an alphabetical letter stamped which is
21 designated in a procedure that defines what length
22 that is by that letter.
23
24
25

1 Q How were the stampes applied to the
2 end of the bolts, the letter designations?

3 A Did you say how were they applied?

4 Q Yes. How were they applied; is it a
5 die stamp again?

6 A Yes.

7 Q Where does that operation take place?

8 A I would have to say the vendor.

9 Q Is it a recessed stamp or a raised stamp?

10 A Recessed.

11 Q Did any Hilte bolts come from vendors
12 unstamped?

13 A I don't know.

14 Q Have you ever seen a Hilte bolt that
15 was not stamped on the end?

16 A Not that I can personally remember.

17 Q Have you ever seen the die stamp being
18 applied in process, that is, during the installation
19 or manufacturing process on site?

20 MR. DAVIDSON: Objection. There is an
21 assumption there, and I think it actually contradicts
22 testimony.

23 He said that the stamps, as he understood
24 it, were applied by the vendor, that is, the seller
25 or supplier, so obviously they were nct fabricated

1 or applied on site at the plant.

2 MR. COCHRAN: I'm entitled to ask him
3 if he's ever seen them applied on site at the plant.
4 He either has or he hasn't.

5 THE WITNESS: Yes, I have.

6 BY MR. COCHRAN:

7 Q All right.

8 What are the circumstances of your
9 having seen them being applied at the plant?

10 A It was due to modifications of a Hilte
11 bolt directed by engineering on CMC's.

12 Q Okay. Tell me what you know about those
13 modifications, how they came about, what the
14 circumstances were.

15 A There was times where maybe the Hilte
16 bolt would not set at the proper depth during the
17 torquing operation, and it would require
18 additional threading, and engineering has to authorize
19 the cutting off of the excess threads, and the
20 rethreading because it's a change to that particular
21 part beyond it's original design.

22 Q Are the circumstances that you have knowledge
23 of, then, do they all relate to Hilte bolts which
24 are too long after installation?

25 A Well --

1 Q By way of explanation, I asked you that
2 because in your descriptive example you said they
3 cut off the end because it wasn't proper, which
4 connotes to me that it ended up being too long.

5 A No, it wasn't that it was too long
6 all the time, okay. It was cut off simply to
7 reduce like personal hazard due to excess threat
8 exposure, if you will. And when it was cut off,
9 you had to be present -- the inspector had to be
10 present when it was cut off to record the amounts
11 that was removed, and then the Hilte was restenciled
12 with the next alphabetical letter which reduced
13 the length of the original.

14 Q In a circumstance such as that, where
15 would the CMC originate from? In other words,
16 who set the process in motion?

17 A Many times it was a craftsman.

18 Q The person doing the installing of
19 the Hilte bolt?

20 A Yes, sir.

21 Q What would the options under those
22 circumstances be for that craftsman? Is there --
23 and let me narrow that down a little bit. Is there
24 an alternate way of correcting the problem? For
25 instance, backing out that Hilte bolt and putting in
another one to attempt to seat it properly.

1 A You could do that, but you could not
2 put the same length in there. You would have to go
3 with a longer one.

4 Q And why is that?

5 A Simply because two diameters the same
6 size, one is pulled out in as large a diameter,
7 the next one is just going to fall out, too, or
8 pull out, we'll say, so you have to go down deeper
9 to get into fresh concrete that has not been
10 stressed, so to speak.

11 Q As opposed to using larger diameter
12 which would fill the hole, then?

13 A A larger one would be an acceptable
14 application, yes.

15 Q So there are three ways to solve the
16 problem, as I take it. One is the way that was
17 apparently chosen, that is, to cut off the end of
18 the as-installed Hilte bolt and change the die
19 stamp, that would be method No. 1; is that correct?

20 A Yes.

21 Q And then method No. 2 would be to back
22 the improperly seated Hilte bolt out and to reseal
23 a longer bolt that would dig into fresh concrete;
24 is that method No. 2?

25 A Yes.

j-3-5

1 Q Then method No. 3 would be to back
2 out the improperly seated Hilde bolt out and
3 reinstall with a larger diameter Hilde bolt; is that
4 correct?

5 A Yes.

6 Q Based upon your level of training
7 and experience, do you know of any structural
8 difference in result between the three methods?

9 A No, sir, not that I can determine.

10 Q Based on your knowledge and your level of
11 training and experience, as far as you know, any
12 of the three would be equally suitable?

13 A To my knowledge, yes.

14 Q One question I'm a little unclear on,
15 in relation to your processing of NCR's, did you
16 not feel it was part of your duties to check for
17 the correctness of the information that was on
18 those NCR's to determine -- by correctness, I
19 mean, to determine whether the inspector really
20 knew what he was talking about?

21 A I really don't understand exactly what
22 you're questioning here.

23 Q You earlier testified that all you did
24 was processed the paperwork, that you didn't go
25 beyond what the inspector had said as long as you

1 could understand what he had said. And I'm asking
2 you, did you not feel it was part of your duty
3 and your responsibility to ensure that your
4 inspectors were in fact writing up correct violations?

5 A Well, yes, I felt it was my responsibility,
6 but you can also read what the person had written,
7 and it tells you, hey, this condition exists. And
8 that was all I felt I really needed.

9 Q Okay.

10 A You know, I don't feel I need to go out
11 and second-guess the inspector.

12 Q Did you feel that it was part of your
13 responsibility to make sure that your inspectors
14 were writing -- in fact writing up violations which
15 they saw? In other words, that they were doing
16 their job?

17 A Sure, it was.

18 Q What steps did you take to ensure
19 that your people were actually writing the violations
20 they saw?

21 A The only thing that I could do was
22 simply tell the people if you saw a nonconformance,
23 you needed to report it. That's what the program
24 required.

25 Q And that's what you did?

1 A Yes.

2 Q Did you have periodic meetings with
3 your people?

4 A Sure.

5 Q What was the frequency?

6 A At least once a week, minimum of once
7 a week.

8 Q Did you have a stated designated time
9 to that everybody knew at, say, Tuesday, at
10 8:00 o'clock we meet with Mr. Snellgrove?

11 A Yes, sir.

12 Q What was that designated time?

13 A It was toward the end of the shift.

14 Q Once a week toward the end of the shift
15 which would be when? I don't know what your shift
16 times are.

17 A Okay. It was between 5:00 and 5:30.

18 Q Any particular day?

19 A No. It varied.

20 Q What was the agenda at a meeting such
21 as that? What would be a typical agenda?

22 A Typical agenda would be simply to sit
23 down and review some instructions that was applicable
24 to that particular area or discipline.

25 Q Some instructions. Can you elaborate on

1 what you mean by "some instructions."

2 A Instructions applicable to our discipline.

3 Q Okay. Well, a discipline would be, for
4 instance, liquid penetrant, just to pick one. Is
5 that what you mean by discipline?

6 A That could fall into that category, yes.

7 Q What do you mean by "discipline"?

8 A The hanger discipline.

9 Q The hanger discipline, then.

10 A Yes.

11 Q All of your people were hanger inspectors.

12 A Yes.

13 Q There were other inspectors, also, I
14 take it?

15 A Yes.

16 Q Who were not in the hanger inspection
17 department?

18 A Correct.

19 Q And so once a week you would have staff
20 meetings of the seven to ten inspectors under
21 your supervision relating to instructions on
22 inspecting hanger packages; is that what you're telling
23 us?

24 A Yes.

25 Q What type of instructions would you give

1 them relating to their inspection of hanger packages?

2 MR. DAVIDSON: Would that be inspection
3 of hanger packages and the hangers themselves,
4 Mr. Cochran?

5 MR. COCHRAN: Yes, that's what I mean.
6 Thanks.

7 THE WITNESS: To simply inform them of
8 changes that may have occurred in a particular
9 procedure, to ask for questions, concerns. It
10 was just open-house type session.

11 BY MR. COCHRAN:

12 Q Would you ever and did you ever give
13 these people instructions or say things to them
14 to impart a belief that they should ease off of
15 the crafts that they were inspecting, and give the
16 guys a break?

17 A No.

18 Q Based upon your knowledge and your
19 experience in the QC department, both at Brown & Root
20 and at TUGCO, was there any sort of a reward
21 system for a dedicated diligent inspector who went
22 out and found problems, and wrote lots of NCR's?

23 A Not to my personal knowledge.

24 Q Do you have any idea what the dollar cost
25 of writing an NCR's to either Brown & Root or TUGCO?

1 A An estimate.

2 Q Tell me what your estimate is.

3 A Probably about \$500.

4 Q And that's for each NCR that is written?

5 Would that also be your estimate for an IR?

6 MR. DAVIDSON: When you say an IR, you
7 mean an unsat. IT, that is, an unsatisfactory
8 inspection report?

9 MR. COCHRAN: Yes.

10 THE WITNESS: I have no idea what it
11 would cost. I would be strictly speculating.

12 MR. COCHRAN: I'll pass the witness.

13 MR. VOEGELI: I have no questions.

14 EXAMINATION

15 BY MR. DAVIDSON:

16 Q Mr. Snellgrove, in your earlier testimony
17 here today, you were asked about a discussion that
18 you had with Mr. Bob Bronson regarding cleaning
19 procedures. Do you remember that discussion, that
20 testimony this morning?

21 A Yes.

22 Q At the time I suggested to Mr. Cochran
23 that perhaps he should find out what the discussion
24 was about, and so in order to complete the record,
25 I would like to ask you to the best of your recollection

XXXXX

1 how did that discussion eventuate, what caused it
2 to take place, and what in fact was said, to the
3 best of your knowledge?

