

ORIGINAL

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the matter of:

TEXAS UTILITIES ELECTRIC
COMPANY, et al

Docket No. 50-445
50-446

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

Deposition of: Fred Coleman

Location: Glen Rose, Texas

Pages: 35,079-35,125

Date: Monday, July 9, 1984

*Original to E. Pleasant
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1 copy to Eric Johnson, Region IV*

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1 UNITED STATES OF AMERICA
2 NUCLEAR REGULATORY COMMISSION

3 BEFORE THE ATOMIC SAFETY & LICENSING BOARD
4

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

11 Glen Rose Motor Inn
12 Glen Rose, Texas

13 July 9, 1984

14 Deposition of: FRED COLEMAN,
15 called by examination by counsel for Intervenors,
16 taken before Mimie Meltzer, Court Reporter,
17 beginning at 2:05 p.m., pursuant to agreement.
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MM/mm

1 APPEARANCES:

2 FOR THE APPLICANT:

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C O N T E N T S

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WITNESS:	Examination by:	Page:
FRED COLEMAN	Mr. Sosnick	35,084
	Ms. Chan	35,121
	Mr. Philips	35,121
	Mr. Sosnick	35,123

P R O C E E D I N G S

1
2 Whereupon,

3 FRED COLEMAN

4 was called as a witness and, having been first duly sworn,
5 was examined and testified as follows.

6 MR. SOSNICK: I would like to introduce myself.
7 My name is Charles Sosnick. I am here today representing
8 Intervenors.

9 We have learned that it may be the custom of
10 Applicants' counsel to put forth an opening statement and we
11 would expressly reserve any rights we may have to do so at a
12 later time.

13 If anyone else would like to proceed with a statement
14 please do so.

15 MR. PHILIPS: I would like to read an opening state-
16 ment into the record, please.

17 My name is Malcolm Philips. I am a member of the
18 law firm of Bishop, Liberman, Cook, Purcell and Reynolds,
19 counsel for Texas Utilities Electric Company, Applicants in
20 this proceeding.

21 I appear here today in that capacity.

22 Before proceeding further, I wish to point out that
23 Mr. Coleman is appearing voluntarily and that he is not under
24 subpoena. Mr. Coleman's testimony has been requested from the
25 Applicant by CASE, Intervenor in this case, on the topic

1 specified in CASE's letter to Leonard W. Bleter, dated June 27,
2 1984, a copy of which has been marked for identification by
3 the reporter and appended to the transcript of Mr. Vega's
4 deposition as Exhibit A.

5 The Applicant has already noted its objections to
6 the deposition procedures and schedule ordered by the Board,
7 and it intends no waiver of those objections by Mr. Coleman's
8 appearance today.

9 At this time, I would like to summarize the guide-
10 lines established by the Board for this proceeding and the
11 taking of this deposition.

12 Under the Order issued by the Board on March 15, as
13 modified by a series of subsequent telephone conference rulings,
14 the scope of this deposition is limited to the taking of
15 evidence and the making of discovery on harassment, intima-
16 tion or threatening of Quality Assurance/Quality Control
17 (that is, "QA/QC") personnel. With one exception, allegations
18 regarding any claimed harassment or intimidation of craft
19 personnel have been specifically ruled by the Board to be beyond
20 the scope of this examination and these proceedings.

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

25 Finally the Board has instructed the parties to

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

6 The issues for this portion of the deposition are
7 defined by CASE's letter of June 27, a copy of which has been
8 marked as Exhibit A to Mr. Vega's deposition.

9 At the conclusion of that evidentiary deposition,
10 the evidentiary record would be closed. And, with the opening
11 of a new transcript -- to be separately bound -- the discovery
12 deposition of Mr. Coleman would commence, should CASE decide
13 to conduct such a deposition.

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

20 MR. REYNOLDS: My name is Chris Reynolds, from the
21 firm Gibbs and Ratliff in Houston, Texas.

22 I am here today to represent the interests of
23 Mr. Coleman individually. He has volunteered to testify here
24 today to facilitate the efforts of the NRC to rule on the
25 licensing application of TUECO.

1 He is not testifying subject to subpoena. He is a
2 third party who is not associate with TUECO.

3 MS. CHAN: My name is Elaine Chan. I am with the
4 Office of Executive Legal Director, representing the NRC
5 Staff.

6 MR. SOSNICK: As a preliminary, and not to offer
7 as an opening statement, Intervenor would inject objections
8 to the generic opening statement of Applicant, in that it may
9 seek to limit the scope of these proceedings or may seek to
10 impose Applicants' understanding of the procedures to be
11 instituted today, which have and I suppose continue to be an
12 item of disagreement.

xxx

EXAMINATION

13 BY MR. SOSNICK:
14 Q Just to make the record clear, Mr. Coleman, you
15 are here voluntarily, is that correct, sir?

16 A Yes, sir.

17 Q Mr. Coleman, have you ever had your deposition taken
18 before?

19 A Yes, sir.

20 Q Under what circumstances was that?

21 A I guess it is for the hearings in Fort Worth.

22 Q In relation to what?

23 A Under the Stiner allegations.

24 MR. PHILIPS: To clarify something, Mr. Coleman,
25 I believe you are confusing the deposition with actually

1 testifying in the evidentiary proceeding.

2 Have you ever had a deposition taken, as we are
3 doing here?

4 THE WITNESS: Yes -- like this? No, not like this.

5 MR. REYNOLDS: You have only testified under oath
6 in court at a hearing?

7 THE WITNESS: Yes, sir.

8 MR. SOSNICK: Let's get a few groundrules down, then
9 everything will go smoothly today. This is akin to testimony
10 in court. It is taken under oath under penalty of perjury.
11 We take a written record of these proceedings.

