

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)

Interview of Dennis Culton, Taken November 8, 1982

Location: Glen Rose, Texas

Pages: 1 - 76

Date: Wednesday, July 18, 1984

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Original to E. Pleasant
#-1149*

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one copy to Region IV
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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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

Transcription Date: July 18, 1984

Interview of DENNIS CULTON, taken November 8, 1982,
at NRC Region IV Office, Arlington, Texas.

- Present: Dennis Culton, Interviewee
 Jaunita Ellis, President, CASE
 Robert Stewart
 Dan Tomlinson
 Richard Herr

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furnished tape recording provided by the Intervenor, CASE.
Speaker designations are alleged, and do not appear and
are not indicated in the tape recording. This is not
a certified transcript.

1 MR. STEWART: -- if you have anything
2 more you could add to this, what you're describing now --

3 MR. CULTON: Do you want a copy of this? Do
4 you have a copy of that?

5 MS. ELLIS: I have a copy of that.

6 MR. CULTON: I was wondering if you had a
7 copy. I felt sure that you did.

8 MR. STEWART: Yeah. This is out of the
9 transcript, yeah. Down on the -- let's see --

10 MR. CULTON: Down near line 20. It's okay
11 if I record this? Is that all right?

12 MR. STEWART: No, fine. Go right ahead.

13 Let's see if I can get a line and page --
14 on page 5552.

15 MR. CULTON: Okay.

16 MR. STEWART: Now you said -- let's see,
17 it'd be line 2 where you said that he -- well, 1, 2 and
18 3 -- 800 foot pull, quality control cable. And I guess
19 you didn't finish the pull and it ended up in the cable
20 spreading room, the lower section of Control Room No. 1.

21 MR. CULTON: Yes, sir.

22 MR. STEWART: Okay. You said --

23 MR. CULTON: That should have been 800-plus.

24 MR. STEWART: Or 800-plus, okay. That's
25 immaterial.

1 On lines 6, 7 and 8 and 9, you said,
2 "Several weeks later or a week later, in fact it was four
3 days later, I went back to that location to check to see
4 if it was spliced, and I found out that it was spliced."

5 MR. CULTEN: Yes, sir.

6 MR. STEWART: Do you have a cable pull number
7 or some way that we could locate that?

8 MR. CULTON: Well, of course not.

9 MR. STEWART: Well, I didn't know. You,
10 you know, pretty specific, said that it was a splice --

11 MR. CULTON: Yes, sir, it was.

12 MR. STEWART: Okay. Can you add anything
13 more to this so where we could get -- you realize what's
14 down in the cable spreading room.

15 MR. CULTON: Right. Oh, I know.

16 MR. STEWART: There's no way in the world
17 that we could find that --

18 MR. CULTON: No, I couldn't go back. I
19 could not go back right now and find that location. I
20 can give you an estimate of the location (telephone
21 ringing), but right now, you know as well as I do.

22 (Background conversation.)

23 MR. CULTON: But when I left, the cable
24 in that tray was over -- over a foot thick, and it
25 was probably in the middle. It was probably about six

1 inches in the middle. So, you know, who knows how much
2 cable is on top of that now.

3 MR. STEWART: Right. Do you have -- you say
4 it went to a relay panel.

5 MR. CULTON: Yes, sir, in Control Room No. 1 --
6 No. 1.

7 MR. STEWART: Do you know what relay panel
8 that was?

9 MR. CULTON: Negative.

10 MR. STEWART: Or where it's located?

11 MR. CULTON: I can give you an estimate of
12 where it's located, but I don't know the panel, and as far
13 as I know, other panels could have been put up in that
14 area, could have been changed out, because they were
15 constantly changing things.

16 MR. STEWART: Do you have -- can you give
17 me a sketch of where it might be located?

18 MR. CULTON: I'll tell you what. Do you have
19 a layout of the cable spreading room?

20 MR. STEWART: No, not right here. It would
21 take us awhile to get one. We normally don't carry them
22 around.

23 MR. TOMLINSON: If we had to keep the prints
24 for all the rooms on all of the sites that we go to, we
25 wouldn't have room here on the Tenth Floor.

1 MR. CULTON: Well, I feel sure -- I understand
2 that, you know. You know, I don't see how you can expect
3 me to have all those drawings either.

4 MR. STEWART: No, no.

5 MR. CULTON: I do have a lot of them.

6 MR. STEWART: I'm not suggesting that.
7 I'm just asking if you can just draw a sketch to show me
8 what approximate location that relay panel's in.

9 MR. CULTON: Uh-huh. Well, that's still
10 not going to tell you anything. I mean, I can give you
11 all kinds of drawings. I'll tell you what. I'll go ahead
12 and make a note of it and sit down and try and sketch
13 it out. Let me think it -- you know, put some more time
14 and thought of it, sketch it out, and I'll bring that
15 drawing to you. How's that sound? Do you want to do that?

16 MR. STEWART: Yeah, sure. Anything that
17 would help.

18 MR. CULTON: Because I think I can make it
19 a little more accurate than I can right here.

20 MR. STEWART: Uh-huh.

21 MR. CULTON: 'cause I can think back and
22 which panel it was, you know, how many panels in. I know
23 it was the -- I think right now, it's the third panel from
24 the aisleway, from the aisle, and there's --

25 MS. ELLIS: You all have access to those

1 drawings, don't you?

2 MR. TOMLINSON: Yes.

3 MR. STEWART: Oh, sure, yes.

4 MS. ELLIS: You couldn't get a copy of the
5 drawing and maybe get that to him, and then he can do that?

6 MR. CULTON: Well, yeah, you can do that.
7 I can make a sketch. Then we can take that drawing down
8 and go over it. Do you want to do that?

9 MR. STEWART: Yeah. We could --

10 MR. CULTON: The Control Room No. 1.

11 MR. STEWART: Uh-huh.

12 MS. ELLIS: That might give you a little
13 closer location.

14 MR. TOMLINSON: You don't remember any names
15 on the panel or any numbers or --

16 MR. CULTON: No.

17 MR. STEWART: Let's see. You mentioned there
18 were two ?

19 MR. CULTON: Oh, well, I know that there
20 are two that we pulled that -- I don't know if our last
21 Q cable, if it was -- if it was spliced or not, but I know
22 that I saw other Q cable in the spreading room and in
23 Safeguard No. 2 -- No. 1 -- Safeguard No. 1, that was
24 spliced. And the --

25 MR. STEWART: You say in the Safeguards

1 Building or --

2 MR. CULTON: Safeguard, Safeguard No. 1.

3 MR. STEWART: The room, the relay panel
4 room, or the --

5 MR. CULTON: No. It's in a tray.

6 MR. STEWART: Oh, that was the tray name?

7 MR. CULTON: No, no. It's a Q cable that
8 was spliced that is in Safeguard -- Safeguard Building No. 1.

9 MR. STEWART: Oh, okay. But it was in a --
10 what? -- overhead tray?

11 MR. CULTON: Yes. Everything in there is in an
12 overhead tray.

13 MR. STEWART: As opposed to the cable
14 spreading room type of tray?

15 MR. CULTON: Yes.

16 MR. STEWART: They're down lower. They're
17 not all overhead.

18 MR. CULTON: Yes, okay. It was -- okay --
19 in that case it was in an overhead tray.

20 MR. STEWART: Was there any -- if we get
21 a drawing, can you help us locate that one also?

22 MR. CULTON: I can try. In fact, I have a
23 layout of the cable spreading room.

24 MR. STEWART: Do you? Well, then, maybe
25 you can use that drawing.

1 MR. CULTON: Yeah, I'll pull it out. Well,
2 you -- no -- you'll have to get a electrical -- I've got
3 the -- just a layout, layout drawing of the cable --

4 (Knock on door.)

5 VOICE: Come on in.

6 MR. CULTON: -- of the Safeguard.

7 MR. STEWART: Hi, Dick. You know Juanita
8 Ellis.

9 MR. HERR: How are you doing.

10 MR. STEWART: This is Dennis Culden.

11 MR. HERR: Dennis, how are you? Richard
12 Herr.

13 MR. CULTON: Hart?

14 MR. HERR: Herr.

15 MR. CULTON: Herr.

16 MR. HERR: H E R R (spelling).

17 MR. STEWART: To bring you up to speed, we're --
18 she's taping, of course; it's all on tape -- and we're
19 just trying to get a -- tie these statements down as to
20 where the location -- to help us locate something, if we
21 can. We're talking about the splices.

22 Okay. I guess we can hopefully get
23 something better from you.

24 MR. CULTON: Well, you get an electrical
25 drawing of the -- (phone ringing) -- I'm trying to think

1 of a close elevation above --

2 MR. TOMLINSON: (Answering phone)

3 Mr. Seidle's office. Tomlinson. Yes. Yes.

4 MR. CULTON: I can't remember.

5 MR. TOMLINSON: Yeah. We're kind of involved
6 right now.

7 MR. CULTON: Do you have a layout--

8 MR. TOMLINSON: Is it okay if I call you back?

9 MR. CULTON: -- of the elevation versus --

10 MR. TOMLINSON: Very good.

11 MR. CULTON: -- locations --

12 MR. TOMLINSON: I'll do it. Thank you.

13 MR. CULTON: -- for the plant.

14 MR. STEWART: You mean as described in the
15 PSAR?

16 MR. CULTON: Yes.

17 MR. STEWART: Yeah. We'd have to go check
18 it out.

19 MR. CULTON: Okay. Well, I can cross-
20 section it for you.

21 MR. STEWART: Okay. I'll tell you what.
22 Since we don't have the other drawings and to avoid the
23 repetition --

24 MR. CULTON: Well, I've got one.

25 MR. STEWART: -- let's get all of this stuff

1 together, and we'll make a note of what we want, and then
2 you can come back later, and we can go through the
3 drawings.

4 MR. CULTON: Well, I'll tell you what --
5 I'll tell you what I came here for. I came here to find
6 out what information that I give you and that you've already
7 gotten, what you're going to do with it?

