

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: Gilbert Smith Keeley

Location: Glen Rose, Texas

Pages: 36,187-36,216

Date: Tuesday, July 10, 1984

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

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY & LICENSING BOARD

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In the matter of:           :
                             :
TEXAS UTILITIES ELECTRIC    :
COMPANY, et al.             : Docket Nos. 50-445
                             : 50-446
(Comanche Peak Steam Electric :
Station, Units 1 and 2)     :
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Glen Rose Motor Inn
Glen Rose, Texas

July 10, 1984

Deposition of: Gilbert Smith Keeley
called by examination by counsel for the Applicant
taken before Marilyn Nations, Court Reporter,
beginning at 6:15 p.m., pursuant to agreement.

1 MR. FIRFO: I would simply note for the
2 record the same objection -- the same observation I had
3 earlier on the part of the staff that we do not consider
4 applicant's attorney to be representing Mr. Keeley in a
5 personal capacity.

6 MS. SAGINAW: I concur and I would also like
7 to reserve other factual objections until a later time.

8 EXAMINATION

9 BY MS. SAGINAW:

10 Q Mr. Keeley, my name is Jane Saginaw and I
11 represent the intervenors in this case. I believe you
12 told me before the deposition began that you didn't bring
13 a resume with you here today; is that right?

14 A That's correct, yes.

15 Q I'm going to have to develop with you,
16 if you will, your resume for the record; okay?

17 A Yes.

18 Q Would you state your full name for the record?

19 A My full name is Gilbert Smith Keeley.

20 Q And where do you presently reside?

21 A 2421 Sir Guy, Grand Prarie, Texas.

22 Q Is that s-u-r?

23 A S-i-r. Two words. S-i-r G-u-y.

24 Q In Grand Prarie?

25 A Right.

XXXXXX

- 1 Q How long have you lived there?
- 2 A A year last May.
- 3 Q Where did you live before you moved to
- 4 Sir Guy?
- 5 A Jackson, Michigan.
- 6 Q Do you have an address for us there?
- 7 A Yeah. 6108 Crest Road in Jackson.
- 8 Q And how long did you live there?
- 9 A I lived there 21 years.
- 10 Q Where were you born, Mr. Keeley?
- 11 A Lincoln, Nebraska.
- 12 Q Did you go to high school there?
- 13 A I went two years to high school there,
- 14 graduated from Topeka, Kansas High School.
- 15 Q Did your family move to Topeka?
- 16 A Yes.
- 17 Q And did you go directly from high school to
- 18 university or college?
- 19 A Yes.
- 20 Q Where did you go?
- 21 A I went to Kansas City, Missouri Junior
- 22 College.
- 23 Q Did you graduate from there?
- 24 A Yes.
- 25 Q When did you enter Kansas City, Missouri

1 Junior College?

2 A Fall of 1940.

3 Q And when did you graduate?

4 A 1942.

5 Q And you got what kind of degree?

6 A Associate of Science degree.

7 Q Associate?

8 A Of science, yes.

9 Q Is that a special two-year program?

10 A No, that's a general science degree in
11 engineering.

12 Q But you went through it in two years?

13 A Yes. At the junior college.

14 Q Then did you go on to another college?

15 A Yes.

16 Q Where did you go?

17 A The University of Missouri at Rala.

18 Q I am assuming that Kansas City, Missouri
19 Junior College was in Kansas City?

20 A That's correct.

21 Q And then you moved and you went to the
22 University of Missouri. What did you study there?

23 A Electrical engineering.

24 Q And did you enter in 1942?

25 A No. I entered there in 1946.

1 Q What did you do between the time you
2 finished up at Kansas City, Missouri Junior College and the
3 time you entered the University of Missouri?

4 A I was in the Coast Guard, U.S. Navy.

5 Q From the whole time of 1942 to 1946?

6 A That's correct.

7 Q Where were you stationed?

8 A I as stationed with the U.S. Coast Guard
9 Academy as a cadet and then I enlisted in the U.S. Navy.
10 I was stationed at Great Lakes Training Station for boot
11 camp. Then at the repair base in San Diego. And I was
12 stationed aboard a repair ship for about six months.