12 So because of that, we have to make sure that you
13 understand everything I ask clearly and that everyone here
14 understands your response. In order to do that, please wait
15 until I finish my question before you respond.

16 All right? Is that all right?

17 THE WITNESS: Yes, sir.

18 MR. SOSNICK: Also, if you don't understand any of
19 my questions, please ask me to repeat them, rephrase them or
20 to clarify them and I will be happy to do so.

21 Also, it is necessary to respond audibly to my
22 questions. A nod or a shake of the head can't be picked up.
23 We only write down what is said verbally and can be heard by
24 the court reporter.

25 Also, I would like to know are you under any

1 medication at this time?

2 THE WITNESS: No, sir.

3 BY MR. SOSNICK:

4 Q All right, Mr. Coleman, what is your occupation?

5 A I am a Level 2 QC inspector, Comanche Peak.

6 MR. PHILIPS: If I might interject, at this point
7 Mr. Coleman's resume is appended to Applicants' Exhibit 177,
8 as Attachment C, to perhaps speed things along a little bit.

9 In addition, a substantial number of questions were
10 asked regarding his background in the previous proceeding at
11 transcript pages 11549 to 50.

12 BY MR. SOSNICK:

13 Q How long have you been a Level 2 QC inspector at
14 Comanche Peak?

15 A Since August 30th last year.

16 Q That would be 1983?

17 A Yes, sir.

18 Q Very quickly, what was your position at Comanche Peak
19 prior to that?

20 A I was a welder.

21 Q Did you have any supervisory capacity?

22 A Yes, sir.

23 Q What was that?

24 A I was welding foreman.

25 Q And for what period of time were you a welding

1 foreman?

2 A 19 -- November, 1979 through some time in '82, I
3 don't know -- in the summer months of '82 is all I can remember.

4 Q In the intervening period between 1982 and August 30,
5 1983, when you became a QC inspector, what did you do?

6 A I was a welder again.

7 Q Were you welding foreman?

8 A No, just a welder in that short period of time in
9 there.

10 Q And prior to 1979?

11 A I was a welder.

12 Q For how long were you a welder, sir?

13 A Hired in in August 30th of '76.

14 Q When did you first come to work for Comanche Peak?

15 A August 30th, 1976.

16 MR. PHILIPS: Mr. Coleman, when you were referring
17 to the time period when you were a welder, you meant a welder
18 at Comanche Peak, is that correct?

19 THE WITNESS: Yes, sir.

20 MR. SOSNICK: Thank you.

21 BY MR. SOSNICK:

22 Q Do you know a gentleman named Henry Stiner?

23 A Yes, sir.

24 Q Under what circumstances are you acquainted with
25 him?

1 A He worked for me when I was a welding foreman.

2 Q What was his position?

3 A Welder.

4 Q For how long did he work for you?

5 A Maybe four or five months, I am not exactly sure.

6 Q And that is the total period of time that Henry

7 Stiner --

8 A -- had worked under me, yes.

9 Q What was his position?

10 A Henry's position was a welder.

11 Q When did Henry Stiner first come to work for

12 Comanche Peak as far as you know?

13 A I don't have no idea.

14 Q Were you his first foreman?

15 A No, sir. He transferred out of the labor department

16 into --

17 Q What is the labor department?

18 A That is the department that laborers work out of.

19 Q Laborers?

20 A Laborers, yes.

21 Q What sorts of jobs do they perform?

22 A Sweeping, cleaning, carrying out trash.

23 Q When Mr. Stiner first became a welder, were you his

24 first foreman?

25 A I think so, yes.

1 Q Did Mr. Stiner require any special assistance when
2 he came to work for you as a welder?

3 A All new welders required a certain amount of
4 supervision extra.

5 Q To kind of show them the ropes?

6 A Yes, sir.

7 Q How to get the jobs done?

8 A How to get the jobs done by procedure and done right.

9 Q What is emphasized in having the job done right?

10 A Well, the weld joints, to make sure that he could
11 weld the joints that was assigned to him to weld.

12 Q How big a factor does time play, time in completing
13 a task?

14 A None.

15 Q Nothing?

16 A Nothing.

17 Q Is cost a factor? As a foreman with your crew?
18 Is that something you keep in mind when they are performing
19 a job?

20 A No, sir.

21 Q In other words, no one would tell you this job has
22 to be done a little bit quicker, it is costing too much money,
23 we have too much labor time?

24 A No, sir. Nobody has ever told me that.

25 Q As a foreman, do you ever have occasion or is it

1 a procedure to write reports as to how long it takes a
2 particular task to be completed by a particular individual
3 that you supervise?

4 A No, sir.

5 Q Did you ever have occasion to write any kind of an
6 evaluation report for the management at Comanche Peak?

7 A I think one time we filled out evaluations, but I
8 don't remember if it was in that time frame or not.

9 Q Is it a regular procedure to fill out evaluations
10 as to those you supervise?

11 A Yes, sir.

12 Q And whose job is that?

13 A The foreman's.

14 Q Had you ever filled out an evaluation report as to
15 Henry Stiner?

16 A I don't think so.

17 Q Why was that?

18 A Because he didn't work for me that long.

19 Q The review then is periodic?

20 A Yes, sir.

21 Q In what intervals?

22 A I think it is in six months.

23 Q Now if I recall correctly, you had been a welder
24 foreman for approximately three years?

25 A All told, yes.

1 Q I mean a welder foreman at Comanche Peak?

2 A Yes, sir.

3 Q And you became a Level 2 QC inspector as of
4 August 30, 1983, is that correct?

5 A Yes, sir.

6 Q Tell us what a Level 2 QC inspector is?

7 A Well, a Level 2 QC inspector is a person who is
8 certified in his procedures and is capable of going out and
9 buying off ASME components.