8 MR. STEWART: We're going to pursue it, if
9 there's an possibility of locating these, you know. We're
10 certainly not going to go down there and inspect every damn
11 cable --

12 MR. CULTON: Right.

13 MR. STEWART: -- in the cable spreading room
14 to try to find a splice.

15 MR. CULTON: Well, I understand that. I
16 understand that, you know, what you're looking for is
17 factual information --

18 MR. STEWART: Right.

19 MR. CULTON: -- stuff that you can go back
20 and that you can take care of.

21 MR. STEWART: Absolutely.

22 MR. CULTON: And the information that I've
23 given you is items that -- that either I was related
24 with or I know should be still there now. I mean, there's
25 101 other items that's going on there or had gone on there

1 that, you know --

2 MR. STEWART: Well, I want to get these two
3 subject matters down first, and then we can ask -- and let
4 us know what else you know or saw or that's not in the
5 testimony. Do you follow?

6 MR. CULTON: Yes.

7 MR. STEWART: Okay. I think we have
8 established now that what we need is some drawings and
9 elevations. We will get the Control Room No. 1 panel
10 drawings, since you don't have those. And we'll also get
11 some elevation drawings.

12 MR. CULTON: Okay.

13 MR. STEWART: So you can help locate these
14 trays.

15 MR. CULTON: Okay.

16 MR. STEWART: And you're going to provide
17 what -- what are you going to provide? You have some
18 sketches, you say, of the --

19 MR. CULTON: I'll just bring what I have,
20 and we'll sit down and go over them.

21 MR. STEWART: Okay.

22 Okay, you were transferred back to the or
23 into the Drafting Department?

24 MR. CULTON: Yes, sir.

25 MR. STEWART: And you were put on the

1 Brown & Root hanger -- hangers location known as the BRHL;
2 is that right?

3 MR. CULTON: Uh-huh.

4 MR. STEWART: Okay, what specifically did you
5 do there?

6 MR. CULTON: I was given --

7 MR. STEWART: Some isos?

8 MR. CULTON: Yes, some isometric drawings of --

9 MR. STEWART: Okay, I guess --

10 MR. CULTON: -- of Brown & Root hangers --
11 no -- of pipe, of piping that was to go up. I was given
12 on another sheet how many hangers to be hung on each spool,
13 each piece of pipe, each section of pipe, and the type
14 of hanger it was.

15 MR. STEWART: Okay. They were already
16 identified on the --

17 MR. CULTON: Yes, sir.

18 MR. STEWART: -- pipe spool or the isos?

19 MR. CULTON: Yes, they were identified.

20 MR. STEWART: Okay.

21 MR. CULTON: And I was to locate them on
22 the isometric drawings and make a redraw.

23 MR. STEWART: Okay. Were the --

24 MR. CULTON: To be issued in the field.

25 MR. STEWART: Were the dimensions already

1 on it?

2 MR. CULTON: No, there were no dimension on
3 it. I was to put them down there. I was just to place
4 them on there, so I couldn't understand -- I was just to
5 place the hanger on the drawing, just to put them down
6 on paper right then. Then later on, after we got our
7 production going, they were turned back to us to put
8 locations.

9 I was given no other information to go by.
10 I was to estimate the feet or the space in between that
11 area of that hanger, just an estimate --

12 MR. STEWART: Uh-huh.

13 MR. CULTON: -- of what I thought was there,
14 and --

15 MR. STEWART: Then the field crews would --

16 MR. CULTON: They were issued to the field.

17 MR. STEWART: Uh-huh. And then they would
18 go put the hangers up?

19 MR. CULTON: Yes.

20 MR. STEWART: Did you go back --

21 MR. CULTON: Yes, sir, I did.

22 MR. STEWART: -- and verify?

23 MR. CULTON: I went out in the field and
24 just out of curiosity, I had a brother that worked out
25 there as a pipe -- what do you call it? -- just places

1 the pipe to each other?

2 MR. STEWART: A pipefitter.

3 MR. CULTON: A pipefitter. And he showed me
4 around some, where the pipe that were hung, and a couple
5 of them were off a little bit, but all of them were within the
6 estimates --

7 MR. STEWART: Uh-huh.

8 MR. CULTON: -- of where I placed them, where
9 I placed the hanger on that piece of spool.

10 You know, of course, there's so much up
11 there, you know, they're going to have to put that in a
12 different -- you know, they're hanging a little bit -- they're
13 either off maybe, you know, several inches, or they may be
14 off several feet, but there's so much junk on that ceiling
15 or on the wall, you know, they could not -- you know, they
16 had to move it down.

17 It was all as-built, and it came back, and
18 sometimes we were issued as-built drawings and changes to
19 that Brown & Root hanger location.

20 MR. STEWART: But you didn't actually go out
21 and do the as-builts? Somebody else did?

22 MR. CULTON: No.

23 MR. STEWART: No.

24 MR. CULTON: Somebody else did.

25 MR. STEWART: Okay. Do you know what the

1 process from that, the system?

2 MR. CULTON: No.

3 MR. STEWART: Because they are verified.

4 MR. CULTON: You mean the as-built drawings?

5 MR. STEWART: Yes.

6 MR. CULTON: Yes, they are, yeah. But they
7 come back to me.

8 MR. STEWART: But they use the as-builts to
9 recalculate the seismic --

10 MR. CULTON: Yes.

11 MR. STEWART: -- okay?

12 MR. CULTON: It's the same hanger number.

13 MR. STEWART: Yeah, I mean, is there something
14 wrong with that? I'm ask- -- you know, --

15 MR. CULTON: No. Well, it was a different
16 hanger. It was a different hanger that was -- the hanger
17 numbers that I had put down on the paper and the type of
18 hanger it was -- if it was a shock hanger or if it was,
19 you know, a direct support. Then it was out there. That's
20 what was hung. At least that's what I saw.

21 Now I know the as-builts, they'll go back
22 and change that, and they may change the type of shock.
23 They may change the type of support, and they may change it
24 and never let us know.

25 MR. STEWART: Uh-huh.

1 MR. CULTON: That could be. But what I saw
2 is what I drew, what I put up.

3 MR. STEWART: Uh-huh.

4 MR. CULTON: Now I'm not saying all of them
5 are thataway.

6 MR. STEWART: No. I mean, what's wrong
7 with that, is what I'm saying?

8 MR. CULTON: Because -- what was wrong with
9 it is why -- why did they put this on me to put in the --
10 put in the footage? Why did they put this on me to put
11 in that thing. The distance between the hangers --

12 MR. STEWART: You've had four years --

13 MR. CULTON: I had no information. But I'm
14 not an engineer. That doesn't mean a damn bit -- that's
15 not a damn thing. I'm not an engineer. I'm not designed --
16 I'm not qualified to put in this hanger.

17 MR. STEWART: Why aren't you? I mean, you've
18 had four years of drafting experience.

19 MR. CULTON: Sure.

20 MR. STEWART: And that's what a draftsman
21 would do.

22 MR. CULTON: As a draftsman, that's right.

23 MR. STEWART: But you don't do any
24 calculations, did you?

25 MR. CULTON: No, of course not.

1 MR. STEWART: Okay. You made a location.
2 The location could have or could not have been exactly
3 where you put it.

4 MR. CULTON: Those engineers went back and
5 they used my drawings to put those supports in.

6 MR. STEWART: Why, what's wrong with that?

7 MR. CULTON: Could be nothing. That's why
8 I'm here.

9 MR. STEWART: There is a -- there is the
10 process that you -- you do the first phase of it.

11 MR. CULTON: That's right.

12 MR. STEWART: The craftsmen go and hang the
13 hangers.

14 MR. CULTON: No, an engineer does the first
15 part, the first phase.

16 MR. STEWART: Well, the installation --

17 MR. CULTON: That's already -- that --
18 all that information should already been figured. It should
19 have already been done. I know that from experience from
20 working with other hangers and other piping supports, that
21 all that information is already done.

22 MR. STEWART: Yes.

23 MR. CULTON: Then it's given to the draftsman.
24 A draftsman is not an engineer.

25 MR. STEWART: Well, the pre-installation is

1 what I'm talking about. You're taking the engineer's
2 work and converting it to a field work drawing.

3 MR. CULTON: That's true.

4 MR. STEWART: The workman goes and puts it
5 in. Then there is a verification program that follows.

6 MR. CULTON: Okay.

7 MR. STEWART: Okay. The exact locations
8 are known, and then there is a recalculation made to make
9 sure, if they are moved, that that is the right hanger,
10 the right size. So I mean there is a very extensive
11 as-built verification program that goes on.

12 MR. CULTON: Not when I was there.

13 MR. STEWART: Well, no, I mean the plant
14 was -- certainly wasn't in that phase of construction by
15 the time you were there. So, you know, I'm trying to
16 find a problem --

17 MR. CULTON: Well, I think the problem --

18 MR. STEWART: -- with the system.

19 MR. CULTON: I think that the situation,
20 that the reason -- what was the reasoning in having me
21 go back and make an estimate between those hangers? I just
22 stuck them on there. I just stuck them on there.

23 MR. STEWART: No way could you do it
24 otherwise than an estimate.

25 MR. CULTON: Why?

1 MR. STEWART: Because you don't know those
2 interferences.

3 MR. CULTON: I know how long that piece of
4 pipe is. I know how many -- I know how many hangers are
5 going in there.

6 MR. TOMLINSON: You said --

7 MR. CULTON: I don't know where the location
8 of that hanger's going to be. I stuck them on there.

9 MR. TOMLINSON: A guess.

10 MR. CULTON: That's right.

11 MR. TOMLINSON: Because you have no way
12 of knowing, until you go out and look at the actual run
13 of pipe.

14 MR. CULTON: But I saw it. And it was there
15 where I put it.

16 MR. STEWART: Well, that's fine.

17 MR. TOMLINSON: They got lucky they didn't
18 have to move something else to get to it, then, or to be
19 able to put it where you had it.