13 Q In California?

14 A No. Overseas.

15 Q Overseas. Where were you?

16 A Japan.

17 Q And when you came back in 1946 that is when
18 you entered the University of Missouri?

19 A The fall of '46, yes.

20 Q And when did you graduate from the University
21 of Missouri?

22 A 1948.

23 Q And you spent those two years studying
24 electrical engineering?

25 A That's correct.

- 1 Q Did you work while you were in school in
2 Missouri?
- 3 A No.
- 4 Q Where did you move in 1948 -- or did you
5 move in 1948 when you graduated from the University of
6 Missouri?
- 7 A Yes. I moved to Schnectedy, New York.
- 8 Q For what reason?
- 9 A I worked for General Electric Company.
- 10 Q In what capacity?
- 11 A As a test engineer.
- 12 Q What were your job duties as a test
13 engineer for GE?
- 14 A We tested various pieces of equipment. I
15 had testing experience in induction motors, electronic
16 controls, aircraft armament controls.
- 17 Q How long did you stay there?
- 18 A I was there approximately one year.
- 19 Q Until 1947?
- 20 A No. '49. I graduated in '48.
- 21 Q Oh, I'm sorry. Okay.
22 And in 1949 what did you move on to?
- 23 A I went to work for Pacific Gas & Electric,
24 California.
- 25 Q Where in California?

1 A Let's see. I worked in San Francisco,
2 Moss Landing, Contra Costa.

3 Q Did you move around in the same job?

4 A Yes, that's correct.

5 Q What was your job for PG&E?

6 A I started out performing startup work on
7 steam plants and worked up to become electrical maintenance
8 foreman in a steam plant at Contra Costa.

9 Q Can you go through with me real briefly
10 in resume type fashion what your job titles were at PG&E
11 and when you moved from job to job within PG&E?

12 A ell, I was initially relay type electrician
13 for approximately two years.

14 Q 1949 to 1951?

15 A 1951. ANd then became electrical maintenance
16 foreman from '51 through most of '55.

17 Q And in both of those jobs you moved around
18 California quite a bit?

19 A No. Just the three places I mentioned.

20 Q Did you live in San Francisco?

21 A Yes.

22 Q What happned in 1955?

23 A 1955 I went to work for Westinghouse Atomic
24 Power Division in Idaho. At the Navy reactor facility.

25 Q Where in Idaho?

- 1 A Outside of Idaho Falls.
- 2 Q And what was your job title there?
- 3 A Initially --
- 4 MR. HARTMAN: Can we go off the record for
- 5 a moment?
- 6 MS. SAGINAW: Yes.
- 7 (Discussion off the record.)
- 8 BY MS. SAGINAW:
- 9 Q Okay. Before we took the little break
- 10 there you were telling me what your job position was
- 11 initially when you went to go to work for Westinghouse.
- 12 A All right. Initially I was hired as a
- 13 reactor engineer who had a responsibility for reactor
- 14 operations, the instrumentation and control of the reactor,
- 15 and to train and qualify Navy personnel in those various
- 16 areas.
- 17 Q Was this a civilian facility?
- 18 A No. This was a Navy reactor facility.
- 19 Q How long were you in that position from '55 --
- 20 A I was in that position approxijmately a year
- 21 and a half and then I was transferred into the plant
- 22 engineering group.
- 23 Q 1957?
- 24 A Yeah. Early '57.
- 25 Q What is a plant engineering group?

1 A Plant engineering group is responsible for
2 design, procurement, installation of equipment in the
3 plant.

4 Q You are talking the same reactor?

5 A Yes.

6 Q And how long did you stay in that group?

7 A Well, I stayed there for approximately
8 six months when I was transferred to the Shippingport
9 Nuclear Power Plant which is a commercial reactor.

10 Q Where is that?

11 A That is in Shippingport, Pennsylvania.
12 To run the preoperational tests, construction type checkout
13 of equipment and to train and qualify the Duchesne Light
14 Company reactor operators.

15 Q But you were still working for Westinghouse
16 then?

17 A That's correct.

18 Q A different facility.

19 And how long did you work at the Shippingport
20 plant?

21 A We were there approximately six or seven
22 months.

23 Q Was that largely a supervisory position?

24 A It was supervisory as far as qualifying people
25 and that, although I had the responsibility to serve as

1 chairman of the board of review for the reactor operators.

2 Q What did that entail?

3 A That entailed initially setting up a
4 training program and then conducting interviews and
5 questions of personnel to determine how well they were
6 qualified.