10 Q What do you mean by "buying off ASME components"?

11 A Well, pipe hangers --

12 Q Excuse me?

13 A Pipe hangers, piping.

14 Q What do you mean by "buying off"?

15 A When the people get through with them, they sign
16 up for QC to come down and verify and check everything.

17 Q What do you check?

18 A Everything.

19 Q Tell me what that is.

20 A I check the welds, the length of materials, the
21 heat numbers of the materials, the location, on and on.

22 Q Why do you check?

23 A Because it is by procedure.

24 Q What procedure would that be?

25 A What procedure?

1 ASME procedures, QC procedures.

2 Q Who writes the QC procedures?

3 A The Level 3's -- the Level 3.

4 Q I'm sorry, I think you misunderstood my question.
5 Who drafts the QC procedures, the things that you work off
6 of? Who wrote those up?

7 MR. PHILIPS: I think there may be a point of
8 confusion. Do you mean who -- it is as we all know, a very
9 extensive sign-off procedure. Who approved them? Drafted
10 them originally?

11 It is a substantial --

12 MR. SOSNICK: I will do it in series.

13 BY MR. SOSNICK:

14 Q When you go and inspect a particular item, what do
15 you refer to? Do you have a checklist?

16 A Yes, sir.

17 Q Who writes the checklist?

18 A I don't think I am -- it is coming through to me
19 what you are trying to ask me.

20 Q Is there a form you pick up for a particular item
21 that has a checklist on it?

22 A You have different type forms for different kinds of
23 things?

24 Q Who writes the forms?

25 A The forms are pretyped. You fill them.

1 Q I understand that, but who is the author of the form
2 as far as you know?

3 MR. REYNOLDS: He wants your personal knowledge
4 about what you know about who wrote the form.

5 THE WITNESS: The Level 3 QC writes the procedures,
6 him and I don't know who else.

7 BY MR. SOSNICK:

8 Q And you don't know who writes the forms then that
9 you pick up, for whatever particular checklist for a certain
10 item?

11 A No, I don't.

12 Q What qualifications are necessary to become a QC
13 inspector?

14 A You have got to have three years related experience
15 in the field and you have got to pass several tests.

End 1.

16 Q What kind of tests?
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1 A You have to pass a visual and an MIFI and practical.

2 Q How extensive are those tests? How long do they
3 take?

4 A You've got, I don't know exactly how many hours,
5 you have got several hours of classroom and you have got to
6 have a lot of time of actual doing the job, on the job
7 training, which they call OJT.

8 Q How many times did you take the various tests?

9 A Only one time.

10 Q One time and you were successful on each occasion?

11 A Yes, sir.

12 Q Now, how does one change jobs from a welding foreman
13 to a QC inspector? Does one have to apply for that switch in
14 jobs?

15 A I was a welder when I went into QC, not a welding
16 foreman.

17 Q Okay. How does one make that transition?

18 A Well, I went to the people and asked them, did they
19 need any more hands, because they had transferred some. And
20 they said yes, if you can get supervision from your supervisors
21 to come up and if you can pass the examinations and go through
22 all our training.

23 Q Is it a promotion of sorts?

24 A Yes. To me it was a promotion, yes.

25 Q Do you receive more money on this job?

1 A No, sir. I make the same money that I made as a
2 welder.

3 Q Is it an easier kind of work?

4 A It is a more challenging work to me, yes.

5 Q Is it a little easier physically?

6 A Yes, sir, it is.

7 Q Who did you ask to become a QC inspector?

8 A Bob Seivers.

9 Q Who is Bob Seivers?

10 A He is our supervisor.

11 Q At that time, when you asked him, he was your
12 supervisor?

13 A No. He was QC supervisor.

14 Q At the time that you asked him?

15 A Uh-huh.

16 Q What is his position now?

17 A Still a supervisor.

18 Q Whose permission did you need to receive to become
19 a QC inspector?

20 Let me just go back. You stated to me that you asked
21 Mr. Seivers if you could become a QC inspector. He said yes,
22 if your supervisors give you permission. Who's that?

23 A I had to go to my supervisors at that time. It would
24 have been Ken Liford.

25 Q Could you spell that?

1 A No.

2 MR. SOSNICK: Does someone have the spelling on
3 that?

4 MR. PHILIPS: L-i-f-o-r-d, I believe.

5 BY MR. SOSNICK:

6 Q What did Mr. Liford say when you asked him for
7 permission?

8 A The first time I asked him he said no way.

9 Q When was the first time that you asked him?

10 A About two months before I went into QC.

11 Q That would be approximately June, 1976?

12 A May or June, yes.

13 Q May or June, 1976.

14 A No, 198 --

15 Q I'm sorry, 1983.

16 MR. PHILIPS: Is this tying in?

17 MR. SOSNICK: Yes, it certainly will.

18 BY MR. SOSNICK:

19 Q When was the second occasion that you asked him?

20 A The second occasion they came to me and asked me
21 did I still -- would I still like to transfer into QC.

22 Q When did they ask you?

23 A When? I don't know the exact date.

24 Q What year?

25 A 1983.

1 Q Do you recall the month?

2 A It was just a couple of months after that there,
3 right before I went into QC.

4 Q So perhaps in the early part of August?

5 A July, August, yes.

6 Q July - August.

7 When you were a welder foreman and Mr. Stiner worked
8 under you, was there ever an occasion where you noticed a
9 defect in an item that he had been working on?