20 MR. CULTON: Well, I guess I earned --
21 I made some money for the plant, didn't I?

22 MR. STEWART: How many other draftsmen were
23 doing the same thing that you're doing?

24 MR. CULTON: Between four and twelve --

25 MR. STEWART: Uh-huh.

1 MR. CULTON: -- I mean, that works under
2 me.

3 MR. STEWART: You feel unqualified as
4 a draftsman?

5 MR. CULTON: Negative.

6 MR. STEWART: So, you know, I --

7 MR. CULTON: I feel unqualified --

8 MR. STEWART: Estimating where a --

9 MR. CULTON: Sticking in a location,
10 estimating a location. That's not my job.

11 MR. STEWART: Well, that's the job that
12 was assigned to you, wasn't it?

13 MR. CULTON: Yes, that's true.

14 MR. STEWART: You know, I'm --

15 MR. CULTON: No, it's you don't understand.

16 MR. STEWART: No, I think you don't understand
17 the system.

18 MR. CULTON: I am not an engineer, and I
19 don't know how heavy that piece of pipe is. I don't know
20 what that load is carrying.

21 MR. TOMLINSON: Who determined what hanger
22 would be placed?

23 MR. CULTON: I did.

24 MR. TOMLINSON: It was up to you --

25 MR. CULTON: I stuck it on there.

1 MR. TOMLINSON: -- to decide whether it
2 was a rigid hanger or a spring can?

3 MR. CULTON: Oh, negative, no. That was
4 already done.

5 MR. TOMLINSON: And the size of the hanger
6 itself, who determined that? Did they give you a number that
7 said it will be such-and-such a spring can?

8 MR. CULTON: Yes. The number was already put
9 down.

10 MR. TOMLINSON: Well, that eliminates the
11 engineering.

12 MR. CULTON: That doesn't eliminate the
13 location.

14 MR. TOMLINSON: Within reason it does.

15 MR. CULTON: Well, does that mean that I
16 could have stuck that hanger anywhere? I could have
17 stuck them all together this far away on a 20-foot
18 piece of pipe carrying an eight-inch --

19 MR. STEWART: Well, I assume you have some
20 reasonable thinking ability to say that that isn't going
21 to be done.

22 MR. CULTON: Well, I'm glad you trust me.

23 MR. STEWART: You know, I don't know.
24 You just don't have the confidence in yourself to do it
25 right or what?

1 MR. CULTON: No, it's not that, sir. It's
2 exactly what I've told you.

3 MR. TOMLINSON: How much latitude were you
4 given in the placement of these hangers?

5 MR. CULTON: I don't understand.

6 MR. TOMLINSON: Well, you say that each one
7 of the hangers had already been preassigned a number.

8 MR. CULTON: That's right.

9 MR. TOMLINSON: A type and number.

10 MR. CULTON: Yes, sir.

11 MR. TOMLINSON: When this came to you, it
12 came to you as an isometric drawing with a just a list
13 of hanger numbers and types, or was there some rough
14 location given to you?

15 MR. CULTON: No rough location at all.

16 MR. TOMLINSON: Were you given instructions --

17 MR. CULTON: An isometric drawing, from
18 this isometric pipe drawing, okay, another list came in
19 from the engineers with the hangers, the drawing number
20 and the type of hanger it was, okay. All that was on one
21 sheet of paper. All of this was on a sheet of paper.

22 MR. TOMLINSON: Uh-huh.

23 MR. CULTON: I was to go back and make
24 redraws, or my group, my group was to go back and make
25 a redraw of the hanger for the people in the field. They

1 were given this same list of just the hanger numbers.

2 MR. TOMLINSON: The list of hanger numbers, was
3 this broken out by hanger types, or was it put down in the
4 order that the hangers were to be installed from, say, a
5 wall here to a wall here (indicating), like you would be
6 given a spring can, a spring can, a rigid support, a rigid
7 support, another spring can, or would you have three spring
8 cans in a row and two rigid supports in a row, or who
9 determined the placement of these?

10 MR. CULTON: I don't remember. I don't remember.

11 MR. TOMLINSON: Well, was it your decision
12 to make, where the hangers would go and in what order?
13 If you so desired, you could put all spring cans at one
14 end of the line?

15 MR. CULTON: No, that was not it.

16 MR. TOMLINSON: A rigid support? Then
17 someone else had already done this?

18 MR. CULTON: Yes.

19 MR. TOMLINSON: Okay. Their calculations
20 were based on a rough placement of these hangers, prior
21 to your ever seeing the list.

22 MR. CULTON: Uh-huh.

23 MR. TOMLINSON: There is a post-installation
24 that Bob was talking about. There is a reverification of
25 this, and they go back to the as-built drawings, and they

1 perform new stress calculations based on the as-built
2 conditions, not what they thought they had and what you
3 thought you had when you made the first drawing, it's
4 what they do -- or it's what they come up with on the
5 as-built drawings, the actual as-built drawings, where
6 the hanger had to be because of other interference.

7 Now if it's a foot off, it's four feet off,
8 does this span allow for this type hanger to perform as
9 it should?

10 MR. CULTON: Uh-huh.

11 MR. TOMLINSON: Or do we have to redesign?
12 Do we have to put another hanger someplace in the thing?
13 But you weren't doing the engineering,
14 though.

15 MR. CULTON: No.

16 (Pause.)

17 But you know what I said is that I gave --
18 I gave the approximate distance between the hangers.

19 MR. TOMLINSON: Uh-huh.

20 MR. CULTON: I put that in. No matter how
21 long that spool was or the section of piping was, no
22 matter what angle it was at, I stuck it there. I put it
23 in there.

24 And I went out in the field to check it, if
25 it was -- if it was eighteen feet, if it was six inches,

1 it was twenty-plus feet, it was there. Almost every one
2 of them, I'll say, was within less than a foot of the
3 location that I put on that drawing.

4 MR. TOMLINSON: How many of these were
5 anchored into baseplates?

6 MR. CULTON: I have no idea.

7 MR. TOMLINSON: Or were installed in
8 ceilings or in the walls?

9 MR. CULTON: I have no idea.

10 MR. TOMLINSON: Because that would have a
11 lot to do with where the hangers would be placed.

12 MR. CULTON: Uh-huh.

13 MR. TOMLINSON: The baseplate were installed
14 at the time the wall was installed or the ceiling was
15 installed, with antici- -- in anticipation of attaching
16 the hangers to them.

17 MR. CULTON: Uh-huh.

18 MR. TOMLINSON: So, again, somebody had done
19 this before.

20 MR. CULTON: Great!

21 MR. STEWART: Have you been out in the field
22 and noticed the bare plates with just numbers on them?

23 MR. CULTON: Sure.

24 MR. STEWART: And those are hanger numbers?

25 MR. CULTON: Yes.

1 MR. STEWART: And those are the ones that
2 you located?

3 MR. CULTON: Yeah.

4 MR. STEWART: On the pipe?

5 MR. CULTON: Some of them were already there.
6 Some of them were just already put up. It's like this.
7 Whenever I was -- well, when I was first hired on out there,
8 I was a scheduler, and you're given -- a lot of the crews
9 want to go ahead and to keep up with their schedule, they
10 find the shortest distance between two points, okay,
11 because it makes them look good. It makes their crew look
12 good if they put in their required 800 foot of pipe or
13 they pulled their, you know, 400 foot of cable or 12,000
14 foot of cable or whatever. It makes them look good,
15 because they're meeting their schedule.

16 They don't give a damn if there's an HVAC
17 unit coming in or if there's another pipe that comes
18 in this location. If they can get theirs in first,
19 regardless of anybody else, as long as they meet their
20 schedule.

21 I had to go back and reschedule a lot because
22 I found out that the competition out there in the field,
23 one that I remember rerouting was a -- an eight-inch pipe
24 that went through, and HVAC needed to come through -- you
25 know, which one have priority. They were pretty much on

1 the same level. You know, when an HVAC -- you know, the
2 pipe was a priority. The HVAC could be the rerouting,
3 and the HVAC unit went in first. So they had to tear it all
4 back out and put in the pipe and reroute the HVAC.

5 MR. STEWART: An NCR was written on it; is
6 that correct?

7 (No response.)

8 MR. STEWART: So there was a decision made
9 by Engineering as to who had priority, the pipe or the --

10 MR. CULTON: There probably was. I don't
11 know for sure.

12 MS. ELLIS: Do you know for sure?

13 MR. STEWART: Oh, that's routinely done that
14 way.

15 MR. CULTON: Bullshit.

16 MR. STEWART: How many construction jobs have
17 you been on? How many nuclear plants have you been on,
18 nuclear plants?

19 MR. CULTON: None, sir, except Brown & Root.
20 Construction, I've been on eight or ten.

21 MR. STEWART: So the only one you've been on
22 is here in Comanche Peak.

23 MR. CULTON: Yes, sir.

24 MR. STEWART: So I mean --

25 MR. CULTON: I went to all the meetings.

1 I went to the NCR meetings. I know what went on. I knew
2 the people there.

3 It's like this. If they wrote an NCR
4 report up, it'd go back to this guy right here. You know,
5 you knew that that pipe wasn't supposed to be down there.
6 Why did you put it up?

7 I had to meet my schedule. And, you know,
8 he was going to take a long time, and I tried to force
9 you a little bit so you could, you know, stay ahead, you
10 know, keep up with your schedule. I asked you if you
11 were going to put it up, and you said no.

12 Okay. Go ahead and tear it down, and, you
13 know.

14 (End tape recording, Tape 1, Side 1.)

15 MR. STEWART: -- except at tremendous
16 cost in labor, while somebody --

17 MR. CULTON: They don't care.

18 MR. STEWART: -- sit around and --

19 MR. CULTON: You're talking to people that
20 they don't care.

21 MR. STEWART: -- that's why they tell them
22 to go ahead and put it in, that an engineering decision
23 will be made.

24 MR. CULTON: Then why wasn't it rescheduled?
25 Why couldn't they do something else?

1 MR. STEWART: It really didn't matter, did it?

2 MR. CULTON: No, of course not. It doesn't
3 matter.

4 MR. TOMLINSON: To us, it really doesn't
5 matter either, because it's a money problem that you're
6 talking, and that's the least of our concerns.

