

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: Jimmie Green

Location: Glen Rose, Texas

Pages: 35,000-35,078

Date: Monday, July 9, 1984

*Original to E. Pleasant
H-1149*

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1 copy to Eric Johnson, Region 10

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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 9, 1984

Deposition of: JIMMIE GREEN

called by examination by counsel for Intervenors,
taken before Mimie Meltzer, Court Reporter,
beginning at 9:55 a.m., pursuant to agreement.

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APPEARANCES:

FOR THE APPLICANT:

MALCOLM H. PHILIPS, JR., ESQ.
Bishop, Liberman, Cook, Purcell & Reynolds
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FOR THE NRC STAFF:

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FOR THE INTERVENOR:

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FOR JIMMIE GREEN, THIRD PARTY WITNESS:

CHRIS REYNOLDS, ESQ.
Gibbs & Ratliff
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1100 Louisiana
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C O N T E N T S

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WITNESS:	Examination by:	Page:
JIMMIE GREEN	Mr. Sosnick	35,006 35,078
	Ms. Chan	35,072
	Mr. Philips	35,074

P R O C E E D I N G S

1
2 Whereupon,

3 JIMMIE GREEN

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

6 MR. SOSNICK: Mr. Green, my name is Charles Sosnick.
7 I am representing the Intervenor today and this is your
8 deposition. I think some people have some opening statements
9 and I will reserve and explicitly preserve the right for
10 Intervenor to make an opening statement at another time.

11 If someone else would like to go ahead and do that,
12 I will wait until I begin my questioning.

13 MR. PHILLIPS: My name is Malcolm Phillips. I am
14 a member of the law firm of Bishop, Liberman, Cook, Purcell
15 and Reynolds, counsel for Texas Utilities and Electric
16 Company, Applicants in this proceeding.

17 I appear here today in that capacity. Before
18 proceeding further, I wish to point out that Mr. Green is
19 appearing voluntarily, that he is not under subpoena.

20 Mr. Green's testimony has been requested from the
21 Applicant by CASE, Intervenor in this proceeding, on the
22 topics specified in CASE's letter to Leonard W. Belter, dated
23 June 27, 1984, a copy of which has been marked for identifi-
24 cation by the reporter and appended to the transcript of
25 Mr. Vega's deposition as Exhibit A.

The Applicant has already noted its objections to

1 the deposition procedures and schedule ordered by the Board
2 and it intends no waiver of those objections by Mr. Green's
3 appearance here today.

4 At this time I would like to summarize the guide-
5 lines established by the Board for this proceeding in the
6 taking of this deposition.

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

17 The Board also has ruled that only evidence based
18 on personal knowledge may be adduced and that hearsay, rumor,
19 innuendo and the like are not proper subjects of the eviden-
20 tiary portions of this deposition.

21 Finally, the Board has instructed the parties to
22 separate the evidentiary and discovery portions of their
23 examination of the witness to give effect to the rulings as
24 well as to ensure expeditious completion of this deposition.

25 We now offer Mr. Green as a witness for the
evidentiary portion of this deposition.

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

At the conclusion of that evidentiary deposition, the evidentiary record will be closed and with the opening of a new transcript to be separately bound, the discovery deposition of Mr. Green would commence should CASE decide to conduct such a deposition.

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

MR. REYNOLDS: Mine is not in the nature of an opening statement. I do want to say on the record, however, that my name is Chris Reynolds. I practice with the firm of Gibbs and Ratliff in Houston, Texas.

I am here today to represent Mr. Green individually. He is the third party witness who is not appearing under subpoena. He has voluntarily agreed to testify to help facilitate the Board's efforts to rule on the licensing application of TUGCO.

MS. CHAN: I wanted to say my name is Elaine Chan, of the Office of Executive Legal Director, USNRC, and I represent the NRC Staff in this proceeding.

1 MR. SOSNICK: All right, just as a preliminary, and
2 I don't want this to constitute an opening statement, we have
3 reserved that right, I will not specifically stipulate to
4 everything that Mr. Philips has stated.

5 We have had a meeting this morning and several
6 issues were discussed and I am sure as the parties agreed,
7 that will limit whatever scope that this deposition will
8 take.

9 Also as a preliminary, Mr. Green, you are here
10 voluntarily, is that correct?

11 THE WITNESS: Yes.

12 MR. SOSNICK: No subpoena?

13 THE WITNESS: No subpoena.

14 MR. SOSNICK: Mr. Reynolds here is representing you
15 in a personal capacity?

16 THE WITNESS: Yes.

17 MR. SOSNICK: Very good. I think we will begin the
18 questioning then.

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End 1.

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EXAMINATION

BY MR. SOSNICK:

1 Q Mr. Green, what is your occupation, sir?

2 A I'm a fitter at Comanche Peak.

3 Q A fitter?

4 A A structural iron work fitter.

5 Q Do you hold any supervisory position -- let me go
6 just a couple of steps.

7 Mr. Green, has your deposition ever been taken
8 before?

9 A Not my deposition.

10 Q All right.

11 Have you ever had your deposition taken at any
12 proceeding?

13 A No.

14 Q All right.

15 Let me just go over a few ground rules. That way
16 everyone here will have a clean record, and we'll have a
17 clean transcript.

18 First of all, understand that this is akin to
19 testifying in court.

20 Do you understand that?

21 A Uh-huh.

22 Q You're under oath?

23 A Yes.

1 Q I'm sure counsel explained that to you.

2 A Yes.

3 Q All right.

4 We don't want anyone to guess here today. We
5 want you to give your best answer.

6 Now, in order to do that, I want you to understand
7 all my questions clearly.

8 All right?

9 A All right.

10 Q If you don't understand one of my questions,
11 please ask me to read it, or we will have Madam Court Reporter
12 repeat it. Or I can rephrase the question.

13 Do you understand?

14 A Yes.

15 Q Also, this is a written transcript. It's a
16 little different than you and I just meeting and conversing.

17 In order that the record reflect everything
18 that was said here today, you must answer me audibly.

19 All right?

20 A Yes.

21 Q A nod of the head or a shake or a gesture can't
22 be picked up, because the court reporter will take down what
23 you say.

24 Also, because we would like to have a clean
25 record, please let me finish my question before you answer

1 it.

2 All right?

3 A Yes, sir.

4 Q Very good.

5 Also, Mr. Green, are you under any medication
6 today?

7 A No, I am not.

8 Q Now, let's go back to my question.

9 Do you hold any supervisory position at your
10 place of employment?

11 A Not at this time.

12 Q What is your official job description?

13 A I'm a structural iron worker-fitter.

14 Q In the past, Mr. Green, have you -- did you have
15 a supervisory position at your place of employment?

16 A Yes.

17 Q What was that?

18 A I was a structural iron worker foreman -- fitter
19 foreman.

20 Q What is your place of employment, Mr. Green?

21 A Comanche Peak.

22 Q What is the nature of that business or industry?

23 A Nuclear power plant.

24 Q And that's under construction now, isn't it?

25 A Yes.

1 Q Now, who is your employer? Who makes out your
2 paycheck?

3 Does it say "Comanche Peak"?

4 A Brown & Root construction company.

5 Q And that is the only pay check you receive from
6 Brown & Root?

7 A Yes.

8 Q And your pay check will read Brown & Root
9 Construction Company?

10 A Yes.

11 Q How long have you worked at Comanche Peak Nuclear
12 Power Plant?

13 A Five years and 11 months.

14 Q So, you began work at Comanche Peak late in
15 1978?

16 A Yes, sir.

17 Q When you came to Comanche Peak late in 1978,
18 what was your position there?

19 A I was a helper.

20 Q Would you describe what a helper does?

21 A You get materials and do errands for the fitters,
22 to help them do their job.

23 Q Who was your supervisor at that time?

24 A A. J. Stone.

25 Q What was his position?

1 A He was a foreman, structural iron worker foreman.

2 Q For how long did you hold that position as
3 helper?

4 A Approximately 8 months.

5 Q And what was your next position at the power
6 plant?

7 A Moved up to a journeyman.

8 Q Journeyman what?

9 A Fitter -- iron worker fitter.

10 Q And who was your immediate supervisor at that
11 time?

12 A A. J. Stone was.

13 Q And was he still a foreman?

14 A Yes. At that time he was.

15 Q Who was Mr. Stone's immediate supervisor or
16 superior?

17 MR. REYNOLDS: When?

18 MR. SOSNICK: When Mr. Green was a journeyman
19 fitter.

20 THE WITNESS: I believe Mike Sanders was the
21 senior general foreman.

22 BY MR. SOSNICK:

23 Q Mike Sanders?

24 A Uh-huh.

25 Q He would be called a senior foreman?

1 A General foreman .

2 Q How long were you a journeyman fitter?

3 A Approximately 8 months. 8 to 10 months.

4 Q After that 8 to 10-month period, did you move
5 into another position?

6 A I moved to a foreman -- fitter foreman.

7 Q Is the normal procedure to graduate a journeyman
8 fitter to a fitter foreman? Is that the normal procedure at
9 the plant?