7 Q So you had people under you who would
8 actually do the interviewing?

9 A No, I did the interviewing.

10 Q You did the interviewing?

11 A That's correct.

12 Q Okay. And then you said you did that for
13 about six or seven months?

14 A Six or seven months.

15 Q And then what did you do? We are still in
16 1957; right?

17 A No. This went on through the first part of
18 1958.

19 Q Okay.

20 A Then I was transferred back to Idaho.

21 Q Same plant?

22 A Still with Westinghouse.

23 No, on a large ship prototype Navy nuclear
24 plant, carrier prototype.

25 Q I am sorry. Would you repeat that?

1 A A carrier, aircraft carrier prototype.

2 Q With nuclear facility on board?

3 A Yes.

4 Q And what did you do in that job? What was
5 your job title when you returned to Idaho?

6 A My job title there was -- I can't remember
7 the exact title. I was supervisor of the reactor
8 engineers. Again, who had responsibility for the reactor
9 operations, training, qualifying Navy personnel and doing
10 initial construction checkout on instrumentation and control.

11 Q Did you ever go back and get any kind of
12 advanced degree in engineering?

13 A I had 18 hours credit from the University
14 of Idaho towards a master's but I didn't finish that
15 since I moved.

16 Q What were those 18 hours in? What courses?

17 A They were in electrical engineering
18 instrumentation and control.

19 Q So your experience in the nuclear aspect of
20 engineering was on the job training; is that right?

21 A On the job. I don't understand the
22 question.

23 Q You became familiar with nuclear operations
24 through your work at --

25 A And through special courses given by

jon

1 Westinghouse.

2 Q What kind of special courses did you go
3 through?

4 A Well, you went through systems courses
5 and they taught you the systems in the plant; they taught
6 you reactor theory.

7 Q Did you actually go to an education type
8 environment to take those or would they be done on your job?
9 Did you go away for a month or two and study?

10 A No. These were done on the job as a part
11 of the Navy training program.

12 Q How long did you stay a supervisor
13 reactor engineer?

14 A That was approximately two years.

15 Q And where did you go from there?

16 A From there I was made supervisor of the
17 instrument shop.

18 Q Same location?

19 A Same location.

20 Q And what did that entail?

21 A That entailed supervising approximately
22 12 instrument technicians who were responsible for
23 maintaining the test equipment in the plant. And
24 assisting Navy personnel on plant instrumentation and
25 controls.

1 Q Was that a promotion from your job as
2 super, reactor engineer?

3 A Yes. That was a promotion.

4 Q And when were you promoted to that position?

5 A Well, it was 1960, something like that.

6 Early '60s.

7 Q How long did you stay in that position?

8 A I stayed in chat position for approximately
9 a year until they moved me into chief operator training.

10 Q Of training, did you say?

11 A No. Chief operator, training, training to
12 be a chief operator. Which chief operator has complete
13 responsibility for the operations of the plant. All
14 personnel come under him.

15 Q That was a formalized training program
16 within Westinghouse?

17 A Yes, it was another formalized training
18 program.

19 Q And what kind of training were you given?

20 A Again given training in all systems in
21 water chemistry and all instrumentation, all the controls,
22 reactor physics, emergency procedures, things like that.

23 Q How long did the training period take?

24 A Well, that took approximately eight months,
25 something like that.

1 Q And you then became a chief operator?

2 A No. I went to that point and then I left
3 the company, transferred -- not transferred but I left the
4 company to go to work for Consumers Power Company in 1961.

5 Q Okay. 1961. After completing the
6 training program you went with Consumer Power?

7 A Right.

8 Q And where is that?

9 A That is in Jackson, Michigan.

10 Q And what was your job description when you
11 went there?

12 A I was hired as a senior engineer to be
13 responsible for running the preoperational test program
14 on the Big Rock Point plant which is up in Northern
15 Michigan; a commercial plant.

16 Q You said Big Rock Point.

17 A Big Rock Point plant.

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MILLERS FALLS
EZEKIAS
COTTON BOWDEN

mgc 14-1

1 A After completing the preoperational test
2 program, I obtained a cold license as a reactor operator
3 and functioned temporarily as a Shift Supervisor. This
4 covered a period of two years.