7 MR. CULTON: Uh-huh.

8 MR. TOMLINSON: Our big thing is safety.

9 MR. CULTON: Right.

10 MR. TOMLINSON: Does it affect safety?

11 MR. CULTON: I don't know. I'm not an
12 engineer.

13 MR. STEWART: Well --

14 MR. TOMLINSON: How they reschedule (simultan-
15 eous conversation) --

16 MR. CULTON: It's y'all's job to find that
17 out. I just give you information. I'm not here to argue.
18 I'm not here to fight. I'm here to give you some facts
19 and let you deal with the facts.

20 MR. STEWART: Well, we'll certainly do that,
21 but --

22 MR. CULTON: I'm here -- I'm here -- if it's
23 fine, if this is right, if this is right, if this is routine
24 for you to do this, or -- that's fantastic. I think that's
25 great. I'm not here to argue with that at all.

1 Now you know, if -- 'cause I know that
2 there's always -- these drawings are always coming back,
3 you know, they're always being reved, and once they get
4 to a Rev. 10, they're redrawn again.

5 MR. TOMLINSON: Uh-huh.

6 MR. CULTON: And, you know, those papers
7 are filed somewhere. As far as I know, those papers could
8 be -- or, you know, a total redraw done on them. They
9 could be thrown out. An engineer might have caught ahold
10 of them and said, "My God, hey, what is this? This is not
11 right. Let's get rid of these. Let's straighten this
12 thing out."

13 I feel -- I feel that it is a possibility
14 that that has happened, but how can I go back and check
15 on it? That's where I asked you -- that's where I asked
16 Juanita, that's where I asked the -- I gave some of my
17 finer drawings to a group that I didn't -- I didn't really --
18 I didn't agree with, that Armadillo Coalition --

19 MR. ELLIS: Armadillo Coalition.

20 MR. CULTON: Armadillo Coalition at North
21 Texas State when I went there. I heard of Juanita's
22 group, and I thought, there's a lady that I have to give
23 these papers to.

24 MR. TOMLINSON: Well, I haven't heard
25 anything that you've said yet that was wrong.

1 MR. CULTON: Well, great!

2 MR. TOMLINSON: As far as the hangers go.

3 MR. CULTON: Well, great! Then we don't
4 don't have to worry about it. I mean --

5 MR. STEWART: I mean, we want -- yeah.

6 MS. ELLIS: Let me ask ya'll something.

7 MR. TOMLINSON: Sure.

8 MS. ELLIS: You're making an awful lot of
9 assumptions, it seems to me. You're assuming that all of
10 the hangers and stuff were checked that he did. You don't
11 know that.

12 MR. TOMLINSON: Yes, ma'am.

13 MR. CULTON: You don't know that.

14 MS. ELLIS: How do you know that?

15 MR. STEWART: It is done on all safety-related
16 systems.

17 MR. TOMLINSON: And there is a system that
18 provides for this. Now whether the system is followed or
19 not, I can't guarantee in all instances.

20 MS. ELLIS: All right. The one's we're
21 talking about --

22 MR. TOMLINSON: Ma'am, I am one person.

23 MS. ELLIS: -- are the ones that he has done.
24 You've got specific --

25 MR. TOMLINSON: Okay, let's --

1 MS. ELLIS: -- concerns here that are being
2 expressed by a specific person.

3 MR. TOMLINSON: Do you have the system that
4 you were working on? Do you know what piping system it
5 was and where this general location of this? We can go
6 back and we can check it, if you can get it specific for
7 us.

8 MS. ELLIS: Can't you check something from
9 the drawings? Can't they check something from the
10 initials, where he initialed the drawings -- where you
11 initialed the drawings that you did?

12 MR. CULTON: Or my group.

13 MS. ELLIS: Or your group.

14 MR. STEWART: Do you realize --

15 MS. ELLIS: Can't you check this?

16 MR. TOMLINSON: We certainly can.

17 MR. STEWART: Do you realize how many hangers
18 there are?

19 MS. ELLIS: An awful lot, I know.

20 MR. STEWART: I mean, we can't just go out
21 and try to spot something out of 20,000 --

22 MR. TOMLINSON: 17,000.

23 MS. ELLIS: Aren't there records that would
24 reflect what he worked on?

25 (Simultaneous conversation.)

1 MR. CULTON: There was a lot of other people.

2 MR. STEWART: If he can tell me a drawing
3 number, the iso or a system number, that's fine. Then we
4 can tie it down.

5 MR. TOMLINSON: But we are talking, just Unit 1,
6 17,000 hangers.

7 MR. CULTON: I believe it.

8 MS. ELLIS: But isn't there something --

9 MR. CULTON: I believe a lot more.

10 MS. ELLIS: -- that would allow you, within
11 the system, to check the hangers that he worked on?

12 MR. TOMLINSON: Only if we sat someone down
13 with a stack of drawings and went through to look for his
14 name or initials.

15 MR. CULTON: Well, my goodness.

16 MR. TOMLINSON: That's the only way we would
17 be able to locate what he had done.

18 MS. ELLIS: Uh-huh

19 MR. TOMLINSON: So how many drawings would
20 there be, let's say on a run of pipe that had five hangers.
21 The potential is there that you've got as many as 15
22 drawings. You've got the isometrics for that. You've got
23 possibly two or three pages on the larger hangers. You've
24 got drawings for baseplates. Just any number of things
25 could be there. We could be, you know, talking a mountain

1 of paper for someone to go through just to locate what
2 he has done.

3 MS. ELLIS: Uh-huh. And you're saying
4 that y'all don't have the personnel or the time to do it?

5 MR. TOMLINSON: Ma'am, we've got five sites.

6 MR. STEWART: We have -- there are checks
7 and balances for all of this.

8 MS. ELLIS: Uh-huh.

9 MR. STEWART: Not only from the construction
10 side, the installation side. Then there's the verification
11 program, which is an engineering recalculation program.

12 MS. ELLIS: Yeah, I understand all of that.
13 But what I'm concerned about is --

14 MR. STEWART: Everyone wants --

15 MS. ELLIS: -- whether or not this works.
16 We don't think it works too well, because of some of the
17 things we've been told by people. And if you're not
18 checking it out, how do you know --

19 MR. STEWART: We do check that out.

20 MS. ELLIS: -- that it's working.

21 You haven't checked out what he is saying
22 specifically, is what I'm saying.

23 MR. STEWART: I know routinely that's the
24 manner in which it is done. Routinely.

25 MS. ELLIS: If you don't have the time to

1 go through the drawings and stuff --

2 MR. STEWART: He's not separate.

3 MS. ELLIS: -- bring some of them here, and
4 I'll go through them and find some of the ones that he's
5 done.

6 MR. TOMLINSON: I don't think Brown & Root
7 would like the idea of us taking a bunch of their drawings
8 off site.

9 MS. ELLIS: Well, at the site.

10 MR. STEWART: I mean, for what purpose?

11 MS. ELLIS: To check out what he's saying,
12 the things that he's concerned about. How are you going
13 to know otherwise?

14 MR. STEWART: Well, I'm telling you, what
15 he is concerned about is routinely done, not just him.
16 There is checks and balances. Like, he says, he is not
17 an engineer --

18 MR. CULTON: That's routinely done, to go in
19 and estimate a spool of pipe?

20 MR. STEWART: You have to.

21 MR. CULTON: I know -- I know an engineer --
22 my father's an engineer.

23 MR. TOMLINSON: But remember, now, --

24 MR. CULTON: This is why --

25 MR. TOMLINSON: -- the baseplates for those

1 supports were in there before you ever saw the isometrics.
2 The baseplates were already installed. Someone --

3 MR. CULTON: Not necessarily.

4 MR. TOMLINSON: An awful lot of them. I'll
5 bet they were.

6 MR. CULTON: An awful lot of them were.

7 MR. TOMLINSON: The walls and the ceilings
8 and the floors were all there.

9 MR. CULTON: But in Unit No. 2, Safeguard
10 No. 2, and the Steam Generator No. 2 was not there.

11 MR. STEWART: In No. 2, do you know what they
12 have in Unit 2, in that corridor?

13 MR. CULTON: What?

14 MR. STEWART: The wall is steel-plated for
15 hangers. That's the very purpose. The problems they had
16 in Unit 1 in locating hangers was tremendous. So in Unit 2
17 in the corridor, they put a whole steel panel up, rather
18 than locate individual hanger inserts.

19 MR. TOMLINSON: The baseplates --

20 MR. CULTON: You're talking inside the
21 container building?

22 MR. STEWART: No.

23 MR. TOMLINSON: Safeguard.

24 MR. CULTON: The Safeguard? Okay.

25 MR. STEWART: So I mean, you know, there has

1 been a tremendous rework that has gone on in Unit 1 because
2 of the location of hangers, interferences primarily.
3 They've been -- they're down now to about four percent
4 rework. But at the initial onset, the location, the
5 system in which they were locating them, they were wrong,
6 so they had to rework.

7 MR. CULTON: I was there when that went on.
8 I was -- I was doing it. That's the reason I was doing
9 the locations, because it was -- at that time, it was all
10 being redone. It was not like, you know, we couldn't use
11 the same drawings we used in Unit 2 -- in Unit 1. That's
12 the reason I was doing this.

13 MR. STEWART: Well, would it satisfy you if
14 we sat down and went step-by-step in what is done at the
15 site in the verification program?

16 MR. CULTON: Satisfy me? No.

17 MS. ELLIS: You mean what is supposed to
18 be done.

19 MR. CULTON: 'Cause I -- that's right.
20 That's what you --

21 MR. STEWART: I know that is what is being
22 done. That's what we go down and inspect, to see that
23 their program is working.

24 MS. ELLIS: I don't --

25 MR. STEWART: We don't go down and --

1 MS. ELLIS: I don't see how you can satisfy
2 his concerns if you don't address his specific concerns.

3 MR. STEWART: Well, I'm trying to find out
4 what his concerns are that are wrong.

5 MR. TOMLINSON: We'll have to go back and
6 do a review --

7 MR. STEWART: What is wrong?

8 MR. TOMLINSON: -- of all of the drawings
9 that he has worked on.

10 MR. CULTON: Not necessarily my drawings.

11 MR. STEWART: I'm saying that they're --

12 MR. CULTON: I believe my drawings were
13 more close to be accurate than anybody else's drawings.
14 I work very hard, and I took a lot of time with the
15 drawings that I drew.