10 A Yes.

11 Q But presently, you're a structural iron worker
12 fitter; is that correct?

13 A Yes. I was a structural iron worker fitter
14 foreman.

15 It's classified "structural iron worker."

16 Q Presently, you're a structural iron worker fitter;
17 is that correct?

18 A That's correct.

19 Q You were a structural iron worker fitter foreman;
20 is that correct?

21 A That's right.

22 Q And that's a step up?

23 A Yes.

24 Q After you were a helper, you became a journeyman
25 fitter?

1 A That's right.

2 Q And then you didn't become a structural iron
3 worker fitter, did you; you became a foreman?

4 MR. REYNOLDS: He was one.

5 THE WITNESS: Repeat that.

6 BY MR. SOSNICK:

7 Q After you were a journeyman fitter, your next
8 position was a fitter foreman?

9 A Yes.

10 Q After you were a journeyman, you were not a
11 structural iron worker fitter, you were a structural iron
12 worker fitter foreman; is that right?

13 Is that what you're telling me?

14 A I'm confused on what you're saying. Would you
15 repeat it?

16 MR. SOSNICK: I think we're all confused.

17 BY MR. SOSNICK:

18 Q You were, after you were a journeyman fitter, a
19 structural iron worker fitter foreman; is that correct?

20 A Yes.

21 Q Is there an intermediary step between a
22 journeyman fitter and a structural iron worker fitter
23 foreman?

24 Are there any persons between those two levels?

25 A No.

1 A No.

2 Q Presently, you are a structural iron worker
3 fitter.

4 Is that higher than a journeyman fitter?

5 A It's the same position.

6 Q All right. Fine.

7 Now, I'm unconfused.

8 Now, for what length of time were you a fitter
9 foreman?

10 A For approximately three years.

11 Q And when did you stop being a fitter foreman?

12 A Approximately a year and a half ago.

13 Q Do you receive less pay now than you did when
14 you were a fitter foreman?

15 A Yes.

16 Q Tell me the circumstances under which you became
17 an iron worker fitter, rather than a foreman?

18 A There was a reduction in force, and the number of
19 crews was cut back. And I was one of the foreman that was
20 mustered back to a journeyman.

21 Q You had approximately four and a half years at
22 the plant, is that right, before you were --

23 A Yes.

24 Q -- before you were made a fitter, after you were
25 a foreman?

1 A Yes.

2 Q And was the -- excuse the term. Was the
3 demotion in rank based on seniority?

4 A I don't know. I didn't make the decision.

5 Q Let me explain.

6 How was the decision made, as you understand it,
7 to put people who were at the fitter level -- excuse me, at
8 the foreman level to fitter level?

9 MR. PHILIPS: I believe he answered that
10 question.

11 He said he did not know how it was made. He
12 didn't understand how it was made.

13 MR. SOSNICK: I asked him about seniority. I'm
14 just trying to clarify the question.

15 BY MR. SOSNICK:

16 Q As you understand it, how was the decision made?

17 A I'm not sure how the decision was made. It
18 wasn't up to me. The people above me did it.

19 Q So, no reason was given to besides a reduction
20 in force?

21 A No.

22 Q The reduction in force was the only reason given
23 to you?

24 A Yes, sir.

25 Q And approximately how much less do you receive

1 in pay now?

2 A 80 cents an hour.

3 Q When you were a fitter foreman -- and that was
4 approximately through the years 1979 to 1982; is that
5 correct?

6 A Yes, sir.

7 Q Why don't you tell me your general job
8 responsibilities?

9 A It was to see that the work at the plant was
10 done correctly. And I was intermediary between the upper
11 supervision and the people working in the field.

12 Q All right.

13 A To make sure the work was done correctly and
14 by the procedures.

15 MR. PHILIPS: I'll just make one comment, a lot
16 of which you've gone over.

17 I've not said a whole lot, but a lot of what
18 you've gone over is already in the record.

19 As we get into substantive issues, I would hope
20 that you will be relying on the record, as opposed to asking
21 the same questions that testimony has already been given on.

22 MR. SOSNICK: Do you have an objection to the
23 preliminaries?

24 MR. PHILIPS: No. That's the reason I didn't
25 say anything.

1 MR. SOSNICK: I want to set up the preliminaries,
2 Mr. Philips, just so we sort of have a complete record.

3 So, there's a transcript that doesn't have a
4 reference.

5 Does anybody have a problem with preliminaries?

6 MS. CHAN: No problem.

7 MR. PHILIPS: No problem.

8 MR. REYNOLDS: No.

9 BY MR. SOSNICK:

10 Q Now, as a fitter foreman, you have stated to me
11 that your job was to see that everything was performed
12 properly?

13 A Yes.

14 Q You were the intermediary between those you
15 supervised; is that right?

16 A Yes.

17 Q And your superiors?

18 A Yes. Correct.

19 Q Who was your immediate superior when you were a
20 fitter foreman?

21 A Ed Hallford.

22 Q What was his position?

23 A He was a general foreman.

24 Q Who was his superior?

25 A It would be George -- George Bunt.

1 Q What was his title?

2 A He was a gold hat.

3 Q Why don't you explain the term "gold hat"?

4 A Just part of the upper supervision.

5 Q Is there a formal name for that?

6 A Not that I know of.

7 Q And who was Mr. Bunt's superior?

8 A Hal Goodson.

9 Q And what was his position, Mr. Green?

10 A He was the senior gold hat.

11 Q Who did you report directly to?

12 A Ed Hallford.

13 Q Was he your general foreman for the entire time

14 that you were a fitter foreman?

15 A All but maybe a month or two. The two month or

16 two I was foreman.

17 Q Who was your general foreman during your first

18 month or two?

19 A A. J. Stone was for a while. Then, they

20 transferred me over to another general foreman that no longer

21 works for us. I can't remember his name right now.

22 And I was transferred to Ed Hallford.

23 Q As a fitter foreman, you've told me that your

24 job was to see that work was performed properly.

25 Does that include any safety measures?

1 A What type of safety?

2 Q You supervised some craftspersons; is that
3 right?

4 A Yes.

5 Q Did you see that the work was done safely?

6 A Personal safety?

7 Q Personal safety.

8 A Yes, sir.

9 Q And the work they performed, there were certain
10 safety precautions taken at the plant; is that correct?

11 A Yes.

12 Q Were you also to see that the work was done in
13 a safe manner?

14 A Yes, sir.

15 Q Now, tell me about -- strike that.

16 What mechanism or what procedure is there at the
17 plant to ensure that the construction is done in a safe
18 manner?

19 A There is a set of procedures laid out for
20 everyone to work by.

21 Q What are those called?

22 A Construction procedures.

23 Q We're not talking about personal safety. I'm
24 talking about the construction.

25 A Yes, sir.

1 Q Construction procedures. Okay.
2 What individuals at the plant enforced the
3 construction procedures?
4 A QC and all of the supervision.
5 Q Would that include you?
6 A Yes.
7 Q How many different construction procedures are
8 there?
9 A I have no idea.
10 Q Tell me about one?
11 A There's thousands of them.
12 Q There are thousands?
13 A Yes.
14 Q You would encounter those every day; is that
15 correct?
16 A No, not every day.
17 Q How many would you encounter in a month's time?
18 A It would depend on what kind of work we were
19 doing, what you were working on and this type of thing.
20 Q Let's say you were welding pipes.
21 A We did no pipe welding.
22 Q Okay. Did you do any conduit work?
23 A No.
24 Q Give me some work that you did.
25 A We welded pipe hangers together.

1 Q Okay.

2 How many different construction procedures, as
3 you call them, relate to welding the pipe hangers?

4 A It depends on what kind of hangers you were
5 working on, if you're working on Class 1 hangers, Class 2
6 hangers.

7 Q Let's talk about Class 2 hangers.

8 How many different construction procedures apply
9 to Class 2 hangers?

10 A There's no way I can tell you exactly how many.

11 Q Describe one.

12 A Well, on your welding, it had to be a certain
13 size. And you had to go by that procedure. What you were
14 given on the package was the minimum weld. And you had to
15 weld it that big -- at least that big.

16 Q All right.

17 Let's say that you saw that a construction
18 procedure was not followed.

19 MR. PHILIPS: I'm not sure of the proper
20 foundation. I object to that. A proper foundation has
21 not been laid.

22 He's not said that he's ever seen a construction
23 procedure that has not followed.

24 BY MR. SOSNICK:

25 Q Have you ever seen a construction procedure not
followed?

1 A Not intentionally.

2 Q I'm not asking about intentional.

3 A Yes.

4 Q Is the power plant a major construction project?
5 Would you consider it a major construction project?

6 A Yes.

7 Q A lot of people are working there; is that
8 right?

9 A Yes.

10 Q Approximately how many?

11 A 3- or 4,000.

12 Q And when did the construction begin?

13 A I don't know the date.

14 Q How many years ago?

15 A Approximately 19 years ago.

16 Q It's still going on now, isn't it?

17 A Yes.

18 Q Thousands of people working for about 10 years;
19 it's a big project?

20 A Yes, a big project.

21 Q And you've been at the plant almost six years
22 now?

23 A Yes.

24 Q Have you ever seen any item of work that did not
25 comport with a construction procedure?

1 A Yes.

2 Q When?

3 MR. PHILIPS: I object.

4 Are we getting far afield of what the
5 actual issues are?

6 MR. SOSNICK: Not at all.

7 MR. PHILIPS: Are you going into discovery at
8 this point? Are you sticking with the principal issue of
9 intimidation?

