

ORIGINAL

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the matter of:

TEXAS UTILITIES ELECTRIC
COMPANY, et al

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

Docket No. 50-445
50-446

Deposition of: Depo. of: Jack Ray Stanford

Location: Glen Rose, Texas

Pages: 57,501-57,587

Date: Wednesday, July 25, 1984

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1 UNITED STATES OF AMERICA
2 NUCLEAR REGULATORY COMMISSION

3 BEFORE THE ATOMIC SAFETY & LICENSING BOARD
4

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

11 Glen Rose Motor Inn
12 Glen Rose, Texas

13 July 25 , 1984

14 Deposition of: Jack Ray Stanford
15 called for examination by counsel for Intervenor, CASE
16 taken before Sandra Harden Court Reporter,
17 beginning at 2:04 p.m., pursuant to agreement.
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25I N D E X

<u>DEPONENT</u>	<u>DIRECT</u>	<u>CROSS</u>	<u>REDIRECT</u>	<u>RECROSS</u>
Jack R. Stanford	57,505	57,550	57,576	57,585

E X H I B I T S

<u>NUMBER</u>	<u>FOR IDENTIFICATION</u>
Stanford Exhibit No. 1	57,507
Stanford Exhibit No. 2	57,538
Stanford Exhibit No. 3	57,540
Stanford Exhibit No. 4	57,543
Stanford Exhibit No. 5	57,547

P R O C E E D I N G S

2:C. p.m.

1
2
3 MR. WATKINS: Let's go on the record.

4 This is the deposition of Jack R. Stanford.

5 My name is McNeill Watkins. I represent
6 the Applicants in this proceeding.

7 And I wonder if counsel could identify
8 themselves. Mr. Coppock?

9 MR. COPPOCK: Yes. My name is Jeff Coppock.
10 I'm associated with the law firm of Vinson & Elkins in
11 Houston. I'm appearing here today representing Mr. Jack
12 Stanford, who is a Brown & Root employee.

13 And for purposes of the record, I would like
14 to note that Mr. Stanford is appearing here voluntarily
15 without being under subpoena.

16 MS. GARDE: My name is Billie Garde. I'm
17 a law clerk with trial lawyers for public justice, which
18 is representing the Intervenor CASE in this matter.

19 MR. BACHMANN: I am Richard Bachmann. I
20 am counsel for the NRC Staff.

21 MS. GARDE: Mr. Stanford, I don't have very
22 many questions for you, but before I begin them, let me
23 go through a few preliminary matters.

24 When I ask you a question, if you don't
25 understand my question or if you'd like me to restate the

1 question or rephrase it, please ask me to do so, and I will
2 attempt to do that in a manner that you can understand.

3 I'm not an engineer or a quality control
4 inspector, and sometimes I'm not-- I don't use the termino-
5 logy in exactly the correct manner that you understand it.

6 If, at any time, I ask you a question that
7 you would prefer to discuss with your counsel, indicate
8 that you'd just like to step outside and talk to counsel.
9 And you have every right to do so. And I'll honor that
10 request.

11 If you don't ask me to restate or rephrase
12 the question, I'll assume that you understood the question
13 and that your answer is responsive to the question as I
14 asked it.

15 COTTON-GO Do you have any questions for me?

16 MR. STANFORD: No.

17 MS. GARDE: Okay. Could you state your
18 full name for the record, please?

19 THE REPORTER: Would you like the witness
20 sworn?

21 MS. GARDE: Oh, yes. I'm sorry.

22 Whereupon,

23 JACK RAY STANFORD,

24 the Deponent herein, after having been duly sworn, was
25 examined and testified upon his oath as follows:

1 MR. BACHMANN: Off the record for a second.
2 (Discussion off the record.)

3 MS. GARDE: We'll go on the record now.

4 DIRECT EXAMINATION

5 BY MS. GARDE:

6 Q Okay. Could you state your full name for
7 the record, please?

8 A Jack Ray Stanford.

9 Q Are you a current employee of Brown & Root?

10 A Yes, I am.

11 Q In what position?

12 A Quality control inspector.

13 Q At what level?

14 A Level 2.

15 Q And who is your supervisor?

16 A At the present time-- You mean my lead or
17 supervisor?

18 Q Who is your--

19 A Supervisor would be Dwight Woodyard.

20 Q Uh-huh. And who is your lead?

21 A Donny Doyle.

22 Q And where are you-- What part of the plant
23 are you working in at this time?

24 A At the present, I'm working in Unit 2,
25 Containment. Or, Reactor 2.

1 Q Now, Mr. Stanford, other than your attorneys,
2 have you discussed your testimony with anyone at the site?

3 A No, ma'am.

4 Q Your attorneys received a copy of an affi-
5 cavit last week of Sue Ann Neumeyer dated, I believe,
6 March 20th, 1984.

7 Have you seen a copy of that affidavit?

8 A No.

9 Q Ok y. I'm going to show you some documents
10 one by one, and I'm going to ask you to identify them and
11 then I'm going to ask you a few questions about them.

12 MS. GARDE: Let the record reflect that
13 I'm showing Mr. Standford a copy of a weld data card.
14 The number in the right-hand corner is 40851.

15 Q (By Ms. Garde, continuing) Would you look
16 this over, please, and tell me if you've ever seen this
17 before?

18 A Yes, I have.

19 Q Is your signature anywhere on that piece
20 of paper?

21 A Yes, ma'am.

22 Q Could you point to where your signature is?

23 A (Whereupon, the witness complied with the
24 request.) Operation 3, 4, and 5 and 6.

25 Q Okay. I'm going to mark this as Exhibit 1

1 to this deposition.

2 (The document referred to was
3 marked for identification as
4 Stanford Deposition Exhibit No. 1.)

5 A I'm sorry. There's also another one.

6 Q Uh-huh.

7 A Operation 2A.

8 Q Uh-huh. Now,--

9 MR. BACHMANN: That would marked as Stanford
10 No. 1.

11 MS. GARDE: Stanford Exhibit 1.

12 BY MS. GARDE:

13 Q Now, Mr. Stanford, what is a weld data
14 card?

15 A It establishes hold points for different
16 operations, inspections, weld techs--

17 Q Uh-huh.

18 A --and NI hold points, things like this.

19 Q Can you indicate to me on this form how you
20 determine whether a hold point is for a weld tech?

21 A Okay. Where it says hold points here, it
22 has a weld tech space,--

23 Q Uh-huh.

24 A --and it's either marked with an "X" or a
25 check or "N/A".

1 Q And on this form, is there any weld tech
2 hold points?

3 A Only on verified cut.

4 Q Okay. That's step number one?

5 A Right.

6 Q Okay. And where do you find out if there
7 is a QC hold point?

8 A In the block next to it, QC hold points.

9 Q Uh-huh. And which of the items require a
10 QC hold point signoff?

11 A On this card, 2, 3, 4, 5, 6, and 2A.

12 Q Okay. And how do you determine if there's
13 an ANI hold point?

14 A The next block to the right has "ANI".

15 Q Uh-huh. And are any of the blanks, numbers
16 1 through 6, ANI hold points?

17 A Just one.

18 Q And which one?

19 A The one with the check mark.

20 Q On the original copy of the-- or, on an
21 original weld data card, is the circle in number 3 in the
22 fitup red?

23 A Most of the time.

24 Q Not all the time.

25 A It doesn't have to be. ANI establishes

1 their own hold points, and for our convenience, everything
2 is black on the form normally.

3 Q Uh-huh.

4 A And for our convenience, they normally
5 circle it in red.

6 Q So you'll notice it.

7 A So you'll notice it.

8 Q To assure notice.

9 A More noticeable.

10 Q Uh-huh.

11 And under the ANI column, there is the
12 letters "NC".

13 What does that mean?

14 A Well, same thing as N/A. They don't elect
15 to give you hold points on that.

16 Q But you don't know what the "C" stands for.

17 A No, ma'am.

18 Q Now, when is the first time that you saw
19 this weld data card?

20 A Date?

21 Q Approximate date.

22 A Probably the 14th of January.

23 Q And how do you know that?

24 A By my signature.

25 Q And your signature is in, I think you said,--

1 I can't read upside down. So, I think it's a "4".

2 A Well, it would actually come up under 2A,
3 which is the cleanliness hold point.

4 Q And the cleanliness, which is block number
5 2, which was a QC hold point had had an NCR written against
6 it, had it not?

7 A I don't know that it did.

8 Q You're not familiar with whether or not it
9 did?

10 A Well, the inspector who unsatted that
11 particular hold point,--

12 Q Uh-huh.

13 A --did work on the call board with me, and
14 she evidently-- From looking at the card, she had a
15 problem with something on the cleanliness.

16 Q Uh-huh.

17 A Normally, when you unsat a hold point,
18 NCR is at issue or something is done to rectify the problem.

19 Q Uh-huh.

20 But you don't recall at this time whether
21 or not an NCR was written?

22 A No, ma'am.

23 Q Is there anything on this weld data card
24 that would tell you how this unsat situation had been
25 dispositioned?

1 A Not on this card, no.

2 Q So, the first time that you saw this card
3 was when? You testified the 14th, but then we talked a
4 little bit about the unsat.