5 Q So that takes us through 1963 I was transferred
6 to Jackson, which is the home office, and I worked in
7 licensing areas as a Senior Engineer dealing with the
8 Staff discussing various licensing aspects on all systems
9 in the plant with the Staff, the NRC Staff.

10 Q I am trying to to determine how your job
11 position changed from 1961 when you first went to work
12 for Consumer Power and 1963. You went to a more supervisory
13 role, is that --

14 A No. I was still a Senior Engineer.

15 Q How long did you stay in that position?

16 A It seems like it was approximately
17 two years or something like that, and I was moved
18 into a supervisory role taking over supervision of
19 a small nuclear engineering group for the company
20 in the home office. This involved reviewing drawings
21 and specifications. At this time, we were taking
22 a look at another nuclear plant.

23 A Where was that?

24 Q Pardon?

25 A Palisades. So this also involved writing

mgc 14-2

1 up technical specifications for the nuclear steam
2 supply system and fuel -- nuclear fuel.

3 Q Okay. What did you do after that?

4 A I think -- I can't remember the exact
5 period of time -- I think that existed for approximately
6 a little over two years, maybe three years.

7 Q Until 1967 or '68?

8 A Right. And then they made me Manager
9 of Plant Engineering, which had under it not only
10 the Nuclear Engineering Group, but also a small
11 group of specialists in the fields of metallurgy,
12 electrical instrumentation and control.

13 Q Let me ask you, when you say "they made
14 me," --

15 A They promoted me.

16 Q They promoted you.

17 A Yes.

18 Q You were willing to take these promotions,
19 were you not?

20 A Yes.

21 Q Okay.

22 A Civil structural also came within the
23 group. This group again reviewed drawing specifications
24 and in some cases wrote up specifications, was responsible
25 for assisting project-type people on Palisades and

mgc 14-3

1 and eventually Midland in putting together the preliminary
2 safety analysis report.

3 MS. SAGINAW: Let's go off the record.

4 (Discussion off the record.)

5 BY MS. SAGINAW:

6 Q Okay, Mr. Keeley, I think we were at
7 1968 when you were the Manager of Plant Engineering
8 for Consumer Power in Jackson, and we were beginning
9 to talk about projects that you were working on
10 in that capacity.

11 Do you want to restate for the record
12 what those projects were?

13 A I worked on the Palisades project on
14 obtaining the operating license for that and on
15 the Midland project obtaining the construction permit
16 for Midland.

17 Q Okay. And where did you go from there?

18 A All right. I remained in that job until
19 1973 when they transferred me to become -- I can't
20 remember -- it was either Manager of QA or Director
21 of Quality Assurance for Engineering and Construction.

22 Q And what did you do in that capacity?

23 A Well, in that capacity I supervised
24 Quality Assurance personnel during the preliminary
25 engineering and construction phases of Midland.

mgc14-4

1 I trained people, saw that they were qualified for
2 various industry codes and standards and wrote up
3 a corporate topical QA program.

4 Q You helped them in designing their QA
5 program; is that what you said?

6 A Yes.

7 Q Was the Midland project licensed?

8 A The Midland project was licensed in
9 1972, if I remember right. The construction permit
10 was granted.

11 Q So that was while you were working on
12 it?

13 A Oh, yes.

14 Q All right. How long did you stay in
15 that position as Manager of QA?

16 A Okay. I stayed in that position for
17 two years until 1975 when I became Manager of the
18 Midland project. That job entailed responsibility
19 for licensing, engineering, construction, costs
20 and scheduling.

21 Q So it's fair to say that that actually
22 was a managerial type job?

23 A Yes.

24 Q Or supervisory type job.

25 A No. It was a manager. These were manager

mgc 14-5±

1 jobs, in my opinion, up in engineering as well as
2 QA.

3 A Okay. And you worked only on the Midland
4 plant at that point in 1975.

5 A That's correct.

6 Q And how long did you stay as Manager
7 of the Midland project?

8 A I stayed until May of last year.

9 Q And what happened in May of 1983?

10 A I took early retirement and came to
11 work for TUGCO.

12 (Pause.)

13 Q What were the circumstances surrounding
14 that change? You had been with Consumer Power for
15 how many years at that time?

16 A Twenty -- '61 through '83 -- twenty-
17 two years roughly.

18 Q Why did you decide to retire early and
19 then thake another job in another location?

20 A Well, I want to give several reasons.
21 One of my boys and his wife live in this area. We
22 wanted to get into a warmer climate. And that was,
23 you know, the basic reason.