10 If it's discovery, then let's refrain from doing
11 that until we finish this portion of the proceeding and then
12 have you go into discovery if you want to.

13 MR. SOSNICK: Is this an objection on relevancy?

14 MR. PHILIPS: Yes.

15 MR. SOSNICK: Please answer the question.

16 MR. PHILIPS: Could you please state --

17 MR. WITNESS: Please repeat it.

18 MR. SOSNICK: Intimidation and harassment has
19 to do with quality control at the plant; is that correct?
20 It is. That's what it has to do with. And that would deal
21 with what Mr. Green has described as construction procedures.

22 MR. PHILIPS: We're not, at this point,
23 addressing the technical issue of problems at the
24 construction of the plant.
25

1 We're addressing intimidation as it relates to
2 QC inspectors, not necessarily anything associated with
3 welding people, not necessarily associated with anything in
4 that light.

5 MR. SOSNICK: The QC people would deal with
6 things that deviated from accepted construction procedures.

7 He was in a supervisory capacity, and if he
8 has seen them they are certainly relevant.

9 Go ahead and answer the question.

10 MR. PHILIPS: Stop.

11 I think we are going beyond what the specific
12 issue is into a discovery area.

13 Now, if this is the evidentiary portion of it,
14 I think that's inappropriate.

15 And I'm going to caution the witness at this
16 point not to respond to that question until we get that
17 result.

18 MR. REYNOLDS: Let me tell you this.

19 Our firm is not a part of this proceeding in any
20 way. We have to rely on what they know about the proceeding.
21 They have been involved in it by virtue of their
22 representation of TUGCO.

23 So, I intend to abide by the instructions or
24 suggested instructions to the witness in instructing my
25 witness not to answer.

1 He can answer if he wants, but I'm going to
2 instruct him not to answer -- if it be the wish of TUGCO,
3 based on their understanding of what is relevant to this
4 proceeding -- I am vaguely familiar with what was supposedly
5 going on here. That is, harassment, intimidation and
6 threats.

7 I can't see this is in any way being related
8 to that at this point in time.

9 MR. SOSNICK: No one here can see that violations
10 or deviation from construction procedures have to do with the
11 control -- quality control at the plant.

12 MR. PHILIPS: Perhaps if you give a proffer of
13 where you're trying to go in this or something of this
14 nature -- maybe -- I'm not trying to be obstructionist;
15 honestly.

16 MR. SOSNICK: I understand.

17 Why don't we go off the record for a second.

18 MR. PHILIPS: Yes.

19 MR. SOSNICK: Off the record.

20 (Discussion off the record.)
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BY MR. SOSNICK:

Q Let's talk about safety measures at the plant,
Mr. Green.

Is there a mechanism or procedure to see that the
certain safety measures at the plant are enforced?

MR. PHILIPS: I would like to clarify what you say.
Is this construction safety?

BY MR. SOSNICK:

Q Excuse me -- construction safety matters.

A QC-QA Department, to make sure all procedures are
followed.

Q Why don't you explain what QC-QA means?

A Quality assurance, quality control.

Q How does that program work?

A I can't explain that. They come out and inspect
our work that we do.

Q That is all you know about it?

A Well, they follow procedures, the procedures -- and
check the work that we do to make sure it is correct
according to the procedures.

MR. PHILIPS: I just might want to pose an
objection to an continued line of question in this area in
that there is thousands of pages of transcript on this exact
issue of how the QA-QC works and it is clearly cumulative.
It is in the record right now.

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MR. SOSNICK: I am just doing this to make in a summarized way sort of a complete record here, rather than just a bit piece, but I recognize I that and I will limit that.

BY MR. SOSNICK:

Q Mr. Green, what are the QA-QC people looking for, as far as you understand?

A To see if any procedures have been violated.

Q Now if a procedure is violated, and we are talking here about the construction procedure that you noted before, is that right?

A Yes.

Q What will the QA-QC person do if they see that, as far as you understand?

A They will either write up a nonconforming report -- it just depends on what the QC people do, I mean what their instructions are.

Q Why don't you just very briefly tell us what a nonconforming report is?

A Is is where something is not made by the procedure.

Q Okay, so write up one of these reports, there has to be a violation of a construction procedure, is that right?

A Yes.

Q How do the QA-QC people find out if there is a violation.

A They know the procedures. If they find one, they

1 write them up.

2 Q Do people tell them?

3 A No.

4 Q Do they inspect?

5 A They inspect, yes. They inspect the hanger.

6 Q Besides inspection, how would a QA-QC person find
7 a violation of a construction procedure?

8 A That would be up to the QC people. We weren't
9 really concerned with that part. We were building it per
10 the procedure and they inspected it.

11 Q If you saw a violation in construction procedure,
12 would you get the QC -- QA-QC person?

13 A Yes.

14 Q Have you ever done that?

15 A Yes.

16 Q On what occasion?

17 A Remember one case where we had some instrumentation
18 linings which had broken off at a valve and we had that
19 corrected.

20 Q When was that?

21 A It has been two or three years ago.

22 Q Any other times?

23 A Not that I can remember.

24 Q So in your six years, on one occasion you informed
25 a QA-QC person of a violation of a construction procedure?

MR. PHILIPS: Object. It is (a) leading, and it

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was a question, and (b) it does not characterize what the witness indicated.

MR. REYNOLDS: The witness testified he recalled one instance specifically.

MR. SOSNICK: Okay.

BY MR. SOSNICK:

Q On how many occasions in your five years and eleven months at the Comanche Peak Nuclear Power Plant have you reported a violation in a construction procedure?

MR. PHILIPS: Asked and answered besides.

BY MR. SOSNICK:

Q Answer the question.

MR. PHILIPS: He has already responded to the question.

BY MR. SOSNICK:

Q You can answer.

A I am not sure. It has been a lot of years. I am not really sure.

Q How many do you remember?

A The one case I was talking about. Well, there was a time when Henry welded on pipe. Henry Stiner. He didn't weld on pipe, I'm sorry, but a gauge on a pipe. I didn't report it but I talked to QC.

Q Okay, tell me about that instance of Mr. Stiner.

MR. REYNOLDS: Ask him a question that he can respond to. That is so vague and ambiguous I can hardly

understand it.

2 BY MR. SOSNICK:

3 Q Sure. You just mentioned a violation of construction
4 procedure and it had to do with someone named Henry Stiner?

5 A Yes.

6 Q Tell me about that instance with Mr. Henry Stiner.

7 MR. PHILIPS: I object. This is already in the
8 record in rather a detailed fashion starting at transcript
9 pages 11717 to 11728, rather substantial questions on that
particular area.

10 MR. SOSNICK: Fine, but we are here to talk about
11 harassment and intimidation.

12 MR. REYNOLDS: Our specific --

13 MR. PHILIPS: Ask something specific in that area.
14 Seriously, there is a lot in there.

15 MR. REYNOLDS: He has already told a lot about that
16 incident in the prior proceeding. You have already had an
17 opportunity to inquire from that. If you would like him to
read from the transcript, he can do that.

18 MR. SOSNICK: I want him to answer the question
19 today.

20 MR. REYNOLDS: I am going to instruct the witness
21 not to answer the question. He has already answered a
22 question about this. He has already testified fully about it.

23 MR. PHILIPS: If you have specific questions, pose
24 specific questions about it. I am certain it will not be
25

1 precisely what he has answered. I am certain that you
2 wouldn't pose those questions if they had already been
3 covered in previous transcript.

4 MR. SOSNICK: For the record, Mr. Green has
5 mentioned an incident with Mr. Stiner. I have asked him the
6 question to describe that and I don't see any valid objection
7 to that.

8 He has mentioned it and I would like to know about
9 it.

10 BY MR. SOSNICK:

11 Q Please answer the question, Mr. Green.

12 MR. PHILIPS: You have been instructed not to
13 respond.

14 MR. REYNOLDS: Mr. Green, just for purposes of the
15 record, did you testify as to everything you knew about the
16 incident earlier in an NRC proceeding?

17 THE WITNESS: Yes, I did.

18 MR. SOSNICK: Let's go off the record for a moment.

19 (Discussion off the record.)