5 A Right.

6 It would be the 14th.

7 Q And tell me to the best of your recollection
8 Mr. Stanford, what happened or what you recall about
9 conducting this inspection.

10 MR. WATKINS: Which inspection?

11 MS. GARDE: Inspection indicated by his
12 signature on the cleanliness-- not cleanliness, fitup,
13 preheat, final DT on the 14th.

14 MR. BACHMANN: I'd like a point of clarifi-
15 cation. There are some-- more than one spaces where Mr.
16 Stanford has dated the 14th.

17 Are we talking about 2A?

18 MS. GARDE: No.

19 MR. WATKINS: Oh, I think you are.

20 MR. BACHMANN: I thought you were.

21 MS. GARDE: Okay. I'm sorry.

22 BY MS. GARDE:

23 Q I don't want to talk to you about the
24 cleanliness hold point or your signature next to the 2A
25 cleanliness clearance, the NCR, if there was one.

1 Okay. I want to talk to you about when you
2 first saw this NCR-- Sorry. Strike that.

3 MR. WATKINS: Would you like to hear the
4 story of Mr. Stanford's inspection, beginning to end?
5 Is that what you're asking for?

6 MS. GARDE: Well, I want to ask it in
7 sequence, but I'm perfectly happy if Mr. Stanford is
8 prepared to tell me what happened on the 14th. I'll
9 listen to that.

10 MR. BACHMANN: Well, I don't mean to
11 testify for the witness, but just to clarify things and
12 move it along,--

13 MS. GARDE: Uh-huh.

14 MR. BACHMANN: --it appears that the first
15 time Mr. Stanford saw this was because there was a unsat
16 hold-- QC hold point.

17 MS. GARDE: Uh-huh.

18 MR. BACHMANN: And that he was-- started
19 with 2A--

20 MS. GARDE: "A".

21 MR. BACHMANN: --refers to 2 which was rated
22 unsat.

23 MS. GARDE: Uh-huh.

24 MR. BACHMANN: And then he-- Evidently for
25 one reason or another, it was turned from the other

1 inspector over to him,--

2 MS. GARDE: Uh-huh.

3 MR. BACHMANN: --and the first thing,
4 obviously, he would have to do is start--

5 MS. GARDE: Mr. Bachmann, you are--

6 MR. BACHMANN: --start-- The witness seems
7 to be agreeing with me. I'm just trying to move this
8 along.

9 MS. GARDE: I could have testified for the
10 witness on that, too. Okay?

11 I'm not interested in pursuing that.

12 MR. BACHMANN: But you asked when he first
13 saw it, and it seems to me--

14 MS. GARDE: He said on the 14th.

15 MR. BACHMANN: And that was because of the
16 Operation 2, cleanliness, which had been given an unsat.
17 And that's where he started.

18 MR. WATKINS: Mr. Coppock, would you like
19 to testify?

20 MR. COPPOCK: No.

21 MS. GARDE: You're right.

22 MR. BACHMANN: It was getting very confusing,
23 and he started with the 2.

24 Is that not correct, Mr. Stanford?

25 THE WITNESS: Right.

1 If I can clarify, possibly, maybe you
2 won't....

3 The 2A is an additional hold point issued
4 because a normal, original 2 was unsatted. You can't go
5 back to the original 2.

6 BY MS. GARDE:

7 Q I understand all that, Mr. Stanford, and
8 I also understand that you didn't unsat it the first time.

9 A Right. And I--

10 Q And I'm not interested in pursuing that
11 particular cleanliness problem on this weld data card.

12 A All right.

13 Q Okay. So, I understand you had to do 2A
14 before you could go on to 3.

15 A All right.

16 Q Can I tell this as it happened--

17 A Tell the story, why don't you?

18 Q This particular item came up on the 14th,
19 which was a special job on Saturday because we were not
20 working on the weekends at that time.

21 A Because of the unsat, evidently, they had
22 had to get this particular item finished or wanted to or
23 something. And they asked for a volunteer to work over.

24 Q So, I told them I'd be glad to.

25 A And 2A was cleanliness, which was Saturday

1 morning early.

2 And so, anyway, we restarted the program
3 to weld up the piping. We reverified the cleanliness,
4 and everything was up to par. Wasn't any. Which is no
5 big thing.

6 And consequently, I stayed with them at the
7 point because I had no other work going.

8 Q Uh-huh.

9 A I was there strictly for this particular
10 crew of welders and fitters.

11 So, I stayed until-- I probably, I imagine,
12 it was probably several hours later, they got ready to do
13 the hold point 3, which is the fitup.--

14 Q Uh-huh.

15 A And I had notified ANI that we did have a
16 fitup in progress that day, so they would be aware of it.

17 So, when it came to that point, I got an
18 ANI inspector, and we both verified that the fitup was
19 good. And I signed off the hold point for the fitup, and
20 he signed off for the fitup himself.

21 At the same time that you sign the fitup,
22 you normally go ahead and do the preheat because they are
23 ready to weld.

24 So, you check your temperature of the pipe
25 and so on, and if everything's sat, well they continue and

1 Q Uh-huh.

2 A At that particular time, it was 3:30 in the
3 afternoon, I remember. And I asked them how long it was
4 going to be before they were ready to do a final DT and a
5 PT.

6 And they said, oh, they wasn't going to be
7 able to do a final or anything because it was going to take
8 them twelve hours to weld that thing out.

9 I said, "Twelve hours. Gee, it's no sense
10 in me staying twelve hours 'til Sunday morning sometime
11 early, unless you just want me to stay. If you want me to
12 stay, I will."

13 And they said, no, there wasn't no reason
14 for me to stay.

15 So, even at that point, the weld would still
16 be hot, and I won't look at anything unless it's cold,
17 especially to do with PT.

18 And so, at that point, I went home. That
19 was on the 14th.

20 And I didn't see this particular card again
21 until Tuesday, the 17th.

22 Q Uh-huh.

23 A Some reason, they elected not to do the work
24 on Monday, or maybe they gave the piping hands Monday off.
25 I don't know.

1 Q Uh-huh.

2 A But they called-- They signed up on my
3 callboard for inspection. Seeing as how I had performed
4 the work on Saturday, I went ahead and elected to take
5 that particular call and went down on it, me and another
6 inspector.

7 And we performed the final VT and PT.

8 The other inspector that was with me
9 actually performed the PT, but he was in training at the
10 time. And I observed his work. And when everything was
11 satisfactory and everything, it was fine, then while he
12 was cleaning up the pipe, I climbed down off the scaffold
13 and reviewed the weld data card and proceeded to sign it
14 off.

15 In doing so, when I reviewed the traveler,
16 I looked at the dates and my signature and proceeded to
17 sign it off, and I inadvertently wrote the same date that
18 I've got above on Saturday, the 14th.

19 And as soon as I had signed it, I looked at
20 it again and noticed that I had signed the same date and
21 wrote the wrong date there.

22 And I cussed myself out real good verbally.
23 And the inspector that was with me wanted to know why,
24 and I told him I wrote the wrong date down.

25 So, I crossed out the date, initialed it,

1 and dated it per procedure and forgot about it. Wasn't
2 nothing else for me to do on it. Hadn't done anything out
3 of procedure.

4 Q Uh-huh.

5 A And when we finished up the inspection,
6 turned in my paperwork and the weld data card. And the
7 piper hands keep it.

8 Q Uh-huh.

9 A And that was the last I seen of it.

10 Q When is the next time you heard about it?

11 A Oh, several months later when document
12 review brought it up to my attention.

13 Q And who from document review brought it up
14 to your attention?

15 A Susie Neumeyer.

16 Q And what did Sue Neumeyer say?

17 A She called me to come down and showed me the
18 weld data card. And she just kind of asked me several
19 questions about it, the best I can remember.

20 And at the time, being several months later,
21 I could not remember the particular particulars or
22 anything about it.

23 Q Uh-huh.

24 A I knew, seeing as how my signature was on
25 it, I had done the work, but I couldn't remember anything

1 else about it.

2 And she asked me if I had performed a PT and
3 a VT, and I told her I had.

4 Q Uh-huh.

5 A And otherwise, I didn't know what problem
6 she was having with it.

7 Q Uh-huh. And where was-- Where did you
8 talk to Miss Neymeyer?

9 A That was in her, I guess you'd call it, her
10 office.

11 Q Was anybody else there that you recall?

12 A There was other people in the room, but
13 they were not in on the conversation.

14 Q Okay. When you were telling me the events
15 of the-- this particular weld data card, you said that
16 you and another inspector went back on the 17th.

17 Who was that inspector?

18 A Robbie Duncan.

19 Q And Robbie Duncan was in training at the
20 time?

21 A Yes, ma'am, on PT's.

22 Q After Sue Ann talked to you about it, when
23 is the next time you heard about it?

24 A To the best of my recollection, it was
25 probably the next day, I believe.

1 Q Uh-huh.

2 A She, again, called me down to her area,

3 Q Uh-huh.

4 A --and she showed me a NCR she was writing.

5 And I don't remember whether she showed me
6 the weld data card or not then, but she showed me a NCR
7 that she was writing.

