

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: Wayne Mansfield

Location: Glen Rose, Texas

Pages: 44,500-44,566

Date: Tuesday, July 10, 1984

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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) :
 -----x

Glen Rose Motor Inn
Glen Rose, Texas

July 10, 1984

Deposition of: Wayne Mansfield
called by examination by counsel for Intervenors
taken before Terri L. Hague, Court Reporter,
beginning at 1:00 p.m., pursuant to agreement.

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1 Appearances:

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C O N T E N T S

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WITNESS:	EXAMINATION BY	PAGE
WAYNE MANSFIELD	Mr. Cochran	44,505
	Mr. Davidson	44,536

MILLERS FALLS
EXPERIMENTAL
COTTON CONTENT

P R O C E E D I N G S

1
2 MR. DAVIDSON: My name is Mark L. Davidson. I am
3 a member of the law firm of Bishop, Liberman, Cook, Purcell
4 & Reynolds, Counsel for Texas Utilities Electric Company,
5 Applicant in this proceeding.

6 I appear here today in that capacity and in
7 conjunction with Mr. Jeffrey Coppock of Vinson & Elkins,
8 Attorneys for Warren Mansfield, a TUGCO employee.

9 Before proceeding further, I wish to point out
10 that Mr. Mansfield is appearing voluntarily and that he
11 is not under subpoena. Mr. Mansfield's testimony has been
12 requested from the Applicant by Case, the Intervenor in
13 this proceeding on the topics specified in Case's letter to
14 Leonard W. Belter, dated June 27, 1984, a copy of which
15 has been marked for identification by the reported and
16 appended to the transcript of Mr. Vega's deposition, as
17 Exhibit A. The Applicant has already noted its objections
18 to the deposition procedures and schedule ordered by the
19 Board, and it intends no waiver of those objections by Mr.
20 Mansfield's appearance today.

21 At this time I would like to summarize the
22 guidelines established by the Board for this proceeding and
23 the taking of this deposition. Under the order issued by
24 the Board on March 15, as modified by a series of subsequent
25 telephone conference rulings, the scope of this deposition

1 is limited to the taking of evidence and the making of
2 discovery on harassment, intimidation or threatening of
3 quality assurance/ quality control, that is QA/QC personnel.
4 With one exception, allegations regarding any claimed
5 harassment or intimidation of craft personnel have been
6 specifically ruled by the Board to be beyond the scope
7 of this examination and these proceedings. The Board has
8 ruled that only evidence based on personal knowledge may
9 be adduced and that hearsay, rumor, innuendo and the like
10 are not proper subjects of the evidentiary portion of this
11 deposition.

12 Finally, the Board has instructed the parties
13 to separate the evidentiary portion of their examination
14 of the witness. To give effect to the rulings, as well as
15 to insure expeditious completion of this deposition, we
16 now offer Mr. Mansfield as a witness for the evidentiary
17 portion of this deposition.

18 The issues for this portion of the deposition
19 are defined by Case's letter of June 25, a copy of which
20 has been marked as Exhibit A to Mr. Vega's deposition.

21 At the conclusion of that evidentiary deposition,
22 the evidentiary record would be closed. And, with the opening
23 of a new transcript, to be separately bound, the discovery
24 deposition of Mr. Mansfield would commence, should Case decide
25 to conduct such a deposition.

1 A. Brown & Root.

2 Q. How long have you been employed by Brown & Root?

3 A. Five years.

4 Q. What was your job title when you entered Brown
5 & Root's employment?

6 A. QC inspection.

7 Q. What had been your history in quality control prior
8 to joining Brown & Root?

9 A. I had worked at Ingle Ship Building as an
10 NDE specialist.

11 Q. Let me break your answer down in two parts. What
12 is an NDE specialist, first?

13 A. Non-destructive examination.

14 Q. Okay. Now, go ahead with your answer.

15 A. Okay. I also worked in the nuclear submarine overhaul
16 program as an inspector.

17 Q. How long were you with Ingle Ship Building?

18 A. I worked there from '70 to '73, went back in '75,
19 and worked through '78. In 1978, I went to work for Bechtel
20 in Milland, Michigan as a quality control inspector.

21 Q. That was at the nuclear plant in Midland?

22 A. Yes, sir.

23 Q. How long were you with Bechtel?

24 A. About six months.

25 (Outside interruption.)

1 BY MR. COCHRAN:

2 Q. You worked six months for Bechtel at Midland,
3 Michigan?

4 A. Yes.

5 Q. Where did you then go?

6 A. Brown & Root.

7 Q. To Brown & Root?

8 A. Yeah, 1979.

9 Q. What level inspector did you join Brown & Root
10 as?

11 A. Level two.

12 Q. What level do you now hold?

13 A. I'm a level two.

14 Q. Under whose supervision are you presently?

15 A. I am a lead inspector. I work for Bob Sievers.

16 Q. When did you become a lead inspector?

17 A. I'm going to say the latter part of 1982.

18 Q. That's a supervisory position, is it not?

19 A. Basically.

20 Q. How many inspectors do you have under your
21 supervision?

22 A. Eight.

23 Q. During you tenure at Brown & Root, have you attended
24 any training programs, the subject matter of which would be
25 Brown & Root's philosophy of its quality control program?

1 A. Yes.

2 Q. Tell me when those occurred.

3 A. Well, everyone has to go through a QA or
4 orientation, which they show you a film and basically go
5 through and explain 10 CFR 50 Appendix B.

6 Q. How long is this orientation session in which
7 Appendix B is explained?

8 A. How long is it?

9 Q. How long is it? Is it one hour, one day, one
10 month, what?

11 A. The orientation itself, I would say, probably lasts
12 in the neighborhood of an hour and a half to two hours. You
13 have to sit down, and a gentlemen will give you a basic
14 orientation, and you have to watch a film which explains the
15 plant and their policies. And then after the film, they ask
16 you to take a test.

17 Q. So breaking it down, there's initially in this
18 hour to hour and a half session, a lecture; that is, a man
19 standing up and talking to you?

20 A. The beginning, yes.

21 Q. Okay, the beginning. Then there's a film that
22 covers the plant generally and the policies of Brown & Root?

23 A. Right.

24 Q. Does the policy explanation cover--

25 (Outside interruption.)

1 BY MR. COCHRAN:

2 Q. Now, tell me generally about the lecture portion
3 of the orientation.

4 A. It basically covers the--well, they start with
5 the importance of quality, and they go through quite a bit
6 in 10 CSR 50. They talk about reporting of non-conformances,
7 just basically general QA orientation.

8 Q. And the film does the same thing; is this what
9 you're telling me?

10 A. Yes.

11 Q. What general subject matter does the test cover?

12 A. 10 CSR 50, Appendix B.

13 Q. Is it strictly on the Appendix B?

14 A. As best I remember, yes.

15 Q. As best you remember, it covers no other subject
16 matter other than Appendix B?

17 A. Yes.

18 MR. DAVIDSON: Off the record.

19 (Discussion off the record.)

20 BY MR. COCHRAN:

21 Q. Have you been through more than one such
22 orientation since then?

23 A. Yes, sir.

24 Q. How often do you go through such an orientation?

25 A. Any job you work, you have to go through it. If

1 you go with a different company--I terminated from Brown
2 & Root in 1980, and went to work for Stone & Webster and
3 had to go through the QA orientation with Stone & Webster.
4 And I went to work with Wright, Showhart, Boecon & Geri.
5 You know, it's basically the same thing any plant you go
6 to. And when I came back to Brown & Root in 1981, I had
7 to go through it again.