20 xxx

21 End 3.

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1 MR. SOSNICK: We are back on the record.
2 We have had a conference call into the Committee
3 Board Chairman.
4 Our point of departure was a question posed
5 relating to Henry Stiner. And an incident which Mr. Green
6 related pertained to a quality control matter.
7 And we have agreed at this time that should a
8 question go to previously offered testimony -- strike that
9 -- questions will go beyond what was previously offered and
10 that a reference to the previously offered testimony will be
11 cited as part of this transcript, to show that it was asked
12 and answered.
13 MR. PHILIPS: That's good.
14 MR. REYNOLDS: Okay.
15 BY MR. SOSNICK:
16 Q Mr. Green, I would like to stay on the topic of
17 quality control, which is something that we were talking
18 about before we left.
19 Describe the relationship between the foremen
20 in the workplace and the quality control personnel.
21 A The foremen tried to get the work as correct as
22 they could. And the QC people came by and inspected it.
23 Q How does it occur that a QC person would come
24 about and inspect the work?
25 A When we thought the hanger was finished, QC was

1 signed up for it, and they would come and inspect the item
2 we had for them to inspect.

3 Q Now, that's assuming that the plans you received
4 for the particular item constructed could be performed?

5 A That's true.

6 MR. PHILIPS: Objection. It's a leading question.

7 MR. SOSNICK: I think it was a little leading.

8 BY MR. SOSNICK:

9 Q Did you understand the question?

10 A Repeat it.

11 Q When you perform a particular item of
12 construction, what do you look at when you do it?

13 A A drawing.

14 Q Does it ever occur that the drawings may not be
15 feasible?

16 A Yes.

17 MR. PHILIPS: Objection.

18 Is this, again -- and we go back to the
19 relevancy -- are we getting into the area of intimidation
20 of QA/QC, or are we getting into construction problems and
21 design problems?

22 MR. SOSNICK: I'm going straight to intimidation.
23 This is sort of a foundational matter.

24 MR. PHILIPS: Okay. Withdraw the objection.

25 MR. SOSNICK: Please read back the last question.

1 (The reporter read the record as requested.)

2 BY MR. SOSNICK:

3 Q What happens if a particular drawing relating to
4 a construction matter is not feasible? What is the foreman's
5 responsibility?

6 MR. REYNOLDS: Let's be clear here, what you
7 mean by "feasible."

8 You mean "can't be built as drawn"?

9 MR. SOSNICK: Correct.

10 MR. REYNOLDS: Is that the way you understood
11 his question when you answered it earlier?

12 THE WITNESS: Yes.

13 It's taken to Engineering.

14 The foreman takes it to the Engineering
15 Department -- and if it's not feasible to build it --

16 BY MR. SOSNICK:

17 Q What does he take to the Engineering Department?

18 A The drawing.

19 Q Assuming you see it's not feasible?

20 A Yes.

21 Q How often might that occur, based on your
22 experience at the plant?

23 MR. REYNOLDS: "Did it" occur? Or "might it"
24 occur?

25

1 MR. SOSNICK:

2 Q Did it ever occur at the plant, where a plan
3 would not be feasible, the drawing?

4 A There's no way I could say.

5 Q Do you recall any instance where a drawing was
6 not feasible?

7 A Yes, sir. Yes.

8 Q Did that instance ever occur and involve a
9 gentleman named Henry Stiner?

10 A Not that I remember.

11 Q Were you the foreman for Henry Stiner?

12 A During his second term of employment, I was.

13 Q When was your second term of employment?

14 A In 81.

15 Q For one year?

16 A No. It was for one month, approximately a month.

17 Q And what was his position?

18 A He was a welder.

19 Q Was that his official job description?

20 A Yes.

21 Q Do you ever recall an incident where there
22 appeared to be a defect or something wrong with an item
23 of construction which involved Henry Stiner?

24 A Just a pipe that we worked on.

25 Q Okay.

1 Have you offered testimony as to what was wrong
2 with that pipe in related proceedings?

3 A Yes, I have.

4 Q I think we can stipulate that related to a
5 certain gouge in the pipe.

6 A Yes.

7 Q What were your instructions to Mr. Green when
8 you saw the gouge in the pipe?

9 MR. REYNOLDS: Once again, you're leading him,
10 because he hasn't testified that he have any testimony.

11 MR. PHILIPS: Start with a question that makes
12 sense.

13 What was the instructions to Mr. Green? Maybe
14 you can repeat the question.

15 MR. SOSNICK: Let's strike the question. Let's
16 go back one step.

17 BY MR. SOSNICK:

18 Q As to Mr. Stinder, only between you and he, what
19 did you do when you saw the gouge in the pipe? Did you give
20 him any instrauctions?

21 A I toled him to get QC.

22 Q And what did Mr. Stiner reply?

23 MR. PFILIPS: I'm going to object to this. I
24 think it's previously covered. It may be best --

25 MR. SOSNICK: Let's just wait.

1 THE WITNESS: He told me he didn't gouge the
2 pipe.

3 (Pause.)

4 BY MR. SOSNICK:

5 Q What was Mr. Steiner's response, again, that
6 you just related to me?

7 MR. PHILIPS: Response to what?

8 MR. SOSNICK: I'll go back.

9 BY MR. SOSNICK:

10 Q You just testified that you stated to Mr. Stiner
11 that we will go get QC -- at to the gouge in the pipe?

12 A Yes.

13 Q And what did Mr. Stiner respond when you said
14 that to him?

15 A He said he didn't make the gouge in the pipe.

16 Q Was there any further discussion between you two
17 as to the gouge in the pipe after he said to you, "I didn't
18 make the gouge"?

19 A No.

20 Q What did you do after he said to you, "I didn't
21 make the gouge," or words to that effect?

22 (Pause.)

23 MR. PHILIPS: Let the record reflect that the
24 that the witness believe he's indicating he believes is in
25 the transcript, the previous transcript.

1 MR. REYNOLDS: It may be in these three pages.
2 Do you want to check these three pages to see
3 if it's in here?

4 (Witness reviewing record.)

5 THE WITNESS: Do you want me to give you a page
6 number?

7 MR. REYNOLDS: I think he is referring to line
8 24, on 11,718 through line 1 on 11,719.

9 Or is it through line 5?

10 THE WITNESS: Through line 3.

11 MR. REYNOLDS: Through line 3.

12 Let the record reflect that this is -- let's go
13 off the record a second.

14 (Discussion off the record.)

15 MR. REYNOLDS: No problem.

16 BY MR. SOSNICK:

17 Q For clarity, that would be in response to my
18 last question?

19 A Yes.

20 Q Now, why don't you just summarize -- tell me what
21 you did.

22 Have you looked at the transcript of your
23 testimony? After Mr. Stiner made that statement to you, what
24 did you do?

25 A There was a pipe welder in the area that went and

1 got a pipe QC because he was familiar with the pipe QC. He
2 went and got a pipe QC to come back and look at the pipe.

3 Q That's what you did, sir?

4 A That's what the pipe welder did. I talked to
5 him.

6 Q Let's just stop right here.

7 I want to know what you did, Mr. Green,
8 immediately after Mr. Steiner said to you words to the
9 effect "I didn't make the gouge."

10 A I talked to a pipe welder that was in the area,
11 Alvarez. He went and got a pipe QC personnel because he
12 was familiar with the pipe people.

13 Q Who is that pipe QC person?

14 A Suzie Newmeyer.

15 Q That is her present name?

16 A That's what she was going by then.

17 Q And what did pipe QC person Newmeyer do?

18 MR. PHILIPS: That's in the record.

19 MR. REYNOLDS: Yes, it has been testified to
20 previously.

21 I believe the responses to this would appear
22 beginning on page 11,718, from line 5 through line 8.

23 Also, on the same page, line 10 through line 13;
24 page 11,719, line 6 through line 9.

25 MR. PHILIPS: Off the record a minute.

1 (Discussion off the record.)

2 MR. SOSNICK: Back on the record.

3 BY MR. SOSNICK:

4 Q When the pipe QC inspector, Suzie Newmeyer, came
5 to the site where the gouge was in the pipe, who was there
6 besides Suzie Newmeyer, in that vicinity?

7 Were there any other individuals?

8 A Myself and Mr. Stiner. And I believe the fitter
9 was there.

10 Q Who?

11 A The fitter that was putting the hanger together.

12 Q Okay.

13 What was the fitter's name?

14 A Buster Stewart.

15 Q Were there any other persons that you recall in
16 that vicinity?

17 A There were people going in and out of that room
18 all the time.

19 There were two or three crews working in that
20 area.

21 Q Did you bring anyone back to the site?

22 A No.

23 Q Did you bring back Mr. Clifton Brown to the site?

24 MR. PHILIPS: That's been asked and answered, in
25 11,717 to 11,728.

1 BY MR. SOSNICK:

2 Q Do you know a Clifton Brown?

3 A Yes.

4 Q Who is that person?

5 MR. PHILIPS: That has been previously asked and
6 answered on numerous occasions in the previous testimony.

7 Indeed, this prefiled testimony is in this
8 proceeding, along with a resume of this Applicant's Exhibit
9 177, admitted into evidence in transcript 9976.