8 Q Uh-huh.

9 A And said that-- told me she was writing
10 this against welding engineering.

11 Q Uh-huh.

12 A Because, best I can remember, was something
13 because not adding additional hold points.

14 Q There was not what?

15 A Because it seemed like it was because they
16 didn't add additional hold points.

17 Q Uh-huh. On what?

18 A On the weld data card.

19 Q Okay. And did you say anything to her at
20 that time?

21 A No. I was still kind of confused about it
22 because I still couldn't see anything wrong with it, but
23 I didn't really understand why they needed additional hold
24 points either.

25 Q Uh-huh. And when was the next time you heard

1 about it?

2 MR. COPPOCK: "About it", being the NCR or
3 the weld data card?

4 MS. GARDE: The NCR written on the weld
5 data card.

6 A (By the witness) I believe it was the
7 next day or two, I was called into a meeting because I was
8 told that there was an NCR written and issued and that
9 it was evidently directly against me.

10 Q Did you go to the meeting?

11 A Yes, ma'am.

12 Q Who was there?

13 A I don't know whether I remember everybody
14 that was in the meeting. The best I can remember, Bob
15 Sievers and Terry Metheny, Ted Blixt.... And to the best
16 of my recollection that was probably about all that was
17 there.

18 Q Sue Ann Neumeyer there?

19 A I don't remember her being there.

20 Q Dwight Woodyard there?

21 A I can't remember whether he was or not.

22 Q Now, who told you that the NCR had been
23 written and issued to you?

24 A You mean against me?

25 Q Uh-huh.

1 A Against me?

2 Q Uh-huh.

3 A I don't remember.

4 Q Who told you about the meeting?

5 A I believemy lead at the time was the one
6 that said we had to go to a meeting.

7 Q And who was that?

8 A Terry Metheny.

9 Q Was Terry Metheny working Saturday the 14th?

10 A I don't remember.

11 Q Now, I'm going to show you a couple of other
12 forms.

13 (Whereupon, a document was placed before
14 the witness.)

15 This form is a weld data filler-- weld
16 filler material log, which I believe is entered into the
17 record in another proceeding.

18 MS. GARDE: Could you check the exhibits,
19 Mr. Bachmann?

20 MR. BACHMANN: I can say this appears to be
21 one of page 8 of 9 from Purdy Exhibit 43-2.

22 Wait a second. 42-3. Appears to be the
23 same piece of paper.

24 BY MS. GARDE:

25 Q Have you seen that before, Mr. Stanford?

1 A I'm sure I have. That don't have my
2 signature or anything on it.

3 Q Uh-huh. I understand that.

4 Now, is it the same weld data card number
5 as Exhibit 1?

6 A Yes.

7 Q Could you tell me by looking at the weld
8 filler material log if there was any weld filler used on
9 that particular weld on or about January 14th or 17th?

10 MR. WATKINS: I'll object to the question
11 as compound. You asked about the 14th first.

12 BY MS. GARDE:

13 Q Do you see any weld filler used on the 14th?

14 A Yes, ma'am.

15 Q And where is that?

16 A Fill weld 40C on 14th, 1-14-84.

17 Q Uh-huh. Do you know whose weld symbol that
18 is?

19 A I would have to get my matrix to find that
20 out.

21 Q Do you see any weld filler used on the 15th?

22 A Not on the weld filler log.

23 Q Okay. On the 16th?

24 A No.

25 Q You don't see any--

1 A Well, I take that back. Maybe up here is
2 the 16th.

3 Q Okay. Now, is that the only-- You said--
4 Would you identify for the record, please,--
5 I know you pointed at it, but this is all going on written
6 words. --where you saw the 16th identified as having work
7 done-- or, weld filler material issued?

8 A I'm not following what you....

9 Q Okay. Is the 16th weld filler material
10 issued, is that indicated on the second and third line from
11 the bottom filled out?

12 A Yes, ma'am.

13 Q Going up from the bottom, what date is there
14 on the fourth and fifth line from the bottom, beginning
15 with the symbol, I think, "FW"? What date is that?

16 A 14th.

17 MR. WATKINS: Excuse me. All the symbols
18 state that they're "FW 40C".

19 MR. GARDE: Okay. I'm sorry. I'm trying
20 to read upside down and help the witness identify sentences
21 that I'm talking about, Mr. Watkins. Maybe you could help
22 him.

23 MR. WATKINS: Well, Miss Garde, the document
24 speaks for itself. Why don't you ask the witness what he
25 knows about it or anything else you want to ask him.

1 But to have him to read into the record
2 documents, the document's in the record.

3 MS. GARDE: I'm asking him to identify when
4 this document indicates work was done and see if that
5 refreshes his recollection.

6 MR. WATKINS: If he knows.

7 MS. GARDE: If he knows.

8 (Pause.)

9 BY MS. GARDE:

10 Q Okay. Let me ask you again, Mr. Stanford:
11 We're trying to determine when weld filler was issued to
12 work on this weld, and I want to know if you're aware of
13 work done on the 14th, on the same day that you have
14 testified that you were there to inspect, sign off the hold
15 points on this particular weld.

16 A (Nodding affirmatively.)

17 MR. WATKINS: Excuse me. I'd like to ask
18 a few questions on voir dire.

19 VOIR DIRE EXAMINATION

20 BY MR. WATKINS:

21 Q Mr. Stanford, do you use these weld filler
22 material lags in the course of your job?

23 A To verify the rods that they us are the
24 right rods.

25 Q And you do that how?

1 A By checking whatever the person who fills
2 out the log against particular rods that they have.

3 Q Do you ever use these rods to determine
4 when welding was performed?

5 A Sometimes, yes.

6 Q How do you do that?

7 A Well, it's normally the date that is in the
8 block here will state--

9 Q Under "date"?

10 A Under date, yes.

11 --what day they drew rods, and--

12 Q Where does that appear on this log?

13 A Under the "date" block there.

14 Q The date block just gives the day. It
15 doesn't say whether rods were issued.

16 A Right. Oh, okay. I see what you mean.

17 These over here to the right, "amount
18 issued".

19 Q What is the "amount returned" column?

20 A That's the rods they did not burn on that
21 particular weld.

22 Q So, they're--

23 A That's what they turned in, back in.

24 Q So, if, for example, the amount issued
25 were 10 and the returns were 10, you would conclude that

SH

1 no welding was done on that date.

2 A Right.

3 MS. GARDE: You done, Mr. Watkins?

4 MR. WATKINS: Yes.

5 MS. GARDE: All right. The recorder has
6 asked that we take a break for a minute.

7 (Whereupon, there was a brief period off
8 the record.)

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1 MR. WATKINS: Back on the record.

2 Ms. Garde, we're going to object to any
3 questions to Mr. Stanford based on this document for several
4 reasons. First, he's here to testify about his personal
5 knowledge --

6 MS. GARDE: Uh-huh.

7 MR. WATKINS: -- as to his inspection
8 activities in connection with this weld.

9 MS. GARDE: Uh-huh.

10 MR. WATKINS: Second, this is apparently the
11 first time in some time that he's seen this Weld Filler
12 Material log.

13 MS. GARDE: Uh-huh.

14 MR. WATKINS: His name appears nowhere on it.

15 MS. GARDE: Uh-huh.

16 MR. WATKINS: He is in no way responsible for
17 it.

18 MS. GARDE: Uh-huh.

19 MR. WATKINS: And third, if you'd like to
20 establish that which you're trying to establish, I think you
21 can make the argument based on the document itself.

22 MS. GARDE: Well, Mr. Watkins, I don't have
23 a lot of emotional attachment to this Weld Material Filler
24 log. I'm trying to establish a chronology of events, and
25 I'll be glad to ask my questions.

1 If I need to use the Weld Filler Material
2 log to refresh his recollection, I will try to do that. But
3 let me continue without --

4 MR. COPPOCK: Ms. Garde --

5 MS. GARDE: -- the use of this document.
6 Uh-huh?

7 MR. COPPOCK: -- there's a difference in
8 showing the witness something that he has personal knowledge
9 of to refresh his memory --

10 MS. GARDE: Uh-huh.

11 MR. COPPOCK: -- and showing the witness
12 something he may or may have not ever seen before and ask
13 him to draw conclusions from what he sees on the document.

14 MS. GARDE: Well I didn't pursue a line of
15 questioning with Mr. Stanford as to whether or not this
16 Weld Filler Material log was attached to the Weld Data Card,
17 and perhaps I should have done that.

18 It's my understanding that they would have
19 gone as a package and that he would have had knowledge and
20 looked at that when he was conducting his inspections. But
21 I think we've probably spent enough time on this and we'll
22 let it move on.

23 BY MS. GARDE:

24 Q Now you've testified, Mr. Stanford, that you
25 left work on the 14th prior to the final VT and the preheat

1 had been done. Or did you testify that the preheat had been
2 done?