8 Q. Well, what you're saying, then, is when you
9 change companies as a new employee, the new company would
10 require you to go through that orientation?

11 A. Yes, sir.

12 Q. Is that correct?

13 A. Yes.

14 Q. Once you have joined that company, though, speaking,
15 for instance, of Brown & Root, is there a periodic review
16 that's required of its quality assurance people?

17 MR. DAVIDSON: I would like to make an objection
18 similar to the one I made earlier in this series of
19 examinations to the effect that there has been an extensive
20 and exhaustive record made in a prior proceeding of the QA/QC
21 program in operation under Brown & Root and TUGCO's direction
22 at Comanche Peak. That record is a thorough one. All the
23 issues have been briefed by all parties, and the record in
24 that matter has been closed and is before the Board.

25 I believe that examination as to the general

1 nature of the program at Comanche Peak for QA/QC, therefore,
2 not only is not relevant to the defined and narrow scope of
3 the proceedings, but, in addition, is merely cumulative of
4 a record that has already been made.

5 With that objection, however, Mr. Mansfield, you
6 can answer his question, you may answer the question.

7 MR. COCHRAN: You may now answer the question.
8 That's lawyer talk.

9 THE WITNESS: Can I ask you to repeat your
10 question, please?

11 BY MR. COCHRAN:

12 Q. Let me try to rephrase it for you, rather than
13 have the reporter read it back.

14 Have you been through such an orientation
15 more than once at Brown & Root other than when you came back
16 to work for them?

17 A. Well, yes, sir. I'm a quality control inspector,
18 and I deal with quality, and, you know, you're continuously
19 going through procedures and continually in and out of
20 the code books.

21 Q. Okay.

22 A. They have had an orientation recently that--
23 I want to say it's called Quality Hotline, but they
24 reinstructed everybody, you know, in accordance with
25 reporting the non-conformances, and--

1 Q. I'm going to ask you about the Hotline
2 situation in a few minutes, but what I'm trying
3 to find out is, and, again, without belaboring the
4 point or unnecessarily getting into the prior record,
5 I want to find out what your understanding is of
6 the periodic review or reorientation of its quality
7 control inspectors like at Brown & Root, and is
8 there such--for instance, do they have to go
9 through a reorientation on any set periodic
10 basis, like every three months, every six months,
11 every year, or anything of that nature?

12 A. Well, yes, they do, as far as procedures
13 are concerned. You know, anytime anything is
14 revised, they're re-instructing.

15 Q. Okay.

16 A. As far as certifications are concerned,
17 we have to recertify every three years. And it's
18 not just going up and taking a test. You've got
19 to go, be re-instructed and take your test for
20 certification.

21 Q. Well, the recertification procedure you're
22 talking about, then, relates to the subsidive
23 areas, that is, liquid penetration versus visual
24 inspection--

25 A. Right.

1 Q. --things of that nature?

2 A. Yes.

3 Q. In that recertification procedure, does
4 the inspector being recertified receive a new
5 orientation on Appendix B?

6 A. No.

7 Q. Other than his on-the-job training
8 and on-the-job use of the codes, is there a
9 formal reorientation on Appendix B and its
10 requirements?

11 A. I could say yes in my case, because
12 I have just gone through for another certification
13 period. I went through two weeks of class and
14 Appendix B was a primary part of it.

15 Q. So is your answer that it may be a part
16 of the certification process for a new
17 certification?

18 A. Yes, sir.

19 Q. May I conclude from that, that it's not
20 a part of a generalized reorientation procedure on
21 any sort of set periodic basis?

22 MR. DAVIDSON: I'm going to object. I
23 don't think that you have any right to make any
24 conclusions from the witnesses' answers. They
25 state--

1 MR. COCHRAN: I asked--

2 MR. DAVIDSON: I'm sorry. I'm not
3 finished. His testimony is factual. He's made
4 statements. If you want to draw conclusions, that's
5 your privilege, in your brief, but I don't think you
6 should ask him to join in with you in making
7 confirmations to argumentative statements, and I
8 think the witness should not answer that.

9 BY MR. COCHRAN:

10 Q. Is there any such generalized reorientation
11 procedure for quality control inspectors?

12 MR. DAVIDSON: If you know it.

13 MR. COCHRAN: If you know. That's fine.

14 THE WITNESS: No.

15 MR. COCHRAN: The answer is no?

16 MR. DAVIDSON: Was the answer no or I
17 don't know?

18 THE WITNESS: I really don't know what
19 you're trying to get me to say. I don't understand
20 what your question is.

21 MR. DAVIDSON: Fair enough.

22 BY MR. COCHRAN:

23 Q. I think my question is very clear.
24 You testified that your initial orientation in
25 the Brown & Root's quality control philosophy

1 was through an initial orientation which included
2 a lecture, which included a film and which
3 included an examination. I've asked you
4 repeatedly if there's any subsequent such
5 orientation which Brown & Root quality control
6 inspectors must go through on a periodic basis.

7 MR. DAVIDSON: And I'm going to object
8 to the question on the basis of my earlier statement
9 that this is an interrogation designed to elicit
10 facts relevant not to Mr. Mansfield's performances
11 or of his responsibilities of a QC inspector and
12 not with the respect to the topics of these
13 proceedings, which is alleged claims and incidents
14 of harassment, intimidation and threatening of
15 QC personnel.

16 These questions, sir, are plainly
17 designed to elicit information about the nature,
18 scope and implementation of the QA/QC program in
19 operation at Comanche Peak by Brown & Root and
20 TUGCO, and, as such, they are, as I earlier
21 represented, not proper subjects of this hearing,
22 but rather parts of a record previously made. And
23 extensive and exhaustive examination of this
24 subject and the QA/QC program has been made. The
25 record in that matter has been closed. It is

1 before the Board.

2 This is not only cumulative, but it is
3 really beyond the bounds of relevance in this
4 proceeding, and I'm going to have to ask the
5 witness not to answer any questions in this line.

6 Now, if you wish to ask questions, sir,
7 with respect to his personal experience in
8 orientation programs, I think that's perfectly
9 acceptable, but if you want him to try and
10 describe a program in operation at Comanche
11 Peak, I think that's a closed subject, as
12 far as I'm concerned.

13 BY MR. COCHRAN:

14 Q. Do you know?

15 MR. DAVIDSON: He's not answering
16 those questions, sir, so I think you ought to
17 put one before him that he can.

18 BY MR. COCHRAN:

19 Q. Have you ever been through any
20 reorientation besides through your new
21 certifications?

22 A. Yes, I have.

23 Q. Tell me about it.

24 A. The Quality Hotline.

25 Q. Okay. Is that the only one?

1 A. The reorientation, yeah.

2 Q. Is that the only reorientation you've
3 ever been through at Brown & Root?

4 MR. DAVIDSON: Excuse me, Mr. Mansfield.
5 Are you having trouble understanding the question?

6 THE WITNESS: Well, that's the only
7 reorientation I've been through. I don't know
8 what else to say.

9 BY MR. COCHRAN:

10 Q. Is that your answer?

11 A. Yeah.

12 MR. DAVIDSON: Please don't feel under
13 an obligation to provide anything other than a
14 factual response. If that is all you know, that
15 is a perfect answer because it's all you know.
16 As long as you are responsive to Mr. Cochran's
17 questions and you answer truthfully and you state
18 what you know, and you respect the limits of your
19 knowledge, and you do not guess and do not
20 speculate, your answer is complete as it is and
21 stands and is perfectly correct. Don't feel under
22 any obligation to accept any characterizations
23 from Mr. Cochran or any arguments or assumptions.
24 Merely state what you know as a fact from your
25 personal knowledge. That's perfectly fine.