10 MR. PHILIPS: Would you please define what you mean
11 by defect?

12 BY MR. SOSNICK:

13 Q Was there something wrong with something he was
14 working on that you saw, anything at all?

15 A I can't think of anything right offhand. It has been
16 quite a few years.

17 Q Then you saw nothing that Mr. Stiner worked on that
18 was improper?

19 MR. REYNOLDS: He said he didn't recall.

20 THE WITNESS: No, sir.

21 BY MR. SOSNICK:

22 Q What was your answer?

23 A No, sir, I can't recall anything.

24 Q You don't remember?

25 A Uh-uh.

1 Q When you were a welding foreman and Mr. Stiner
2 worked for you, was there ever an occasion where you saw a
3 misdrilled hole anywhere at Comanche Peak?

4 A Anywhere at Comanche Peak?

5 Q Yes.

6 A I am sure I have seen misdrilled holes, yes.

7 Q Where did you see them?

8 MR. PHILIPS: To be clear, was this during the
9 time frame when --

10 MR. SOSNICK: Yes, I qualified that -- when Mr.
11 Stiner was --

12 THE WITNESS: I have no idea where it could be but
13 I am sure I have seen one somewhere in that plant. There was
14 lots of holes. I'm sure one of them must have been misdrilled
15 somewhere.

16 BY MR. SOSNICK:

17 Q What was done with these holes? If you saw one and
18 if it was in your area of jurisdiction at that time, what
19 would you instruct your men to do?

20 MR. PHILIPS: If I may just indicate that substantial
21 testimony was given on this in Applicants' Exhibit 177,
22 precisely the technique that was used to weld misdrilled holes,
23 precisely the methods used, so forth and so on.

24 MR. SOSNICK: I am not asking for technique. I am
25 asking him what he instructed or what he had someone do, and

1 that goes directly to the issue at hand.

2 BY MR. SOSNICK:

3 Q What would you instruct to be done when you saw
4 that?

5 MR. PHILIPS: If I could just again clarify, is this
6 as he walked up and saw a misdrilled hole or is this after
7 he had been given a paper to do something? It is not clear
8 precisely what you were referring to, the setting.

9 MR. SOSNICK: All right.

10 MR. REYNOLDS: We don't even know that he had
11 responsibility for misdrilled holes.

12 MR. SOSNICK: I am not asking for responsibility.

13 BY MR. SOSNICK:

14 Q Your testimony is that you have seen misdrilled
15 holes in the plant, is that correct?

16 A Yes, I have seen misdrilled holes in the plant.

17 Q What as far as you know is the procedure to correct
18 misdrilled holes at Comanche Peak?

19 MR. REYNOLDS: Safety or non-safety?

20 MR. SOSNICK: Let's start with safety.

21 THE WITNESS: What is the procedure?

22 BY MR. SOSNICK:

23 Q You were a foreman --

24 A Yes, and I have discovered a misdrilled hole?

25 Q What do you do next?

1 A I would report it, that the hole has been misdrilled
2 and that we need the proper paperwork to make a weld repair.

3 Q Who do you report it to?

4 A I would report it to my general foreman and he would
5 take care of it from there.

6 Q As to non-safety items, what would you do if you
7 saw the misdrilled holes?

8 A I didn't work on non-safety items.

9 Q All right.

10 A Are you telling me then that the holes, misdrilled
11 holes you have seen related to safety items --

12 A Well, on the cable tray supports they were AWS welds.
13 They are not the same as on pipe hangers and stuff like that.

14 A You can repair misdrilled holes on cable tray
15 supports, but not on ASME pipe hangers.

16 Q Did you ever instruct anyone to repair a misdrilled
17 hole?

18 A I don't think I ever did.

19 Q Did you ever instruct Henry Stiner to perform a
20 plug weld on a misdrilled hole?

21 A I don't ever remember Henry plugging a weld, I mean
22 plugging a hole.

23 Q Do you know what a plug weld is, sir?

24 A I know what a plug weld is, yes, sir.

25 Q Why don't you tell us what that is?

1 MR. PHILIPS: That has been extensively testified
2 to with regard to Applicants' Exhibit 177.

3 BY MR. SOSNICK:

4 Q You know what it is, then, sir?

5 A I know what a plug weld is.

6 MR. PHILIPS: Mr. Coleman is one of the witnesses
7 that adopted that testimony.

8 BY MR. SOSNICK:

9 Q Have you ever seen a plug weld being performed at
10 Comanche Peak?

11 MR. PHILIPS: Let me interject a clarification point
12 because I don't think -- this was again the subject of
13 extensive clarification on the record and it had to do with
14 the term "plug weld" as opposed to welding a misdrilled hole.
15 A plug weld, as was testified in the record, is a different
16 animal and that is not what Stiner was testifying to or what
17 his concerns are. He is concerned about repairing misdrilled
18 holes and there is extensive evidence on that in the record.

19 MR. SOSNICK: I have asked the witness if he knew
20 what a plug weld was. He answered that affirmatively. He
21 said it is extensively briefed in his testimony and I am going
22 further now.

23 MR. PHILIPS: Okay.

24 BY MR. SOSNICK:

25 Q Have you ever seen a plug weld performed at Comanche

1 Peak?

2 A Not a plug weld, no.

3 Q Did you ever instruct Henry Stiner to perform a
4 plug weld at Comanche Peak?

5 A Not a plug weld, no.

6 Q Did you ever instruct Henry Stiner to repair a
7 misdrilled hole at Comanche Peak?

8 A No, sir.

9 Q Have you ever instructed anyone to repair a
10 misdrilled hole at Comanche Peak?

11 A I don't believe I ever have, no.

12 MR. PHILIPS: Again, a point of clarification to
13 your question. When you say "instructed anyone to repair"
14 do you mean Mr. Coleman directing the person to repair
15 initially or Mr. Coleman supervising while the person repaired
16 that worked under him after he was directed in paperwork to
17 do it?