16 MR. TOMLINSON: Well, there is no way that
17 they can go back and pull --

18 MR. CULTON: Now other people in my crew
19 didn't give a damn where that location went in. They went
20 in and just stuck that hanger any damn where -- any place
21 where it was -- where they could stick it.

22 If it was a 20-foot piece of section in there,
23 they stuck that hanger anywhere, and they went back and
24 made a estimate of where that piece of pipe went, where
25 that hanger was located between that spool.

1 They didn't care. They did not care where
2 that hanger was supposed to be. They went out --

3 MS. ELLIS: (Interposing).

4 MR. CULTON: They went back out -- we went
5 back out in the field --

6 MR. TOMLINSON: That's a reverification
7 (inaudible) --

8 MS. ELLIS: Sure.

9 MR. CULTON: -- and checked --

10 MR. TOMLINSON: -- of 17,000 hangers. There
11 is no possible way.

12 MR. CULTON: I know he can't.

13 MS. ELLIS: Why?

14 MR. STEWART: But that -- the reverification
15 program is in operation. That's what I'm saying.

16 MR. CULTON: That's great.

17 MR. STEWART: There's hundreds of people
18 that are working on hangers. And part of that is a
19 verification. Is it the right hanger? Is it the right
20 location, and is it on the right pipe? All of those,
21 and the calculations that follow. I mean, there's a
22 tremendous amount of hours. You already have Mr. Doyle
23 and somebody else that have some allegations regarding
24 the design function.

25 MS. ELLIS: Uh-huh.

1 MR. CULTON: But I sat down, not only with
2 my father, who's a consultant to me as an engineer on those
3 hangers, but I took it to a professor at UTA and another
4 consultant engineer that I've worked with on other sites.

5 I was going to say something else. I'd
6 better not.

7 They said that that was not the proper way
8 to locate the hangers, that when I was given that
9 information, I knew how long that spool of pipe was. I
10 knew the angle in which the intent was supposed to be.
11 I knew how many hangers were supposed to go in this one
12 area.

13 MR. STEWART: But was the iso marked with an
14 X for a hanger?

15 MR. CULTON: No.

16 MR. STEWART: There was nothing on the iso
17 that would locate the hanger?

18 MR. CULTON: No.

19 MR. STEWART: Not even an approximate --

20 MR. CULTON: No. I was given an isometric
21 drawing, --

22 MR. STEWART: Uh-huh.

23 MR. CULTON: -- and that's it. With the
24 distance --

25 MR. STEWART: The pipe number?

1 MR. CULTON: -- with the pipe number, with a
2 spool number, with the distance between the spool from one
3 end to the other, from one valve to another. I knew that.

4 I was given the information, No. 2. I
5 was given the information of how many hangers was to go on
6 this drawing. I did not know if it was supposed to go from
7 left to right, from right to left. I did not know what
8 hanger was supposed to be hung between these distances.
9 I could have stuck every one of these hangers just right --
10 just right in here.

11 And then I gave -- I -- my job was finished.
12 Later on, this came back to me. Verbal communication came
13 from me, from my supervisor, which was to estimate the
14 distance between each hanger that I and my group have
15 located on these isometric drawings. We went back. We
16 gave a rough estimate of how far apart the hangers were,
17 put them in a box. Each week they are issued to the field.
18 They were stamped and issued to the field.

19 MR. STEWART: Can you give me a system that
20 you worked on, the name of a system? An iso? Some way
21 that we can go back and do some checking on these?

22 MR. CULTON: I can give you my crappy
23 drawings that I have. I have -- you know, like I said,
24 the choice drawings that I had are given away to a
25 professor at UTA, have been given away to a professor

1 at North Texas State that are interned with the group,
2 the Nuclear Reg- -- the --

3 MS. ELLIS: The Armadillo Coalition.

4 MR. CULTON: -- the Armadillo Radical
5 Coalition.

6 MR. STEWART: Do you have duplicates of
7 those?

8 MR. CULTON: They're the ones that have that.
9 What?

10 MR. STEWART: Are they duplicates, what
11 you have --

12 MR. CULTON: YES, they are duplicates.
13 They are just copies. They are not the drawings; they
14 are just copies.

15 I took those drawings -- a draftsman always
16 saves some of his work, some of his finer work a draftsman
17 saves for the benefit of going back into another position
18 that you, as an employer, would like to see what kind of
19 work I do. You'd like to see how, you know, that -- some
20 of my ideas. I might be able to help you to, you know,
21 change some of your ideas. I might have a better idea.
22 You might have a better idea. But you want to see my work
23 to see what kind of quality draftsman I am.

24 So where am I supposed to get that
25 information? On my own time drawing it? Well, that's fine

1 and dandy. But nine times out of ten, if you draw it on
2 your own time for you, I would do a fantastic job. I would
3 do a very quality job of doing it.

4 That's not what you want to see. You want
5 to see production work, okay. That's it. That's what
6 you want to see.

7 MR. TOMLINSON: Let's go back to some of
8 the things you said a minute ago that you --

9 MR. CULTON: That's what I did, and that's
10 what my group did.

11 MR. TOMLINSON: You turned over some of the
12 drawings to a gentleman down here at UTA and another one
13 at North Texas State.

14 MR. CULTON: Yes, sir.

15 MR. TOMLINSON: And you said that they --
16 it was their opinion that this was not being done a proper
17 manner.

18 MR. CULTON: Yes, sir.

19 MR. TOMLINSON: Did they verify any of the
20 stress calculations or find out that the hangers were in
21 the wrong place, were not the proper strength? Or did they
22 find any fault with them?

23 MR. CULTON: They found, for instance,
24 that some of the hangers were -- had some improper welds,
25 the wrong type of bevel weld, the -- some of the types of

1 welds that they used in the location of stress were the
2 wrong types.

3 MR. TOMLINSON: Now, this, if you can get
4 me all the specifics on this, --

5 MR. CULTON: Well, I think I only --

6 MR. TOMLINSON: -- then we're in my ballpark.

7 MR. CULTON: We went through -- the last
8 time I talked to you, you had -- I'm not sure if he was
9 an engineer -- I thought he was an engineer that looked
10 at it.

11 No, he was a welder at the nuclear power
12 plant in Glen Rose, and he saw -- he pointed out several
13 of the welds that were wrong. They were improper welds.

14 MR. TOMLINSON: Well, the design or the --

15 MR. CULTON: It was design. It was the
16 design on the -- on the hanger and on the baseplates.

17 MR. TOMLINSON: Now if you can give me --
18 if you can give me something specific on that, --

19 MR. STEWART: Did they have the loads and
20 everything on there for the weld design?

21 MR. CULTON: I'm not sure.

22 MR. STEWART: I mean, how did they say that --
23 what was their basis that it was wrong?

24 MR. CULTON: Some of the material I had,
25 I had written down, some information off a piece of paper,

1 onto the drawings.

2 MR. STEWART: You mean, they were stress
3 calculations of what?

4 MR. CULTON: It was for my -- it was for
5 my benefit, you know, because it made it look, the drawing
6 look neat. It looked -- you know, I was going to keep it,
7 you know, a copy of this drawing, just for my benefit.
8 I didn't know what I was really putting down. I didn't
9 know that that was a, you know, the improper -- or the
10 stress, what the stress load was.

11 But when I took it to North Texas State and
12 gave it -- the professor gave it to, I felt --

13 MR. STEWART: An engineer?

14 MR. CULTON: I don't know. Somebody. And
15 he came back, and he told me that they were improper
16 stress loads. I don't know.

17 MR. STEWART: You said you had some rough
18 sketches that you have?

19 MR. CULTON: Yes, what everybody picked
20 through.

21 MR. STEWART: And do you have them with you?

22 MR. CULTON: No. "Cause I was going to find
23 out and see what you were going to do first. If you're
24 not going to do anything, there's no reason why --

25 MR. STEWART: Well, I mean, if we weren't

1 going to do anything, we wouldn't have called you in.

2 MR. CULTON: Well, I don't know that.

3 MR. STEWART: Okay. I mean, give us some
4 credit.

5 MR. CULTON: Oh, yeah, I give you credit.
6 I give you credit for being here, for making an attempt,
7 you know, for giving Brown & Root -- or not necessarily
8 Brown & Root, but, you know, the nuclear power plant in
9 Glen Rose a headache.

10 MR. STEWART: We want it right. Our
11 responsibility --

12 MR. CULTON: I want it right.

13 MR. STEWART: -- is to see a safe, you know --

14 MR. CULTON: I'm paying for part of it.

15 MR. STEWART: that's our job.

16 MR. CULTON: And you're paying for part of it.

17 MR. STEWART: Right. Well --

18 MR. CULTON: I know what went on there.
19 They, you know -- the people that I worked with knew what
20 went on there.

21 MR. STEWART: I mean, I've been in the
22 business for thirty years, and I know construction.

23 MR. CULTON: Good.

24 MR. STEWART: I know just every phase of it,
25 and --

1 MR. CULTON: Great.

2 MR. STEWART: -- I am concerned, and my
3 fanny comes first, you know, as far as the safety -- as
4 the health and safety of the public. So if it isn't
5 safe for me --

6 MR. CULTON: I'm not here to stop it.

7 MR. STEWART: Well, all right.

8 MR. CULTON: Believe this. I'm not here to
9 stop, you know, the production of electricity at the
10 nuclear power plant in Glen Rose. I'm here, like I said
11 ten times, to give you the information that I have.

12 MR. STEWART: Well, we certainly appreciate
13 it.

14 MR. CULTON: And if you work with it, that's
15 fine and dandy. If you, you know, if you can't do anything
16 with it, then, you know, give it back to me where I can
17 give it to my employer someday where he can look at it and,
18 you know, and see if he wants to give me a raise.