1 BY MR. COCHRAN:

2 Q. Explain to me how your understanding of
3 claims of intimidation or harassment are to
4 be handled within Brown & Root's overall quality
5 assurance program.

6 A. First, if I was harassed as an inspector,
7 first thing I would do would be to go to my
8 supervisor and talk with him, tell him what
9 happened. In turn, I would think that he would
10 go to his supervisor, and he would get the
11 problem corrected. And if I did not get a
12 response from him, I would go to his boss
13 personally, myself.

14 Q. Now, part of the time that the hotline
15 was instituted, what was your understanding of
16 your options in the event the harassment and
17 intimidation on doing the job was coming from
18 your supervisor?

19 A. Would you ask me that again, please?

20 Q. What was your understanding of what
21 your options were prior to the hotline if the
22 intimidation and harassment was originating from
23 your supervisor?

24 MR. DAVIDSON: In other words, what
25 could you do? Where could you go to make a

1 complaint about such alleged harassment?

2 A. If I couldn't get anything from Brown
3 & Root, I could call the NRC.

4 BY MR. COCHRAN:

5 Q. Okay. Did you ever do so?

6 A. No, sir.

7 Q. Do you know of instances where your
8 fellow inspectors did, in fact, call the NRC?

9 A. No.

10 MR. DAVIDSON: I think that question
11 was asked and answered.

12 BY MR. COCHRAN:

13 Q. Were there affirmative policies that
14 you were aware of to encourage the inspectors to
15 seek out and find the non-conforming items as they
16 saw to do their job?

17 MR. DAVIDSON: Do you understand the
18 question, Mr. Mansfield?

19 THE WITNESS: I think I do. I'm going
20 to try and answer it.

21 MR. DAVIDSON: Now, be certain, because
22 I know Mr. Cochran joins me in saying to you he
23 doesn't want you to answer a question you don't
24 completely and thoroughly understand. Don't try
25 and guess at what the proper answer is. You

1 have to be sure you understand the question in
2 order to give a proper answer.

3 Would you like the question repeated?

4 THE WITNESS: Would you please repeat
5 it?

6 MR. COCHRAN: Can you read it back?

7 (Record read by the
8 reporter as requested.)

9 A. There was a procedure that we used
10 to report non-conforming conditions.

11 BY MR. COCHRAN:

12 Q. And that's the procedure of writing an
13 NCR or an unsat IR, is that correct?

14 A. Right.

15 Q. And what's your understanding of when
16 those two forms were to be used?

17 A. You write an unsat IR when you're doing
18 an in-process inspection.

19 Q. Okay.

20 A. If an unsat IR cannot be corrected
21 through an engineering change or whatever the
22 case may be, if it comes back as a use as is
23 disposition, that unsat IR is closed and an
24 NCR is written, because we cannot accept a
25 use as is disposition on an unsat IR.

1 Q. Okay.

2 A. Okay. An NCR is written if we have
3 an actual non-conforming condition. If it does
4 not comply to the drawing, procedure or
5 specifications as it is installed in the plant,
6 it is a non-conforming condition.

7 Q. Let me see if I understand what you've
8 just said to me. If you write an unsat IR, a
9 CMC is written, did I understand you-- I'm not
10 clear. I'm just asking for some clarification.
11 Did I understand you to say that the inspector
12 then has the responsibility to write an NCR?

13 MR. DAVIDSON: Mr. Cochran, I'm certainly
14 convinced you don't understand his testimony.

15 MR. COCHRAN: I'm asking for clarification.

16 MR. DAVIDSON: Maybe it would be best
17 to do it by question, Mr. Cochran.

18 MR. COCHRAN: I did.

19 MR. DAVIDSON: What was the question?

20 MR. COCHRAN: I think the witness
21 understood the question.

22 MR. DAVIDSON: I would like to hear
23 the question repeated, Ms. Reporter.

24 BY MR. COCHRAN:

25 Q. What happens with an unsat IR after it

1 leaves the inspector's hands?

2 A. First thing, he has got to get a
3 number on for tracking purposes. Then it's
4 sent to the responsible organization to be
5 corrected. That problem being corrected, whether
6 it would take a CMC or a rev--

7 MR. DAVIDSON: Does "rev" stand
8 for revision?

9 THE WITNESS: Yes.

10 A. (continuing) --additional documentation,
11 it really depends on what the problem is, but the
12 unsat IR in your question is forwarded to the
13 responsible organization to correct the problem.

14 Q. What happens if it comes back use as is?

15 A. We write an NCR and close out the
16 unsat.

17 Q. That's where I misunderstood you before.

18 A. Okay.

19 Q. Who in that situation would make the
20 determination directing that it be used as is?

21 A. Engineering.

22 Q. And so if engineering made the determination
23 on an unsat IR to use as is, what does the
24 inspection department then do?

25 A. We in turn write an NCR because we cannot

1 accept a use as is disposition on an unsat IR.

2 Q. So it's part of the QC inspector's
3 responsibilities to not accept that engineering
4 judgment, is that correct?

5 MR. DAVIDSON: I'll object to the
6 form of the question.

7 MR. COCHRAN: You may answer. That's
8 just for the record.

9 A. The responsibility of the QC is to
10 identify, "Hey, we've got a problem." And it's
11 up to engineering to make the determination as
12 to what to do about it. And if they accept--if
13 we feel like they've got a problem and we accept
14 it or not accept it, I don't think that falls
15 under the category of quality control. That's
16 up to engineering.

17 BY MR. COCHRAN:

18 Q. Okay. Well, let me ask you this.

19 MR. DAVIDSON: Excuse me. I would
20 like to talk to the witness, please. I'm having
21 trouble following his responses.

22 MR. COCHRAN: You just don't like
23 what he said. You just want to woodshed him.
24 We're in the middle of the deposition. And I
25 want that on the record.

1 MR. DAVIDSON: Mr. Cochran, you can
2 make whatever assertions you want.

3 (Discussion off the record.)

4 MR. DAVIDSON: Mr. Cochran, we can go
5 back on the record. The witness has straightened me
6 out.

7 BY MR. COCHRAN:

8 Q. Mr. Mansfield, were you acquainted with
9 Robbie Robinson?

10 A. Yes, I was.

11 Q. What was the nature of your acquaintance
12 with him?

13 A. I was a QC inspector in the fab shop, and
14 he was the general foreman in the fab shop.

15 Q. Were you in the fab shop--or what period
16 of time were you in the fab shop?

17 A. Oh, in mid-1979 to mid-1980.

18 Q. What was the period of time that you
19 had left Brown & Root? Tell me that again. You
20 initially joined them in 1979, and then there
21 was a break in there. When was that?

22 A. I left in 1980, in October of 1980.

23 Q. And you rejoined them when?

24 A. October of 1981.

25 Q. So it was during your first term of

1 employment that you were in the fab shop?

2 A. Yes.

3 Q. What department are you currently a
4 QC inspector in?

5 A. What department?

6 Q. Yes. If that's not the right term, I
7 apologize; but what area do you supervise as a
8 QC inspector?

9 MR. DAVIDSON: What discipline?

10 MR. COCHRAN: What discipline.

11 A. We do hangers, piping, mechanical
12 equipment.

13 Q. When you first rejoined that Brown
14 & Root in 1981, what discipline were you a QC
15 inspector for?

16 A. Hangers.

17 Q. How long were you working only with
18 hangers? How long were you a QC inspector only
19 for the hangers discipline?