4 A The craft people began complaining about
5 Bronson over-inspecting, and then we -- you know,
6 our question, what their problem was, and they stated
7 he was requiring them to clean mechanically after
8 the welding had been accomplished.

9 Q To any particular length or dimension?

10 A Yes. He was requiring them to go at
11 least one inch.

12 Q From the weld?

13 A Yes.

14 Q In either direction?

15 A In either direction, yes. And after this
16 discussion with the craft people, I got with
17 Mr. Bronson and tried to explain to him that the procedure
18 only required one-half of an inch mechanical
19 cleaning each side of the weld, and that was prior
20 to the physical welding.

21 There was no procedure requirement that
22 it be mechanically cleaned after the welding
23 process was accomplished.

24 Q Let me be sure I understand you. There is
25

1 a procedure for cleaning the weld site prior to making
2 the weld, is that what you're saying?

3 A Yes, sir.

4 Q What is that procedure?

5 A QIQAPI1.1-28.

6 Q And what is the preparatory cleaning
7 required by that procedure that you have just
8 referenced?

9 A Half inch mechanical, two inch chemical.

10 Q Is that two inch chemical required or is
11 that merely --

12 A It's an option.

13 Q It's an option?

14 A Yeah, depending on the conditions.

15 Q Is there a specific requirement in that
16 procedure or any other procedure for cleaning after
17 the weld is made for presentation for inspection?

18 A No, sir.

19 Q Is some form of cleaning, however,
20 appropriate prior to presentation?

21 A Yes, sir.

22 Q What is it?

23 A Well, the weld should be free of all slag,
24 smoke, scale, rust.

25 Q Did you say smote?

1 A Smoke.

2 Q Smoke, excuse me. Is there any procedure
3 to your knowledge which requires prior to inspection
4 but after completion of the weld that there be
5 mechanical cleaning to a margin of one inch on
6 either side of the weld?

7 A No, sir.

8 Q But it's your understanding, based
9 on the complaints made to you, that Mr. Bronson
10 was requiring post-weld cleaning of a margin of one
11 inch either direction mechanically?

12 A Yes.

13 Q You spoke with Mr. Bronson about this
14 matter, then?

15 A Yes, we did.

16 Q And what did you say to him about his
17 insistence on cleaning being made that was not
18 pursuant to a procedure?

19 A That he should only invoke what the procedure
20 required, not to invoke more criteria above and
21 beyond what the procedure required.

22 Q Why did you suggest to him that he not
23 insist upon procedures that were not authorized
24 or above those that were required?

25 A Simply because he was imposing his own

j-3-14

1 will, is what it amounted to, and apparently he just
2 did not understand the requirements of the instructions
3 by him imposing more stricter criteria than the
4 instructions actually required.

5 Q When you say the instructions and
6 you say he didn't understand the instructions, you
7 mean he did not understand the procedure?

8 A That's correct.

9 Q Mr. Snellgrove, earlier this morning,
10 you were asked about a discussion you had with
11 Mr. Bronson about flare bevel welds. Do you
12 remember that testimony?

13 A Uh-huh.

14 Q Just to be certain that I understand it,
15 do you remember how that conversation took place.
16 Did Mr. Bronson initiate it, did he come to see
17 you about flare bevel welds?

18 A Yes, he did.

19 Q And what was his concern as best you
20 remember it?

21 A His concern was that there was no welding
22 procedure for welding a flare bevel weld.

23 Q And was he concerned that there were
24 flare bevel welds being made without a procedure for
25 that?

1 A Yes, his concern was that.

2 Q What did you respond to him when he
3 told you this?

4 A My response was that the weld procedure
5 listed on the multiple weld data card at 11032 did
6 in fact cover this process of welding flare bevel
7 welds.

8 Q The 11032 to which you refer is a
9 welding procedure, is it not, WPS?

10 A Yes, it is WPS.

11 Q And it covers butt welds?

12 A Yes, it does.

13 Q But does it also cover flare bevel welds?

14 A Yes, it does.

15 Q So therefore, that procedure covers
16 both types of welds?

17 A Yes, it does.

18 Q Was Mr. Bronson's concern that people
19 were making flare bevel welds in place of butt welds?

20 A In place of butt welds?

21 Q In other words, instead of them.

22 A I believe -- rephrase it, would you, please?

23 Q Yes, certainly. In other words, what
24 I'm getting at, Mr. Snellgrove, is that as you
25 have told us, the concern was that there was no

1 procedure for flare bevel welds. And my question
2 is, his concern, therefore, was not that people were
3 making -- substituting one type of weld for
4 another that was called for by specifications.

5 A If I understand --

6 MR. COCHRAN: I'm going to object to
7 that as leading.

8 THE WITNESS: If I understand your
9 question --

10 BY MR. COCHRAN:

11 Q Well, if you don't understand it, let
12 me try it one more time.

13 A Yes, explain it.

14 Q Okay. I'm very sorry. And if I could,
15 I would put just a short preface to it. My
16 understanding is that if a drawing calls for a
17 particular kind of weld to be made that that is
18 the weld that the inspector checks for, and that
19 is the weld that the craft must use, otherwise it's
20 a variance from the dictated weld, and that the
21 only way that there can be a change that's made in
22 that weld that is called for, is if there's a CMC
23 or DCA, design change authorization which allows
24 for a different authorized weld, and if that's the
25 case, then that becomes the new authorized weld.

1 Therefore, what I'm saying to you is,
2 I'm just trying to get clear in my mind the problem
3 that Mr. Bronson was concerned with was not that
4 people were substituting improperly a weld not
5 specified for, but merely he was claiming welds
6 were not being called for without an applicable
7 procedure.

8 A That's correct.

9 Q Well, you told them there was such a
10 procedure?

11 A Yes, I did.

12 Q Did you show him the procedure; did
13 you show him a copy of 11032, if that's the right
14 number?

15 A I don't remember that detailed.

16 Q Might you have shown him a copy?

17 A It's possible, yes.

18 Q Could he obtain a copy of 11032 if you
19 did not show it to him?

20 A Yes.

21 Q Where would he get one?

22 A Every welder on the job is required to
23 have one in his hands.

24 Q So he could have actually seen it on the
25 job site?

1 A Yes, sir.

2 Q What did you conclude from this
3 conversation about Mr. Bronson's unfamiliarity with
4 the existence of a flare bevel weld procedure in
5 11032?

6 A Simply that he apparently had not looked
7 at the particular prescribed welding procedures
8 as called for on the multiple weld data card, which
9 it lists the procedure that is to be used and in
10 its body it gives you the joint geometries that
11 are covered by that particular welding process.

12 Q Would it also mean he failed to ask the
13 weld person for a copy of the procedure reference
14 in the multiple weld data card?

15 A Yes.

16 Q Would that reflect either a laxity on
17 his part or a failure to understand the proper
18 procedures for performing the inspection?

19 A Yes.

20 Q Did you conclude from this discussion
21 that Mr. Bronson did not understand the applicable
22 procedures and was not familiar with the proper
23 manner in which to perform this inspection?

24 A Yes.

25 Q Mr. Snellgrove, during the testimony

1 earlier here this morning, you were asked about
2 your knowledge of Hilte bolts. Do you remember
3 that?

4 A Yes.

5 Q I think that it would be useful to flush out
6 the record if we examined or at least had some
7 testimony on the manner in which the installation
8 of Hilte bolts is inspected. I know it's an
9 open-ended question, but I'm trying to get your
10 testimony, and not trying to ask you too many
11 questions.

12 Could you explain how the installation
13 of a Hilte bolt is inspected, what is the procedure?

14 A The procedure for inspecting a Hilte bolt
15 is that the Hilte bolt is verified by review of
16 the drawing, bill of materials which prescribes
17 the particular size and length of Hilte required
18 for that support.

19 The inspector then should measure the
20 physical diameter and naturally compare that to the
21 drawing requirement. Then he should view the
22 exposed end of the Hilte bolt which is stamped with
23 some type of an alphabetical letter which corresponds
24 to a Hilte bolt length as prescribed in a site
25 procedure.

1 Then he physically witnesses the torquing
2 operation to the prescribed torque that's listed
3 in the site procedures. And after that is
4 accomplished satisfactorily, there is a tab of
5 yellow torque seal, if you will, that's applied at
6 the connection point of the nut and the thread on
7 the stud to indicate that this has been accomplished.

8 Q Now, at the time that Mr. Bronson was
9 under your employ, were there specifically people
10 who were QCI designated inspectors of the Hilte bolts?

11 A Yes.

12 Q Were those people known as Hilte bolt
13 inspectors?

14 A Yes.

15 Q And it was their job to perform the
16 inspection that you have just described?

17 A Yes.

18 Q During your testimony, you said that
19 from time to time a variation would be made or a
20 correction would be made to an installed Hilte
21 bolt. If you can recall, I think I correctly
22 summarized the testimony. You identified three
23 ways in which there could be a repair or a
24 correction or a change made in an installed Hilte
25 bolt, the first one of which was, I believe, cutting

1 off some portion of the end if the Hilde bolt did
2 not sit properly and deep enough.

3 A Yes.

4 Q And then rethreading and restamping the
5 end with an appropriate letter to correspond to
6 its new length.

7 The second one was to extract the Hilde
8 bolt as installed and to obtain a longer Hilde
9 bolt and then reinsert that in the hole previously
10 made until it bit some new concrete to get a
11 firm hold deeper in so it would have to be a longer
12 bolt; is that correct?