19 MR. STEWART: Well, I'm not going to keep
20 anything you've got. All I want is to see it, and I'd
21 like to see it, and maybe make copies of some of it, if --

22 MR. CULTON: I'm very sorry that I can't
23 give you, you know, the good stuff that I have. I don't
24 know who has the -- who has it at North Tex State. I'll
25 be up there later on this week, and I'll go by and talk

1 to the professor.

2 MR. STEWART: Well, if you can get some of
3 the --

4 MR. CULTON: And see if I can get them.
5 'Cause I'll tell him what's going on, and, you know,
6 I think it would be of benefit to him, both groups and
7 myself.

8 MR. STEWART: Certainly.

9 MR. TOMLINSON: Are you saying that the
10 isometrics and the hanger lists were given to you by
11 your boss? Could we get a name for him, please? It
12 probably would be easier to go through him.

13 MR. CULTON: Yes.

14 MR. TOMLINSON: To get copies of things that
15 you had worked on before. He would probably have some
16 record of what you or your crew had done.

17 MR. CULTON: No, he's not there anymore.

18 MR. TOMLINSON: He's bound to have a
19 replacement.

20 MR. CULTON: Yes.

21 MR. TOMLINSON: And there's bound to be a
22 record kept someplace in the firm.

23 MR. CULTON: I don't remember his name.
24 I think it -- did I mention his name here? I mentioned
25 it back over here.

(Pause.)

1 Brian Lee. Brian Lee was my supervisor
2 in the Drafting Department.

3 I thought the Scheduling Department was
4 fantastic. They had some very fine schedulers. I've
5 been scheduling for -- this is my seventh year as a
6 scheduler, and I still go by some of their techniques
7 and I still pull out some of their little manuals on
8 scheduling. I like it. I've scheduled at Vought
9 Corporation in Grand Prairis for a year and a half.

10 MR. STEWART: Uh-huh.

11 MR. CULTON: That's production scheduling.
12 And I've given a lot of information for some of the course
13 seminars that they had that I went through, courses
14 that I took there at -- onsite at the nuclear power
15 plant, and they are using that at Vought right now.

16 I thought that was fine. I thought the
17 scheduling -- the schedulers were very good, but --
18 at least that's what we issued to the field. Now what
19 you see -- what you see could be something totally
20 different from what I drew.

21 MR. STEWART: Uh-huh. Well, what I'd like
22 to get, if possible is a typical or a sampling of
23 your sketches. If you've got some old one, or you don't
24 think they're that good, I'd like to see them anyway.

25 MR. CULTON: Uh-huh.

1 MR. STEWART: Just to get an idea, a
2 sampling.

3 MR. CULTON: Uh-huh.

4 MR. STEWART: You can be more specific on
5 the drawings.

6 MR. CULTON: Okay.

7 MR. STEWART: So if you can bring that back
8 with you --

9 MS. ELLIS: If y'all go through and find
10 some of the things that he has finished, and they turn
11 out to be all right, would you pursue it further?

12 MR. STEWART: Well, it all depends on what
13 is being done.

14 MS. ELLIS: Some of the others?

15 MR. STEWART: In a manner so that we know
16 there's a stopgap or a checkpoint that what he's saying
17 is overlooked.

18 MS. ELLIS: Well, you know that they're going
19 to say that there is, but it's --

20 MR. STEWART: No, no. I --

21 MS. ELLIS: -- a matter of whether it's
22 working or not.

23 MR. STEWART: We don't just go verbally.

24 MS. ELLIS: Yeah, that's what I want to know.

25 MR. STEWART: We actually do the inspection

1 ourselves. But again, it's only on a sampling basis.

2 MS. ELLIS: Uh-huh.

3 MR. STEWART: And if we have any doubts at all,
4 then we put the burden of proof on them, particularly if
5 we find some questionable area.

6 MS. ELLIS: One thing that concerns me is,
7 after taking such a strong position in the hearings for
8 their getting a license, frankly is how close y'all might
9 look at some things at this point.

10 MR. STEWART: At this point?

11 MS. ELLIS: Uh-huh.

12 MR. STEWART: No.

13 MS. ELLIS (laughing): I don't mean to --

14 MR. STEWART: You mean, well --

15 MS. ELLIS: -- impugn your integrity or
16 anything like that, but --

17 MR. STEWART: No, no. I -- the thing is
18 that the checks and balances --

19 MS. ELLIS: It would be awfully hard to take
20 a contrary position at this point.

21 MR. STEWART: Not for us. By no means.
22 We can shut a plant down just like right now if there's
23 a concern of safety. So the thing is, trying to describe
24 to you the checks and balances that go on in almost every --
25 well, on every safety system that's in that plant, there's

1 a tier of inspections. Right now, the start-up crews
2 do their own system walkdown from as-built drawings, and
3 they walk every inch of those lines. They have to, for
4 one: I mean, that's their requirement.

5 Secondly, it's the best way to know a system
6 if you're an operator. Okay. After the start-up crews
7 go through and do their start-up checks, then the operations
8 crews go through and do their own system walkdowns. And,
9 you know, there's things caught, you know -- not anything
10 really significant, other than like San -- not at San --
11 is it San Onofre? -- where they did find mirror images
12 were wrong, you know, dual plants.

13 MS. ELLIS: Uh-huh.

14 MR. STEWART: But the checks and balances
15 that go on are numerous, and that's in addition to our
16 samplings that we do in every system and every plant in
17 our Region.

18 MR. TOMLINSON: For every safety system.

19 MS. ELLIS: When y'all check this out,
20 will y'all be doing this yourselves, actually doing the
21 checking out and everything yourselves?

22 MR. STEWART: Oh, yeah.

23 MR. CULTON: You'll do it yourself?

24 MR. STEWART: Oh, absolutely.

25 MR. CULTON: You'll walk it?

1 MR. STEWART: Absolutely.

2 MS. ELLIS: I know --

3 MR. STEWART: But I'm not going to walk
4 17,000 hangers, you know what I mean. I want to tie it
5 down into -- try to get into an area that you're concerned
6 with, the timeframe that you're --

7 MR. TOMLINSON: If we can take -- if we can
8 take the things that you worked on, and that you have
9 concerns with, and do these in-depth, then we find that
10 there are things wrong, or there are not things wrong.
11 There's always the two possibilities.

12 If we find that there is nothing wrong,
13 then it goes away. If we find there are things wrong,
14 and you're right, than all of a sudden it becomes a
15 major problem, and then is when we go into other systems.

16 MR. CULTON: I'm concerned about the, you
17 know, some of the drawings that I did, like I told you.
18 But I'm more concerned about some of the drawings that
19 my group did.

20 MR. TOMLINSON: Can you give us the names
21 of the people that worked for you --

22 MR. CULTON: Yes.

23 MR. TOMLINSON: -- so that we could pull the
24 work that they did?

25 MR. CULTON: Sure. Because they -- you know,

1 a lot of them -- well, I can't give you the names now.
2 I'll -- I have -- I also did the, you know, the special
3 event drawings, anything that Texas Utilities came down
4 to see, the -- what do you call it? -- rank of hierarchy
5 of people in departments. I did all those, you know,
6 put everybody's name down, and I kept a copy of it. I
7 drew all those, you know, made them real nice and pretty,
8 (inaudible) and their offices, kept a chart of who was
9 working for who. I did all those.

10 So you can take those or make copies of
11 those and go by the names. But, you know, there's a
12 hundred people before me and a hundred people after me
13 that you don't see. All you see is the time span when
14 I worked there. You don't see any other people that
15 I worked with, and you don't see --

16 MR. TOMLINSON: Is that what you have here?
17 Is that what raises the major concern in your mind, is
18 the time that you were there, what you did see?

19 MR. CULTON: That's why I'm here.

20 MR. TOMLINSON: And those are the ones
21 we're interested in, then.

22 MR. STEWART: Can you give us some dates?

23 MR. CULTON: For what?

24 MR. STEWART: That time span.

25 MR. CULTON: I can't recall right now.

1 MR. STEWART: I mean, the year. Was it
2 one year, two years?

3 MR. CULTON: I guess it's in here.

4 MS. ELLIS: It looks like it is.

5 MR. CULTON: I have my -- a copy of my
6 resume, a copy of my -- when I was -- the day that I quit
7 and walked out the gate, I got a copy of my report about
8 me -- which you're not supposed to get, but I got it --
9 and I'll let you just go ahead and make copies of everything
10 that I have.

11 MR. STEWART: Well, we'd certainly appreciate
12 it.

13 MR. CULTON: And then you can see -- see what
14 I got.

15 MS. ELLIS: Once you've done this, will you
16 let me know what you've done?

17 MR. STEWART: Oh, absolutely.

18 MR. TOMLINSON: Yes, ma'am.

19 MS. ELLIS: This has been one of the problems
20 with some of our witnesses.

21 MR. STEWART: Uh-huh.

22 MS. ELLIS: They've asked for things and
23 never found out what happend to them. I know Henry Stiner
24 in particular was very upset because he's never been given
25 a copy of the I&E report in regard to his allegations.

1 MR. TOMLINSON: As a matter of course,
2 he will not be given a copy of the report, but it will
3 be filed in the PDR.

4 MS. ELLIS: Uh-huh.

5 MR. TOMLINSON: And it will be available.
6 In the case of a special request, maybe we'll make a
7 phone call and we'll tell him what the outcome was. But
8 as far as mailing a copy of our report to an individual,
9 that just isn't done.

10 MS. ELLIS: Well, if he had even known what
11 it was or anything and he wanted to find out what had
12 happened, I think he made that pretty clear, and this, to
13 me, is one of the problems. I think there's a real
14 communications breakdown between the NRC and people who
15 make allegations. And we talked to an awful lot of people
16 that wouldn't come to the NRC with an allegation under
17 any circumstances, because they don't believe you'll do
18 anything about it.

19 MR. CULTON: I was reluctant to come here.

20 MS. ELLIS: (Laughing.)

21 MR. CULTON: That's the reason I brought --

22 MR. STEWART: Juanita.

23 MR. CULTON: -- Juanita. The reason I brought
24 Juanita and the reason that -- you know, I even went down
25 to the little hearing that you had. I was reluctant to do

1 anything about it. I was more inclined to go ahead and
2 give all the information to the radical group or somebody
3 like that that might -- that might, you know, at least
4 hold this up and say, "Hey, look, this is wrong, sucker.
5 This is what's going on. This is what is, you know,
6 what probably is there now."