20 A. At what time period?

21 Q. From 1981 forward. Are you telling me
22 it was sporadic, that you were in and out of that
23 discipline?

24 MR. DAVIDSON: Objection to the form
25 of that question.

1 A. No, I'm not telling you that I was
2 in and out, but I am certified to do more than
3 just hanger inspection.

4 Q. Okay. I was not asking the areas you
5 were certified in.

6 A. Okay.

7 Q. I'm asking you what you actually did
8 on the job, what your job assignment was. And
9 you told me initially it was in hangers.

10 A. Right.

11 Q. How long were you an inspector, as
12 far as job duties are concerned, only for hangers?

13 A. Right now? I mean, during this time
14 period or--

15 Q. Yes, from 1981 forward.

16 A. Since I went back with them in 1981,
17 I have worked hangers--the majority of my work
18 has been in hangers, let me say that.

19 Q. Had you worked in hangers in the
20 1979 to 1980 period?

21 A. Yes, I did.

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1 Q Who was your supervisor at that period
2 of time?

3 A When I first joined Brown & Root in 1979,
4 a man by the name of Chuck Irby was the supervisor.

5 Q Did he remain your supervisor until you
6 left in October of 1980?

7 A No.

8 Q Who replaced Mr. Irby?

9 A A man by the name of Joe Crossland.

10 Q What position did they hold, Mr. Irby
11 and Mr. Crossland?

12 A Supervisors.

13 Q Were they lead inspectors such as you now --

14 A No.

15 MR. DAVIDSON: I'm sorry. I didn't
16 hear you, Mr. Mansfield.

17 THE WITNESS: No, they were not lead
18 inspectors. Chuck Irby was a supervisor and so
19 was Joe Crossland.

20 Q Who replaced Joe Crossland?

21 A James Patton.

22 Q When did Mr. Patton become supervisor?

23 A 1980. I can't tell you the exact time.

24 Q Did you discuss with Robbin Robinson your
25 work as a hanger inspector?

1 A Did I discuss my work with him?

2 Q Yes.

3 A Jobwise, yes.

4 Q Yes, jobwise.

5 A Yes.

6 Q Did you ever state to him you didn't
7 inspect hangers because you knew you would be
8 overridden?

9 A No, I didn't.

10 Q Did you ever say anything to him close to
11 that?

12 A No, sir, I didn't.

13 Q Can you point any conversation -- that's
14 a bad question.

15 Do you recall any conversation with Mr.
16 Robinson that would have led him to have believed
17 that you were making a statement of that nature?

18 MR. DAVIDSON: I'm going to --

19 MR. COCHRAN: That's a bad question, too.

20 MR. DAVIDSON: Now, listen, Mr. Cochran,
21 you have to let me object to the questions before
22 you do.

23 BY MR. COCHRAN:

24 Q Do you have any idea why Mr. Robinson
25 would have thought -- or what would have occurred

1 that would have caused Mr. Robinson to think you
2 were telling him that? I can't do it any better.

3 MR. DAVIDSON: I've got to object to
4 that question, Mr. Cochran. I don't think he can
5 answer that.

6 BY MR. COCHRAN:

7 Q When did the orientation relating to the
8 Hotline take place?

9 A I want to say the standard in the latter
10 part of 1980, but I can't be sure.

11 Q Okay. November of '80 sound about right?

12 A Possibly.

13 MR. DAVIDSON: I just want to point out,
14 Mr. Mansfield, that the reporter is taking your
15 deposition down in stenotype, and when you shake
16 your head or nod, or use a hand gesture, she can't
17 put that in the record, and although we know you're
18 shrugging your shoulders and suggest that's as
19 good a guess as any, that doesn't get across, so
20 if you will try when Mr. Cochran asks a question
21 to say yes, no, or I don't know, that will be more
22 helpful.

23 BY MR. COCHRAN:

24 Q Well, you mentioned there was an
25 orientation in regard to the new Hotline. Tell

1 me what you recall about that orientation.

2 A We were given a phone number that we
3 would call if we felt like there was a nonconforming
4 condition that was not being properly handled. We
5 were also informed that there was a full-time attorney
6 on site and was given his number that we could
7 call and talk to him.

8 Q What were you told about the reasons
9 why the Hotline procedure and the full-time
10 attorney were instituted?

11 A Because we wanted to build a quality plant.

12 Q Who gave the orientation that you
13 attended?

14 A I don't know.

15 Q Were there multiple orientations with
16 small groups or was it merely one giant orientation
17 with everybody there at the same time?

18 A There was only, you know, 30 or 40 people
19 per orientation.

20 (Outside interruption.)

21 BY MR. COCHRAN:

22 Q There were only a few people at your
23 orientation session?

24 A What?

25 Q Did I understand you to say there only

1 a few people at your orientation session in regard
2 to the Hotline?

3 MR. DAVIDSON: I object to the question.
4 I think that's a mischaracterization --

5 MR. COCHRAN: That's why I asked. I
6 didn't remember, and I want to have her read it
7 back.

8 MR. DAVIDSON: I'm sorry.

9 BY MR. COCHRAN:

10 Q How many people, do you remember?

11 A 30 or 40 people. I'm not sure.

12 Q Was it handled by departments or
13 by work groups or just on a time basis of come by
14 when you can get it in? How was it set up?

15 A I would say it was handled by departments.

16 Q Were you told anything about why it
17 was being instituted beyond that we want to have
18 a good quality control and good quality plant?

19 A I feel like that they wanted to give
20 people the opportunity to be able to voice a concern.

21 Q Without feeling intimidated?

22 A Right.

23 Q Without feeling that they were under
24 the threat of harassment.

25 A I would say so.

1 Q And without feeling that they were
2 putting their jobs on the line?

3 A I would say yes.

4 Q Prior to the institution of the Hotline
5 had you felt like your job would be on the line
6 if you complained about any harassment or intimidation
7 that you saw?

8 A No, sir.

9 Q Did you see inspectors being harassed
10 or intimidated or interfered with in the performance
11 of their job?

12 A No, sir.

13 Q Were you ever harassed, intimidated,
14 or interfered with in the performance of your job?

15 A No, sir.

16 Q Were any of your unsatisfactory inspection
17 reports or NCR's ignored?

18 A No, sir.

19 Q Were any of your -- did any of your
20 supervisors attempt to influence you to not write
21 NCR's or to not write as many NCR's or unsat. IR's?

22 A No, sir.

23 Q Are you aware that other inspectors
24 have felt like they were so harassed and intimidated?

25 MR. DAVIDSON: I'm objecting to that question

1 because it seems to inevitably lead to eliciting hearsay
2 testimony and unsubstantiated assertions from an
3 unidentified source.

4 MR. COCHRAN: That question doesn't
5 call for a hearsay, and I'm entitled to an answer
6 from that question.

7 MR. DAVIDSON: I think you're asking
8 for rumor and innuendo. I don't think this is
9 the kind of record since it's evidentiary that should
10 be cluttered up with scuttlebutt, but rather with
11 valid admissible testimony.

12 MR. COCHRAN: I asked whether he was
13 aware of such instances. Whether I ask him a
14 follow-up question is my decision, which I have not
15 made yet.

16 MR. DAVIDSON: Would you repeat the
17 question, Ms. Reporter?

18 (The reporter read the record as requested.)

19 MR. DAVIDSON: I must object to that
20 question. There is no evidence in the record to
21 establish a foundation for the premise implicit
22 in that question, that there are or exist QC
23 inspectors who have felt harassed or intimidated.
24 There's been absolutely no evidence in the record to
25 substantiate such assertion or even give rise to such

1 allegation. I will not allow the witness to
2 answer such speculative questions.