10 BY MR. SOSNICK:

11 Q As to the gouge in the pipe, Mr. Green, did
12 Mr. Stiner offer or suggest some repair to the pipe?

13 A No.

14 Q Did you, with regard to the gouge in the pipe,
15 offer or suggest to Mr. Steiner some repair in the pipe?

16 A No.

17 Q Have you ever heard of the term "downhill weld"?

18 MR. PHILIPS: That's been asked and answered on
19 numerous occasions.

20 It's in the prefiled testimony, Applicant's
21 Exhibit 177.

22 BY MR. SOSNICK:

23 Q Could you describe what a downhill weld is?

24 MR. PHILIPS: That's in the Applicant's same
25 objection.

1 BY MR. SOSNICK:

2 Q Tell me, Mr. Green, since you have previously
3 described what a downhill weld is, under what circumstances
4 could such a weld be used?

5 A They can't be used on plant projects, according to
6 Brown & Root welding procedures -- per Brown & Root welding
7 procedures.

8 Q Per their procedures what, sir?

9 A A downhill weld cannot be used.

10 Q Why is that? Do you know, sir?

11 A I don't know why it's not in the procedure.

12 Q Have you ever seen a downhill weld done or
13 performed in the plant?

14 MR. PHILIPS: That's previous prefiled testimony,
15 Applicant's Exhibit 177.

16 BY MR. SOSNICK:

17 Q Have you ever seen Henry Stiner perform a
18 downhill weld?

19 MR. PHILIPS: It's in the same question, and
20 the answer is "subsumed."

21 MR. SOSNICK: I don't think it's asked and
22 answered.

23 MR. PHILIPS: If he's never seen anybody perform
24 one, he's clearly never seen Henry Stiner perform one.
25

1 BY MR. SOSNICK:

2 Q That is your testimony, sir?

3 A Yes.

4 Q Tell me, what would your responsibility be, as
5 a foreman, if you saw a downhill weld performed?

6 MR. REYNOLDS: Once again, he said those are
7 facts that he's never even encountered.

8 MR. SOSNICK: I didn't ask him that. This is a
9 different question.

10 MR. PHILLIPS: You're asking a hypothetical, the
11 basis of which has not been established.

12 He's never seen anybody, he said, perform a
13 downhill weld.

14 BY MR. SOSNICK:

15 Q Is it your testimony, in Brown & Root procedures,
16 downhill welds are not to be performed?

17 MR. PHILIPS: That's a leading question. I
18 object.

19 BY MR. SOSNICK:

20 Q What is the standard procedure, as a foreman,
21 when you see some procedure being performed in the plant
22 that is not according to construction procedures?

23 MR. REYNOLDS: Asked and answered earlier today.
24 Don't answer the question. You've answered it
25 earlier today in your transcript.

1 MR. PHILIPS: Off the record just a moment.

2 (Discussion off the record.)

3 MR. PHILIPS: Back on the record.

4 BY MR. SOSNICK:

5 Q Now, Mr. Green, we all know -- do you recall an
6 incident with a gouged pipe and a Henry Stiner -- strike
7 that.

8 Does Mr. Stiner still work at the Comanche Peak
9 Nuclear Power Plant?

10 A No.

11 Q When did he leave his employment at Comanche
12 Peak Power Plant?

13 MR. PHILIPS: That's asked and answered in the
14 record, Applicant's Exhibit 177. And it has also previously
15 been answered.

16 BY MR. SOSNICK:

17 Q Under what circumstances did he leave his
18 employment?

19 A That's in there, also, isn't it?

20 Q I don't think so.

21 A It was because of absenteeism. He was
22 terminated.

23 Q And that was stated in some document somewhere?

24 MR. REYNOLDS: That was a leading question. He
25 didn't say that.

new BU

1 BY MR. SOSNICK:

2 Q When someone is terminated from the plant, how

3 is it done?

4 A They are taken to the time office. A form is

5 filled out terminating him.

6 Q What happens to the form?

7 A It's kept on record.

8 Q Who gets copies of the form?

9 A I have no idea.

10 Q What does the person -- is the person told

11 orally or in written form that he is terminated? How is

12 that person informed when he's terminated?

13 MR. REYNOLDS: Speak only from your personal

14 knowledge.

15 THE WITNESS: Orally.

16 BY MR. SOSNICK)

17 Q What would that oral communication consist

18 of?

19 A The reason why he was terminated.

20 Q Were you with Henry Stiner when he was

21 terminated?

22 A No, he wasn't there that day.

23 Q He was not there that day?

24 A No.

25

1 MR. PHILIPS: To be clear on that, when you say
2 "terminated," you mean the physical act of him checking out?
3 Or do you mean the process or continuing process, so the
4 witness understands precisely what you mean by the actual
5 termination point?

6 MR. SOSNICK: The witness has testified that when
7 some witnesses terminated, they are told orally.

8 I'm asking him if he was there when Mr. Stiner
9 was told orally that he was terminated.

10 MR. REYNOLDS: He hasn't said Mr. Steiner was
11 told orally though.

12 MR. SOSNICK: He has told me someone -- when
13 someone is terminated, he was told orally.

14 MR. REYNOLDS: He was testifying as a matter
15 of procedure.

16 BY MR. SOSNICK:

17 Q Do you know how Mr. Stiner was terminated?

18 A He wasn't there when he was terminated.

19 Q Do you know how he was informed that he was
20 terminated?

21 A I suppose people at the time office told him.

22 Q Okay.

23 Were you with him when he was informed that he
24 was terminated?

25 A No

- 1 Q How did you learn of his termination?
- 2 A I was given a three-part memo by the general
3 foreman.
- 4 Q Who was that?
- 5 A Ed Hallford.
- 6 Q Whose name appeared at the end of that three-part
7 memo? Did Mr. Hallford's name appear?
- 8 A Yes.
- 9 Q Did anyone else's name appear?
- 10 A Not that I know of.
- 11 Q As foreman, would you have the occasion to fill
12 out any sort of form regarding a termination?
- 13 A Yes.
- 14 Q What form would that be, sir?
- 15 A The one they had at the time office.
- 16 Q Is it called --
- 17 A I'm not sure what it's called.
- 18 Q And what kind of information would you have to
19 put in there?
- 20 A His work record, the reason he was fired.
- 21 Q Who would tell you the reasons he was fired?
- 22 A In this case, it was on a three-part memo that
23 I received.
- 24 Q The Hallford memo you referred to?
- 25 A Yes.

1 Q And so you filled out a form with regards to
2 Henry Stiner and his termination?

3 A Yes.

4 Q And what did you put in that form, as best you
5 remember?

6 A I don't remember exactly.

7 Q When did you fill out that form?

8 A I believe it was a Wednesday morning.

9 Q Do you remember the date?

10 A No.

11 Q Do you remember the year?

12 A It was in '81.

13 Q Do you remember the month?

14 A I believe it was August.

15 Q Was it in the beginning of the month or the end of
16 the month, as best you remember?

17 A I believe it was the first of the month.

18 Q The first part of the month?

19 A Yes.

20 Q Let's go back to the pipe gauge incident. When did
21 that occur?

22 A I am not sure of the date.

23 Q What year?

24 A '81.

25 Q Do you remember the month?

1 A It was some time during July or the first part of
2 August. That is the only time he was there.

3 Q So it occurred either in July or the first part of
4 August?

5 A Yes.

6 Q After you had filled out the certain termination
7 papers you referred to, did Henry Stiner have occasion to
8 return to Comanche Peak Power Plant?

9 A Yes, he came back.

10 Q Why did he come back?

11 A He picked up his tools.

12 Q The certain papers that you filled out, how were
13 those delivered or given to Mr. Stiner?

14 A They were given to him by the time office personnel.

15 Q How long after you had filled out those certain
16 papers were they given to him?

17 MR. REYNOLDS: Testify from what you know.

18 THE WITNESS: I don't know for sure.

19 BY MR. SOSNICK:

20 Q Was it a long time, as best you remember? A short
21 time?

22 A It depends on how you define it. Several hours.

23 Q It was the same day?

24 A Yes, same day.

25 Q As a foreman, are familiar with the various reasons

1 that people can be terminated at a plant, at your power plant?

2 A Yes.

3 Q What are some of those?

4 A Absenteeism, failure to follow instructions.

5 Q Any others that you know of right now?

6 A Not right now.

7 Q What is the absentee standard based on?

8 A People are supposed to call in or be there continuous,
9 not miss days now and then.

10 Q Let's be more specific. How many days can they miss
11 within a certain period?

12 A I would say three days. That is what we usually
13 went by.

14 Q Three days in what period? A year? Three days in
15 a month? What are we talking about?

16 A Three continuous days.

17 Q I understand when -- during how long a period?

18 A Any time, any length of time -- in a week --

19 Q Or in a year?

20 A In a year.

21 MR. PHILIPS: The witness has already answered the
22 question. He said any three continuous days and that means
23 any three continuous days period. I don't care if it occurs
24 in three continuous days or --

25

1 BY MR. SOSNICK:

2 Q That would be an absence, I assume, without some sort
3 of accepted reason or explanation?

4 A Yes.

5 Q What would be the accepted reasons or explanations
6 as you know them?

7 A A doctor's excuse, something on that order.

8 Q How many days absent was Mr. Green?

9 A Myself?

10 Q How many days absent was Mr. Green?

11 A I am Mr. Green.

12 Q I am sorry, Mr. Stiner.

13 MR. PHILIPS: If I could just enter an objection.
14 You mean in his first term of employment or during his second
15 term of employment -- because there is a substantial number.