13 A Yes.

14 Q And a third way you identified is to use
15 a wider bolt so as to expand within the hole
16 previously made, and therefore, gain pressure in
17 the concrete; is that what you told us?

18 A Yes.

19 Q Now, you told us, if I'm correct, that
20 the first procedure would require a CMC be initiated,
21 that is, a component modification card; is that
22 correct?

23 A Yes.

24 Q That means it would require an engineering
25 evaluation?

A Yes.

1 Q That the craft could request a CMC be
2 initiated but only -- strike that. That's leading.

3 Would could initiate a CMC, component
4 modification card?

5 A Hanger engineer.

6 Q An engineer?

7 A Yes.

8 Q Who could request that it be initiated?

9 A Anyone.

10 Q So craft finding they had a problem with
11 the installation of a Hilte bolt could call upon
12 hanger engineer to make an evaluation and initiate
13 a CMC, a component modification card, so they could
14 make the change we just discussed?

15 A Yes.

16 Q When the hanger engineer made an
17 engineering evaluation and initiated the CMC, was
18 that CMC reviewed by anyone?

19 A Yes. It was reviewed by second party
20 engineering.

21 Q A second party what?

22 A Engineer.

23 Q Second party engineer. And was that
24 determination by the two engineers in the hanger
25 engineer or proper engineering department reviewed

1 by anyone?

2 A They are reviewed as a final design
3 package, yes.

4 Q By whom?

5 A Another engineer.

6 Q A design engineer?

7 A Yes, sir.

8 Q Is the CMC a formal document?

9 A Yes, it is.

10 Q Now, you stated that you would need a
11 CMC for the change, the first correction. Would
12 you need a CMC for the second correction to put in
13 a longer bolt than that specified originally?

14 A The procedure, if I remember correctly, did
15 allow you to go to a longer bolt. You could not
16 go to a shorter bolt without a CMC.

17 Q So the procedure was to put in a bolt
18 at least as long as required if not longer?

19 A Yes.

20 Q And at least as wide as required but not
21 narrower?

22 A Correct.

23 Q So there would be a secure purchase,
24 as you recall it?

25 A Yes.

1 Q In performing a Hilte bolt inspection,
2 di an inspector ever insist that the bolt be
3 extracted? Was it the procedure for him to have
4 the bolt extracted so he could measure it
5 longitudinally, that is, its length?

6 A No, sir. It was not a practice that the
7 inspector require the Hilte to be removed just to
8 measure length.

9 Q I'm not talking about whether it was a
10 practice. I'm asking if it was a procedure.

11 A No, sir, it was not a procedure.

12 Q His job was to check the alphabetical
13 letter on the end to make certain that it corresponded
14 to the indicated length required by the drawing or
15 specification.

16 MR. COCHRAN: Objeciton. It's leading.

17 BY MR. DAVIDSON:

18 Q What was his job if it was not to measure
19 the length in order to verify the length of the
20 material?

21 A The inspector's job was to review the bill
22 of materials to determine the prescribed length that
23 the engineer required, view the end of the bolt, and
24 measure the diamter for the -- also view the end of
25 the bolt for the letrer designation and compare that

1 letter to a procedural letter which would define the
2 prescribed length for that letter, compare that to
3 bill of materials, and if the two matched, then
4 it was acceptable for that installation.

5 Q And --

6 A As far as the type.

7 Q And what would that inspector then do
8 if it was acceptable, it corresponded to the
9 indicated specifications?

10 A He would indicate this by signing on
11 the material identification log.

12 Q In the space that said "verified material"?

13 A Yes, sir.

14 Q Now, was there a program or a procedure
15 for ensuring that the alphabetical letters stamped
16 on the end of Hilte bolts in fact did correspond
17 to their indicated length?

18 A Through the vendor audits and receiving.,

19 Q When you say receiving, was there a receiving
20 inspection made of parts supplied to the Comanche Peak
21 installation?

22 A Yes, sir.

23 Q Is that what you're referring to as
24 the vendor audit?

25 A No, sir.

1 Q That's something else.

2 A That's a separate -- the vendor audit
3 is performed by a different section, if you will,
4 quality engineering, quality assurance group, if
5 you will, where they physically go to the vendor's
6 site or plant and verify conformance to the
7 prescribed contract.

8 Q So there is a vendor audit program at
9 the site -- manufacturer of the supplier, for example,
10 Hilte bolts to make sure they're stamping that
11 correctly; is that what you're stating?

12 A Yes, sir.

13 Q There is a second inspection upon
14 receiving at the plant installation?

15 A Yes, sir.

16 Q A receiving inspection to make certain
17 that these alphabetical letters correspond to the
18 lengths indicated?

19 A Yes.

20 Q Is there any other inspection prior to
21 the installation of the bolt to verify length?

22 A No, sir.

23 Q But there are these two inspection procedures?

24 A Yes, sir.

25 Q Mr. Snellgrove, there was testimony earlier

1 here today that you and Mr. Bronson had a discussion
2 about Hilte bolts. Do you remember those questions
3 and that testimony?

4 A Basically.

5 Q Just so the record is clear on this, do
6 you recollect who initiated that conversation?

7 A Yes, sir. It seems that the question was
8 brought about due to a return of one of Bob's
9 packages, my review cycle that we had. And
10 Bob wanted to know what to do with the concern.
11 The concern was that the Hilte bolts were not documented
12 on the MIL as being signed off and verified.

13 Q I don't mean to interrupt your response --
14 have you completed it to this point?

15 A Sure.

16 Q All right. You say it was the return
17 of one of Bob's packages?

18 A Yes.

19 Q Now, what you're talking about is a
20 hanger package that had been processed by an inspection
21 by Bob Bronson.

22 MR. COCHRAN: Objection. That's leading.

23 BY MR. DAVIDSON:

24 Q All right. Let me ask you this way.
25 Well, I don't think it's leading. I'm just asking

j-3-28

1 him to clarify that when you say it was the return
2 of the package, you're talking about a hanger package;
3 is that correct?

4 A Yes.

5 Q And when you say one of Bob's packages,
6 you mean a package that was developed or was the
7 result of an inspection performed by Robert Bronson?

8 A Yes.

9 Q And that he had filled out -- in other
10 words, he had filled out an inspection report contained
11 in that package?

12 A Yes.

13 Q As well as other documentation?

14 A Yes, sir.

15 Q As documenting his inspection?

16 A Yes.

17 Q And you say it was returned?

18 A Yes.

19 Q Who returned it?

20 A One of my designated review inspectors.

21 Q Did you or one of your designated review
22 inspectors regularly review packages?

23 A Yes, sir.

24 Q Generated by all of the inspectors under
25 your supervision?

1 A Yes, sir.

2 Q And it was returned, you say?

3 A Yes.

4 Q Why was it returned -- well, first, to
5 whom was it returned?

6 A Well, it was returned to the person
7 that had performed the final inspection, in this case,
8 Bob Bronson.

9 Q And who returned it to him, if you
10 remember?

11 A Myself.

12 Q And why did you return it to him?

13 A Because the MIL did not reflect that
14 the Hilte bolts had been verified as being properly
15 -- the proper materials per the program.

16 Q When you say the Hilte bolts had not
17 been verified, you mean that the length of the
18 Hilte bolt had not been verified as indicated by
19 a sign-off on the material identification log by
20 the inspector?

21 A Yes.

22 Q In this case, Mr. Bronson?

23 A Yes.

24 Q He had failed to sign it?

25 A Yes.

1 Q Did you ask him why he had failed to
2 sign it?

3 A Yes, we did.

4 Q Let me back up one moment.

5 It take it if a package is incomplete,
6 it can't be processed.

7 A That's correct.

8 Q Therefore, this had to be completed
9 either -- in one way or another; is that correct?

10 A Yes.

11 Q Now, this was not complete so you asked
12 him -- excuse me, when you returned the package,
13 what did you say to him?

14 A Well, I asked him to resolve the problem
15 with the unsigned material of the Hilte bolts.

16 Q What was his explanation as to why he
17 had failed to sign off on the material identification
18 log verifying the length of the Hilte bolt?

19 A His explanation was that there was
20 torque seal present on the fastener, indicating
21 that it had been torqued and that he could not
22 verify the length without pulling the Hilte bolt
23 out of the wall, which is uncommon practice.

24 Q So is it uncommon practice or simply
25 not procedure?

1 A It's not procedure.

2 Q And not required per procedure?

3 A No, sir.

4 Q What was he required to do?

5 A He was simply required only to physically
6 measure the diameter of the bolt, view the end of
7 the bolt for the stamped letter, and compare
8 that to the bill of materials on the drawing and
9 to the procedure that defined the letter length,
10 and if the two matched, document the results on the
11 material identification log.

12 Q What did you suggest he do?

13 A Do that or he could go to the vault
14 and track down a Hilte bolt torque record to find
15 which inspector had witnessed the torquing and
16 contact that person, and have him sign off the MIL.

17 Q But that person would do the same inspection?

18 A He would do the exact same thing.

19 Q He wouldn't extract the bolt?

20 A No, sir.

21 Q He would merely look at the end of the
22 bolt to see the alphabetical letter to determine
23 that it was the proper length?

24 A That's correct.

25 Q For purposes of verification per procedure?

1 A That's correct.

2 Q When you told this to Mr. Bronson and
3 explained the procedure to him, what did he say?

4 A His ambition was that we should pull
5 the bolt out of the wall so we could measure.

6 Q When you say his ambition, do you mean
7 he insisted the only way he could verify was to
8 remove and extract the Hilte bolt?