3 MR. COCHRAN: Let me rephrase that
4 slightly.

5 BY MR. COCHRAN:

6 Q Are you aware of other instances? Are
7 you aware of instances of other inspectors being
8 harassed, intimidated or interfered with in the
9 performance of their job?

10 A No.

11 Q Has any other inspector said to you
12 that he felt like he was being interfered with in
13 the performance of his job?

14 A No.

15 Q Or that he was being harassed or intimidated?

16 A No.

17 MR. DAVIDSON: Off the record.

18 (Discussion off the record.)

19 BY MR. COCHRAN:

20 Q Do you remember a QC manager named
21 Rose Klinist?

22 A Yes, I do, Klinist.

23 Q Kli.ist. M rather than N, is it
24 K-l-i-m or K-l-i-n?

25 A I think it's K-l-i-m.

1 MR. DAVIDSON: Is that M as in Mark,
2 as opposed to N as in Nancy?

3 THE WITNESS: M as in Mark.

4 BY MR. DAVIDSON:

5 Q Was she QC manager during your first
6 term with Brown & Root, or your second term?

7 A First term.

8 Q Do you know the circumstances of her
9 being returned to Houston?

10 A No.

11 Q Were you aware of any differences in
12 the way the QC department was run while she was
13 QC manager as opposed to either before or after her
14 occupying that position?

15 A No.

16 Q From what you know and what you observed,
17 was the QC department run any tighter or any looser
18 either under her or not under her?

19 A No.

20 MR. COCHRAN: I believe I'm going to
21 pass the witness at this time.

22 MR. VOEGELI: I have no questions.

23 MR. DAVIDSON: I have a few questions,
24 if I may.

25 MR. COPPOCK: May I take just a couple

1 minutes? May we have just a couple seconds?

2 MR. COCHRAN: Sure.

3 (Short recess.)

4 MR. DAVIDSON: Let's go back on the record.

XXXXX

5 EXAMINATION

6 BY MR. DAVIDSON:

7 Q Mr. Mansfield, earlier in this afternoon's
8 proceedings, you testified that you were an NDE,
9 that is, nondestructive examination specialist
10 while involved in the Ingles Shipyard in
11 Pascadula; is that correct?

12 A Yes.

13 Q Let me be clear in this. When were you
14 hired as an NDE specialist in the Ingles Shipyard?

15 A I started to work in July of 1970 as
16 an apprentice. When I left in 1978, I had become
17 an NDE specialist.

18 Q All right, sir.

19 Now, in order to become an NDE specialist,
20 did you have to take any training?

21 A Yes, I did.

22 Q Was that training in the form of one
23 course or more than one course?

24 A More than one course for the different
25 phrases of NDE.

1 Q In other words, you were trained in
2 more than one aspect of nondestructive examination?

3 A Yes, sir.

4 Q Could you list for me each of the areas
5 or disciplines under the NDE program that constitutes
6 the areas in which you were certified?

7 A I was a radiographer, a UT examiner.

8 Q I appreciate you know what UT is,
9 but --

10 A Ultrasonic testing. Mag particle testing,
11 liquid penetrant testing. I also performed
12 hardness tests and I was certified in acid spot
13 tests.

14 Q Now, were you certified in each of these
15 examination techniques?

16 A Yes, I was.

17 Q And how did you become certified in
18 radiography? In other words, what training did
19 you have to receive?

20 A I had to go to 40 hours of classroom
21 training in order to become just a helper. Okay.
22 And after a certain amount of OJT I had to go back
23 to school for another 40 hours to become a
24 radiographer -- to be certified as a radiographer.

25 Q Did you have to take a test at the

1 conclusion of this classroom training?

2 A Yes.

3 Q And did you take it?

4 A Yes.

5 Q Did you pass it on the first attempt?

6 A Yes.

7 Q Now, you've stated you were certified
8 in ultrasonic testing which I think you called UT.

9 A Right.

10 Q Did you have to take any training to
11 be certified in UT?

12 A Yes, I did.

13 Q Could you describe that training?

14 A All right. Ultrasonics, you have to go
15 40 hours for theory, and then 40 hours for each
16 technique, and I was certified in fitness, quality,
17 and weldments.

18 Q Those are three separate techniques
19 under the ultrasonic discipline?

20 A Correct.

21 Q And your testimony is that you had to
22 take 40 hours of classroom training in each of those.
23 Have you completed the initial 40 hours of theory?

24 A Yes. But under weldments you had to go
25 back and go through the 40 hours of theory prior

1 to being certified in weldment.

2 Q So you had an additional training in
3 theory when you get certified in that sub-technique?

4 A Right.

5 Q Now, at the conclusion of this classroom
6 training, did you take a test?

7 A Yes, I did.

8 Q Did you pass that test?

9 A Yes, I did.

10 Q Did you pass it on the first attempt?

11 A Yes, I did.

12 Q At the conclusion of the training and
13 the testing, did you then receive any further training
14 in the area?

15 A At the end of the training, I was --

16 Q I mean by that did you receive something
17 in the nature of on-the-job training?

18 A Yes.

19 Q Did the on-the-job training that you
20 received require a certain stated number of hours
21 before it was completed? In other words, was there
22 a period of time during which you were specifically
23 required to receive this on-the-job training?

24 A No, sir.

25 Q You say you were certified in mag particles,

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which I think is magnetic particle testing.

A Yes, it is.

Q Did you have to take classroom training for that certification?

A Yes, I did, 40 hours.

Q At the conclusion of that classroom training, did you take a test?

A Yes.

Q Did you pass that test?

A Yes, I did.

Q Did you pass it on the first attempt?

A Yes, I did.

1 Q. Did you thereafter have on-the-job training?

2 A. Yes, I did.

3 Q. In order to be certified in what you've
4 testified in liquid penetrant, which I think you called
5 PT testing, did you have to take classroom training?

6 A. Yes, sir.

7 Q. How much classroom training?

8 A. Forty hours.

9 Q. And at the conclusion of that classroom training,
10 did you take a test?

11 A. Yes, I did.

12 Q. Did you pass that test?

13 A. Yes, I did.

14 Q. On the first attempt?

15 A. Yes, sir.

16 Q. Thereafter did you have additional on-the-job
17 training?

18 A. Yes, sir.

19 Q. Now, you stated you were certified to perform
20 hardness testing.

21 A. Correct.

22 Q. Did you receive classroom training for the
23 hardness testing?

24 A. Yes, I did.

25 Q. How much time?

1 A. It was a portion of the quality and ultrasonic
2 so that I received the hardness training.

3 Q. Did you have to pass a test in hardness testing?

4 A. Yes, I did.

5 Q. And did you take such a test?

6 A. Yes, I did.

7 Q. And did you pass it on the first attempt?

8 A. Yes, I did.

9 Q. You said you were also certified in acid spots
10 testing?

11 A. Yes, sir.

12 Q. Did you take classroom training for that?

13 A. Yes, sir.

14 Q. How many hours?

15 A. Forty hours.

16 Q. And did you take a test at the conclusion of
17 that classroom training?

18 A. Yes, sir.

19 Q. Did you pass that test?

20 A. Yes, sir.

21 Q. On the first attempt?

22 A. Yes, sir.

23 Q. And did you thereafter receive on-the-job training?

24 A. Yes, sir.

25 Q. When you returned to Ingles in 1975, did you return

1 in the capacity of a quality control inspector?