18 MR. SOSNICK: I think the question was fairly clear.
19 Did you ever initiate, did you ever instruct anyone to repair?
20 Did you understand it to mean that, that I was asking?

21 Did you ever go up to anybody and ask them to repair?

22 A I don't believe I ever have. It is possible, but
23 I don't ever remember doing that.

24 Q But that is possible?

25 A It is possible that it could have happened, yes.

1 Q If it were possible, under what circumstances would
2 it be so possible?

3 MR. REYNOLDS: Don't speculate. If you know some-
4 thing --

5 THE WITNESS: I don't know of any holes. I mean
6 I don't know of one that I have told anybody to repair.

7 BY MR. SOSNICK:

8 Q If it is possible, sir, under what circumstances
9 would it be possible?

10 A I don't understand what you are trying to ask me.

11 Q I think you are, if it is possible that you may have
12 instructed someone to repair a misdrilled hole, under what
13 circumstances would it be possible?

14 A Oh, if we found a hole that needed to be repaired.

15 Q What is the established procedure for repairing
16 misdrilled holes?

17 A Now you wanted to know how to plug it, or the
18 procedure?

19 Q No. You are the foreman?

20 A Yes, sir.

21 Q You find the misdrilled hole.

22 A Yes, sir.

23 Q What do you do?

24 A I go to my general foreman and tell him we found
25 holes that need to be repaired for redrilling. He would

1 initiate the paperwork.

2 Q And then what would happen?

3 A The paperwork would come back. We would have them
4 repaired.

5 Q Did you ever have occasion to work -- and we are
6 speaking of the time that you were the weld performer and
7 Henry Stiner was working under you, did you ever have occasion
8 to work in the South Yard Terminal at Comanche Peak -- excuse
9 me, South Yard Tunnel?

10 A I never worked down there myself, but I had some
11 people loaned out down there, yes.

12 Q What persons were those?

13 A I couldn't give you the names. It has been too
14 long ago.

15 Q Was Henry Stiner one of those persons?

16 A It seems to me that he did work down there, yes.

17 Q Okay, when did he work there?

18 A I couldn't tell you that. It was after I wasn't
19 welding foreman for them anymore.

20 Q When was Henry Stiner working under you?

21 A In early '81.

22 Q Any other time?

23 A No, not for me, I don't think.

24 Q How long did he work for you?

25 A Four or five months, I am not really sure.

1 Q And that was in 1981?

2 A Uh-huh.

3 Q Did you ever have occasion --

4 MR. PHILIPS: Let me interject one thing. I think
5 this is already subject to testimony in Applicants' Exhibit
6 177, as to the precise time that Henry Stiner worked for
7 Mr. Coleman, who he worked for, so forth and so on.

8 MR. SOSNICK: Okay, I don't want to waste anyone's
9 time to going into what has been said before, so I am not
10 going through that line by line.

11 These are just a few matters and I think that they
12 are not especically difficult lines and I think we can just
13 get through them very quickly.

14 BY MR. SOSNICK:

15 Q Did you ever have occasion to see misdrilled holes
16 in the South Yard Tunnel?

17 A No, sir.

18 Q Did you ever have occasion to see plug welds?

19 A No, sir.

20 Q In the South Yard Tunnel?

21 A No, sir.

22 Q You had men loaned out and working in the South
23 Yard Tunnel at some time?

24 A Yes, sir.

25 Q When was that?

1 A Some time in early '81.

2 Q And Henry Stiner, as you said, was one of those
3 persons?

4 A I am not real sure, but I think he worked in there,
5 yes.

6 Q If you had certain individuals working in a certain
7 part of the plant, would you have responsibility to see that
8 their work was performed properly?

9 MR. PHILIPS: There is a substantial amount of
10 testimony previously given on that in the record. I object
11 to the question.

12 MR. SOSNICK: Where is that in the record?

13 Off the record.

14 (Discussion off the record.)
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End 2.

1 MR. SOSNICK: Back on the record.

2 BY MR. SOSNICK:

3 Q Mr. Coleman, as a foreman, if you had people
4 loaned out in a differant part of the plant -- in other
5 words, they were working in a part where you were not
6 physically located, did you still have responsibility to see
7 that their work was performed properly?

8 A Yes, sir, because --

9 Q What's that?

10 A The people we loaned them to are still working
11 for our superintendent.

12 Q Okay.

13 And you would be the intermediary?

14 A (Nodding affirmatively.)

15 MR. PHILIPS: If I can have a point of
16 clarification.

17 (Discussion off the record.)

18 MR. PHILIPS: Back on the record.

19 BY MR. SOSNICK:

20 Q Just as a matter of clarification, I referred to
21 the term "loaned out," I meant the particular person working
22 under you was working in another physical location.

23 A Yes, sir.

24 Q Now, Mr. Coleman, is a plug weld considered
25 repair work?

1 A No, sir.

2 Q What is it considered?

3 MR. PHILIPS: Point of clarification.

4 When you use the word "plug weld," are you
5 referring to welding a misdrilled hole? Or are you referring
6 to plug welding in the true sense of the AWS plug welding,
7 ASME plug-welding concept?