9 MR. COCHRAN: Objection. That's leading.

10 MR. DAVIDSON: I'll rephrase the question.

11 BY MR. DAVIDSON:

12 Q When you say ambition, his ambition was
13 to extract the bolt, waht do you mean by "ambition"?

14 A It was his preference to pull the bolt
15 out, out of the physical concrete structure so
16 he could measure the length, which is -- well, as
17 we previously stated, was not a procedure requirement.

18 Q Did you understand from this -- did
19 you conclude from this conversation with Mr. Bronson
20 that he did not understand the procedure?

21 MR. COCHRAN: Objection. That's leading.

22 BY MR. DAVIDSON:

23 Q Let me rephrase that question.

24 Did you reach any conclusions about
25 Mr. Bronson's familiarity with the Hilte bolt procedures?

1 A Yes, sir.

2 Q What conclusion was that?

3 A Simply that Mr. Bronson did not fully
4 understand the program with use of the
5 instructions of Hilde bolts.

6 Q Mr. Snellgrove, in earlier testimony here
7 today, you have stated that you or one of the
8 designees in your inspection crew would review
9 all packages for documentation -- excuse me,
10 accuracy of documentation; is that correct?

11 A Yes, sir.

12 Q Did you do that for all packages that
13 were to be processed?

14 A Yes.

15 Q Does that mean you reviewed satisfactory
16 inspection report packages or -- excuse me, you
17 reviewed packages that included satisfactory
18 inspection reports?

19 MR. COCHRAN: Objection. That's leading.

20 MR. DAVIDSON: I'll rephrase the question
21 to accommodate Mr. Cochran.

22 BY MR. DAVIDSON:

23 Q You reviewed all packages whether they
24 contained satisfactory or unsatisfactory inspection
25 reports?

1 MR. COCHRAN: Objection. That's leading.

2 MR. DAVIDSON: I think you're mistaken,
3 sir. Answer the question.

4 THE WITNESS: Yes, we reviewed all packaged.

5 BY MR. DAVIDSON:

6 Q Thank you.

7 And did you review all NCR's that were
8 generated by inspectors under your supervision?

9 A I did review the NCR's, yes.

10 Q Did you have occasional personnel to
11 review hanger packages that were produced as a
12 consequence of Mr. Bronson's inspections?

13 A Yes.

14 Q And did you review them for accuracy?

15 A Yes.

16 Q And were they accurate in their documentation?

17 A Seldome ever.

18 Q What kind of mistakes would Mr. Bronson
19 make?

20 A Typical example would be that the
21 documentation would be incomplete. Things that should
22 have been signed were not signed, signing
23 incorrect things such as, perhaps the support was
24 what we classify as a sway strut, and he had
25 maybe signed the portion of the documentation that

1 reflected a snubber-type support. Incomplete MIL's.
2 Not completing the review of the MIL's and also of
3 the weld fill material logs. That's some of
4 the typical type things that we would encounter.

5 Q Can you think of any other mistakes or
6 errors that might have been in the packages produced
7 by Mr. Bronson?

8 A Many times -- yeah, I did remember just
9 the one. The inspection report which would be also
10 in those packages would be in the same condition.
11 He did not sign off things. He wouldn't put the
12 dates that he accomplished the work. Things of that
13 nature.

14 Q Now, with documentation in that state,
15 could those packages be properly processed for
16 quality control?

17 A No, sir.

18 Q They had to be returned to Mr Bronson
19 for correction?

20 A Yes.

21 Q When you returned packages to Mr. Beonson,
22 what did you say to him about these errors?

23 A Well, my approach was to -- you know, I
24 recognized that if an inspector had a problem of a
25 certain type, I always took the approach that maybe

1 he needed additional instructions, and I would attempt
2 to, you know, clarify what his problem was, and give
3 him the directions that I felt that he needed to
4 help him improve, and this is what we did.

5 Q But you did not change these packages
6 yourselves?

7 A No.

8 Q You did not rewrite them?

9 A No, sir.

10 Q You explained the procedure to him and
11 asked him to make the appropriate or indicated cor-
12 rections per procedure?

13 A Yes.

14 Q Were Mr. Bronson's packages -- would you
15 say that Mr. Bronson regularly made errors in his
16 documentation?

17 A Yes.

18 Q The record can't reflect how emphatically
19 you said that. When you say yes, do you mean to
20 imply that in almost every case, his packages
21 were inaccurate?

22 MR. COCHRAN: Objection. That's leading.

23 MR. DAVIDSON: Fair enough.

24 BY MR. DAVIDSON:

25 Q What do you intend to imply about that
emphatic yes?

1 A Simply that it was seldom ever that he
2 had a package that was turned in as a completed
3 package that did not have numerous problems as
4 previously described.

5 A Did Mr. Bronson make the error of
6 misdescribing the locations of the support he
7 was inspecting?

8 A Yes.

9 Q Did he ever make the error of misdescribing
10 the support component that he was supposed to be
11 inspecting?

12 A Yes.

13 Q Did others of your inspectors ever make
14 a mistake or have inaccurate documentation?

15 A They're human, yes.

16 Q When you say they're human, what do you
17 mean by that?

18 A Well, everyone makes a mistake to a certain
19 degree.

20 Q Would you say they made them as often
21 as Mr. Bronson?

22 A No, sir.

23 Q How would you characterize Mr. Bronson's
24 level and frequency of mistakes relative to your
25 other quality inspectors under your supervision?

1 A Well, Mr. Bronson's mistake condition was
2 extremely, well above what should have been
3 anticipated for a person with his background.

4 Q Among those under your supervision, how
5 did Mr. Bronson rank?

6 A He was extremely low.

7 Q How low?

8 A As low as you can get.

9 Q All right.
10 Now, when did you first notice that Mr.
11 Bronson's packages were regularly inaccurate? When
12 did that first come to your attention?

13 A I guess it was my recollection a couple
14 of weeks after he became certified, and he, you
15 know, started processing papers through our little
16 in-house program there that we were all working on.

17 Q Well, now, when he was hired, he
18 wasn't certified. He had to get certified like
19 every other inspector?

20 A Yes.

21

22

23

24

25

1 Q And that took how long?

2 A It varies from one individual to the next.

3 Q Do you know when Mr. Bronson became
4 employed?

5 A Seems like it was in early 1982.

6 Q And how soon after he became employed,
7 if you know, did he become certified?

8 A It should have been a couple of weeks,
9 best as I recollect.

10 Q And after his certification, within two
11 weeks after he was sent into the field, you began to
12 notice an error problem.

13 What did you do, if anything?

14 A Well, as I previously stated, when I
15 seen the problems he was having, our attempt was
16 to, you know, communicate with the guy and see if
17 we could resolve his problems by giving him additional
18 instructions or directions to the procedure require-
19 ment, and that was our approach to it at that time.

20 Q Was it your conclusion at that time that
21 he simply needed instructions because he did not
22 understand the procedures?

23 A Yes, sir.

24 Q What counseling did you -- well, I shouldn't
25 use that word. You said you spoke with him about

1 this matter within two weeks after he went out to
2 the field.

3 A Yes, sir.

4 Q What did you say to him, if you remember
5 this conversation?

6 A My recollection would be something to
7 the effect that, you know, Bob, this is not correct.
8 The procedure says you should document certain
9 conditions for a certain type support, and you
10 need to actually verify those conditions exist. And
11 I also ended up the conversation with, if you have
12 any problems, please ask questions.

13 Q Did he ever take you up on that invitation
14 to ask questions and get explanations?

15 A Weldom, seldom ever.

16 Q Do you know why he didn't ask you questions?

17 MR. COCHRAN: Objection. That calls
18 for a conclusion. It's also hearsay.

19 BY MR. DAVIDSON:

20 Q If he ever explained it to you, did he
21 ever tell you why he didn't bother to ask you
22 questions even though you were receptive to them?

23 A No, sir, he did not.

24 Q Mr. Snellgrove, did you ever overrule
25 an inspection report prepared by Mr. Bronson?

1 A Overrule, no, sir. I don't have the
2 authority to overrule an inspection report, or
3 didn't have the authority. I could only show a problem
4 to the inspector so that he could clarify or
5 correct the problem so the paperwork would flow in
6 a proper manner and accurately reflect what was
7 accomplished on that inspection.

8 Q Did you ever direct Mr. Bronson to
9 file a satisfactory inspection report when he
10 had filed an unsatisfactory one?

11 A No, sir.

12 Q Did you ever direct Mr. Bronson to refrain
13 from filing an NCR?

14 A No, sir.

15 Q Did you ever suggest to Mr. Bronson
16 that he withdraw an NCR?

17 A No.

18 Q Now, after this conversation to which
19 you testified that occurred some two weeks after
20 Mr. Bronson became certified and in which you tried
21 to give him some instructions on procedures, did
22 his performance improve?

23 A No, sir.

24 Q Did you take any actions?

25 A Yes, sir. We gave him what is considered a

j-4-4

1 counseling guidance QA evaluation, which states
2 the problem that the person was having.

3 Q Now, when you say we gave him a guidance
4 and counseling -- what was it, session, did you say?

5 A Yes.

6 Q It means you had another conversation with
7 Mr. Bronson?

8 A Yes, sir.

9 Q Did you have that conversation with Mr.
10 Bronson with anyone else? Was anyone else present?

11 A Yes, sir.

12 Q Who was present at that conversation?

13 A Our immediate superintendent.

14 Q Who was that?

15 A James Patton.

16 Q And both of you spoke with Mr. Bronson?

17 A Yes, sir.

18 Q And if you can, what was the sum and
19 substance of what you told Mr. Bronson?

20 A It was again the same thing that we
21 have been talking about, it was failure to comply
22 with the procedures of proper documenting and
23 completing documentation on the inspections that
24 he had, so-called, performed.