2 A. Yes, I did.

3 Q. Were the certifications that you had previously
4 attained sufficient to obtain that job for you?

5 A. I had to recertify before I could go to work.

6 Q. Now, which of the disciplines did you have to
7 recertify in?

8 A. Radiography, ultrasonic, mag, particle, liquid
9 penetrant, hardness testing, acid spot tests.

10 Q. In other words, you had to be recertified in
11 every single one of these specialties?

12 A. Yes, sir.

13 Q. Did you also say that you worked in the
14 nuclear submarine program at Ingles?

15 A. Yes, sir.

16 Q. Were there certain specifications that you
17 received as an NDE Specialist previously, the same
18 certifications as you received to work in the Navy
19 nuclear submarine program?

20 A. No, sir.

21 Q. Now, did the Navy nuclear submarine program
22 certifications differ from the earlier ones?

23 A. They were quite a bit more stringent. I had
24 to recertify in liquid penetrant, visual, mag particle.

25 Q. When you say, "visual," do you mean visual

1 weld inspection?

2 A. Yes, sir.

3 Q. And you had to recertify after you returned to
4 work or that was part of that recertification when you
5 returned to work?

6 A. When I moved to the submarine program, it was a
7 different base.

8 Q. So this is the third time you were recertified
9 in these specialties at Ingles?

10 A. Yes, sir.

11 Q. And what was your job title in the nuclear submarine
12 program?

13 A. I was the nuclear quality assurance inspector.

14 Q. Now, when you left the Ingles program, submarine
15 program, you went to work for Bechtel. Did you work in
16 quality control?

17 A. Yes, I did.

18 Q. What specialties were you certified in, sir?

19 A. Typing, mechanical and weld inspection.

20 Q. Did you have to be recertified in those
21 specialties or certified in them for the purpose of Bechtel's
22 employment?

23 A. Yes, sir.

24 Q. Did you take a test?

25 A. Yes, sir.

1 Q. In each of these three disciplines?

2 A. Yes, sir.

3 Q. And did you pass th t test?

4 A. Yes, sir.

5 Q. Did you pass it on the first attempt?

6 A. Yes, sir.

7 Q. I'm not going to -- Well, I will. When you
8 went to Brown & Root in 1979, did you go through a process
9 of recertification?

10 A. Yes, sir.

11 Q. And did you have to take classroom training?

12 A. Yes, sir.

13 Q. And did you have to pass a test?

14 A. Yes, sir.

15 Q. Did you pass the test?

16 A. Yes, sir.

17 Q. Did you pass it on the first attempt?

18 A. Yes, sir.

19 Q. In each of the disciplines you earlier mentioned,
20 you were certified in?

21 A. Yes, sir.

22 Q. Were you also in quality control inspection when
23 you left Brown & Root to work for Stone & Webster in or about
24 October of 1980?

25 A. Yes, sir.

1 Q. What was your title there?

2 A. I was a senior quality control inspector.

3 Q. Did you have to be recertified?

4 A. Yes, sir.

5 Q. And were you recertified?

6 A. Yes, sir.

7 Q. In what specialties?

8 A. Visual inspection, hanger, piping, mechanical
9 equipment, welding.

10 Q. I see. What was your job at -- I hope I've got this
11 right. Is it WCR?

12 A. WBG.

13 Q. What is it?

14 A. WBG.

15 Q. At WBG--and I'm not going to try to repeat the name
16 of it, but what was your job title there?

17 A. I was a quality engineer.

18 Q. Quality engineer?

19 A. Yes.

20 Q. And did you have to be recertified in your
21 specialties there?

22 A. No, sir.

23 Q. And when you returned to Brown & Root in October
24 of 1981, as you've testified, were you recertified at that
25 time?

1 A. Yes, sir.

2 Q. In all of the specialties we've previously
3 discussed?

4 A. Yes, sir.

5 Q. Did you have to take classroom training?

6 A. Yes, sir.

7 Q. Did you have to take a test?

8 A. Yes.

9 Q. Did you have to pass those tests?

10 A. Yes, sir.

11 Q. And did you do so?

12 A. Yes, I did.

13 Q. On the first attempt?

14 A. Yes, I did.

15 Q. Now, for a summary question, Mr. Mansfield, how many
16 years have you been involved in quality control inspection?

17 A. Approximately 14 years.

18 Q. And your current position is as a lead quality control
19 inspector?

20 A. Yes, it is.

21 Q. When you returned to Brown & Root in October of 1981,
22 and after you were recertified in all of these various
23 specialties, to whom were you assigned-- No, strike that. To
24 what discipline were you assigned?

25 A. Hangers.

1 Q. And who was the superintendent in charge of
2 hanger inspection?

3 A. James Patton.

4 Q. And who was the lead QC to whom you reported as your
5 direct supervisor?

6 A. Billy Snellgrove.

7 Q. Billy Ray Snellgrove?

8 A. If his middle name is Ray, yes.

9 Q. Oh, you didn't know that?

10 A. No.

11 Q. All right, sir. How long were you assigned to the
12 hanger inspection crew that was superintended by James Patton?

13 A. Approximately six months.

14 Q. At the conclusion of that six-month period, where
15 did you then go?

16 A. I was sent to a group which is called quality
17 engineering completions.

18 Q. Now, who was the superintendent of quality
19 engineering completions?

20 A. Dwight Woodyard.

21 Q. I'm sorry, sir?

22 A. Dwight Woodyard.

23 Q. Dwight Woodyard. And who was the QC lead at that
24 time to whom you reported directly?

25 A. Greg Bennetzen.

1 Q. Would you spell that?

2 A. B-e-n-n-e-t-z-e-n.

3 Q. And what discipline was that in?

4 A. QC completions.

5 Q. And since that time you have now become a lead
6 QE?

7 A. Yes.

8 Q. Now, earlier you testified that one could not have
9 a use as is disposition to unsat IR.

10 A. That is correct.

11 Q. Could you have a use as is disposition to an
12 NCR?

13 A. Yes.

14 Q. Is it the job responsibility of a QC inspector to
15 monitor or otherwise evaluate the job performance or decisions
16 of the engineering departments?

17 A. No, sir.

18 Q. When an unsat IR is submitted, it is not procedure
19 to disposition it with a use as is?

20 A. That's correct.

21 Q. But it is to disposition an NCR by a use as is?

22 A. Yes, sir.

23 Q. Sir, when you testified that use as is is not a
24 proper disposition in some cases, it was only that the procedure
25 doesn't permit it to be entered in response to an unsat IR?

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

2 MR. DAVIDSON: Allow me to rephrase that.

3 BY MR. DAVIDSON:

4 Q. Thus, when you testified earlier, you were merely
5 testifying as to the procedures for dispositioning an unsat
6 IR and dispositioning an NCR?

7 MR. COCHRAN: Objection. That's leading and
8 suggestive.

9 MR. DAVIDSON: I don't believe that's leading.

10 A. Yes.

11 BY MR. DAVIDSON:

12 Q. And is it correct, then, that it is a proper
13 procedure to disposition a non-conforming condition with a
14 use as is if engineering so evaluates and approves?

15 A. That is true.

16 Q. And it is not the job of the QC inspector to
17 evaluate the engineering decision?

18 A. That's true.

19 Q. Now, if I may just take you--one question on your
20 qualifications, and I didn't quite fit this in. Did you ever
21 have any employment other than with a nuclear power plant or
22 a nuclear ship-building program?

23 A. Yes.

24 Q. What was that?

25 A. Between 1973 and 1975, I worked at various

1 construction sites as a carpenter.

2 Q. Did you ever work in any metallurgical fields?

3 A. Well, when I worked at the shipyard, I worked out
4 of the metrology lab.

5 Q. I see. So you were the NDE specialist in the
6 metrology lab?

7 A. Sure.

8 Q. Did you ever perform some constructive
9 examination for ship parts and bulk heads and plates?

10 A. Yes, I did.

11 We would take welders' samples and cut them,
12 polish them, acid etch them, photograph them, send them
13 to the Navy for records of the welder's certification.