3 A. No, the preheat had been done.

4 Q. Had been done. And it was the final VT that
5 had not been done.

6 A. That's right.

7 Q. Now are you aware of whether or not an NDE
8 radiograph is required on the auxillary feed water system?

9 A. An x-ray?

10 Q. Uh-huh.

11 A. No, I'm not really familiar with which ones
12 they have to do or which ones they elect to do.

13 Q. And who is "they"?

14 A. The RT group are who establishes the RT NDEs.

15 Q. You don't have any knowledge of that.

16 A. No.

17 Q. Who would have knowledge of that?

18 A. I couldn't say. I don't know.

19 Q. As an inspector that's signing of hold points
20 on a Weld Data Card, this Weld Data Card, or another Weld
21 Data Card in the same system, do you need to have knowledge
22 of that? Do you need to know whether an NDE radiograph is
23 required?

24 A. No.

25 Q. So the NDE guys are just doing their own

1 MR. WATKINS: Excuse me. Objection. Who are
2 the "NDE guys"? Have you established from Mr. Stanford what
3 NDE is and what it includes?

4 MS. GARDE: Well he asked me if it was x-ray,
5 and I said, "Yeah, it was."

6 BY MS. GARDE:

7 Q. Non-Destructive Examination, is that --

8 A. It is a portion of the NDE.

9 Q. Right, radiograph.

10 A. Right, radiograph.

11 Q. An x-ray, yes.

12 A. It is a different group entirely --

13 Q. Uh-huh. I understand that.

14 A. -- from our group.

15 Q. I understand that.

16 A. And normally on the Weld Data Card, they do
17 not have a hold point established for --

18 Q. Uh-huh.

19 A. -- what they call an "RT."

20 Q. Uh-huh.

21 A. So I would have no -- no idea as to what was
22 needed and what wasn't needed or --

23 Q. Uh-huh.

24 A. -- required.

25 Q. Uh-huh.

1 A. As far as that part of it.

2 Q. Were you aware on the 17th that it had been
3 rejected after an RT, this particular weld that you're
4 looking at?

5 A. Not that I recall.

6 Q. Did you ever become aware that it had been
7 rejected?

8 A. No, ma'am.

9 Q. No one ever told you that this particular
10 weld had failed an RT?

11 A. No, ma'am.

12 Q. Mr. Stanford, I'm going to show you a docu-
13 ment. I'd like you to identify, if you could, if it's the
14 same weld as the weld we are talking about.

15 MR. WATKINS: Do you recognize this document,
16 Mr. Stanford? Do you think you've ever seen this document
17 before?

18 THE WITNESS: Huh-uh.

19 MS. GARDE: I want him to look at the document,
20 Mr. Watkins. And I want him to tell me if it is the same
21 numbered weld that is identified in this Weld Data Card
22 as is on this sheet of paper.

23 MR. WATKINS: The document can speak for
24 itself. Mr. Stanford has never seen the document and --

25 MS. GARDE: Mr. Stanford is perfectly capable

1 of looking at the document.

2 MR. WATKINS: That's right. So are you and
3 so are the Judges and so is the Board. And they will do so
4 if necessary.

5 MS. GARDE: I want Mr. Stanford to look at
6 the document.

7 MR. WATKINS: I --

8 MS. GARDE: Are you going to object to the
9 document?

10 MR. WATKINS: Yes, I'm going to object.

11 MS. GARDE: Are you going to instruct him not
12 to look at the document?

13 MR. WATKINS: Yes. I'm going to object to
14 any questions based on the document. He said he hasn't seen
15 it. The document, itself, is hearsay. And if you'd like
16 to make an argument based on the identification of the weld,
17 then you may do so.

18 Mr. Stanford has not seen the document and
19 you don't need his testimony to do so.

20 MS. GARDE: All right. But I want to take
21 a break for a minute because I think I want to get the Judge
22 on the phone. I have about ten more questions for this
23 witness. If you're going to continue to object to every
24 piece of paper I put in front of Mr. Stanford's face when
25 you haven't had -- spent the time with Mr. Stanford to

1 prepare him for this examination, then I want to get the
2 Judge on the phone.

3 I've got about ten questions for this witness,
4 and you have objected to every single one.

5 MR. WATKINS: Ms. Garde, in preparing Mr.
6 Stanford for examination, I haven't been showing him docu-
7 ments he's never seen before and doesn't know what they are.
8 Now what --

9 MS. GARDE: Fine. I want a break. I want
10 a break.

11 MR. BACHMANN: We're off the record.

12 MR. WATKINS: Off the record.

13 (Whereupon, a recess was taken.)

14 MS. GARDE: Back on the record.

15 My understanding is that there's a pending
16 question and an objection. I'm withdrawing the question I
17 asked the witness regarding the form entitled "Request for
18 RT" based on his not having ever seen this particular
19 document before.

20 I am going to ask Mr. Stanford a few generic
21 questions about this form. I don't have a blank form
22 available, so I'm going to give you back the form that we
23 were having a discussion with. And I'm going to ask you
24 some generic questions about this form, itself.

25 //

1 BY MS. GARDE:

2 Q Do you understand what I mean?

3 A Uh-huh.

4 Q Okay. Do you ever see these forms in the
5 normal course of your work?

6 A Once in awhile, we see them in the package.

7 Q And what -- what is this form?

8 What is the form used for? Does that explain
9 the question better?

10 A Uh --

11 MR. WATKINS: I'm sorry. Could you repeat
12 the question?

13 MS. GARDE: Uh-huh. I've restated the
14 question.

15 BY MS. GARDE:

16 Q What is this form used for?

17 MR. WATKINS: If you know.

18 Q If you know.

19 A From reading the form, it says "Request for
20 RT."

21 Q Okay. Now do you have any knowledge of who
22 would request an RT, what position?

23 A I believe your foreman of craft. In this
24 particular instance probably the piping foreman.

25 Q Okay. I have one more question on this form.

1 I want you to look at the top of the page where it has got --
2 thank you -- where it says "Film To." There are four words
3 in two columns, "Quality Assurance, Weld Engineering." And
4 then in the next column, "Final" and "Information Only."
5 Do you see that?

6 A Yes, ma'am.

7 Q Okay. What is your understanding of what
8 this block means?

9 MR. WATKINS: If you have any understanding.

10 A By reading it, I can surmise what it means.
11 It seems to me it says "Film To."

12 Q Uh-huh.

13 A So in other words, the x-ray film --

14 Q Uh-huh.

15 A -- would go to Weld Engineering. And
16 evidently it's an information only type x-ray.

17 MS. GARDE: Okay. I have no other questions
18 -- on this form.

19 MR. WATKINS: Could we go off the record
20 briefly?

21 MS. GARDE: Uh-huh.

22 (Whereupon, a short break was taken.)

23 BY MS. GARDE:

24 Q Who was the craft foreman on the crew that
25 did this work, if you know?

COTTON CONTENT

1 A. To the best of my recollect, Ron McBee.

2 Q. Okay. Now when you came back to work on
3 the 17th, did you go and look at the weld or the work that
4 you'd left on Saturday? Did you make an effort to go seek
5 out what -- what happened on that particular weld?

6 MR. WATKINS: Objection. Asked and answered.
7 He's already described what happened on Tuesday.

8 MS. GARDE: Okay. Then, Mr. Watkins, maybe
9 you could summarize because I don't remember what he said.

10 MR. WATKINS: I will give you my understanding
11 of the answer. That on Tuesday Mr. Stanford arrived at
12 work, and at some point that day, that morning, that day, a
13 request appeared on his call board to inspect a final weld
14 that he and Duncan, whom he was training, went to the weld.
15 That they performed VT, PT, and that Mr. Stanford erroneously
16 signed -- he signed the Weld Data Card. He erroneously
17 wrote the 14th down --

18 MS. GARDE: Uh-huh, uh-huh.

19 MR. WATKINS: -- and crossed those out and
20 wrote the --

21 MS. GARDE: Uh-huh.

22 MR. WATKINS: -- 17th and initialed it.

23 BY MS. GARDE:

24 Q. Did Mr. Watkins accurately summarize what
25 you testified?

1 A. Uh-huh.

2 Q. Okay. So then the answer to my question
3 which is "Did you actively seek out this weld when you got
4 back" would be no, is that correct?

5 A. No, normally you're too busy to go seek out --

6 Q. Uh-huh.

7 A. -- work.

8 Q. Okay.

9 A. You've usually got plenty.

10 Q. Okay. Mr. Stanford, have you ever seen this
11 before? This is a "Quality Assurance Department, Visual
12 Examination Checklist."

13 MR. COPPOCK: Do you mean that particular
14 document or the checklist?

15 MS. GARDE: That particular document.

16 MR. WATKINS: Or a copy thereof?

17 MS. GARDE: Or a copy thereof.

18 A. Yeah.

19 Q. Is that your signature?

20 A. Yes, ma'am.

21 Q. What is that form used for?

22 A. It's a Visual Examination Checklist.

23 MR. WATKINS: Ms. Garde, could you have this
24 marked, please, for identification?

25 MS. GARDE: Uh-huh, yes. Can we mark for --

1 I -- actually, I'm going to make this as an exhibit --
2 "Visual Examination Checklist." It says "Unit 1, Page 1 of
3 1" in the right-hand corner.