16 MR. SOSNICK: Sure, thank you.

17 BY MR. SOSNICK:

18 Q Let's talk about the second term of employment. When
19 was that second term of employment so we are straight on that?

20 A Between July and August.

21 Q Of what year?

22 A '81.

23 Q All right, thank you.

24 How many days absent from the job was Mr. Steiner
25 during that period.

1 A Two full days and Wednesday he came in, he had
2 already been terminated. He had missed a half a day before
3 that.

4 It was an excuse -- I excused him a half a day before
5 that.

6 Q You excused him for half of one of those days?

7 A Not one of those days; the previous day.

8 Q So how many days did he have an unexcused absence
9 for?

10 A Three -- or two and part of a day till he was
11 terminated.

12 Q Two days absence?

13 A Yes, and part of another day had passed. He was
14 away until 9 o'clock. If he hadn't shown up, they terminated
15 him on the third day.

16 Q Nine o'clock in the morning, of course?

17 A Yes.

18 Q Who would someone as Mr. Stiner report to, to give
19 his explanation for not being present, for not being able to
20 attend work on a particular day? Who would he tell?

21 A He would call the office and talk to the secretary
22 or the general foreman.

23 Q Which office would he call?

24 A That pipe hanger office.

25 Q Is that the only procedure?

1 A Yes.

2 Q Would there ever be occasion where he might tell you?

3 A No, he wouldn't call me.

4 Q Would there ever be an occasion where he might tell
5 you while he is at work one day that I am not coming in the
6 next day because I have, for example, a doctor's appointment?

7 A It is possible.

8 Q What would you do if he told you that?

9 A Find out his reason.

10 Q What is that?

11 A Find out the reason why he was going to be off.

12 Q Okay.

13 A If it was a good enough reason, he'd probably be
14 excused.

15 Q Once you obtain that knowledge from someone that I
16 am not going to be in tomorrow because I have to go to the
17 doctor, would you tell anybody about that?

18 A The general foreman.

19 Q You'd tell the general foreman?

20 A Yes.

21 Q Now let's talk about that second period of
22 employment. Who was your general foreman?

23 A Ed Hallford.

24 Q Did Mr. Green tell you on any occasion as to those
25 days that he was absent that he had some sort of appointment

1 and that is why --

2 MR. PHILIPS: I'm sorry, you again used "Mr. Green."

3 MR. SOSNICK: I apologize.

4 BY MR. SOSNICK:

5 Q Did Mr. Stiner state to you, and we are referring to
6 the days that he was absent, did he state to you, Jim, I
7 can't come in tomorrow or whatever day it was, because I have
8 a doctor's appointment?

9 A No.

10 Q Who signed Mr. Stiner's final termination papers?

11 A I signed them.

12 Q Since the basis of that termination, as you stated,
13 was absenteeism, what records did you look at to determine
14 that the requisite number of days absent had occurred?

15 A I didn't. The general foreman is the one that told
16 me to fire him.

17 He had had a talk with him and told him he was going
18 to have to be there because of his previous appointment.

19 Q Did anyone show you his record of days in and days
20 out?

21 A No, not at that time.

22 Q So your general foreman just said "fire him," and
23 you signed the paper?

24 A Yes.

25 Q Now you have been at the plant a long time, and I am

1 sure you are aware of the need to have things on schedule.

2 Is it important to have things on schedule?

3 MR. REYNOLDS: You don't have to accept any of the
4 premises of his questions. I will instruct you -- you don't
5 have to pay any attention to the stuff in the beginning.
6 Answer the question he asked if you can answer it as it was
7 phrased.

8 BY MR. SOSNICK:

9 Q As a foreman, is it one of your job duties to see
10 that things are performed as scheduled?

11 MR. PHILIPS: That has been previously asked and
12 answered.

13 MR. SOSNICK: Is there any objection to an answer,
14 yes or no?

15 MR. REYNOLDS: Answer please.

16 THE WITNESS: Repeat it.

17 BY MR. SOSNICK:

18 Q As a foreman, is it part of your general job duties
19 to see that things are performed as scheduled?

20 A Yes.

21 Q What are some of the problems if things are not
22 on schedule? What might happen if things are not according
23 to schedule, based on your experience? What effects might that
24 have?

25 A The plant would be further behind on schedule.

1 Q What kind of problem would that present for the
2 plant?

3 A I don't --

4 Q Does it cost money?

5 A I don't know. I am sure it would.

6 Q If something has to be done twice, does that cost
7 more money?

8 A Yes.

9 MR. REYNOLDS: Please testify only from what you
10 know.

11 BY MR. SOSNICK:

12 Q Now tell me, as far as you know, what is the purpose
13 of having quality control people in that plant?

14 A To make sure it is built correctly.

15 Q Besides the obvious safety reasons, what other
16 reasons might there be?

17 A I have no idea.

18 Q Now based on your experience in the plant, is safety
19 a big concern? Safety of the plant -- how it is constructed?

20 A Yes.

21 Q What kind of incentives do you as a foreman give
22 those that you supervise to make sure that everything is built
23 correctly and safely?

24 A There is no incentive given. They are just told to
25 build it by the procedures, to follow the procedures.

1 Q Now how often would you go and look at those people
2 who you supervise and make sure they are following procedures?

3 A Continuously.

4 Q All day long?

5 A All day long.

6 Q Now on how many occasions would someone that you
7 supervised go and seek out a quality control person, without
8 you?

9 MR. PHILIPS: I'm sorry, would you restate the
10 question please?

11 MR. SOSNICK: Sure.

12 BY MR. SOSNICK:

13 Q Has it ever occurred that one of the persons that
14 you supervised has gone and sought a quality control person
15 without you?

16 A Yes, they do it all the time.

17 Q That happens regularly?

18 A Yes.

19 Q And what persons have done that?

20 A Just people on the crew.

21 Q Do you remember some names?

22 A They were continuously selling hangers to QC.

23 Q Selling?

24 A Getting them inspected and there were people going
25 all the time talking to QC. There was no problem with that.

1 Q What were they telling QC when they went to go see
2 them?

3 A When they'd sign up on the call board for them,
4 they would come back and look at whatever they had for them
5 to inspect, the weld or whatever.

6 Q How would that procedure work -- strike that.
7 How would that procedure work -- how would a person
8 know that their particular item had to be inspected?

9 A When they were finished or they reached the hold
10 point, that was established by welding engineering.

11 Q Was that in their drawings or were they instructed
12 after they finished a particular item that they were to go get
13 QC?

14 A It was in the drawing. There was a card for it in
15 the drawing, the hold points to be bought off by.

16 Q Does the card indicate that after you finish a
17 particular item that you must go get QC?

18 A Yes.

19 Q That is what the card says?

20 A Yes.

21 Q Does the card say anything else?

22 A On which particular card?

23 Q The card saying you have to go see QC when you finish
24 a particular item?

25 A It has hold points set out by steps. When you finish

1 that step, you go get a QC personnel to come inspect it. If
2 there is other steps -- all the hangers were different.

3 Q Are there ever any drawings that don't have a card
4 that says you have to see QC after a particular procedure?

5 MR. REYNOLDS: Has he become aware of any at
6 Comanche Peak?

7 MR. SOSNICK: You know, in terms of the packets with
8 the drawings on them?

9 MR. PHILIPS: I think that clearly Applicants would
10 stipulate that there are substantial drawings where QC people
11 are not involved in any inspections, because there are
12 substantial non-Q, non-safety related systems out there with
13 drawings all over the place.

14 MR. SOSNICK: All right. That is what I am getting
15 at.

16 BY MR. SOSNICK:

17 Q You would agree with that?

18 A Yes.

19 Q Do all safety-related systems have a card which
20 indicates you must see QC after you have finished working on
21 a particular step in that component?

22 MR. PHILIPS: Could you be a little more specific,
23 because you are saying "are there systems" -- each system has
24 component construction steps and perhaps if you can be more
25 specific, he may be able to respond.

1 BY MR. SOSNICK:

2 Q Go ahead.

3 MR. PHILIPS: Can you be more specific, please?

4 MR. SOSNICK: All right.

5 BY MR. SOSNICK:

6 Q Does every safety-related system have a card which
7 says you have to go see QC?

8 MR. PHILIPS: I think the problem is when you say
9 every safety-related system. A system may be miles of typing.
10 There may be a thousand work items on that system and there
11 may be a thousand such cards or a million such cards .

12 MR. SOSNICK: Let's call them work items.

13 MR. PHILIPS: That is what I am saying. If you can
14 be particular about one specific -- maybe he can respond.

15 MR. REYNOLDS: You are talking about only the ones
16 he experienced and has come across?

17 MR. SOSNICK: I only want him to testify to his
18 personal knowledge.

19 THE WITNESS: On Class V seismic hangers, there are
20 no hold points established on some of the cards. It depends
21 on what the item is.

22 BY MR. SOSNICK:

23 Q Are these safety-related items?

24 A Seismic hangers?

25 Q Yes.

1 A Yes.

2 Q Was there ever occasion where, as you have described,
3 a card would not appear with the seismic hangers or another
4 item which called for that person calling QC where that person
5 went to QC anyway?