7 MR. STEWART: Yeah, I see you've got your
8 time span here. You said you started working October 18,
9 '79.

10 MR. CULTON: That's about right.

11 MR. STEWART: And then you said, "I quit
12 in June of 1980 in order to go back to school."

13 MR. CULTON: That's about right.

14 MS. ELLIS: And then a little later, you
15 came back to work.

16 MR. CULTON: Negative.

17 (End of tape recording, Tape 1, Side 2.)

18 MR. CULTON: -- which, it was for my
19 benefit. My supervisor thought it was a good idea,
20 because of the, you know, past experience that I have,
21 and I intended and intend to become a mechanical engineer.

22 MR. STEWART: Uh-huh.

23 MR. CULTON: Or really right now, a civil
24 engineer, and to work in construction. I have -- I live
25 on a farm. I've lived on a farm all my life. So I know

1 how to wire something together and keep it running. But
2 I've also worked in construction for -- for six years.
3 I've been a scheduler, you know, at the same time for a
4 total of seven years, production field work, one year.

5 MR. STEWART: Okay. Well, how soon can you
6 get this information back to us?

7 MR. CULTON: When do you want it?

8 MR. STEWART: As soon as you can. We'll
9 have to get some drawings also.

10 MS. ELLIS: There's another aspect of this --

11 MR. STEWART: Can you come back Friday, or --

12 MS. ELLIS: There's another aspect of this
13 that kind of bothers me. I think after talking to Dennis
14 just recently that we feel like his testimony should be
15 part of the record, and as you know, these limited
16 appearance statements don't really, you know, mean all that
17 much in the record, because they're not sworn statements.
18 They're not cross-examined on them or anything like that.

19 I really feel that some of the things need
20 to be in the record, especially about the cable, the Q
21 cable being spliced, because there's nothing officially
22 in the record, even though we've got allegations from
23 the fellow who's in prison in Oklahoma about the same sort
24 of thing.

25 MR. STEWART: Uh-huh.

1 MS. ELLIS: There's still nothing officially
2 in the record about it, and I think it needs to be there.

3 One of the things that I'm concerned about,
4 frankly, is that if Dennis gives you the names of some
5 of these people, and there's, you know, to look at this,
6 you go out and investigate it and talk to them, then
7 they're veild in this cloak of secrecy. Whereas if we
8 present the information in the hearings and he names names
9 in the hearing, then we can ask that the Board subpoena
10 these people and the records and go from there, and it
11 will be part of the public record.

12 We ran into that problem with the Stiners.
13 Now Mrs. Stiner tried to tell the Hearings Examiner,
14 the Board Chairman, what she really meant about that, and
15 never at any time meant to say that the people who were
16 interrogated, who were being accused of doing things
17 wrong, should not be brought forward in the hearing,
18 or the confidentiality, in their opinion, was being
19 offered to them.

20 So we have a very weird sort of situation
21 in that regard. This decision will have to be Dennis'
22 for sure, but that's one of the problems that I've got
23 with some of this right now.

24 MR. STEWART: Well, you know this is being
25 adjudicated right at this point as to naming names, and

1 I don't want any comment about it one way or the other.

2 MS. ELLIS: Uh-huh.

3 MR. STEWART: But -- well, I think we've
4 got a good beginning here, and we can start off, and if
5 we can get these drawings, the information that you have,
6 and sit down and try to locate these splices --

7 MR. CULTON: Okay. Some of the drawings
8 that I have at UTA, I'm going to talk to the professor
9 today about them, and then I'll get back with you on
10 those.

11 MR. STEWART: Okay.

12 MR. CULTON: Before I get -- before I give
13 you anything, I want to talk to two other people and
14 Juanita, and then what papers I give you, you'll get.

15 MR. STEWART: Well, all we want to do is
16 make copies.

17 MR. CULTON: It'll be about five minutes
18 before I need to leave.

19 MR. STEWART: Okay. Let's --

20 MR. CULTON: If there's anything else --

21 MR. STEWART: How soon can you call me
22 on that?

23 MR. CULTON: Call you on what?

24 MR. STEWART: On the -- when you --

25 MR. CULTON: On the drawings?

1 MR. STEWART: Yeah.

2 MR. CULTON: How about the day after
3 tomorrow?

4 MR. STEWART: That's fine.

5 MR. CULTON: Wednesday?

6 MR. STEWART: Wednesday is fine.

7 MR. CULTON: All right.

8 MR. STEWART: Okay.

9 MR. CULTON: About what time? How about
10 nine --

11 MR. STEWART: Well, --

12 CULTON: Wednesday. It'd have to be in
13 the afternoon.

14 MR. STEWART: Okay.

15 MR. CULTON: Three o'clock?

16 MR. STEWART: Fine.

17 MR. CULTON: Okay.

18 MR. STEWART: And in the meantime, you said
19 you'd see other things that you noticed or -- why don't
20 you give us a run-down on those, what you can remember
21 or recall?

22 MR. CULTON: Well, why don't we just hold
23 off on that right now, and --

24 MR. STEWART: No. I don't mean now. I mean
25 in the meantime.

1 MR. CULTON: Okay.

2 MR. STEWART: You can just make notes.

3 MR. CULTON: All right.

4 MR. STEWART: On what you're concerned with

5 MR. CULTON: Okay.

6 MR. STEWART: Okay? You say you've got

7 to get going to class?

8 MR. CULTON: Uh-huh.

9 MS. ELLIS: I haven't really had a chance

10 to talk to Dennis. It may be that his situation will be

11 different from the Stiners anyway. It might be. But if

12 he has someone that he thinks has not done work correctly

13 or he's concerned that may not have done work correctly,

14 and he says, "Joe Blow down there didn't give a damn about

15 the way things were done, and I don't think he did it

16 right, or there's been a possibility that he didn't do

17 it right," and we give you that name, and you go check

18 with Joe Blow, and he says, "Why I always did everything

19 right; everything's beautiful," and that's confidential

20 between you and him and we never get to even hear about

21 it or cross-examine him or anything like that --

22 MR. STEWART: Normally, we don't --

23 MS. ELLIS: That's what I'm concerned about.

24 MR. STEWART: -- talk to him. We would

25 go see, one, the work he did, if we know specifically.

1 If we have specifics, we can track these things down.

2 MS. ELLIS: Uh-huh.

3 MR. STEWART: But when people talk in
4 generalities, you know, what can we do?

5 MR. TOMLINSON: You're talking about a lot
6 of cables, a lot of hangers, an awful lot of people, the
7 proverbial needle in a haystack. We really have to have
8 something that will pin it down a little closer than that --
9 there's a cable at Comanche Peak, or there's a hanger
10 at Comanche Peak.

11 MS. ELLIS: Right.

12 MR. CULTON: The information that I've given
13 you, is it pretty much common? Do you get this all the
14 time, or am I pretty much an isolated case, that I'm one
15 out of the hundreds of (inaudible but substantive adjective)
16 people that work there that just happen to realize that
17 that was the Q cable that was spliced, or that was the,
18 you know, that they're crowding the trays or that they're
19 doing something?

20 MR. TOMLINSON: You're in a better position
21 to answer that than we are.

22 MR. CULTON: How many -- how many people,
23 how many people come by here and talk to you like this?

24 MR. TOMLINSON: You're in a much better position
25 to answer that than we are.

1 MR. HERR: Yeah, and my answer may tend to
2 identify various people, and I don't know if I'd like
3 to answer that or not. There are --

4 MR. CULTON: Well, you don't have to mention
5 any people.

6 MS. ELLIS: Well, not names or anything like
7 that.

8 MR. CULTON: Just give a percentage. Just
9 give an idea of how many people come by and talk to you.

10 MS. ELLIS: All he wants is just --

11 MR. CULTON: That's all I care about.

12 MS. ELLIS: He just wants to know if he's
13 just an isolated case.

14 MR. TOMLINSON: No.

15 MR. HERR: No.

16 MR. STEWART: No. That -- no.

17 MR. CULTON: Do you get a lot of people,
18 a few people -- ten, twenty? Less?

19 MR. HERR: Somewhere in there.

20 MS. ELLIS (laughing): Ten, twenty or less.

21 MR. HERR: Let me ask you a question. I have
22 one question I'd like to ask you on the Q cable.

23 Is there a way you can take a Q cable and
24 splice it and it be all right?

25 MR. CULTON: Yes, sir. That's probably true,

1 but that's not what the contract says.

2 MR. HERR: I just want to know if there's
3 a way, and if you're aware of that way?

4 MR. CULTON: I am not an electrician.

5 MR. TOMLINSON: I've got another question
6 on that. When you're talking about a spliced cable, is
7 it a factory-sliced cable, or is it a site-sliced cable?

8 MR. CULTON: No, it's site-sliced.

9 MR. TOMLINSON: Site-spliced.

10 MR. CULTON: That is right. It was a
11 site-spliced cable, it was not a factory-spliced cable.

12 MR. TOMLINSON: Okay.

13 MR. HERR: How did you recognize it?

14 MR. CULTON: Because I pulled it. I'm
15 telling you, the cable that I pulled --

16 MR. STEWART: No. Recognized exactly where
17 it was spliced?

18 MR. CULTON: Yes, sir.

19 MR. STEWART: What did it look like at
20 the time you say it? Had it been a finished splice?

21 MR. CULTON: Oh, it was very nice, very
22 neatly done, very well done splice.

23 (Phone ringing.)

24 MR. CULTON: They did a very good job --

25 MR. TOMLINSON (answering phone): Seidle's

1 office, Tomlinson.