4 MR. WATKINS: Why don't you give it to the
5 Reporter so she can mark it.

6 (The document above referred
7 was marked Stanford Exhibit
8 No. 2 for identification.)

9 MR. BACHMANN: That should be Stanford Number
10 2, I believe.

11 MS. GARDE: Off the record.

12 MR. WATKINS: Off the record.

13 (Discussion off the record.)

14 MS. GARDE: Back on the record.

15 MR. WATKINS: Is there a pending question?

16 THE WITNESS: I think I answered it.

17 BY MS. GARDE:

18 Q Which was "Had you ever seen it before," and
19 you said, "Yes."

20 A It is my signature, yes.

21 Q Okay. It is your signature.

22 Okay. And what does this form indicate?

23 A Well, it indicates that I did the fitup on
24 the 14th and the final VT on the 17th.

25 Q Uh-huh. Now I'm going to ask you some

1 questions about the final VT. About what time of the day,
2 if you can recall, did you perform the final VT?

3 A. I'm sorry. I just don't recall what time of
4 the day it was.

5 Q. And was Mr. Duncan with you when you performed
6 the final VT?

7 A. Yes.

8 Q. Do you recall at that time, the time that you
9 performed the final VT, finding out that this weld had been
10 rejected when it underwent a RT?

11 A. I don't recall.

12 Q. Do you recall after you did the final VT
13 finding out that this weld had been rejected in a RT?

14 A. No.

15 Q. Did you ever find out it had been rejected in
16 an RT?

17 A. I've never -- never heard that it had been.

18 Q. Okay. I'll show you one more document, Mr.
19 Stanford.

20 MS. GARDE: Would you identify it for the
21 record, please, Max, since you've got it?

22 MR. WATKINS: It's a Brown & Root, Inc.
23 Quality Assurance Department MT/PT Report.

24 Could we have that marked for identification,
25 please?

1 BY MS. GARDE:

2 Q Is that your signature, Mr. Stanford?

3 A Yes, ma'am.

4 Q And whose initials are that above your name?

5 A Robbie Duncan.

6 MR. WATKINS: Excuse me. Could we have it
7 marked?

8 (The document above referred
9 was marked Stanford Exhibit
10 No. 3 for identification.)

11 MR. BACHMANN: It should be Stanford Number 3,
12 if my notes are correct.

13 MS. GARDE: Uh-huh.

14 BY MS. GARDE:

15 Q And what does that form indicate?

16 A It says I did a PT on the weld 40C on the
17 1-17-84.

18 Q Uh-huh.

19 A And the results were accepted.

20 Q Okay. Now I want to go back to the meeting
21 about this -- about the NCR that was written on this Weld
22 Data Card. Do you recall any comments that were made to you
23 during the meeting by Mr. Woodyard?

24 MR. WATKINS: Objection. I believe he's
25 testified that he didn't remember Mr. Woodyard being there.

1 MS. GARDE: Excuse me.

2 BY MS. GARDE:

3 Q Do you remember any comments made to you at
4 the meeting by Mr. Sievers?

5 A Are you saying comments or questions?

6 Q Questions or comments.

7 A Oh. I remember talking to Mr. Sievers about
8 the Weld Data Card. If my recollection is right, it was
9 about the Weld Data Card.

10 Q And what did he ask you?

11 MR. WATKINS: I'll object on hearsay grounds,
12 subject to your representation that you're not seeking to
13 elicit this statement for the truth of the statement.

14 MS. GARDE: Well I want to know what he told
15 him.

16 MR. WATKINS: Does that mean you are invoking
17 the well-known hearsay exception or not?

18 Excuse me. Don't answer the question.

19 MS. GARDE: Now what?

20 MR. WATKINS: Does that mean that you are
21 invoking the exception?

22 MS. GARDE: I'm invoking the exception.

23 MR. WATKINS: Yes, the witness may answer the
24 question.

25 A Personally, I -- I can't really recall what

1 was asked of me, truthfully, during the meeting.

2 Q. Uh-huh.

3 A. I remember a meeting being held. And there
4 was questions but I don't --

5 Q. Uh-huh.

6 A. -- remember what they were then.

7 Q. Uh-huh, uh-huh. Do you remember Mr. Sievers
8 being upset with you?

9 A. Yeah, he was a little upset.

10 Q. Was Mr. Blixt upset with you?

11 A. I don't remember Mr. Blixt talking to me. He
12 may have.

13 Q. Uh-huh.

14 A. I don't remember.

15 Q. Uh-huh.

16 A. I didn't -- he's not directly over me, so --

17 Q. Uh-huh.

18 A. -- I don't have any recollection of him.

19 Q. Okay. Let me ask you a few questions about
20 Ms. Neumeyer, and then I don't have any more questions for
21 you.

22 Now, I'm going to show you a copy of an NCR
23 which I believe is entered into the record in another
24 deposition, the Purdy deposition.

25 MR. WATKINS: Could you have that marked for

1 identification before you show it to the witness, please?

2 MS. GARDE: Uh-huh.

3 (The document above referred
4 was marked Stanford Exhibit
5 No. 4 for identification.)

6 MR. BACHMANN: I guess that will be Stanford
7 Number 4. I have in front of me the attachments to the
8 Purdy deposition which were offered into evidence after the
9 Purdy transcript, 41,188, as a Purdy exhibit, 42-3.

10 The basic document appears to be the same
11 NCR. At least it has the same number. A quick perusal
12 indicates that they are not identical, that the document Ms.
13 Garde is referring to is an earlier -- it appears to me an
14 earlier version of the copy entered into the Purdy
15 deposition since the Purdy deposition document has addi-
16 tional writing on it.

17 MS. GARDE: All right. We will enter it into
18 the record in this case.

19 MR. BACHMANN: Okay.

20 BY MS. GARDE:

21 Q You testified earlier, Mr. Stanford, that
22 Ms. Neumeyer showed you an NCR she was writing, which
23 she told you she was writing against Weld Engineering.
24 Is that a copy of what she showed you, do you recall?

25 MR. BACHMANN: A point of clarification,

1 counsel. I'm not clear as to whether it was established
2 that Mr. Stanford was shown a document.

3 MS. GARDE: He testified, according to my
4 notes, that he was -- that she showed him an NCR that she
5 was writing and told she was writing against Weld Engineering.

6 Now if that's -- my notes are inaccurate, I
7 certainly stand to be corrected.

8 MR. BACHMANN: Okay. Is that a correct
9 statement of your testimony, Mr. Stanford?

10 THE WITNESS: I believe I said that. Can you
11 restate the question again?

12 MS. GARDE: Uh-huh.

13 BY MS. GARDE:

14 Q I want to know if that is a copy of the NCR
15 that you previously testified she showed you as she was
16 writing.

17 MR. WATKINS: If you remember.

18 A I can't say it is or isn't. I don't remember
19 now, you know, what was --

20 Q Uh-huh.

21 A -- said on the NCR's she showed me.

22 Q Uh-huh. Okay. Fine. When she showed you
23 the NCR, which may or may not have been the one that I just
24 showed you, do you recall what she said to you about
25 writing it against Weld Engineering.

1 A. She said she was writing an NCR against
2 welding engineering because they did not re-establish hold
3 points. I believe that's the way she put it.

4 Q. And did you make any comments to her at that
5 time?

6 A. I don't remember that I did.

7 Q. Did she ask you why this had happened -- why
8 this incident had happened with the lining through of the
9 dates?

10 A. I believe she may have asked me about the
11 line-throughs.

12 Q. Do you recall what you told her?

13 A. No, ma'am, I don't. I don't remember. I
14 don't recall exactly what the conversation was.

15 Q. Do you recall any discussion about Terry
16 Metheny?

17 A. No.

18 Q. Do you recall her telling you about the fact
19 that the weld had failed in RT?

20 A. No, she never mentioned it.

21 Q. Do you recall her asking you if you had
22 lined through and signed it in error?

23 A. Yes.

24 Q. Do you recall what you responded to her?

25 A. I don't remember exactly what the conversation

1 -- what I said, because at the time I could not recall
2 exactly what the particular article, what line or any -- what
3 job we had done at that present time.

4 Q Uh-huh. So when Ms. Neumeier was talking
5 to you, you didn't have a lot of recollection about the
6 specific weld she was talking about?

7 A Yes.

8 Q Do you know who the weld tech is that signed
9 the -- strike that question.

10 Okay. Would you have any reason to review
11 the Repair Process Sheet associated with this weld?

12 MR. WATKINS: Objection. It hasn't been
13 established that there was one.

14 MS. GARDE: Okay.

15 Q In the normal course of doing your work, such
16 as the kind of work we're talking about on this Weld Data
17 Card, would you review a Repair Process Sheet?

18 A Normally, if it's in the package I would.
19 Or if I knew that a repair had made -- been made.

20 Q Uh-huh.

21 A And it was in the package, I would.

22 Q Okay. I'm going to show you what we'll need
23 to mark, I guess, as Exhibit 5.

24 MR. COPPOCK: Will that be 5 or 4?

25 MS. GARDE: 4.

1 MR. BACHMANN: Number 4, according to my
2 notes, was the NCR.

3 MR. COPPOCK: I'm sorry.

4 (The document above referred
5 was marked Stanford Exhibit
6 No. 5 for identification.)