25 Q Do you recollect how soon after the first

1 conversation you had with him that you gave him
2 this guidance and counseling session?

3 A It must have been a couple, three
4 weeks, thereabouts, to my recollection.

5 Q Did you in any way formalize in a document
6 the guidance and counseling session you had with
7 Mr. Bronson?

8 A Yes, sir.

9 Q After the guidance and counseling session
10 you had with Mr. Bronson, did his performance improve?

11 A No, sir.

12 Q What actions, if any, did you take then?

13 A Well, my approach then was based on the fact
14 that Mr. Bronson had been with us for three, four
15 months, something in that neighborhood. And he had
16 built up a fear in me that he would go out -- if I
17 sent him out on a critical job or something that
18 I had a fear that he might accept something that
19 he shouldn't accept, because he just didn't appear
20 to have confidence in himself in performing the
21 procedures.

22 So I tended to sort of refrain from
23 sending him out on a very complicated-type support.

24 Q Do I understand you correctly that you
25 were afraid he was going to buy off or accept

1 unsatisfactory components?

2 A Yes, sir.

3 Q Did you give Mr. Bronson any further
4 counseling?

5 A Not in a written format, no, sir.

6 Q Did you give it to him in conversations?

7 A Yes, sir, I'm sure that we communicated,
8 you know, on the other attributes that we did allow
9 him to do.

10 Q Now, after this occurred, did Mr.
11 Bronson continue in your employ or under your
12 supervision?

13 A He was there for a short time frame.
14 I don't recollect the exact time length, but it
15 wasn't a very long spell.

16 Q And then where did he go?

17 A He was transferred to another section.

18 Q Did you effect that transfer?

19 A No, sir.

20 Q Are you aware of the circumstances of
21 that transfer?

22 A No, sir.

23 Q Did you have any conversations with
24 Mr. Bronson in which he expressed his opinion about
25 the competence of his co-workers?

1 A Yes, sir.

2 Q What was that opinion?

3 A His opinion basically --

4 MR. COCHRAN: I'm going to object unless
5 the witness can just tell us what records Mr.
6 Bronson used. I don't want any characterization.

7 MR. DAVIDSON: I think Mr. Cochran's
8 suggestion is a good one, Mr. Snellgrove. What we're
9 interested in is only what he said to you.

10 THE WITNESS: He stated that he felt
11 that the superiors were too young to be in
12 their positions.

13 BY MR. DAVIDSON:

14 Q Did he express any view as to the competence
15 of these overly young superiors?

16 A Would you repeat that, please?

17 Q Well, the question, Mr. Snellgrove, was,
18 did Mr. Bronson ever have a conversation with
19 you in which he declared his opinion as to the
20 competence of his co-workers. And you said yes.
21 So then I asked, what opinion did he express. And
22 Mr. Cochran said now I want to make sure you get
23 the right words, and I said, okay, that's right.
24 Let's go through the words -- and you said that he
25 said that the superiors were too young. And what

1 I want is to know if he also said something about
2 the age reflecting on their competence but also if
3 he said something in the way they performed the
4 job, either in supervision or inspection.

5 A No, sir. To my recollection, it was
6 in reference to age only.

7 Q How old was Mr. Bronson?

8 A Estimated guess, late forties.

9 Q How old were Mr. Bronson's superiors?

10 A I myself was -- let's see, it was '82.
11 I need to figure it out here. 30, about 36. Mr.
12 Patton was in the neighborhood of 28.

13 Q Really? Excuse me. And that's it as
14 far as the immediate personnel?

15 Did Mr. Bronson state or otherwise indicate
16 that he was more competent for a supervisory job?

17 A He indicated, yes.

18 Q By virtue of his age and experience?

19 A Yes, sir.

20 Q Based upon your objection of his work
21 habits and his performance, was there any basis
22 for his conclusions, any objective basis for his
23 conclusions?

24 MR. COCHRAN: I'm going to object. That's
25 simply not relevant to any controversy in this issue.

1 MR. DAVIDSON: I think Mr. Bronson was --

2 MR. COCHRAN: I'm going to object to this
3 speech in the record, also.

4 MR. DAVIDSON: You may do so, but
5 please don't interrupt me.

6 All I want to state as a proffer,
7 since you've questioned the relevance of this
8 testimony, is that it shows, I believe, or tends to
9 show and is probative that Mr. Bronson's assertions
10 about incompetence in the supervision and in the
11 inspection area are attributable to his own personal
12 psychological problems. The fact that he is
13 obviously an embittered older person whose lack
14 of ability has left him behind younger men who
15 have demonstrated the ability to do their job, and
16 that this is something with which he hasn't been able to
17 reconcile himself, and therefore he has made
18 statements about their competence and their age
19 which tend to degrade their qualifications, when
20 in fact the objective observed facts do not support
21 his position, but reflect only on his psychological
22 state of mind and his problem.

23 And I think that it's perfectly acceptable
24 for me to ask Mr. Snellgrove, who was a supervisor, if
25 based on his observations of Mr. Bronson's work

1 habits and performance, whether his assertion that he
2 was more qualified than his supervisors was justified
3 on the basis of the objective facts, his performance.

4 MR. COCHRAN: My objection stands.

5 MR. DAVIDSON: And now you may answer the
6 question.

7 THE WITNESS: No, sir, he was not.

8 MR. DAVIDSON: I'm sorry.

9 THE WITNESS: I said, no, he was not.

10 BY MR. DAVIDSON:

11 Q He was not justified in making those
12 statements?

13 A No, sir.

14 Q Mr. Snellgrove, are you familiar with
15 an individual by the name of Ted Neeley?

16 A Yes.

17 Q Who is that person?

18 A He is one of the inspectors that was
19 under my direction during this time frame.

20 Q During the time when Mr. Bronson was also
21 under your supervision?

22 A Yes, sir.

23 Q Based on your observations of Ted Neeley's
24 performance, was he a competent inspector?

25 A Yes, he was.

1 Q Did Ted Neeley understand the procedures,
2 as far as you know?

3 A Yes, he did.

4 Q Were Ted Neeley's packages and his
5 documentation acceptable?

6 A Yes, they were.

7 Q How would you rate Mr. Neeley's performance?

8 A Very good.

9 Q Do you know what Mr. Neeley is currently
10 doing?

11 A Currently he has been promoted to the
12 quality engineering section of NCR's coordination
13 in the quality program.

14 Q Is that a desirable promotion?

15 A Yes, sir.

16 Q In testimony earlier submitted in these
17 proceedings, Mr. Bronson indicated that Ted Neeley
18 was unqualified or otherwise incompetent. Based
19 on your observations of Mr. Neeley's performance
20 during the time he was under your supervision, do
21 you believe that to be an accurate appraisal?

22 A No, sir.

23 Q During the time that Mr. Neeley was
24 under your supervision and worked alongside -- well,
25 strike that.

j-4-12

1 During the time that Mr. Bronson was
2 under your supervision and Mr. Neeley was likewise,
3 how old was Mr. Neeley?

4 A Estimated guess, 28 to 30.

5 Q Do you know a Mr. Richard Smith?

6 A Yes, sir.

7 Q Who is Richard Smith?

8 A Richard Smith was another inspector
9 who was employed along at the same time as
10 Mr. Bronson was employed with us.

11 Q Was Mr. Smith under your direction?

12 A Yes, sir.

13 Q Did you have occasion to review Mr.
14 Smith's work?

15 A Yes, sir.

16 Q The packages he produced?

17 A Yes.

18 Q Based on your observations of Mr. Smith's
19 work habits and his performance, would you say
20 that he was a competent inspector?

21 A Yes, I would.

22 Q How would you rate Mr. Smith's performance?

23 A It was very good.

24 Q Do you know what Mr. Smith currently is
25 doing?

1 A No, sir, I do not.

2 Q In testimony earlier filed in these
3 proceedings by Mr. Bronson, he states that
4 Mr. Smith -- I believe he states that Mr. Smith
5 was otherwise unqualified or incompetent. Based
6 on your observations of the work habits and the
7 performance of Mr. Smith, would you view that
8 assertion as accurate?

9 A No, sir.

10 Q To your knowledge, during the time that
11 Mr. Smith was under your employ, did he ever refuse
12 to make an inspection?

13 A No, sir.

14 Q Did he ever fail to complete assigned work?

15 A No, sir.

16 Q Did he ever fail to turn in adequate
17 documentation?

18 A No, sir.

19 Q Did you ever instruct Mr. Smith at any
20 time while he was under your direction not to file
21 an unsatisfactory inspection report?

22 A No.

23 Q Did you ever direct him not to file an
24 NCR?

25 A No.

1 Q Did you ever suggest that he change
2 an unsatisfactory inspection report to a
3 satisfactory one?

4 A No, sir.

5 Q Did you ever suggest that he change
6 an NCR to some other disposition?

7 A No, sir.

8 Q Did you ever overrule an inspection report
9 by Mr. Smith?

10 A No, sir.

11 Q Mr. Snellgrove, do you know Mr.
12 Jeffrey McComas?

13 A Yes, sir.

14 Q Oh. I'm sorry. Before that, how old
15 is Mr. Smith?

16 A Mr. Smith was approximately my age, 36,
17 37.

18 Q Thank you.

19 Do you know Mr. Jeffrey McComas?

20 A Yes, sir.

21 Q Who is Mr. Jeffrey McComas?

22 A He, again, was one of the inspectors
23 in the immediate work group?

24 Q When you say the immediate work group, do
25 you mean the inspectors under your supervision at

1 the time that Mr. Bronson was employed?