8 MR. REYNOLDS: Does he understand what a plug
9 weld is?

10 MR. SOSNICK: We can go through both.

11 BY MR. SOSNICK:

12 Q Let's call it a plug weld of misdrilled holes.

13 A Everything we're speaking of misdrilled holes?

14 Q Right.

15 Now, this question is: Is a plug weld of a
16 misdrilled hole considered repair?

17 A Yes, sir.

18 Q Who would authorize such a repair?

19 MR. REYNOLDS: He's already testified who was
20 authorized to repair misdrilled holes, I believe.

21 MR. SOSNICK: I don't think he has testified.

22 MR. REYNOLDS: He said he went to his job
23 foreman.

24 BY MR. SOSNICK:

25 Q Is that your response, the general foreman would

1 authorize?

2 A No, he would get the paperwork, took care to
3 generate the repair.

4 Q Okay. Let's go into that for a moment.
5 Where would he give the --

6 A He would probably start out with --

7 MR. REYNOLDS: Don't speculate. Testify from
8 your personal knowledge.

9 BY MR. SOSNICK:

10 Q What is the nature of the paperwork that the
11 general foreman would use to authorize the plug weld repair
12 in a misdrilled hole?

13 A I really don't know the whole term, so I'd just
14 rather not answer that, because I just don't know.

15 Q You're a QC inspector. You don't know how
16 repairs are made?

17 A We do not repair holes in ASME baseplates.

18 Q You may inspect them though; is that correct?

19 A ASME and AWS are two different welds. I work at
20 ASME. I'm an ASME QC inspector.

21 Q Regardless of where the paperwork comes from --
22 and it comes through the general foreman, as you have stated
23 -- is that transmitted, then, to the foreman?

24 MR. PHILIPS: Object.

25 Are you testifying that it comes through the

1 general foreman?

2 MR. SOSNICK: No, the witness has testified to
3 that.

4 MR. REYNOLDS: You've testified the general
5 foreman did the things to initiate the paperwork.

6 MR. SOSNICK: Fine.

7 BY MR. SOSNICK:

8 Q Whenever those procedures are completed, are they
9 then transferred to the foreman?

10 A Yes, sir.

11 Q What does the foreman do with that?

12 A I can't see where you're coming from right now.
13 You're going to have to clarify it here a little bit.

14 MR. REYNOLDS: Why don't we find out what it is
15 the foreman gets.

16 MR. SOSNICK: That's a good question.

17 BY MR. SOSNICK:

18 Q What does the foreman get?

19 A I have no idea. I never got one that I know of.

20 Q Did you have occasion to receive something from
21 a general foreman which indicated to make a repair?

22 A Not on a plug weld.

23 Q When you received anything that indicated to
24 make a repair, did it come from your general foreman?

25 A The fitter's foreman brought all of that stuff

1 in. All I was is with the welders. All I did was sign,
2 write tickets.

3 Q If one of your men, one of the men working under
4 you, was to perform a repair on any item and it was something
5 that required the paperwork you referred to from the general
6 foreman, would you know about it?

7 MR. REYNOLDS: Please quit saying that, because
8 he didn't refer to paperwork from the general foreman. He
9 said the general foreman initiated the paperwork. He didn't
10 say what paperwork got things going.

11 I wish you'd quit mischaracterizing his testimony
12 that way. It's just wasting the guy's time, and you're
13 trying to put words in his mouth that he hasn't said.

14 MR. SOSNICK: I apologize, Mr. Coleman. I
15 certainly don't want to put words in your mouth.

16 BY MR. SOSNICK:

17 Q Whenever the final authorization came to do a
18 repair item and one of your men that was working under you
19 was to perform the repair, were you notified?

20 A I would sign the rod ticket to -- draw rods to
21 make the repairs.

22 Q What is a rod ticket?

23 A A weld-filler-material log.

24 Q After such a repair was made, was there any
25 additional paperwork done, as far as you know?

1 A If there was a misdrilled hole and the paperwork
2 -- yes, there would be paperwork for a QC inspector to come
3 in and inspect it.

4 Q And what would happen to that paperwork?

5 MR. PHILIPS: I'm going to have to object. We're
6 getting a little outside -- tie it up.

7 MR. SOSNICK: I'll tie it up quickly.

8 MR. REYNOLDS: Also, everyone must be mindful
9 of the fact that he's never worked with any misdrilled holes
10 on a repair order.

11 MR. SOSNICK: I'm speaking generically, about
12 repair work.

13 MR. REYNOLDS: This is, by and large,
14 speculation on his part.

15 MR. SOSNICK: I'm trying to get a procedure down.
16 This man was a foreman. Now he's a QC inspector.

17 BY MR. SOSNICK:

18 Q After a repair was made --

19 MR. PHILIPS: I think the witness has something
20 to say.

21 THE WITNESS: If you're speaking of repairs in
22 general, we work from RPSs that come directly from
23 Engineering.

24 MR. SOSNICK: Fine.

25

1 BY MR. SOSNICK:

2 Q After repair work is done, is there something that
3 indicates that repair work was so performed?

4 A Yes, sir.

5 Q What is that?

6 A There will be an RPS.

7 Q What is an RPS?

8 A A repair request. It's the paper that's
9 generated to do the repair, and then QC will come and
10 inspect it.

11 Q Now, after the paperwork is done, after the
12 repair that has been performed, does that go into a file?

13 A Yes, sir.

14 Q What file is that?

15 A In the end, it will wind up in the Department of
16 Plans' record vault.

17 Q Is that the QA vault?

18 A Yes, sir.

19 Q You're aware that Mr. Steiner has claimed
20 certain plug weld repairs of misdrilled holes will perform
21 in the south yard tunnel at Comanche Peak?

22 A No, sir, I didn't know that there was ever a
23 misdrilled hole in the south yard tunnel.

24 Q You've never heard of him before?

25 A No, sir.

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MR. REYNOLDS: Are you aware of the allegations?
Are you aware that the Stiners have claimed that happened,
whether it happened or not?