7 BY MS. GARDE:

8 Q. I'm going to show you what's been marked as
9 Stanford Exhibit 5, a Repair Process Sheet. Do you recall
10 if this Repair Process Sheet was in the package that you
11 looked at before performing your final VT?

12 A. I don't recall. I can't recall what was in
13 there, if it was.

14 Q. Uh-huh.

15 MS. GARDE: Okay. I have no further ques-
16 tions for this witness.

17 MR. BACHMANN: At this point the Staff would
18 assert its prerogative that we've sort of waived previously,
19 since this is a matter that involves a certain amount of
20 hardware and a certain amount of technical allegations as
21 far as this witness is concerned, and would like to proceed
22 last with its questioning.

23 MR. WATKINS: Let me, if I may, defer that
24 so that we can have a brief recess. But Applicants would
25 at this time move the admission of Stanford Exhibits 2 and

1 3.

2 MR. BACHMANN: Into evidence, counsel?

3 MR. WATKINS: Yes.

4 MS. GARDE: Is that because I didn't do it?

5 MR. BACHMANN: None of these exhibits have
6 been moved into evidence.

7 MS. GARDE: That's why I'm asking him why
8 he's only moving in Exhibits 2 and 3.

9 MR. WATKINS: Mr. Stanford has identified
10 both exhibits as exhibits that he signed. Those are to my
11 knowledge the only ones he's indicated that he did sign.
12 And for that reason, we move their admission. Any objection?

13 MS. GARDE: Is there any reason why you're
14 doing this instead of me?

15 MR. WATKINS: No. Would you like to move the
16 admission of Exhibits 2 and 3?

17 MS. GARDE: No, you have taken care of that
18 housekeeping chore, and I thank you.

19 MR. BACHMANN: The Staff -- on the record
20 the Staff has no objection to the admission into evidence
21 of these exhibits. Do you have any objection?

22 MS. GARDE: No, I certainly don't.

23 MR. WATKINS: May we take a brief recess to
24 discuss Mr. Bachmann's proposal?

25 MR. BACHMANN: We're off the record.

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(Discussion off the record.)

MR. WATKINS: On the record.

Applicants have no objection to the procedure suggested by Mr. Bachmann. We do have a request for a 20-minute recess to prepare Mr. Stanford's direct or recross or whatever we're calling it here.

MR. BACHMANN: I believe that it would be considered cross-examination insofar as Mr. Stanford constitutes part of the direct case of the Intervenor's.

MR. WATKINS: To prepare Applicants examination of Mr. Stanford.

MS. GARDE: Okay.

MR. BACHMANN: Off the record.

MS. GARDE: Off the record.

(Whereupon, a short recess was taken.)

MR. BACHMANN: Back on the record.

CROSS-EXAMINATION

BY MR. WATKINS:

(Go on to the next page-----)

1 Q Mr. Stanford, you testified that Sue Ann
2 Neumeyer called you one day to discuss the weld data card
3 and that subsequently she called you in a second time to
4 discuss an NCR that she had drafted; is that correct?

5 A Yes, sir.

6 Q At your first meetings with Sue Ann Neumeyer,
7 did you know her?

8 A Yes.

9 Q How did you know her?

10 A I had worked with her at night before and
11 from being in the same group, QC group, where she was also
12 an inspector.

13 Q Did you ever work as a team during that
14 period?

15 A Yes.

16 Q Was this in 1983?

17 A Yes.

18 Q Was it in the first half of 1983?

19 A I believe so.

20 Q How do you know that?

21 A We was still wearing coats at night.

22 Q It felt cool in the evening?

23 A Yes.

24 Q That's when they should have had this hearing.
25 During the period that you worked with Sue

1 Ann Neumeyer, did she ever tell you that she was harassed,
2 intimidated, or threatened in such a way that she could not
3 perform her duties as an inspector?

4 A No, she never said anything like that.

5 Q During that period, did she ever show any
6 reluctance to report non-conforming or discrepant data?

7 A No.

8 Q Now, the second time you met with Ms.
9 Neumeyer to discuss the NCR that she had drafted, was it
10 your impression that she wasn't so much concerned about
11 your corrections of the date of the DT and PT inspection
12 as she was about the lack of hold points; is that correct?

13 A That as my indications from the way she
14 indicated to me, yes.

15 Q On that basis, were you particularly
16 concerned?

17 A No, sir.

18 Q Now, you testified as to a meeting with
19 Mr. Siever in his office with several other people.

20 Did you become concerned during that meeting?

21 A I became concerned because they seemed to
22 be irritated at me, I'll say.

23 Q At the time of that meeting, you were shown
24 a weld data card.

25 Did you connect the actual inspection that

1 you now remember having performed with the weld data card
2 that you were shown at that meeting?

3 MR. BACHMANN: Excuse me, counsel. Before
4 you proceed with that question, you have stated he was
5 shown a weld data card.

6 MR. WATKINS: Yes.

7 MR. BACHMANN: I assume that you are
8 connecting that up with Stanford Exhibit No. 1 of this
9 deposition; is that correct?

10 MR. WATKINS: May I see Stanford 1?

11 (Whereupon, the document requested was
12 provided.)

13 BY MR. WATKINS:

14 Q Mr. Stanford, I show you Stanford Exhibit 1.
15 Now, at the time, were you shown that weld data card at
16 the first meeting with Mr. Siever?

17 A I believe I was.

18 Q Well, at the time that you were at that
19 meeting, did you-- based on your review of that weld data
20 card, could you connect the weld data card with the actual
21 inspection events?

22 A No, sir, I couldn't.

23 Q Now, when you left the meeting, were you
24 more concerned than you had been after your discussions
25 with Miss Neumeyer?

1 A Yes, I was.

2 Q Did you investigate to see whether you
3 could jog your memory as to the actual inspection that
4 you conducted?

5 A Yes, sir, I did. I investigated and checked
6 with the piping department foreman as to see if he could
7 remind me as to what we was working on, what line and such.

8 Q And how did you identify the line to the
9 piping foreman?

10 A With the weld data card number.

11 Q What did he tell you?

12 A Well, they remembered it very well because
13 of having to work all night Saturday night to weld it up.

14 Q Based on that explanation, did you then
15 remember--

16 A Yes.

17 Q --your-- Did you remember your inspection
18 activities on Saturday and then the following Tuesday?

19 A Yes.

20 Q And did you then remember that Miss Duncan
21 had accompanied you on Tuesday to the VT and PT inspections?

22 A Yes, sir.

23 Q Had you remembered that he was with you
24 before that time?

25 A No.

1 Q Was there a later meeting that day in Mr.
2 Siever's office that you attended?

3 A Yes, sir.

4 Q And did you explain your recollection of
5 the facts to Mr. Siever?

6 A Yes, sir, I did.

7 Q Did you tell him that Mr. Duncan had been
8 a witness to the second set of inspections?

9 A Yes.

10 Q Do you know whether Mr. Siever talked to
11 Mr. Duncan?

12 A Yes, sir, he did. He requested that I
13 personally go and get Mr. Duncan and send him i to the
14 meeting.

15 Q Did you do so?

16 A Yes.

17 Q Now, Mr. Stanford--

18 MR. BACHMANN: There's a question out,
19 counsel, that has not yet been answered.

20 MR. WATKINS: I though I said, "Did you do
21 so?" And he said, "Yes."

22 MR. BACHMANN: I didn't hear the answer.
23 I'm sorry.

24 BY MR. WATKINS:

25 Q Was it "Yes"?

1 A Yeah.

2 Q Did you go and get Mr. Duncan, and--

3 A Yes, I did.

4 Q --have him come to Mr. Siever's office?

5 A I think she coughed when I said that.

6 Q Now, Mr. Stanford, if you could look again
7 at Stanford Exhibit 1, which is weld data card, and then
8 compare it with what has been either identified or moved
9 into evidence as Purdy Exhibit 42-3, which is also a weld
10 data card.

11 MR. BACHMANN: Let me have the page number
12 of the Purdy exhibit, please.

13 MR. WATKINS: It is page 9 of 9, a notation
14 in the upper right-hand corner.

15 BY MR. WATKINS:

16 Q Looking at the bottom, is there an addition
17 to the weld data card?

18 A Yes, there's an asterisk with a "date in
19 error", my initials and the date.

20 Q Did you sign your initials and the date?

21 A Yes.

22 Q And is that your writing?

23 A Yes.

24 Q Mr. Stanford, if a QC inspector makes a
25 mistake on an inspection document, procedurally, how can he

7

1 remedy the mistake?

2 A Procedurally, he'll line through the mistake
3 with the signature, date, what have you; make the correct
4 correction; and initial the initials and the date that you
5 made the correction.

6 Q Do you believe that you followed that
7 procedure when you corrected the weld data card, which has
8 been identified as Stanford Exhibit 1?