2 A Yes.

3 Q And did you have occasion to observe
4 Mr. McComas' performance and work habits as an
5 inspector in that group?

6 A Yes.

7 Q Did you review his packages?

8 A Yes.

9 Q Did Mr. McComas perform assigned duties
10 in a competent manner?

11 A Yes.

12 Q How would you rate Mr. McComas?

13 A He was very good.

14 Q What is Mr. McComas doing at this time,
15 if you know?

16 A To my knowledge, he is a quality engineer
17 with Brown & Root at Comanche Peak.

18 Q Did that constitute a promotion from
19 his previous assignment?

20 A Yes, sir.

21 Q Is that a desirable promotion?

22 A Yes, sir.

23 Q In previous testimony in this matter,
24 Mr. Bronson has asserted that Mr. McComas was
25 unqualified for his job. Based on your observations
of Mr. McComas' performance and his work habits, do

1 you believe that that assertion is accurate?

2 A No, sir.

3 Q How old is Mr. McComas -- how old was
4 Mr. McComas at the time that he worked in your crew?

5 A In the neighborhood of 24, 25.

6 Q Mr. Snellgrove, based on your
7 observations of Mr. Bronson's work habits and
8 performance, do you think he was qualified to judge
9 the ability of the other individuals under your
10 supervision or his superiors?

11 A No, he was not.

12 Q Based on your observations, Mr. Snellgrove,
13 of Mr. Bronson's work habits and performance, did
14 you conclude that he understood the proper procedures
15 and responsibilities of his job?

16 A Repeat that, please.

17 Q Based on your observations, Mr. Snellgrove,
18 of Mr. Bronson's work habits and performance, did
19 you conclude that he understood the procedures
20 and the responsibilities of his job?

21 MR. COCHRAN: Objection. That's leading.

22 MR. DAVIDSON: I will rephrase the question.

23 BY MR. DAVIDSON:

24 Q Based on your experience, Mr. Snellgrove,
25 and your observation of Mr. Bronson's work habits

1 and performance, did you form any conclusions
2 about his understanding of procedures and the
3 responsibilities of his job?

4 A Yes, I did.

5 Q Could you state what that conclusion was.

6 A The conclusion was that for a person
7 of Mr. Bronson's experience, background so
8 recorded, he was not capable of performing the assigned
9 duties.

10 Q Thank you.

11 Mr. Snellgrove, as Mr. Bronson's immediate
12 supervisor, you had an opportunity to observe
13 him in the performance of his work habits and on
14 the job on a daily basis, did you not?

15 A Yes.

16 Q Was he an ambitious and motivated worker?

17 MR. COCHRAN: Objection. That's
18 speculative.

19 MR. DAVIDSON: I will accept that objection
20 for the time being, and supply a foundation.

21 BY MR. DAVIDSON:

22 Q Mr. Snellgrove, did Mr. Bronson, based on
23 your observations of him on a daily basis, perform
24 his responsibilities diligently?

25 A No, sir.

1 Q How did you come to the conclusion that
2 he was an indolent worker? No, strike that.

3 MR. COCHRAN: Thank you for saving me the
4 trouble.

5 BY MR. DAVIDSON:

6 Q How did you come to the conclusion,
7 and what facts do you base your judgment on that
8 Mr. Bronson did not perform his duties diligently?

9 A Well, based on the amount of paperwork
10 that was continually being returned to Mr. Bronson
11 with reported deficiencies in those papers, it
12 just -- you know, it led me to believe that he
13 either wasn't -- he wasn't attempting to progress
14 and learn the program and move up the ladder, if
15 you will, in any aspect. He was just dormant,
16 if you will.

17 Q Let me see if I can clarify your response.
18 Are you saying you reached the conclusion
19 that he was not performing his duties diligently
20 because he did not correct his lack of understanding
21 of the procedures?

22 MR. COCHRAN: Objection. That's leading.
23 The witness has stated his interpretation.

24 MR. DAVIDSON: I think it's devastating
25 as it is, but I want to get some more facts on the

1 record just to show how fair-minded Mr. Snellgrove's
2 determination was.

3 BY MR. DAVIDSON:

4 Q Did Mr. Bronson despite the counseling
5 provided to him ever improve?

6 A No, sir.

7 Q Did you form a conclusion as to why he
8 failed to improve in his understanding of the
9 procedures?

10 A No, not in exact, no.

11 Q In testimony earlier in this proceeding,
12 Mr. Bronson's performance on the job was characterized
13 as that of being a loafer. Would you say that was
14 a fair characterization?

15 A Yes, sir. That could very well cover it.

16 Q You stated earlier, Mr. Snellgrove, that
17 you observed Mr. Bronson on a daily basis.

18 A Yes, sir.

19 Q Throughout the work shift?

20 A Yes, sir.

21 Q Where was your office located, Mr.
22 Snellgrove?

23 A It was located over on what is called
24 the West Island, which is the west side of the plant.

25 Q Was that in a building or --

1 A Trailer.

2 Q It was in a trailer.

3 A Yes.

4 Q Did members of your crew have access
5 to that trailer?

6 A Yes.

7 Q For what purpose did they use the trailer
8 other than to see you?

9 A It was a place that retained the procedures
10 and instructions for reference, communications, along
11 with myself as needed.

12 Q Did inspectors on your crew also have
13 meetings there?

14 A Yes, sir.

15 Q Did they eat their lunch there?

16 A Yes, sir.

17 Q Did you eat your lunch there?

18 A Yes, sir.

19 Q Did Mr. Bronson make use of the trailer?

20 A He would to a minimal amount, yes.

21 Q Did you observe him eating lunch with
22 anyone?

23 A No, sir.

24 MR. COCHRAN: Objection as to relevance.

25 MR. DAVIDSON: Perhaps I can supply a

1 foundation for that.

2 BY MR. DAVIDSON:

3 Q Based on your observations on a daily
4 basis of Mr. Bronson, did he have any friends among
5 the group of inspectors under your supervision?

6 MR. COCHRAN: Objection as to relevancy.

7 THE WITNESS: I would say no.

8 BY MR. DAVIDSON:

9 Q Do you know whether Mr. Bronson had
10 any friends in the work force?

11 MR. COCHRAN: Objection to relevancy.

12 THE WITNESS: None that I'm aware of.

13 BY MR. DAVIDSON:

14 Q Based on your experience -- based upon
15 your observations of Mr. Bronson on a daily basis
16 and your observations of his expressed attitudes
17 and opinions, did you form a conclusion as to
18 whether Mr. Bronson was a popular member of the
19 work force?

20 MR. COCHRAN: Objection as to relevancy.

21 THE WITNESS: Yes. The conclusion was really
22 that, you know, he was a man of -- a loner, I
23 guess you could say.

24 BY MR. DAVIDSON:

25 Q Was he unpopular?

1 A Yes, he was.

2 Q Mr. Snellgrove, you were Mr. Bronson's
3 immediate superior during the four months he was
4 assigned to the hanger inspection crew under Mr. James
5 Patton's superintendency; is that correct?

6 A Yes.

7 Q Did you have occasion to observe his
8 record of attendance at work?

9 A Yes, we did.

10 Q Could you tell us what Mr. Bronson's
11 record of attendance was?

12 A Very poor, very poor.

13 Q When you say very poor, Mr. Snellgrove,
14 do you mean that he missed a lot of time at work?

15 A Yes, he did.

16 Q Do you mean that he left early on some
17 days?

18 A Yes.

19 Q That he came in late on some days?

20 A Yes.

21 Q Was this a chronic problem for Mr. Bronson?

22 A Yes, it was.

23 Q In terms of the average or normally
24 anticipated absenteeism for inspectors, how would
25 you rate Mr. Bronson's attendance?

1 A The worst.

2 Q Was it an acceptable record, sir?

3 A No, sir.

4 Q Could it have resulted in his termination?

5 A Yes, it could have.

6 Q Do you know whether it did?

7 A No, sir, I do not.

8 Q Do you know the circumstances of

9 the termination of Mr. Bronson's employment?

10 A No, I do not.

11 Q Mr. Snellgrove, are you familiar with

12 the certifications achieved by your inspectors,

13 the inspectors that work under your supervision?

14 A Yes, sir.

15 Q Do you have access to their certification

16 files?

17 A Yes, sir.

18 Q So that you know or can determine whether

19 an inspector under your jurisdiction has been

20 certified in a particular discipline?

21 A Yes, sir.

22 Q And you can determine when he was

23 certified?

24 A Yes.

25 Q And you can determine when he received his

1 training and when he took his test?

2 A Yes.

3 Q And whether he passed that test?

4 A Yes.

5 Q And the dates for the administration
6 of those tests?

7 A Yes.

8 Q Was Mr. Jeff McComas under your supervision
9 during the time that Mr. Bronson was employed at
10 Comanche Peak?

11 A Yes.

12 Q Do you know whether Mr. McComas had the
13 certification appropriate to his job responsibilities?

14 A Yes, he did.

15 Q In testimony earlier filed in these
16 proceedings, Mr. Bronson contends that Jeff McComas
17 was permitted to take his certification examination
18 with approximately two years between the specific
19 general tests and the practical. Do you know from
20 your recollection whether that assertion is accurate?