6 A Rephrase your question.

7 Q Sure.

8 Was there ever occasion where someone that you
9 supervised went to QC when there was no card that said "time
10 to go to QC"?

11 A Yes, yes.

12 Q Okay. What occasions were those?

13 A When they would complete the hangers.

14 Q Any others?

15 A If it required a preheat, the fitter would heat the
16 baseplate or whatever and would go get QC to verify the
17 preheat.

18 Q Any other circumstances?

19 If they saw something wrong, for example?

20 A I can't think of a case.

21 Q So you know of no occasion where one of those persons
22 that you supervise went to QC because of something wrong?

23 MR. REYNOLDS: That is an inaccurate statement. He
24 said he didn't recall any.

25 THE WITNESS: Henry Stiner said he went.

1 BY MR. SOSNICK:

2 Q I am talking about instances where they went without
3 you and you did not know?

4 A No.

5 Q Any instances where they went without you and you
6 learned of it later?

7 A I usually learned of it later.

8 Q You learned of it later?

9 A Uh-huh. Well, we are getting QC people, like I said
10 a little while ago, all the time.

11 Q Under those circumstances where someone would see
12 something wrong and go straight to a QC person without you,
13 you learned of it later. Did that ever occur?

14 MR. PHILIPS: I think that there is a little lack
15 of clarification there. Are you referring to times that they
16 normally go get QC that's on the card, or that it is not on
17 the card?

18 MR. SOSNICK: Not on the card.

19 MR. REYNOLDS: He is talking about where someone
20 discovers a problem.

21 BY MR. SOSNICK:

22 Q Someone discovers a problem -- let's make the record
23 clear -- someone discovers a problem. Is there ever occasion
24 where they would go straight to QC?

25 MR. PHILIPS: To be precise, you are talking of

1 someone -- the people who were on his crew during the one
2 month approximately that Henry Stiner was here, or what?

3 MR. SOSNICK: No, at any time, people on his crew.

4 THE WITNESS: I can't remember an occasion when
5 they did.

6 BY MR. SOSNICK:

7 Q How much leeway do you have as a foreman in taking
8 corrective action when you see that something may not fit
9 right in a safety-related item?

10 A We had to build it per the design or take it to
11 engineering and let them come out and look at it and change
12 it or whatever.

13 Q And if you saw that it wasn't exactly right, what
14 would you do normally?

15 A If you saw an item had a fault with, it was safety
16 related item, what would you do?

17 A Go to QC.

18 Q You would go to QC on every occasion?

19 A Yes.

20 Q Would you ever go to the engineering department?

21 A If it was a problem with the drawing, we would go
22 to engineering.

End 5.

23

24

25

1 Q What would you tell Engineering when you went
2 to them and you said, "There's a problem with the drawing"?
3 What would you say to them?

4 MR. PHILIPS: Could I just ask, Bruce, is this
5 getting back to the intimidation issue? Are you backdooring
6 into it quickly?

7 MR. SOSNICK: Yes, I'm backdooring.

8 THE WITNESS: We would just tell him our
9 problem that we were having with the hanger, why we couldn't
10 get it installed the way they had designed it.

11 BY MR. SOSNICK:

12 Q As you recall, did Henry Stiner ever go to the
13 Engineering Department and stated that there was a problem
14 with the drawing?

15 A I don't believe he did.

16 On my crew, most of the time, I took all the
17 drawings myself.

18 Q Let's talk about Henry Stiner again.

19 During the second term of his employment -- that
20 was July to August 1981?

21 A Uh-huh.

22 MR. PHILIPS: If I could interject there, I
23 think the record can reflect numerous occasions in the
24 record. It was the month of July, approximately a 30-day
25 period.

1 MR. SOSNICK: Okay.

2 BY MR. SOSNICK:

3 Q Do you know of any occasion when Henry Stiner
4 went to a QC person regarding a fault in the safety-related
5 item without your knowledge -- that he went to the QC person
6 without your knowledge?

7 A No.

8 Q And you learned of it later?

9 A I don't know of it, no.

10 Q Did you have any discussions with Henry Stiner
11 after he was terminated?

12 A I did maybe at the time office. I told them to
13 come and get his -- take his tools out.

14 Q Did you have a conversation with him?

15 A No.

16 He was wanting to talk to the gold hat, I
17 believe. And we met him going into the gang box to get his
18 tools.

19 Q Who was the gold hat?

20 A George Bunt.

21 Q Did Henry Stiner ask you any questions at that
22 time?

23 A No.

24 Q Did he ask you, "Why was I fired"?

25 MR. REYNOLDS: He just said he didn't ask any

1 questions.

2 BY MR. SOSNICK:

3 Q He just picked up the papers and you told him,
4 "Pick up your tools"?

5 A I think I told him he was fired because of
6 absenteeism.

7 Q Did he respond?

8 A He wanted to talk to the gold hat.

9 Q Did he want to talk to you?

10 A No, he didn't say anything about talking to me.

11 Q And he said nothing to you at that time?

12 A He just said he wanted to talk to the gold hat.

13 Q And he walked away?

14 A We went out the door of the time office and
15 started to walk to the gang box.

16 Q Did you say good-by to him?

17 A I don't remember. I might have shaken hands with
18 him.

19 Q Did you say anything to him, besides "Pick up
20 your tools"?

21 A When he was leaving, I think I wished him luck
22 or something like that.

23 Q And you made no statements to him besides "Pick
24 up your tools," "Good-by," or something like that?

25 A No.

1 Q And he only asked you one question, "Why was I
2 fired"?

3 A Yes.

4 Q So, you must have had a very short conversation.

5 A Uh-huh.

6 Q How long did it take?

7 A As long as it took him to say that -- a few
8 seconds, a minute.

9 Q Does Suzie Neumeyer still work at Comanche Peak
10 nuclear power plant?

11 A I don't believe so.

12 Q Do you know how long she had worked at Comanche
13 Peak nuclear power plant?

14 A No.

15 Q Any guess? Any estimate?
16 One year? One month.

17 A I have no idea.

18 Q Did you know her at the plant by name?

19 A No, not really by name. Well, I knew her name
20 but I didn't know her. I had seen her, you know, going up
21 and down the halls.

22 Q You knew her by face?

23 A Yes.

24 MR. REYNOLDS: Off the record just a second.
25 (Discussion off the record.)

1 MR. SOSNICK: Back on the record.

2 BY MR. SUSNICK:

3 Q Once the QC person inspects something, if they
4 find there's a fault with it, what do they do?

5 A They either put a hold tag on it, an on-site
6 inspection report on the item.

7 Q They write various reports on the item, is that
8 what you're saying?

9 A Yes.

10 Q And who would review those reports?

11 A Someone at QC, I don't know who.

12 Q As foreman, would you have occasion to review
13 those reports?

14 A How are you using "review"?

15 Q Would you look at them?

16 A Yes, I would see it.

17 Q What would you do after you saw them, what would
18 you do?

19 A We would wait for the paperwork to come down to
20 do the corrections. That was necessary to complete the
21 hanger.

22 Q Did you ever offer a solution to correct the
23 hanger? Would you offer that to Engineering?

24 A Engineering?

25 Q Yes.

1 Would you tell them, "Look, we can fix it like
2 this"?

3 A No.

4 Q Did they ever ask you how they could fix it?

5 A No.

6 Q Did you ever suggest to one of those that you
7 supervised how it could be fixed?

8 A No, because we didn't fix it. The Engineering
9 Department would fix it.

10 Q On no occasion you ever suggested to a person
11 you supervised that they could fix something that you thought
12 has a fault in it?

13 MR. PHILIPS: Let me be clear. Is your question
14 after it has gone on an NCR or an IR?

15 Or is it just if there is -- like a little
16 porosity or something or a little problem with the weld, that
17 the weld was incorrect?

18 I'm not sure what it encompassed.

19 MR. REYNOLDS: After they call QC in?

20 MS. CHAN: That's an unsat report -- is that
21 correct, you said unsatisfactory report?

22 THE WITNESS: Sometimes the NCRs were affixed to
23 the hanger. Or there was an unsat written on it and how
24 major the problem was.
25

1 BY MR. SOSNICK:

2 Q Now, let's say before a QC inspector even saw
3 the fault in a safety-related item, would you ever propose
4 fixing it?

5 A If it was a little porosity or a weld needed to
6 be increased while we were in the process, yes, we'd fix it.

7 Q That was an accepted procedure?

8 A Yes.

9 Q That was accepted procedure in the drawings?

10 A On the drawings?

11 Q In the drawings, to perform this certain item?

12 MR. PHILIPS: To clarify, I think you're talking
13 about a deficiency in drawings, where he's talking about a
14 deficiency in the actual welding that is trying to become
15 into conformity with the drawings.