9 A Yes, sir, I do.

10 MR. WATKINS: No further questions.

11 I believe we have decided that Mr. Bachmann
12 will proceed now.

13 MR. BACHMANN: Unless Mr. Coppock--

14 MR. COPPOCK: No, I have no questions.

15 MR. BACHMANN: All right. Thank you.

16 I'm going to take a couple of questions here
17 out of order from my original intent because I want to be
18 clear as to the answer to your last question.

19 Or, actually, it was really, I believe, the
20 next to the last question.

21 CROSS-EXAMINATION

22 BY MR. BACHMANN:

23 Q Mr. Watkins asked you about correcting the
24 date on a weld data card; is that correct?

25 A Yes, sir.

1 Q And I'm not sure if the record reflects,
2 although I suppose the document speaks for itself, is that
3 those are your--

4 I'm not exactly sure that we got this into
5 the record that just below where the dates have been changed
6 from 1-14-84 on these two lines number 5 and 6, that just
7 below each of those changes, there are initials and then
8 1-17-84 also written underneath those.

9 Are those your initials?

10 A Yes, sir.

11 Q And you changed the 1-14 to 1-17 and then
12 underneath it put your initials and date of 1-17; is that
13 correct?

14 A Yes, sir.

15 MR. BACHMANN: At this point, I would move
16 that Stanford Exhibit No. 1 be put into evidence.

17 Are there any objections? It has been
18 authenticated and the foundation laid.

19 MR. WATKINS: Applicants do not object.

20 MS. GARDE: I don't object.

21 MR. BACHMANN: I request that it be bound
22 into the record following Mr. Stanford's testimony.

23 MR. WATKINS: Mr. Bachmann, is there some
24 sort of outstanding commitment that you know of that the
25 Applicants attempt to provide a better copy?

1 MR. BACHMANN: At the time of Mr. Purdy's
2 deposition on July 10, 1984 at transcript page 41,188 of
3 the Purdy deposition, I had made the suggestion that cleaner
4 copies be provided. That encompassed a number of the
5 documents that were a part of the NCR package that is at
6 issue.

7 I'm not quite sure, without reviewing that
8 transcript,-- At this point, I'd rather not do it just
9 now. --whether a firm commitment was made on the behalf
10 of Applicants or not.

11 I do know there was a certain amount of
12 argument as to whether or not that would be apropos.

13 MR. WATKINS: Looking at--

14 MR. BACHMANN: However, I might say that I
15 would still like this document to be put into evidence on
16 this deposition for-- if nothing else, for the convenience
17 of the Board.

18 MR. WATKINS: I understand.

19 And looking at page 9 of 9 of Purdy Exhibit
20 42-3, I can understand your observations.

21 BY MR. BACHMANN:

22 Q Mr. Stanford, the weld that we have been
23 talking about, the one that was the subject of the NCR
24 written by Susie Neumeyer, was this a safety-related weld?

25 A Yeah, I would say so.

1 Q Does a safety-related weld of itself require
2 QC hold points?

3 MR. WATKINS: Objection.

4 Mr. Bachmann, you're getting into--

5 MR. BACHMANN: I withdraw the question.

6 BY MR. BACHMANN:

7 Q Mr. Stanford, did anyone ever suggest to
8 you that you should change the date from January 14--
9 We're talking, of course, about items 5 and 6 on the weld
10 data card. --change the dates from January 14 to January
11 17 for any other reason than you had made an error in the
12 date?

13 A No, sir. 'Cause it was only about two
14 seconds between the times that I wrote and changed it.

15 Q There has been a lot of discussion today
16 during your deposition, and I don't think it's been made
17 particularly clear or focused, and I'm trying to make it
18 focused right now, as to whether or not on the 17th you
19 had any awareness that the weld had gone through a radio-
20 graphic test, had failed the test, had passed the test or
21 anything else, other than you knew they were preparing the
22 weld on the 14th and you inspected it on the 17th.

23 Do you-- And I'm asking you flat-out right
24 now: On the 17th when you made your inspection, and we're
25 speaking about Tuesday, did you have any knowledge at that

1 time of anything done on that weld, other than the welding
2 that followed your, shall we call it, pre-weld inspection
3 on the 14th?

4 A I don't recall anything as far as RT or
5 repair on the weld or seeing anything on the weld.

6 Q Well, we're speaking as of the 17th.

7 A Right. The 17th.

8 Q There has been a lot of discussion, as I
9 mentioned before, and papers thrown back and forth on the
10 fact that there was an alleged failure of a RT inspection
11 and there has been some indication that the weld might
12 have been redone over the weekend.

13 I'm asking your opinion now, and it's
14 strictly your opinion. Had you known of anything other
15 than the fact they had merely done the weld over that
16 weekend, would you have done anything different on the 17th?

17 A Can you give me that again?

18 Q All right.

19 There has been a lot of discussion during
20 this deposition, during your deposition, about radiographic
21 testing and possible alleged failure and acceptance, et
22 cetera, of that weld.

23 MR. WATKINS: There has been a lot of
24 discussion about documents that may or may not reflect
25 that.

1 MR. BACHMANN: Purport to reflect that there
2 may have been some problems with the radiographic testing.

3 I don't think that that's in issue here.
4 Documents have been produced, true or not.

5 What I want to get is an opinion, and we
6 can consider it a expert type of opinion, based on the job
7 Mr. Stanford has been hired to do and is qualified to do
8 on whether on the 17th he had known that there had been
9 additional testing, perhaps additional welding, anything
10 else.

11 Other than the fact that he saw the weld
12 prepared on the 14th and inspected on the 17th, would he
13 have done anything different in his inspection on the 17th?
14 And if so, why?

15 MR. WATKINS: If he can answer that, fine.
16 If he can't, it is -- do I make myself clear?

17 THE WITNESS: Yeah.

18 A (By the witness) I'm afraid that this will--
19 Many times, they do an RT after we have completed a weld.
20 Sometimes they put information on it. Sometimes, it's
21 probably requires RT. We don't know this. This is issued
22 by the foreman, the craft foreman.

23 And a lot of times if it fails, then
24 sometimes we're involved, and I guess most times, we're not
25 until they come back to, maybe, finalize that weld.

1 They will not-- Our hold punch are not
2 affected until they come back to get us, sign up on the
3 call board again and say we got a final.

4 It's-- It's hard for me to say that I
5 would have done something different.

6 Q (By Mr. Bachmann) That's fine. That's the
7 answer I-- That answers my question. Let me put it that
8 way.

9 Where do the radiographic testers, as far
10 as you know, fall within or without the QC organization?

11 Let me add something to that question.

12 You did the PT's and the VT's as part of
13 your job as a QC inspector; is that correct?

14 A Yes, sir.

15 Q But the RT's were not done by the QC people;
16 is that correct?

17 A They were not done by our particular group
18 of QC. I think the RT, they are a group in their own of
19 the QC department, but a separate group totally.

20 Q Where would be the first level in the chain
21 of command where you would have a common boss? How far up
22 do you have to go?

23 What I'm trying to ask you-- I'm not trying
24 to make a trick question here, seriously.

25 A Yeah.

1 Q I just would like to know whether you would
2 normally be talking to the RT people in the course of your
3 normal work.

4 A Not normally, no, sir.

5 Normally, we would probably never see them.
6 They usually work at night.

7 Q Would you expect to know if the RT inspectors
8 had failed a well that you had been assigned to, let's say?

9 A I would say, normally, sometimes you do and
10 sometimes you don't.

11 Unless you're involved with a repair or
12 something like that, you probably wouldn't know. Unless
13 there was some kind of documentation in the package that
14 you reviewed personally. If it's not on a RT, you probably
15 wouldn't because it doesn't pertain to us.

16 Q Okay. Now, I will accept the objection of
17 asked and answered, but when you went to inspect the weld at
18 issue on the 17th, was there-- to the best of your
19 recollection, was there anything in the package indicating
20 an RT inspection after the 14th and before the 17th?

21 A I cannot remember one at all in the package,
22 to my recollection.

23 Q Had there been one, would you have-- do
24 you think you would have noticed it?

25 A I--

1 MR. WATKINS: Mr. Bachmann, the witness has
2 testified that he did not see one, and your questions are
3 getting awfully hypothetical. You have the facts.

4 MR. BACHMANN: I withdraw the question.

5 BY MR. BACHMANN:

6 Q Mr. Purdy has testified, and this is on the
7 record in these depositions, that the-- I assume it was
8 Mr. Duncan, although he did not name names. But the
9 inspector that was with you on the 17th, in so many words,
10 had no love for Mr. Stanford.

11 MR. WATKINS: That's your interpretation of
12 what Mr. Purdy--

13 MR. BACHMANN: Shall I quote it?

14 MR. WATKINS: --is supposed to have said.

15 MR. BACHMANN: Shall I quote Mr. Purdy's
16 transcript or--

17 MR. WATKINS: May I ask as to the relevance
18 of this question?

19 MR. BACHMANN: The relevance of this question
20 is that Mr. Purdy put a certain amount of weight on the
21 corroboration of the inspection being done on the 17th to
22 the fact that the other inspector, which has now been
23 identified as Mr. Duncan, in Mr. Purdy's opinion, were
24 not what you would call good friends. Mr. Stanford and Mr.
25 Duncan.