21 A No, sir, I do not.

22 Q Do you recollect ever having seen the
23 certification filed of Mr. McComas?

24 A Yes, sir. I had seen it.

25 Q Would a two-year interruption between the

1 time of the administration of the specific general
2 test and the practical test be something that you would
3 notice?

4 A No, sir, it would not.

5 Q In other words, that would not cause
6 you to take notice?

7 MR. COCHRAN: Objection. That's leading.
8 The witness has already said repeatedly he does
9 not know.

10 THE WITNESS: That particular area
11 really belongs to another party rather than myself.

12 BY MR. DAVIDSON:

13 Q Who was that other party, Mr. Snellgrove?

14 A That would have been the appropriate
15 level 3.

16 Q The training person, level 3 is a
17 training person?

18 A No, sir. He is the certifier, if you will.

19 Q The person who certifies?

20 A Who validates that a person has the
21 required data, training, documentation, et cetera,
22 to validate his certification to a certain discipline.

23 Q Who was that person at the relevant
24 time, that is, the time here when Mr. Bronson -- when
25 Mr. McComas and Mr. Bronson were under your supervision?

1 A I believe at that time frame it was
2 Mr. Ed Opelsky and Ron Washington, I believe it
3 was. There was two of them.

4 Q Thank you.

5 Mr. Snellgrove, Mr. Bronson has stated
6 in earlier testimony filed here that he was concerned
7 because, as he stated, hanger engineers would
8 come along and change the blueprint and I assume
9 he meant drawing there, if he, meaning Bronson,
10 refused to go along with what, quote, they wanted
11 to do, closed quote.

12 Do you understand what his complaint there
13 was?

14 A What I get from that complaint is
15 simply the fact that an inspector is out in the
16 field performing an inspection of a particular
17 support. He might detect some type of a discrepancy
18 and a simple engineering evaluation could be performed
19 within a short time period by simply contacting
20 the appropriate engineer and following this up
21 with a CMC to document his evaluation and results
22 of that discrepant reported condition.

23 Q In other words, you understand Mr.
24 Bronson to be complaining about the fact that he
25 wanted to write someone up but instead the engineering

1 evaluation performing according to procedure
2 merely initiated a CMC.

3 A That's correct.

4 Q Is a CMC an authorized procedure?

5 A It's an authorized document.

6 Q It's a formal document?

7 A Yes.

8 Q And it's part of the program and procedures?

9 A Yes, it is.

10 Q Craft can request it?

11 A Yes, they may.

12 Q Can craft initiate it?

13 A Craft cannot initiate it, no, sir.

14 Q Who can initiate a CMC?

15 A The engineering department.

16 Q And we had testimony here earlier today --

17 MR. DAVIDSON: Off the record.

18 (Short recess taken.)

19 MR. DAVIDSON: Terri, could you read back

20 the last question?

21 (The reporter read the record as requested.)

22 MR. DAVIDSON: Can you go back one more?

23 (The reporter read the record as requested.)

24 MR. DAVIDSON: Thank you. I apologize.

25

1 Q Does the CMC have to be approved?

2 A Yes, it does.

3 Q Who approves it, Mr. Snellgrove?

4 A The engineers approve by the engineer who
5 originates it, and then it is approved by a second
6 engineer for the appropriate data, calculations.

7 Q Is there any subsequent approval of
8 the CMC?

9 A Yes. The final design and review group
10 engineering department reviews CMC's.

11 Q Is that an established procedure?

12 A Yes, sir.

13 Q And what results is a CMC, component
14 modification card, which is a formal document?

15 A Yes.

16 Q Do you know to whose supervision Mr. Bronson
17 was transferred when he left your immediate
18 supervision?

19 A Yes, I know.

20 Q Who was that individual?

21 A Denny Leigh.

22 Q It's your understanding that he moved
23 directly from your hanger inspection group to the
24 group supervised by Mr. Leigh?

25 A Yes.

1 Q What group did Mr. Leigh supervise?

2 A He was over the QC completions group, to
3 the best of my knowledge.

4 Q There was testimony earlier in this
5 proceeding that the QC completion group at that
6 time was under the supervision of a Mr. Dwight Woodyard.
7 Is that inaccurate?

8 A I really am not sure exactly who was
9 over what section in those other groups.

10 Q Do you know what group Mr. Leigh supervised
11 if it was not the completion?

12 A It was the document review group.

13 Q The document review group?

14 A Yes.

15 Q Is that a different group from the one
16 you just mentioned, completion engineering group?

17 A To my knowledge, it was a combination.

18 Q Did you ever have occasion to talk with
19 Mr. Leigh about Bob Bronson?

20 A Very seldom.

21 Q When you say very seldom, does that
22 mean you did on one or more occasions have a discussion
23 with him about Mr. Bronson?

24 A About Mr. Bronson, no, sir.

25 Q You never discussed Mr. Bronson with

1 Mr. Leigh?

2 A No, sir.

3 Q Did you ever have a conversation with
4 any other individual who had responsibility for
5 supervising Mr. Bronson?

6 A No, sir.

7 Q Did you ever have a conversation with
8 Mr. James Patton?

9 A Yes, sir.

10 Q He was your immediate supervisor?

11 A Yes, sir.

12 Q Did Mr. Patton have an opportunity to
13 observe directly on a regular basis Mr. Bronson's
14 performance?

15 A Yes, he did.

16 Q Do you know what Mr. Patton's opinion
17 of Mr. Bronson's performance was?

18 MR. COCHRAN: Objection. That's hearsay.

19 MR. DAVIDSON: I think it's an improper
20 question, I agree. I withdraw the question.

21 Let me rephrase it.

22 BY MR. DAVIDSON:

23 Q Did Mr. Patton ever express to you his
24 opinion of Mr. Bronson's performance?

25 A Yes, he did.

1 Q And what did he say?

2 MR. COCHRAN: Objection. That's hearsay.

3 MR. DAVIDSON: We will offer that for
4 his statement. We have his earlier testimony. We
5 would offer it for the statement he made to Mr.
6 Snellgrove.

7 MR. COCHRAN: It's cumulative.

8 MR. DAVIDSON: We will offer it for
9 the fact of its utterance rather than the truth of the
10 matter asserted. We will rely upon Mr. Patton's
11 testimony for it's truth.

12 BY MR. DAVIDSON:

13 Q Mr. Snellgrove, did Mr. Patton express
14 his opinion about Mr. Bronson's performance and what
15 was that opinion stated?

16 A Yes, he did, and he felt that he was a
17 loafer.

18 Q Did Mr. Patton express his opinion as to
19 Mr. Bronson's understanding of procedures?

20 A Yes, he did.

21 Q And what did he say?

22 MR. COCHRAN: I have the same objection.
23 I assume you're making the same limited offer.

24 THE WITNESS: He stated that in his
25 interpretation Mr. Bronson was not fully understanding

1 or knowledgeable of the procedure requirements.

2 Q Did you ever discuss with Mr. Patton
3 Mr. Bronson's assertions that his superiors were
4 incompetent?

5 A Yes, sir, I mentioned it to him.

6 Q What was Mr. Patton's response?

7 A Sort of a chuckle.

8 MR. VOEGELI: I didn't hear that. What
9 was that?

10 THE WITNESS: A chuckle.

11 BY MR. DAVIDSON:

12 Q Did Mr. Bronson ever tell you that he thought
13 that you were incompetent?

14 A Not directly to me, no, sir.

15 Q You say not directly to you?

16 A Yes.

17 Q Do you mean to say that you heard him
18 say it to someone else?

19 MR. COCHRAN: Objection. That's leading.

20 MR. DAVIDSON: I'm sorry.

21 BY MR. DAVIDSON:

22 Q Did you hear him say that you were incompetent
23 to someone else?

24 A No, sir, I did not.

25 Q Did someone report to you that Mr. Bronson

1 had told them you were incompetent?

2 MR. COCHRAN: Objection. That's hearsay.

3 MR. DAVIDSON: I will offer it merely for
4 the assertion and utterance and not for the truth
5 of the matter there stated. For that limited purpose,
6 you may answer the question, Mr. Snellgrove.

7 THE WITNESS: No, sir.

8 MR. DAVIDSON: That concludes my questions
9 at this time.

10 Mr. Voegeli, do you have any questions?

11 MR. VOEGELI: I have no questions.

12 MR. COCHRAN: I have a few, and I think
13 we can finish up very quickly.

14 EXAMINATION

15 BY MR. COCHRAN:

16 Q Do you know the circumstances behind
17 Richard Smith leaving Brown & Root?

18 A I have some in between -- I am not positive
19 of what I heard, just hearsay, again.

20 MR. DAVIDSON: Now, wait a minute --

21 BY MR. COCHRAN:

22 Q Who did you hear it from?

23 MR. DAVIDSON: One second, now, Mr. Snellgrove.
24 I have to tell you, you shouldn't make the hearsay
25 objections. Mr. Cochran makes those. Occasionally

XXXXXX

1 I do. You are not allowed to. But if the question
2 is questionable, I will certainly try to do my job.

3 Could you repeat the question, Terri?

4 MR. COCHRAN: The original question?

5 MR. DAVIDSON: Yes.

6 (The reporter read the record as requested.)