2 MR. CULTON: -- of splicing it. But --

3 MR. TOMLINSON: Oh, we're just about closing
4 up.

5 MR. CULTON: -- my understanding of the
6 contract that they had with Q cable was that there was
7 no splicing --

8 MR. TOMLINSON: Hang on just a second.

9 MR. CULTON: -- whatsoever.

10 MR. TOMLINSON: What color was the cable?

11 MR. CULTON: I don't recall.

12 MR. TOMLINSON: He doesn't recall the color.

13 MR. CULTON: Green, yellow, orange, black.

14 MR. TOMLINSON: Okay. Uh-huh.

15 MR. CULTON: They had all colors, all kinds --
16 all different colors. But I know at that time -- hell,
17 it's been what? -- two years ago, three years ago? I don't
18 remember.

19 At that time I'd worked on six different --
20 six different sites pulling all, you know -- pulling cable,
21 routing it, routing it, you know, to the side of the
22 conduits.

23 MR. HERR: When you saw this, did you
24 write it up as a nonconformance or bring it to anybody's
25 attention?

1 MR. CULTON: Negative. Are you kidding?

2 MR. HERR: I don't kid very much.

3 MR. CULTON: Well, I'm sure you don't, sir,
4 but I express that as a -- I didn't -- I didn't mean that
5 as a wise comment. But as a person in the field, as a
6 worker in the field, you didn't do that, because my
7 brother did that -- I had two other brothers that worked
8 there. My one brother that worked as a pipefitter made
9 an attempt to write a nonconformance report, and it made
10 his life in jeopardy. I honestly believe that.

11 And you just -- when you're working out with
12 that many people, you had -- I'm not going to say a low
13 class, but you had people that was coming from a three-dollar-
14 an-hour job that they were happy with at one time, and then
15 start -- jumped up and made eight, ten, twelve, thirteen,
16 fourteen dollars an hour. You weren't going to take that
17 job away from them.

18 If you wrote that nonconformance report up,
19 in turen -- not just that one person, but that crew would
20 be jeopardized.

21 MR. HERR: Are you telling me that
22 nonconformances aren't written out there in your
23 department?

24 MR. CULTON: No, sir, I'm not telling you
25 that.

1 MR. HERR: What are you telling me, then?
2 Your brother didn't write one because he was afraid
3 of getting beat up. That's an isolated case?

4 MR. CULTON: That happened, sir.

5 MR. HERR: Or is that the feeling --

6 MR. CULTON: That happened outside all the
7 time.

8 MR. HERR: Is that a feeling throughout the
9 department --

10 MR. CULTON: Yes, sir.

11 MR. HERR: -- that you work for?

12 MR. CULTON: Not -- that's the feeling
13 throughout the plant.

14 MR. HERR: So therefore, if that feeling
15 persisted, there wouldn't be any nonconformances written.

16 MR. CULTON: I know that on the containment
17 No. 1 door, the -- what's that called? -- the pressure
18 door? -- airlock -- there was a faulty weld on that door
19 that was reported, and four people were fired. I went
20 out in the parking lot, and there was a good fight going,
21 and it was due to that. The person just --

22 MR. HERR: Did you participate in the fight?

23 MR. CULTON: No. I ran like hell.

24 MR. HERR: How did you know it was a fight
25 over that and not over some girl?

1 MR. CULTON: Yes, sir.

2 MR. HERR: Well, how many nonconformances
3 are written down there? Do we have any?

4 MR. TOMLINSON: Oh, this place --

5 MR. STEWART: Are you kidding?

6 MR. CULTON: Hundreds, thousands.

7 MR. TOMLINSON: Thousands.

8 MR. HERR: Thousands. We're talking about
9 a five-year period?

10 MR. STEWART: You've been looking at them.

11 MS. ELLIS: (Laughing.)

12 MR. STEWART: You've been sorting through
13 them.

14 MS. ELLIS: I may be the most expert person
15 here on that (laughing).

16 MR. STEWART: Right. How many is there?
17 Did you ever count them?

18 MS. ELLIS: There's a few thousand --
19 (inaudible comment) --

20 MR. CULTON: I got to sit in on the --

21 MS. ELLIS: However --

22 MR. CULTON: -- meetings as a scheduler, as
23 a planner/scheduler. I had the opportunity to sit in on
24 some of the meetings where they discussed some of the
25 nonconformance reports. When they felt that there was

1 a problem somewhere, they tried to talk it out before it
2 was formally written up: "Can we go ahead and get this
3 thing taken care of?" That happens on every site. They
4 try to go ahead and see what they can do to settle it
5 before it's written, formally written up.

6 MR. HERR: That's probably good management
7 practice. Besides that, I believe you said you saw
8 thousands?

9 MS. ELLIS: Probably. I imagine three or
10 four thousand, yes.

11 MR. HERR: Three or four thousand?

12 MR. TOMLINSON: That's a decent number.

13 MR. HERR: So I guess there are not too many
14 people who feared about losing their job if they write
15 a nonconformance.

16 MS. ELLIS: Also you need to look at what
17 has been written up and what hasn't been written up --

18 MR. STEWART: Uh-huh.

19 MS. ELLIS: -- also.

20 MR. HERR: See, if this is a problem --

21 MS. ELLIS: I think in certain areas
22 you'll find some things --

23 MR. HERR: I've investigated these before.

24 MS. ELLIS: -- written up and some things
25 not.

1 MR. HERR: And I've found some of them
2 to be true in some departments. And I would only be
3 concerned if it was true in your department. But it's
4 obviously not true throughout the whole plant, so I can
5 dismiss 95 percent and concentrate on the five percent.

6 MR. CULTON: Well, if you want to defend
7 95 percent of it, then that's fine.

8 MS. ELLIS: I think I'd have to disagree
9 about that.

10 MR. CULTON: But all I know was the feeling
11 was throughout the plant. I went -- I went down there
12 as a very green person. I didn't know what was going on.
13 I didn't know, so I had to follow, follow everybody. I had
14 to talk to other people. My crew, you know, we were
15 a small group, but you always heard -- you know what's
16 going in a construction plant. You know, you know, where
17 you are in the percentage of completion, from the start
18 to the completion. You just know it. You're putting it
19 up; you're doing it.

20 MS. ELLIS: There's a lot of things that
21 happen down there. If somebody tells you you've got to
22 be very, very careful, that can be taken a lot of different
23 ways, and you don't have to always be told, "I'm going to
24 beat the hell out of you in the parking lot if you do this,"
25 to know that that's what they mean sometimes.

1 And as far as what's written up, I think
2 that that -- that's something else that bothers us, but
3 I don't know if we really want to get into all that
4 right now.

5 MR. HERR: Yes, but you're telling me that
6 you didn't write this question up because you felt
7 irimidated and threatened? And if you had --

8 MR. CULTON: No. I felt at that time, it
9 would probably be repulled, be pulled back. But it was
10 too long a pull -- it was full spool. They'd have to go
11 back --

12 MR. HERR: So you didn't report it, because
13 you felt that it was going to be repulled?

14 MR. CULTON: At that time, --

15 MR. HERR: At that time.

16 MR. CULTON: -- I probably did. In fact,
17 maybe I -- maybe I can come back and say I really didn't
18 care. I had the idea in my mind that I cared, but I wasn't
19 overly concerned. I had other problems going on outside
20 of my --

21 MR. HERR: What has changed your thinking?

22 MR. CULTON: Sir?

23 MR. HERR: I mean, could they have pulled
24 that and you not have known about it?

25 MR. CULTON: Very true. All these drawings

1 could be redone and properly relocated. If that's true,
2 that's fine and dandy, but there's no way that they're going
3 to let me in that gate right now and find out.

4 MR. HERR: That's -- I just wanted to know.
5 That's all.

6 MR. CULTON: I would like to find out. You
7 know, if I could go down there and I could scrounge through
8 some of that cable to see if it's been spliced, you know,
9 you know, it seems like that's all I'm basing my comments
10 on, is that capable and, you know, a few of these drawings,
11 a few hundred of these drawings that I've drawn, which is
12 a very small fraction of what is really going on there.

13 Juanita, I spilled my guts out to her one time,
14 and she was going, "My God," --

15 MS. ELLIS: (Laughing.)

16 MR. CULTON: -- "I don't believe what I'm
17 hearing."

18 But what you want is facts. What you want
19 is what I had or I have on a piece of paper.

20 MS. ELLIS: All that he's talked to you
21 about here is, is what he can pretty well prove or that
22 he has concerns about that is provable.

23 MR. STEWART: Uh-huh. Well, like I say.
24 I think we can't do much more now until you get, you know,
25 try to tie this stuff down a lot closer than what it is.

1 MS. ELLIS: When you get this done, if
2 you went and found that there were problems, would those
3 specific problems be addressed, or would a thorough
4 investigation then follow if there were problems? "

5 MR. TOMLINSON: A little of both. Because
6 it would be done in two stages.

7 First, we would locate the things that he
8 has said. There would be a report written on that.

9 Then there would probably be some action
10 taken -- I hate to use the word "stop work" or anything
11 else --

12 MS. ELLIS: Uh-huh.

13 MR. TOMLINSON: -- but some action would be
14 taken, and then it would go much further.

15 MR. CULTON: It's getting close to that time.

16 MS. ELLIS: Yeah.

17 MR. CULTON: I need to go ahead and run.
18 We can continue this later on, if you'd like, if you feel
19 that this -- you know, this is enough information for you,
20 or the information that I'm going to continue to give
21 you. We can meet some other time. But I need to go ahead
22 and get my class.

23 MR. STEWART: Yeah, okay.

24 MR. CULTON: What was your name, again?

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MR. STEWART: Bob Stewart.

MR. CULTON: Bob Stewart.

And you're?

MR. TOMLINSON: Dan Tomlinson.

MR. CULTON: Dan Thomasson?

MR. TOMLINSON: Uh-huh. T O M L I N S O N
(spelling).

MR. CULTON: And you're?

MS. ELLIS: Richard Herr.

MR. CULTON: It'll still pick up, sir.
It picks up very well.

MR. HERR: Richard Herr.

MR. CULTON: Richard Hart?

MS. ELLIS: Herr.

MR. HERR: Herr, H E R R (spelling).

MR. CULTON: Richard Herr.

(End of tape recording, Tape 2, Side 1.)

(End of interview.)

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MERRILL G. CORKUM

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15 Place and Date of Transcription: Glen Rose, Texas
16 July 18, 1984.
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