24 Q Did you have the job with TUGCO before
25 you moved down here, or did you move down here and

mgc 14-6

1 A No. I had the job with TUGCO.

2 Q Before you moved?

3 A Correct.

4 Q When you began working there in May
5 of '83, what was your job title when you started
6 there?

7 A I was Senior Engineer working for Dick
8 Kahler in the Engineering Administrative Section.

9 (Pause.)

10 Q Did you work with Mr. Spangler?

11 A Yes, we were basically in the same group.

12 Q Did you work together on projects when
13 you first got there in 1983?

14 A I don't know what you mean by projects.

15 Q Well, did you have -- like you worked
16 together on this project, the report that was published
17 on August 19, 1983. I'm wondering if there are
18 other kinds of projects like that that you had ever
19 worked on together?

20 A Well, eventually I was made Chairman
21 of the TUGCO Operations Review Committee, and Mr.
22 Spangler, before he got into Quality Assurance,
23 assisted in preparing discussions that we had with
24 the Operations Review Committee.

25 Q I'm a little bit confused. Were you

mgc 14-7

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co-workers, or would he report to you?

A No, he never reported to me. He always reported to Dick Kahler.

Q So you would both report to Kahler

A That's correct.

Q Different component parts --

A That's correct.

Q -- at the same time.

A That's correct.

Q When did you become Chairman of the Operations Review Committee?

A I think that was approximately six months ago, around the first of the year, 1984.

Q Would you consider that a promotion from your job as Senior Engineer?

A Yes. They also at that time promoted me to Principal Engineer.

Q As Chairman of the Operations Review Committee you were Principal Engineer?

A That's correct.

Q It's the same -- it's a co-title?

A Well, no. Principal Engineer is an engineering title that has with it more responsibility than a Senior Engineer, and when they made me Chairman, they also promoted me to Principal Engineer.

mgc 14-8

1 Q Do you know the circumstances surrounding
2 that promotion? Do you know why you were promoted?
3 Did you apply for it, or did someone suggest --
4 recommend you for the job?

5 A Well, I think Mr. Clements felt that
6 I was qualified to do the job. He previously --
7 or he, up to that time, had been Chairman of the
8 Operations Review Committee, and he felt that there
9 should be, you know, a little bit more of a separation
10 from himself to this committee, so he was looking
11 for somebody to take over that chairmanship.

12 Q Did they create this position for you,
13 or was someone else in that position before you.

14 A No. Mr. Clements was Chairman of the
15 Operations Review Committee?

16 Q I see. And then he moved up, and you
17 moved into his place.

18 A Well, no, he didn't move up; he, you
19 know, still is Vice President of Operations. But
20 I think he felt a need to have more independence
21 from his direct line responsibilities for plant
22 operations.

23 Q So you took over part of his -- the
24 area that he was at one time --

25 A That's correct.

mgc 14-9

1 Q Do you know if Mr. Kahler recommended
2 you for that job?

3 A I don't know.

4 Q Was there any formal recommendation?
5 Did he write you a letter, or did he introduce you?

6 A I don't know of any formal letter from
7 Mr. Kahler to Mr. Clements, no.

8 Q Did you ever talk to Mr. Kahler about
9 the job, the new job?

10 A Oh, yes. Mr. Kahler is Secretary of
11 the Operations Review Committee, so, you know, we
12 talk all the time.

13 Q So are you and Mr. Kahler now -- I don't
14 quite know the terminology, but would you say you
15 are on equal grounds in the hierarchy at TUGCO?

16 A Well, no, I wouldn't say equal grounds.
17 I still report to Mr. Kahler --

18 Q You do.

19 A -- for day-to-day activities. He gives
20 me jobs to perform, things like that, except in
21 the area of the Operations Review Committee, I
22 am chairman there --

23 Q You're autonomous there.

24 A -- and responsible for the meetings,
25 the subjects of the meetings and the conduct of

mgc 14-10

1 the meetings.

2 Q So you reported to Mr. Kahler when you
3 first arrived at TUGCO as a Senior Engineer in May
4 of '83, and you still report to him in certain areas,
5 but in other areas, you are completely autonomous
6 now.

7 A That's correct.

8 Q Okay. At the time that this report
9 was issued -- I'm referring to the report of August
10 19, 1983, you were working under Mr. Kahler as a
11 Senior Engineer?