THE WITNESS: No, sir.

BY MR. SOSNICK:

Q Prior to appearing here today, sir, did you
review any documents in preparation for this deposition?

A Repeat that,

Q Prior to coming here today, did you review any
documents in preparation for this deposition?

A No, sir.

Q None at all?

A No, sir.

MR. PHILIPS: Let me be clear. When you say
"documents," you mean specifically documents filed by CASE?
Or do you mean such as his transcript, which clearly would
be documents? Or perhaps his prefiled testimony, which may
have been documents, things of this nature?

BY MR. SOSNICK:

Q Did you look at anything written?

A I looked at my transcript.

I thought you were speaking of documents. I
thought you were speaking of documents at the plant.

Q Sure.

You looked at your transcript?

1 A Yes.

2 Q Did you look at anything else?

3 A No, sir, not that I know of.

4 Q Since we got off the track a little bit, a normal
5 procedure is that once the repair is done, that the paperwork
6 that you refer to would be put in a file that the repair was
7 done.

8 MR. PHILIPS: I'm going to object to any further
9 line of questioning in this area. There's been an extensive
10 amount of testimony -- literally thousands of pages of
11 testimony that goes into QC procedures. QA process is how the
12 whole things works.

13 I don't see any relevancy where we get into the
14 intimidation issue, which is what we are here to deliberate.

15 MR. SOSNICK: It's a course of conduct, so it's
16 certainly relevant as a yes-or-no question. We don't have
17 to go through all those thousands of things.

18 Mr. Coleman.

19 MR. PHILIPS: What was the question?

20 MR. SOSNICK: Will you repeat the question.

21 (The reporter read the record as requested.)

22 MR. PHILIPS: I object. That's a leading
23 question, if it's a question at all.

24 BY MR. SOSNICK:

25 Q As a welder foreman, what incentives did you

1 give to those working under you to report any defects in any
2 items at Comanche Peak?

3 A I have always told them if there's a defect,
4 report it. Don't never weld nothing that's against
5 procedures.

6 Q Was there any policy encouraging that in the
7 plant?

8 A Yes, sir.

9 Q What was that?

10 A The safety of the plant is the most important
11 thing out there.

12 Q How many defects have you reported to QC while
13 you were a welder foreman or a welder?

14 A I couldn't say.

15 Q Any?

16 A I don't think I ever took anything to QC; no.

17 Q Did any men working under you ever take anything
18 to QC?

19 A Not that I know of, no.

20 MR. PHILIPS: Point of clarification.

21 When you say "taking things to QC," you mean
22 report, as opposed to the normal? Getting the QC inspector
23 to come in and sign off?

24 MR. SOSNICK: Yes, exactly.

25

1 BY MR. SOSNICK:

2 Q Now, then, Mr. Coleman, as a QC inspector coming
3 up on a year now, how many reports do you receive from crafts
4 people regarding defects in any items at Comanche Peak?

5 A I haven't, had anybody come to me personally, no.

6 Q Did you know that Mr. Stiner was terminated from
7 his employment at Comanche Peak?

8 A Yes, I knew he was terminated.

9 Q Did you see him on the day that he was terminated,
10 or did you talk to him?

11 A No, sir, I don't think I did.

12 Q Have you had occasion to speak with him since
13 his termination?

14 A Over the telephone, I talked to him one time
15 since he was terminated.

16 Q When was that?

17 A I think that's all in that testimony. I can't
18 remember the exact time, date.

19 Q Generally, what was the subject of that
20 conversation?

21 MR. PHILIPS: Object. It's in the record, and
22 substantial amounts, starting with transcript 11,552 until
23 11,565, then again at 11,606 and 7.

24 MR. SOSNICK: I'm not seeking the substantiated
25 amount, just generally.

1 MR. PHILIPS: Okay.

2 MR. REYNOLDS: I'll let you ask a couple of
3 questions. Otherwise, we're just going to refer to the
4 record.

5 BY MR. SOSNICK:

6 Q Generally, what was the substance of that
7 conversation, if you recall?

8 A He was wanting me to sign some kind of documents
9 or something. He wanted to press some charges or something
10 or other.

11 I never did make heads or tails, really, out of
12 what he was saying. But he wanted to file some kind of
13 grievance against the company or something.

14 Q Against which company?

15 A I guess it was TUGCO or Brown & Root, one. I
16 don't know which.

17 Q Do you know why Henry Stiner was terminated from
18 the Comanche Peak plant?

19 MR. REYNOLDS: Please exclude from your answer
20 anything you've heard in conversations with your attorneys
21 when you were seeking legal advice.

22 MR. SOSNICK: You're claiming your attorney-client
23 privilege?

24 MR. REYNOLDS: As between him and me, I am.

25 MR. SOSNICK: Is that your objection?

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MR. REYNOLDS: I'm asking him to exclude anything he learned in connection -- from his attorney in connection with seeking legal advice.

You can answer the question, but exclude from your question anything you might have learned from your attorney.

THE WITNESS: Hearsay is all I know. He got fired for not coming to work, absenteeism.

end 3

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BY MR. SOSNICK:

2 Q Is performance of plug welds in the plant
3 ever permissible without a specific repair order?

4 MR. PHILIPS: Point of clarification if I could
5 get you to try to say weld the misdrilled holes, because
6 it is a totally differnt thing.