14 Q. Thank you.

15 Turning to your employment at Brown & Root in 1979,
16 I believe you stated--and correct me if I'm wrong--that
17 you worked in the fabs jobs, that is the fabrication shop--

18 A. Yes, sir.

19 Q. --in or about the middle of 1979 to in or about
20 the middle of 1980, is that correct?

21 A. That's correct.

22 Q. And it was during the course of your employment
23 there as a QC inspector that you met Robbie Robinson, is that
24 correct?

25 A. That's correct.

1 Q. Earlier in this afternoon's proceedings, you
2 were asked whether you had ever discussed your job with
3 Mr. Robinson. Do you remember that?

4 A. Yes, I do.

5 Q. And I think you said, "Well, do you mean did
6 I talk about my job?" And Mr. Cochran said, "Yes." And
7 you said, "Well, I talked to Robbie job-wise."

8 A. Right.

9 Q. And I, frankly, am not sure I understood what
10 you meant by the word "job-wise."

11 A. What I meant by that, I didn't discuss the
12 job as a personal relation to Robbie. I discussed the job
13 as job-related problems that we ran into in the fab shops.
14 One particular problem that I had was that the fab shop craft
15 people were shooting Nelson studs on an embedded plate prior
16 to having the gun certified. And at that time I discussed
17 with Mr. Robinson that problem.

18 Q. My question--and I think I understand you now--
19 my question is what you meant by the word that you had
20 discussions with him job-wise. And I take it what you
21 mean is that you didn't have personal discussions with Mr.
22 Robinson about any number of unrelated matters and your own
23 personal feeling, but you had regular intercourse with Mr.
24 Robinson because your job demanded it? He was the general
25 foreman of the fab shop, and you were a quality control

1 inspector in that job, and you discussed with him the
2 work that the two of you had between each other? Is that
3 what you're saying?

4 A. Yes, sir.

5 Q. I understand. So when you say, "job-wise," you mean
6 you were having discussions about the job at hand?

7 A. Right.

8 Q. Now, Mr. Mansfield, in earlier testimony submitted
9 in these proceedings, Mr. Robinson says that you refused to
10 perform inspections. Is that true?

11 A. No.

12 Q. Well, let's take the matter of--what was that you
13 called it?

14 A. The Nelson stud.

15 Q. I'm sorry. --the Nelson stud. You had a discussion
16 with Mr. Robinson about that. How did that all come about?

17 A. I was called over to make inspections on some
18 Nelson studs, and when I got over there and I found out that
19 the gun had not been certified, which procedure requires that
20 the gun be certified and test studs shot, bent and inspector-
21 inspected to make sure that it was up to par to shoot these
22 studs. When I got there, I found the gun had not been
23 certified. I went back to my lead, told him the problem,
24 and we both in turn went and discussed it with Robbie
25 Robinson.

1 We showed him exactly in the procedure--

2 Q. Let me see if I understand now. You were called
3 to inspect some Nelson studs?

4 A. Correct.

5 Q. Nelson studs are implanted in the--

6 A. Embed plate.

7 Q. By using a stud-shooting gun?

8 A. Right.

9 Q. Do I understand correctly, are you saying in
10 order to use such a gun, the gun itself must be first
11 certified, as you said, for, what, before it can be used?
12 What has to be done to it?

13 A. Well, in order to certify the gun, there are
14 test studs that have to be shot, and you have to do a bend
15 test on them in order to make sure that the weld is good and
16 the stud is not going to break off prior to shooting
17 production.

18 Q. Does a quality control inspector have to witness
19 that test?

20 A. Yes, they do.

21 Q. So before they can use the gun, you've got to
22 certify the gun or inspect the gun's use with these tested
23 studs?

24 A. Yes, sir.

25 Q. And then they would shoot the studs, and then you

1 would test--excuse me. I mean, you would inspect the Nelson
2 studs that were then embedded?

3 A. Yes, sir.

4 Q. Now, going back to this incident, you were called
5 over to inspect Nelson studs, and they had already been
6 embedded; is that what your testimony is?

7 A. Yes, sir.

8 Q. And you had not witnessed or otherwise certified
9 the gun itself that was used?

10 A. That's true. I had not witnessed it.

11 Q. And that was not according to procedure?

12 A. That was not according to procedure.

13 Q. Did you then refuse to make the inspection of the
14 Nelson studs?

15 A. Yes, sir. I wasn't willing to inspect them if
16 they weren't any good.

17 Q. Let me see if I understand what you mean by "they
18 weren't any good."

19 A. Let me rephrase it. I could not sign them off
20 because they did not follow procedure.

21 Q. In other words, you would make an inspection,
22 and there would be a package?

23 A. Yes, sir.

24 Q. And you would take the package and sign off one
25 element or one thing in the package?

1 A. Yes.

2 Q. And is it your statement that you say you would
3 not sign off on these Nelson studs; is that what you're
4 saying?

5 A. Yes, sir.

6 Q. And the reason you would not sign off on them
7 was you had not certified the gun?

8 A. That's true.

9 Q. Did you take this matter up with Mr. Robinson?

10 A. I and my lead.

11 Q. I should ask you, who presented you with these
12 studs to be inspected?

13 A. Some of the craftsmen in the shop.

14 Q. Not Mr. Robinson?

15 A. No.

16 Q. And did you tell the people of the craft, "I can't
17 sign off on these because I have not witnessed and certified
18 the gun"?

19 A. Yes, sir.

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

21 BY MR. DAVIDSON:

22 Q. What did you tell the craft people?

23 A. I told them that I couldn't buy the studs.

24 Q. What did they say to you?

25 A. Nothing.

1 Q. Well, they didn't just stand there mutely,
2 did they?

3 A. Well, basically asked, you know, "Why, why not?"
4 And I told them why I couldn't.

5 Q. And what did they say?

6 A. There was nothing that they could say. At that
7 point in time I went with my lead to Mr. Robinson.

8 Q. Let me see if I follow this. Why did you feel
9 it necessary to go back to your lead QC to see Mr. Robinson
10 if the craft accepted your position?

11 A. Because I felt like he needed to be aware of the
12 problem.

13 Q. You mean, Mr. Robinson should be advised?

14 A. Right.

15 Q. And you wanted to bring somebody who was at the
16 appropriate level; is that why you brought your lead?

17 A. Yes, sir.

18 Q. And did you and he--I should ask you, who was
19 your lead at that time?

20 A. James Patton.

21 Q. And did you and Mr. Patton go and see Mr.
22 Robinson?

23 A. Yes, we did.

24 Q. And did you tell Mr. Robinson you could not sign
25 off or complete the inspection of the Nelson studs because of

1 the problem you indicated earlier, because you had not
2 seen or witnessed the certification of the gun?

3 A. Yes, I did.

4 Q. What did Mr. Robinson say?

5 A. "Show me in the procedure where it says that."

6 Q. He wanted proof, he wanted convinced?

7 A. Yes, sir.

8 Q. What did you do?

9 A. Showed him the procedure.

10 Q. You showed him the procedure?

11 A. Yes.

12 Q. Should Mr. Robinson have been familiar with
13 that procedure?

14 MR. COCHRAN: That calls for a conclusion on
15 the part of the witness.

16 BY MR. DAVIDSON:

17 Q. Is it your understanding, Mr. Mansfield, that the
18 general foreman of the fab shop should be familiar with the
19 procedures applicable to the embedding of Nelson studs by
20 his craft employees?