7 THE WITNESS: No.

8 BY MR. COCHRAN:

9 Q Do you know that he no longer is in
10 Brown & Root's employ?

11 A No, I do not.

12 Q Is he employed by anybody at the Comanche
13 Peak site?

14 A I do not know.

15 Q When the last time you saw Richard Smith?

16 A The day he left.

17 Q You know he left, then?

18 A He left, yes.

19 Q Okay. You know he hasn't been back?

20 A To my knowledge, he hasn't.

21 Q Okay. So you know he's not employed
22 out there, don't you?

23 A Yeah.

24 MR. DAVIDSON: Now, wait a minute. That's
25 a leading question and argumentative.

1 Mr. Snellgrove, when you say the day he
2 left, you mean the day he left your supervision
3 or the day he left --

4 MR. COCHRAN: I object.

5 MR. DAVIDSON: Now, wait a minute.

6 I'm sorry. What did you mean, sir?

7 THE WITNESS: The day he left under my
8 supervision.

9 MR. DAVIDSON: That's why your follow-up
10 question was inaccurate.

11 BY MR. COCHRAN:

12 Q Do you know why he quit?

13 MR. DAVIDSON: Objection. That is clearly
14 a leading question. Mr. Snellgrove has already
15 testified that he does not know the circumstances of
16 Mr. Smith's termination, and indeed does not even
17 know if he has left the employ of Comanche Peak.

18 BY MR. COCHRAN:

19 Q Do you know why he left your supervision?

20 A No, I do not.

21 Q Has anybody ever told you why he left
22 your supervision?

23 A No.

24 Q When you earlier said that you knew only
25 rumor and hearsay, can you identify the persons
for me from which that rumor and hearsay originated,

1 just the names?

2 A No, sir.

3 Q You don't know?

4 A No, sir.

5 Q You don't remember?

6 A I don't know.

7 Q Okay. Let me see if I understand this
8 procedure relating to initiating CMC's when
9 Mr. Bronson would find a nonconforming item on a
10 hanger.

11 MR. DAVIDSON: I'm going to object if that's
12 a preface to a question.

13 MR. COCHRAN: That was just by way of
14 introduction as to what the subject matter is going
15 to be.

16 MR. DAVIDSON: Oh, fair enough.

17 BY MR. COCHRAN:

18 Q Did I understand your testimony to be that
19 Mr. Bronson was complaining that when he wrote an
20 NCR relating to some nonconforming item on a hanger
21 that the hanger engineers would come out and
22 process a CMC and that he was complaining about that?

23 MR. DAVIDSON: I'm sorry. I didn't --

24 MR. COCHRAN: Is that correct?

25 MR. DAVIDSON: I'm sorry. I didn't hear

1 the question.

2 BY MR. COCHRAN:

3 Q Did I correctly understand your earlier
4 testimony to be that Mr. Bronson was complaining
5 that CMC's were being initiated rather than correcting
6 the problem that he was complaining of on hangers?

7 MR. DAVIDSON: I'm going to object to
8 that. I think it has several premises. I think
9 it's argumentative and --

10 MR. COCHRAN: I'm just asking him if I
11 correctly understood his prior answers.

12 MR. DAVIDSON: I don't think the witness
13 should be put into the position of having to
14 recollect the testimony correct. You either recollect
15 the testimony correctly or not. Fortunately, we
16 don't have to rely on your memory.

17 And now, if you have a question for the
18 witness, he can answer it. I'm not going to let
19 him answer that one.

20 BY MR. COCHRAN:

21 Q Let me rephrase it this way. Did
22 Mr. Bronson complain to you that he had written an
23 NCR on a hanger in relation to a defect on a hanger,
24 and rather than correcting the problem that a CMC
25 was initiated?

1- MR. DAVIDSON: Are you having difficulty
2 with that question?

3 THE WITNESS: Yes. I don't fully
4 understand.

5 BY MR. COCHRAN:

6 Q Could you explain your difficulty and
7 I'll try to --

8 A I don't know how to explain. I don't
9 understand.

10 MR. DAVIDSON: I think maybe I can
11 clarify. My understanding is, and don't take
12 this as testimony, but I think this may help you
13 phrase the question as you want it, Mr. Cochran,
14 is that the initiation of a CMC is a form of
15 disposition of an NCR. It's in fact a correction.

16 BY MR. COCHRAN:

17 Q Is that what you're hung up on?

18 A Yes, it is.

19 Q All right. Let me rephrase that, then.

20 Did Mr. Bronson complain to you about
21 CMC's being initiated as a corrective method rather
22 than the actual physical item being changed?

23 A Yes.

24 Q Was his complaint that rather than changing
25 the physical item, then, it was merely being

1 papered over?

2 MR. DAVIDSON: I object to the form of
3 that question of the characterization "papered over."
4 If you mean, was it being handled by proper
5 procedure --

6 BY MR. COCHRAN:

7 Q Do you understand what I mean by "papered
8 over"?

9 A If you mean procedure, yes.

10 Q That is the paperwork being changed
11 to conform to the item rather than the item being
12 changed to conform to the specifications under
13 which it was supposed to have been built?

14 A Yes.

15 Q That was his complaint?

16 A Yes.

17 MR. COCHRAN: I don't believe I have any
18 other questions.

19 MR. DAVIDSON: I have just one or two questions
20 with relation to the last exchange between Mr. Cochran
21 and the witness, Mr. Snellgrove.

22 EXAMINATION

23 BY MR. DAVIDSON:

24 Q Mr. Snellgrove, was Mr. Bronson, to your
25 knowledge, an engineer?

XXXXX

1 A To my knowledge, no, sir.

2 Q Was it a part of the job of QC inspectors
3 to make engineering evaluations?

4 A No, sir.

5 Q Whose job was that, sir?

6 A Engineering.

7 Q Could a QC inspector initiate a CMC?

8 A No, sir.

9 Q Who would a QC inspector have to go to
10 to have a CMC initiated?

11 A It would have to interface with the
12 appropriate engineer.

13 Q Only engineers were empowered to make that
14 decision?

15 A That's correct.

16 Q If an NCR were to be filed, whose
17 responsibility was it to disposition the NCR?

18 A Engineering.

19 Q What were the means by which an NCR could
20 be dispositioned by engineering?

21 A There again, this depends on the type
22 of disposition that they prefer, whether it's
23 use as is, they would simply use as is. If it
24 required documentation changes such as CMC's to reflect
25 the as-built conditions, then the appropriate CMC

1 would be initiated and so indicated by number in
2 the disposition portion of the NCR.

3 Q Could they also initiate a DCA, that
4 is, a design change authorization, which would
5 be, I guess, more global than a CMC?

6 A Yes, a DCA could be originated.

7 Q Could one of the dispositions be to
8 remove the work and have it redone?

9 A Yes, that's possible.

10 Q Could one of the dispositions be that
11 the work was acceptable in the form?

12 A That's a use as is, yes.

13 Q Use as is. So that the filing of an NCR
14 didn't necessarily result in work being moved, but
15 merely having it reviewed for an engineering
16 evaluation.

17 MR. COCHRAN: Objection. That's leading.
18 It's really not even a question. It's argument.

19 MR. DAVIDSON: That's right. I'm afraid
20 I have to agree with Mr. Cochran. It certainly was.

21 Let me see if I can rephrase that in an
22 acceptable manner.

23 BY MR. DAVIDSON:

24 Q In other words, an NCR did not always
25 result in the removal of the as-built equipment?

1 A That's correct.

2 Q Wasn't an NCR merely a means to obtain
3 and engineering evaluation of the condition
4 identified by the inspector?

5 A Yes.

6 Q You testified, Mr. Snellgrove, that Mr.
7 Bronson complained to you about the fact that these
8 matters were being dispositioned by CMC's.

9 A Yes.

10 Q Was that disposition according to procedure?

11 A That was within the program, yes, sir.

12 Q Do you draw a conclusion about Mr.
13 Bronson's understanding of procedure based upon the
14 fact that he was complaining about accepted parts
15 of the program?

16 A Yes, sir.

17 Q What was that conclusion?

18 A Simply again that he did not know the
19 total program and how the CMC's were being originated,
20 and approved by the appropriate engineering departments.

21 Q Based on that complaint and your conversation
22 with him surrounding it, did you form a conclusion
23 as to whether he understood the NCR process and
24 procedure?

25 A Yes.

1 Q And what conclusion was that?

2 A The simplest conclusion was that, again,
3 he did not know the difference at the time, you know,
4 when an NCR had to be written and when an NCR
5 didn't have to be written.

6 Q From that conversation and that complaint,
7 Mr. Snellgrove, did you form a conclusion as to
8 Mr. Bronson's understanding of the dispositioning
9 process?

10 A Of the dispositioning process, no, sir.

11 MR. DAVIDSON: I have no further questions
12 for Mr. Snellgrove at this time.

13 Mr. Voegeli?

14 MR. VOEGELI: I have no questions.

15 MR. COCHRAN: I have no further questions.

16 MR. DAVIDSON: Mr. Cochran, you have at
17 this time an opportunity to close the evidentiary
18 record and take a discovery deposition of Mr.
19 Snellgrove if you wish.

20 MR. COCHRAN: All of our discovery in these
21 proceedings are evidentiary in nature -- all of
22 our questions in these proceedings are evidentiary
23 in nature.

24 MR. DAVIDSON: I will accept your first
25 characterization.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

In any event, the record is closed with respect to this witness.

(Whereupon, at 12:20 p.m., the deposition was concluded.)

MILLERS FALLS
EVERETT
COTTON WATSON

1 CERTIFICATE OF PROCEEDINGS

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

5 In the matter of: Comanche Peak Steam Electric
6 Station, Units 1 and 2

7 Date of Proceeding: July 10, 1984

8 Place of Proceeding: Glen Rose, Texas

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

11
12 TERRI L. HAGUE

13 Official Reporter - Typed

14 *Terri L. Hague*

15 Official Reporter - Signature
16
17
18
19
20
21
22
23
24
25