7 MR. SOSNICK: Sure, fine. Thank you.

8 BY MR. SOSNICK:

9 Q Why don't we just call it plug welding of misdrilled
10 holes.

11 A What was the question again?

12 Q Is it ever permissible without a specific repair
13 order?

14 A I don't believe it is, no.

15 Q Have you ever shown anyone how to perform a plug
16 weld?

17 MR. PHILIPS: Object. That is in the record
18 currently in several places. It is clearly stated that he
19 has shown people.

20 BY MR. SOSNICK:

21 Q Was Henry Stiner one of those persons you showed
22 how to do a plug weld?

23 A I don't remember Henry ever plugging a hole.

24 Q Did you ever show him how to do one?

25 A I don't think think I did, no.

1 MR. SOSNICK: I have nothing further right now.

2 BY MS. CHAN:

3 Q I just wanted to clarify one point if I could,
4 Mr. Coleman.

5 You said you are certified in procedures for buying
6 off ASME components and ASME holes are not repaired. Is
7 that correct? Misdrilled holes.

8 A The repair of misdrilled holes, they can be
9 repaired. If it is engineering approved, they can be repaired.
10 But normally they do not repair them, they scrap it and
11 get a new item. We are speaking of baseplates.

12 Q All right.

13 In line with Intervenor's counsel's questions, did
14 the holes that you are referring to or he was referring to,
15 did you assume that they were ASME holes? You said you
16 never received a repair order, you never received instructions
17 to fill?

18 A I was confused between ASME and AWS until he got
19 over to any repairs. Then I understood he meant -- that is
20 what we had RPS to repair.

21 Q So you never understood that ASME holes --

22 A I didn't at the time, no.

23 MS. CHAN: Fine. Thank you.

24 BY MR. PHILIPS:

25 Q Just about three questions, Mr. Coleman.

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1 Did you at any time ever direct Mr. Stiner to
2 weld misdrilled holes in violation of procedures?

3 A No, sir.

4 Q Mr. Coleman, did you ever direct Mr. Stiner to
5 weld any time in violation of any procedures?

6 A No, sir.

7 Q Finally, Mr. Coleman, have you ever stood watch
8 for QC or QA personnel while Mr. Stiner was welding?

9 A No, sir.

10 Q Last two questions:

11 Mr. Coleman, you were asked a question as to your
12 understanding of the reason for Mr. Stiner's termination.
13 Could you please restate what your understanding of the
14 reason is?

15 MR. SOSNICK: I have to object. That is clearly
16 asked and answered. I don't see the point in restating his
17 understanding of what is already asked.

18 MR. PHILIPS: All right, fine. Go ahead and
19 answer. I understand the objection.

20 THE WITNESS: Just that he was terminated for
21 absenteeism.

22 BY MR. PHILIPS:

23 Q Mr. Coleman, as a result of conversations with
24 your attorneys or any other way, have you ever heard of any
25 other different reason other than excessive absenteeism for

mm4 1 his termination?

2 And your attorney may want to counsel you on this.

3 MR. REYNOLDS: No. Answer the question.

4 THE WITNESS: No. The only thing I knew, he was
5 terminated for his absenteeism. I never knew anything else.

6 MR. PHILIPS: That's all.

7 MR. REYNOLDS: No questions.

8 MR. SOSNICK: I just have a few.

9 BY MR. SOSNICK:

10 Q How were you informed that the reason for
11 Mr. Stiner's termination --

12 A Beg your pardon?

13 Q What was the circumstances under which you learned,
14 as you understand it, that the reason for Mr. Stiner's
15 termination was absenteeism?

16 A Well, I was told by different people that he
17 missed a week at one time and that they had terminated him
18 because he just missed too much time.

19 Q Who told you that?

20 A I don't know. I don't remember exactly who it was.
21 I think it was Darlene.

22 Q Darlene who?

23 A Stiner, his wife.

24 Q Did anyone else tell you this?

25 A I've heard it from several different people. But

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1 I couldn't remember who they was. But I heard that was the
2 reason he got fired.

3 It's hearsay. He wasn't working for me. I don't
4 know.

5 Q Do you know one of those several people? You
6 can't remember any of them?

7 A Let's see. Jimmie Green I think might have
8 mentioned it. And I can't really remember who it could have
9 been. I wouldn't want to put nobody on the spot because I
10 don't really know who it was exactly.

11 Q Mr. Coleman, have you ever had occasion at any
12 time to discover misdrilled -- excuse me -- repair of
13 misdrilled holes in violation of procedure at the plant?

14 MR. PHILIPS: I object to that. That is beyond
15 the scope of direct. You are taking a second bite at the
16 apple.

17 MR. SOSNICK: I took it from your question.

18 MR. PHILIPS: Tell me which question you took it
19 from. The only thing I asked him was in relation to
20 exactly whether Henry Stiner welded misdrilled holes. If
21 you can relate it to that, fine. Other than that I think it
22 is beyond the scope.

23 MR. SOSNICK: I don't think it is beyond the scope,
24 so we will just note the objection.

25 I will repeat the question.

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BY MR. SOSNICK:

Q Did you ever have occasion to discover a repair of a misdrilled hole at Comanche Peak in violation of procedure?

A Did I ever have -- no, I never have.

Q You have never discovered that?

A I've never discovered one myself, no.

MR. SOSNICK: Okay, that's it.

Thank you Mr. Coleman.

(Whereupon, at 3:05 the taking of the deposition was concluded.)

Fred Coleman

CERTIFICATE OF PROCEEDINGS

This is to certify that the attached proceedings before the
NRC COMMISSION

In the matter of: Texas Utilities Deposition of Fred Coleman

Date of Proceeding: Monday, July 9, 1984

Place of Proceeding: Glen Rose, Texas

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

Mimie Meltzer
Official Reporter - Typed

Mimie Meltzer
Official Reporter - Signature