21 MR. COCHRAN: Same objection.

22 MR. DAVIDSON: You may answer that question.

23 A. Yes, sir. I feel like he should have been
24 aware.

25 BY MR. DAVISON:

1 Q. Can you think of any other occasion where
2 you were unable to make an inspection or sign off on an
3 inspection because of failure to follow procedures in the
4 fab shop?

5 A. No, sir.

6 Q. Now, in earlier testimony filed in these
7 proceedings, Mr. Robinson has alleged that you refused to
8 make inspection. Could it be that he had this incident
9 in mind?

10 MR. COCHRAN: Objection. That calls for
11 speculation.

12 MR. DAVIDSON: I'll accept that.

13 BY MR. DAVIDSON:

14 Q. Mr. Mansfield, other than the incident to which we
15 have just discussed about the Nelson studs, is there any other
16 occasion while you were in the fab shop that you were
17 unable to make an inspection or sign off on presented
18 fabrications because of your perception or understanding
19 that procedures had been violated?

20 A. It's kind of a hard question to answer with a "yes"
21 or "no".

22 Q. All right. I'll try an easier question for you.

23 Mr. Mansfield, could material, that is fabrications
24 and components that would be fabricated for hangers, be
25 released from the fab shop for installation in the field

1 without full documentation and acceptance by a quality
2 control inspector?

3 A. No, sir.

4 Q. It could not?

5 A. No, sir.

6 Q. And, therefore, a failure by a quality control
7 inspector in the fab shop to sign off on a component would
8 make it impossible to submit that material to the field for
9 installation?

10 A. That's true.

11 Q. Because no material could leave the shop without
12 a full sign-off, was it necessary in order to require a
13 correction that an NCR or unsat IR be filed on in-process
14 work in the fab shop?

15 A. During that period of time, the unsat IR program
16 was not in effect.

17 Q. Was the program then not to sign off on proffered
18 in-process work? When I say "proffered," I mean when in-process
19 work is presented to you, like components that have not been
20 installed and made in the fabrication shop. Since there was
21 at that time no unsat IR procedure, was the procedure for you
22 merely to refuse to sign off on that because of what you
23 believed to be a violation of procedure?

24 MR. COCHRAN: I'm going to object. That's a
25 leading question. Just ask him what the procedure was.

1 BY MR. DAVIDSON:

2 Q. I think that Mr. Cochran has a point there.

3 What I'm trying to find out from you, Mr.
4 Mansfield, is since you said they didn't have the unsat
5 procedure at that time, what we both want to know is
6 what was the procedure for you to implement?

7 A. Of course, I--you know, procedure, you've got
8 a set of tolerances to go by. If I went over and there
9 was a mistake made in the fabrication of that part, I
10 would tell the craft people that I cannot sign it off,
11 that it is incorrect, and then, in turn, they would re-fab
12 the part, and when it was correct, I would inspect that
13 it was correct per the drawing. I would sign it off, and
14 it would be shipped out.

15 MR. COCHRAN: So it's verbal, is what you're
16 saying? It's just a verbal exchange between you and the
17 craft?

18 THE WITNESS: Yes, sir.

19 MR. COCHRAN: Sorry.

20 BY MR. DAVIDSON:

21 Q. If the craft disagreed with your decision, what
22 avenue did they have? What could they do?

23 A. Nothing. They could prove me wrong, I'm willing
24 to accept that.

25 Q. I understand. But, I mean, let us say that they

1 disagreed with your view, they thought it was according
2 to procedure, who would they go to to say that they felt
3 that your decision was incorrect and they didn't want to
4 re-fab the part; they wanted to send the part out as is?

5 A. They would come to me first.

6 Q. I assumed that, but you would disagree with them?

7 A. Right. And I would more than likely show them
8 in the procedure where--

9 Q. You would show them the procedure?

10 A. Right.

11 Q. And then what? I assume sometimes that would
12 convince them, but sometimes it might not?

13 A. If it didn't, they would go to my supervision.

14 Q. Who would they go to over you?

15 A. At that time, James Patton or Joe Crossland.

16 Q. That would be the superintendent?

17 A. Yes.

18 Q. Would they ever go up the chain of command
19 in the craft area, namely, to their foreman or their
20 general foreman?

21 A. Sure.

22 Q. So they might go, ultimately, to Mr. Robinson,
23 who was at that time, the general foreman of the fab shop?

24 A. Yes.

25 Q. Did that ever happen?

1 A. Yes.

2 Q. Can you describe an incident where that happened?

3 A. Well, the basic--the Nelson stud problem.

4 Q. The Nelson stud problem was such an instance?

5 A. Yes. It happened daily, you know.

6 Q. So if I understand, the procedure for you at
7 that time was to refuse to sign off on fabricated in-process
8 work that did not meet the procedure?

9 A. Yes.

10 Q. And then I understand that if the documentation
11 was not complete, the work could not be sent out to the
12 field for installation?

13 A. That's right.

14 Q. Other than this procedure where you would refuse
15 to sign off on proffered parts, did you ever refuse to
16 actually make an inspection?

17 A. No, sir.

18 Q. Did anyone ever tell you not to make an inspection?

19 A. No, sir.

20 Q. Did anyone ever tell you not to write an unsat IR?

21 A. No, sir.

22 Q. Did anyone ever tell you not to write an NCR?

23 A. No, sir.

24 Q. During the time that you were under the supervision
25 of Mr. Patton, did he review your packages?

1 A. Did--

2 Q. He or his designee, you know, review your--

3 A. James Patton?

4 Q. Yes, your hanger packages.

5 A. Yes, sir, I'm sure he did.

6 Q. Do you know the purpose for which he reviewed them?

7 A. Procedure.

8 Q. Did he ever ask you to correct a hanger package?

9 A. Sure.

10 Q. Did he ever ask you to change an IR?

11 A. No.

12 Q. What corrections did he ask you to make on the
13 packages?

14 A. Well, sometimes I would forget to put the rev to
15 the procedures or N/A certain blanks that are not applicable.
16 If I had made a mistake and recorded something wrong, I had
17 to go out and reinspect it and come back and make that
18 correction.

19 Q. You had to reinspect before you could make a
20 correction?

21 A. Yes.

22 Q. That was also a procedure?

23 A. Right.

24 Q. Did Mr. Patton find a lot of mistakes in your
25 packages?

1 A. I wouldn't think so.

2 Q. Is that a no?

3 A. No.

4 Q. Did you ever work under the supervision of Billy
5 Ray Snellgrove as a lead QC?

6 A. Yes, sir.

7 Q. Did he or his designee also review your packages?

8 A. Yes, sir.

9 Q. Was your experience with Mr. Snellgrove much the
10 same as your experience that you've described with Mr. Patton?

11 A. Yes, sir.

12 MR. DAVIDSON: I think that concludes the questions
13 that I have at this time.

14 Any re-examination by you, Mr. Cochran?

15 MR. COPPOCK: I don't have anything.

16 MR. DAVIDSON: Mr. Voegeli?

17 MR. VOEGELI: I have no questions.

18 MR. COCHRAN: I have no further questions.

19 MR. DAVIDSON: At this time, I offer to you, Mr.
20 Cochran, the opportunity to close the evidentiary record
21 and take a discovery deposition of Mr. Mansfield.

22 MR. COCHRAN: All of our questions have been
23 evidentiary in nature and will continue to be so.

24 MR. DAVIDSON: We will close the record for this
25 witness.

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(Whereupon, at 2:40 p.m., the
deposition was concluded.)