12 A That's correct.

13 (Pause.)

14 Q Have you ever testified before, Mr.
15 Keeley?

16 A Yes.

17 Q In what circumstances? Or have you
18 testified more than once?

19 A I testified in the Palisades operating
20 permit hearing.

21 Q When was that?

22 A That was approximately 1970.

23 Q And were you a witness in that?

24 A Yes.

25 Q And who were you called by?

mgc 14-11

1 A As far as I remember, I was called by
2 the company.

3 Q What was your testimony in regard to?

4 MR. HARTMAN: Could I object to the
5 form of the question, absent some kind of showing
6 as to the purpose for it?

7 MS. SAGINAW: Certainly. I want to
8 know if he has ever testified, as he is doing today,
9 in the context of nuclear regulatory matters. It's
10 totally relevant.

11 MR. HARTMAN: Why?

12 MS. SAGINAW: To show his familiarity
13 with the processes, to show his understanding of
14 what he's doing here today, to qualify him as a
15 witness.

16 MR. HARTMAN: Thank you.

17 BY MS. SAGINAW:

18 Q So you testified in 1970. When did
19 you testify after that?

20 A I testified in 1971 on the Midland construction
21 permit hearing.

22 Q And in what area did you testify in
23 that case?

24 A Principally in the QA area, because
25 the QA Supervisor for Consumers reported to me.

mgc 14-12

1 Although I hadn't been made Director of QA, I was
2 still Manger of Plant Engineering. But the organization
3 at that time, the man in charge of QA reported to
4 me.

5 Q Okay. And when did you testify after
6 that?

7 A I testified in 1976 on the show-cause
8 hearing -- oh, wait a minute. There was one before
9 that.

10 I testified in 1974 on the show-cause --
11 and I guess I -- no, I can't say show-cause. It
12 was a QA hearing on Midland, whether the QA program
13 on Midland was adequate.

14 And then in 1976, I testified during
15 the Circuit Court of Appeals hearing on Midland,
16 whether construction should be continued or stopped,
17 I forget the legal terms for it.

18 Q Cease and desist, maybe?

19 A No, it's something else.

20 Q Okay.

21 A I think that's all of the hearings that
22 I testified at.

23 Q You have never testified outside of
24 your work. You have never personally been involved
25 in litigation where you were called as a witness.

mgc 14-13

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A You mean in civil litigation?

Q Uh-huh.

A No.

Oh, one other thing I testified on.

I should remember that; it's the most recent. It was 1983 on the remedial soils hearing at Midland.

End 14

mgc 15-1

1 MS. SAGINAW: Okay, I think that's all
2 the questions I have for you, as far as your educational
3 and job background, and we'll take your substantive
4 deposition tomorrow.

5 THE WITNESS: All right.

6 MS. SAGINAW: Do you have any questions?

7 MR. HARTMAN: No. I would just like
8 the record to reflect that you have decided to continue
9 the substantive deposition tomorrow.

10 MS. SAGINAW: Well, we can go now, if
11 you would like.

12 MR. HARTMAN: What is the Staff's position
13 on that?

14 MR. PIRFO: Well, it's after seven o'clock.
15 A little reason should apply. I'm sure we can go.
16 I wouldn't be delighted with it.

17 MS. SAGINAW: I thought we agreed to
18 stop and 6:30, so I thought it sounded reasonable.

19 MR. PIRFO: It's not my deposition.
20 I don't really have a position. I am at the mercy
21 of --

22 MS. SAGINAW: Would you like to continue?

23 MR. HARTMAN: It's your dime. If you
24 want to stop, I'm not going to object to it.

25 MR. PIRFO: It's seven o'clock in the

mgc 15-2

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evening. I mean, you know --

MR. HARTMAN: Good things have to come
to an end sometime.

MS. SAGINAW: That's it, I think.

(Whereupon, at 7:05 p.m., the taking
of the deposition was recessed to reconvene at
9:00 a.m., Tuesday, January 10, 1989.)

G. S. KEELEY

CERTIFICATE OF PROCEEDINGS

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

In the matter of: DEPOSITION OF GILBERT SMITH KEELEY

Date of Proceeding: 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.

Marilynn Nations

Official Reporter - Typed

Marilynn Nations

Official Reporter - Signature