16 MR. REYNOLDS: He said work in progress.

17 MS. CHAN: Workmanship.

18 MR. PHILIPS: As opposed to the design
19 efficiency.

20 BY MR. SOSNICK:

21 Q Let's talk about workmanship.

22 It was an accepted procedure, then, if it was an
23 item of workmanship, that you could suggest how to remedy it.

24 A As long as it was in process.

25 Q As long as it was what?

1 A In process, still working on the thing.

2 Q If it was a matter of design, did you ever
3 suggest to anyone how it could be remedied?

4 MR. REYNOLDS: Asked and answered.

5 THE WITNESS: No, we wouldn't.

6 BY MR. SOSNICK:

7 Q Your answer is "no"?

8 A Yes.

9 Q Is there a regular review process for items --
10 strike that.

11 When you were foreman and your crew was working
12 on certain items, was there a regular review process to look
13 at the workmanship and whether things had been put up
14 correctly or constructed correctly?

15 MR. PHILIPS: I'm not clear what the "regular
16 review process," by craft, by QA?

17 MR. SOSNICK: By anyone.

18 MR. PHILIPS: "Regular" being procedurized?

19 MR. SOSNICK: Procedural.

20 THE WITNESS: QC would inspect. I would usually
21 inspect them, look at them and see if I could see anything
22 wrong with it. And then we would get QC.

23 BY MR. SOSNICK:

24 Q You would inspect them?

25 A Yes.

1 Q And if you saw something wrong, what would you
2 do?

3 A We would fix it, as far as workmanship was
4 concerned.

5 Q If it wasn't an item of workmanship what would
6 you do?

7 A We'd go to engineering.

8 Q And if there was a defect in a part and you saw
9 it, what would you do?

10 A It depends on what the defect was. If it was a
11 violation of the base metal, you would get QC and have a
12 repair work order fixed up.

13 Q And in your five years and 11 months at the
14 plant, how many times have you gone to QC after reviewing
15 something?

16 MR. PHILIPS: That's already been --

17 BY MR. SOSNICK:

18 Q Twice?

19 MR. PHILIPS: That's already been asked and
20 answered.

21 BY MR. SOSNICK:

22 Q Is your answer "twice"?

23 MR. REYNOLDS: You don't have to answer the
24 question.

25 MR. SOSNICK: I think that will be it.

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1 Do you have --
2 MR. PHILIPS: Do you have any questions you would
3 care to ask?

4 MS. CHAN: I just wanted to distinguish in this
5 last discussion -- to separate the questions referring to
6 workmanship on repairs from those regarding QC, IRs, or NCRs
7 -- repairs.

8 MR. SOSNICK: Do you want me to clarify? Or
9 would you like the witness to clarify?

10 MS. CHAN: I think if you could clarify your
11 questions.

12 He had talked about IRs, and you were asking
13 about repairs.

14 I think his reply referred to workmanship
15 repairs, so if you could clarify that.

16 MR. SOSNICK: I think it might be better if you
17 did, because then I might have to restate his testimony.

18 BY MS. CHAN:

19 Q Mr. Green, if we could just clarify some of your
20 replies to Intervenor counsel's questions about repairs,
21 could you tell us, for the record, if IRs were written or
22 NCRs were written on particular hangers, or whatever the job
23 was, were any efforts made on your part to do any fixing?

24 A Not after they were written. We had to wait
25 for the paperwork to be processed, wait for the NCR to be

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1 dispositioned or the RPS to come back, and we'd do the repair
2 on the base metal or whatever the problem was.

3 Sometimes there were unsat IRs written.

4 Q So, that's different?

5 A Yes. It would depend on the severity of the
6 problem.

7 If the way QC did it -- if they write an unsat IR,
8 it was porocity in the well, it could be taken care of very
9 easy.

10 But if there was a big base metal problem --
11 they'd write up an NCR and it would dispositioned through
12 the regular channels.

13 Q I see.

14 But either way, if QC wrote up the report, you
15 did not do the repairs until you were instructed on how to
16 do it.

17 A That's right. We would be given paperwork to do
18 the repairs.

19 Q So, your instructions on the repairs were
20 limited to workmanship problem where the work was in progress;
21 is that correct?

22 A Yes.

23 MS. CHAN: Thank you very much.

24 MR. PHILIPS: I have about three questions.

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BY MR. PHILIPS:

Q Mr. Green, did you at any time direct Mr. Stiner to downhill weld in violation of procedures?

A No, I didn't.

Q Mr. Green, did you at any time direct Mr. Stiner to weld in violation of any procedures?

A No.

Q Mr. Green, did the fact that Mr. Stiner brought out a gouge in a pipe have any bearing whatsoever on Mr. Stiner's continued employment at Comanche Peak?

A No, it didn't.

MR. SOSNICK: Objection. There's no foundation established to -- that Mr. Stiner gouge.

MR. PHILIPS: I'm sorry, he said "brought out," that Mr. Steiner -- that he identified the gouge and brought it to light, as opposed to gouging the pipe itself.

MR. SOSNICK: I understand.

MR. PHILIPS: Do you withdraw your objection?

MR. SOSNICK: I withdraw.

BY MR. PHILIPS:

Q Would you now, please, answer the question?

A There was no problem in reporting.

Q Then, what you're saying, Mr. Green, is that there was no relationship between him reporting the gouge and --

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1 MR. SOSNICK: I have to object.

2 I think you're testifying for the witness now.

3 MR. PHILIPS: I will restate the question, and
4 I will restate it exactly how I stated it before.

5 BY MR. PHILIPS:

6 Q Mr. Green, was there a relationship between him
7 reporting the gouge in the pipe and his continued employment
8 at Comanche Peak?

9 A No.

10 MR. SOSNICK: I have to object. There's no
11 foundation to state that. He would have -- has any authority
12 to terminate any person.

13 MR. REYNOLDS: You can answer the question.

14 MR. PHILIPS: You stated your objection?

15 MR. SOSNICK: That's my objection.

16 MR. PHILIPS: Would you answer the question?

17 THE WITNESS: Would you repeat?

18 BY MR. PHILLIPS:

19 Q I just want you to answer the specific question.
20 Mr. Green, did the fact that Mr. Stiner reported
21 a gouge in the pipe have any bearing on Mr. Stiner's
22 continued employment at Comanche Peak?

23 MR. SOSNICK: I have to object. It calls for
24 speculation.

25 MR. PHILIPS: The objection is noted.

1 Would you please respond to the question.

2 THE WITNESS: No.

3 BY MR. PHILIPS:

4 Q One other question.

5 In the cross-examination by the Intervenor's
6 counsel, he asked a question regarding the incentives of
7 craft to perform quality work in accordance with the
8 procedure.

9 Do you remember that conversation you had?

10 A Yes.

11 Q Is there any incentive on craft's part to perform
12 quality work?

13 MR. SOSNICK: I have to object. I think that's
14 the same question. I don't see a difference in the
15 question. I don't think Mr. Green sees a difference in the
16 question either.

17 MR. PHILIPS: Strike the question.

18 I'll rephrase it.

19 BY MR. PHILIPS:

20 Q Is there an incentive not to perform work -- is
21 there an incentive to perform -- strike that.

22 Mr. Green, why do individuals adhere to
23 procedures -- craft individuals adhere to procedures?

24 A Mainly to keep their job. You have to follow
25 the procedures to stay on the job. If you violate procedures,

1 you're not going to be there very long.

2 Q Mr. Green, is there a certain pride in craftsmen
3 that you're aware of at Comanche Peak?

4 A Yes. I think they're more or less proud of their
5 work.

6 I pride myself in my work. I like to do a good
7 job.

8 Q Do people that work for you generally have that
9 same feeling that you share?

10 A Yes.

11 MR. PHILIPS: Any questions?

12 MR. REYNOLDS: I have no questions.

13 MR. PHILIPS: I have no further questions.

14 Do you?

15 MR. SOSNICK: Yes, I'll have a few on redirect.

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BY MR. SOSNICK:

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2 Q Just to make this clear, Mr. Green, you have, in
3 terms of Mr. Stiner, when he was terminated, he was
4 terminated based on what you were told by the gold hat.

5 A By the general foreman.

6 Q Is that right?

7 A Yes.

8 Q And you accepted that and signed the termination
9 papers?

10 A Yes.

11 Q Did you question the reason stated by the gold
12 hat, that it was absenteeism, or you just accepted it?

13 A I accepted it. I agreed with it.

14 MR. SOSNICK: All right, that's it. No further
15 questions.

16 MS. CHAN: Staff has no further questions.

17 MR. PHILIPS: That's it.

18 MR. REYNOLDS: That's it.

19 MR. SOSNICK: Thank you, Mr. Green.

20 (Whereupon, at 1:10 p.m., the taking of the
21 deposition was concluded.)
22

23 _____
24 Jimmie Green
25

end 7

CERTIFICATE OF PROCEEDINGS

1
2
3 This is to certify that the attached proceedings before the
4 NRC COMMISSION

5 In the matter of: Texas Utilities Deposition of Jimmie Green

6 Date of Proceeding: Monday, July 9, 1984

7 Place of Proceeding: Glen Rose, Texas

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

10
11 Mimie Meltzer
Official Reporter - Typed

12
13 
14 Official Reporter - Signature