1 I'm just wanting to ask whether or not that
2 is a fair characterization of your relationship with Mr.
3 Duncan, your professional relationship.

4 A fair characterization of your relationship
5 with Mr. Duncan, that is, they had no love for each other.
6 In Mr. Purdy's words.

7 MR. WATKINS: Is your question to the witness,
8 then, whether he liked or disliked Mr. Duncan?

9 MR. BACHMANN: Or whether Mr. Duncan liked
10 or disliked the witness, either way. However he would like
11 to comment on it.

12 MR. WATKINS: I'll object to the last part
13 of that question. He doesn't have any way of knowing,
14 does he?

15 BY MR. BACHMANN:

16 Q What were your relations with Mr. Duncan?

17 A Personally, I thought they was very good.
18 We worked the call board together for many months and on
19 the same crew for a long time.

20 We don't see each other socially, but I
21 thought we worked very well together.

22 Q So, in your opinion, there was no specific
23 like or dislike that would occur in that situation.

24 A Should not have been, no.

25 Q Okay. I was just trying to clarify what

1 Mr. Purdy had said.

2 I just have a few brief questions now.

3 Very early on in your testimony when Ms.
4 Garde asked you questions concerning the time that Susie
5 Neumeyer first talked to you about this NCR she was writing,
6 I take you back to when she asked you that, according to
7 my notes, your response was: When Susie talked to me, it
8 was several months after I had done the inspection.

9 Since then, I think we've established th.
10 the time frame was a lot closer.

11 Can you clarify that for us?

12 A Well, it just seems like a long time to
13 me now. But looking at the dates and all, it's not. It
14 was just a few days.

15 Q Okay. Fine. You made that clear.

16 Okay. Now, I would like to just briefly,
17 and then I'll close on these questions, the meeting
18 concerning the NCR where-- I'm not, at this point, sure
19 how much you testified for. We've had a number of
20 witnesses who have testified to this meeting, and I'm not
21 going to characterize that you testified to it.

22 It's been established there was a meeting
23 to clear up the NCR written on that weld data card.

24 MR. WATKINS: Just to clarify, there's now
25 been testimony that there were two meetings.

1 MR. BACHMANN: I think--

2 MR. WATKINS: That Mr. Stanford attended,
3 anyway.

4 MR. BACHMANN: I think Mr. Stanford indicated
5 that there were two meetings prior to the meeting that
6 everyone was at.

7 MR. WATKINS: Perhaps you could ask him
8 whether there were two meetings in Mr. Siever's office.

9 MR. BACHMANN: The last meeting-- I'm not
10 arguing with you. I'm just trying to get it straight.

11 Yeah, I'm sure I'm getting a little confused
12 myself.

13 The last meeting-- that was when I asked
14 him to indicate verbally that he had, indeed, gone for
15 Robbie Duncan.

16 BY MR. BACHMANN:

17 Q Was that the last meeting you had with Mr.
18 Siever?

19 A Yes, sir.

20 Q Okay. And that was the meeting where there
21 were a number of people present; is that correct?

22 A Yes, sir. There was-- In both meetings,
23 there was a number of people present.

24 Q Okay. Then I stand corrected. There were
25 two meetings, and that was the second meeting. I'm sorry.

1 Do you re-- This may have been asked, but
2 I'm sorry.

3 The second meeting, Sue Ann Neumeyer, other
4 people testified she was present. Do you recall her being
5 present?

6 A I don't recall her being present.

7 Q At the conclusion of the meeting, you have
8 testified that--

9 Excuse me. Back up.

10 You have testified that at the conclusion
11 of that second meeting that you were instructed to get
12 ahold of Mr. Duncan; is that correct?

13 A Yes. What--

14 Q Were you instructed-- Let me finish the
15 question. Okay?

16 Were you instructed to do anything else?
17 And could you please explain everything that you were
18 instructed to do at the end of that meeting?

19 A No, sir. The only thing I was instructed
20 to do was to get Mr. Duncan and have him report to the
21 meeting immediately.

22 Q Did Mr. Duncan come to the meeting?

23 A Yes. He went directly to the meeting.

24 Q Did Mr. Duncan say anything at the meeting?

25 A I suppose he did.

1 Q Do you have any recollection as to what he
2 said at the meeting and to whom he said it?

3 MR. WATKINS: Objection. It hasn't been
4 established that Mr. Stanford was there when Mr. Duncan
5 was there.

6 BY MR. BACHMANN:

7 Q Were you still there when Mr. Duncan
8 arrived?

9 A No, I wasn't there.

10 Q So, the last thing you remember being told
11 to do after this meeting was to get Mr. Duncan?

12 A Yes. I was instructed to get Mr. Duncan
13 and, in other words, for me to stay out of the meeting.

14 Q Were you told, at any time during the
15 meeting, to produce the two NDE papers covering the two
16 tests that you and Mr. Duncon did on the 17th?

17 A No, sir.

18 Now, you say "two tests".

19 Q That would be Stanford Exhibits 2 and 3.

20 MR. WATKINS: Could we have a look at those,
21 please?

22 (Whereupon, there was examination of
23 documentation by the witness.)

24 A No, sir.

25 Q While you were at that second meeting, were

1 you made aware, in any way, that anyone had those particular
2 two documents? Anyone else at the meeting?

3 A No, sir.

4 May I clarify here?

5 Q Yeah.

6 A On this second meeting, I may have been in
7 that second meeting, maybe, two minutes. 'Cause I walked
8 into the meeting and made my statement, and that's when
9 they told me to go get Robbie Duncan. I never even sat
10 down.

11 Q Now, the question I'm going to ask you
12 right now is I'm just trying to get it clear in my own
13 mind if we're talking about the same meeting.

14 Who was present at the first meeting with
15 Mr. Siever?

16 A Best of my recollection, and I may be wrong
17 on this because there was quite a few people there, and it
18 seems like I went into the meeting with Terry Metheny and
19 Greg Bennetzen.

20 And it was in Bob Siever's office, and
21 Siever was present. I believe Ted Blixt was there, and--

22 MR. BACHMANN: Can we go off the record for
23 a second, please?

24 (Discussion off the record.)

25

1 MR. BACHMANN: Back on the record.

2 Counsel for the Staff would like to state
3 for the record that while off the record, it was established
4 that the meeting that I should have been asking the questions
5 about was, in Mr. Stanford's mind, what he would call the
6 first meeting with Mr. Siever, and that that was the meeting
7 that had been the subject of other discussions on this
8 record.

9 And I apologize for taking up the time
10 pursuing the wrong meeting.

11 BY MR. BACHMANN:

12 Q You may have asked questions earlier -- been
13 asked -- been asked and answered questions earlier about
14 this subject.

15 I am going to ask you these questions in an
16 attempt, perhaps, to jog your memory from other testimony
17 on the record. I'm saying this for counsel's benefit to
18 preclude and perhaps forestall some objections.

19 (Pause.)

20 During the first meeting, do you recall
21 anyone making the statement or alluding to the idea that
22 they might void the NCR?

23 A I'd have to say I don't recall anything like
24 that. Personally, I don't recall too much about the first
25 meeting except that I felt like I was in a lot of trouble.

1 For some reason, I couldn't figure out why.

2 Q Who, in your mind -- who, in your opinion,
3 was doing or saying things that made you feel you were in
4 a lot of trouble?

5 A Well, mainly the only one that really did,
6 you know, any talking in the meeting who was -- and he was
7 in charge of the meeting, you know -- I mean, it's his
8 place to be -- is Bob Sievers, of course.

9 And he was the one that was more or less
10 quizzing me, talking to me.

11 Q To the best of your recollection, and I
12 realize it has been a number of months, can you recall what
13 Mr. Siever said to you?

14 A No, sir, I can't. I tried.

15 Q Did he seem to be questioning you about the
16 dates that were crossed out on the Weld Data Card?

17 A There were -- the best I can remember, that
18 was the main emphasis put on the meeting now -- was the
19 crossed-out dates.

20 Q When you say that was the "main emphasis
21 put on the meeting," do you -- did you get the impression
22 that other people other than Mr. Siever were concerned
23 about those dates?

24 A Well, not other than maybe Suzie Neumeyer.

25 Q And do you recall anything that she may have

1 said or done at the meeting that was --

2 A. Not at the meeting. I don't -- I don't
3 recall her being at the meeting.

4 Q. Okay. But she had given you the indication
5 at some other time?

6 A. Before. Before the meeting, yes, when we
7 had talked. When she had called me down to the -- let me
8 review the Weld Data Card.

9 Q. I asked you this question before pertaining
10 to the second meeting, and I should have asked you it for
11 the first meeting.

12 Did you leave the first meeting with any
13 impression you were under instructions to do something,
14 get somebody or do something?

15 A. No, sir, I don't remember.

16 Q. With regard to the NCR. I'm sorry.

17 A. Right. I don't remember them actually
18 requesting that I come up with some documentation.

19 Q. Is there anything there that you were
20 supposed to do when you left the meeting?

21 A. Way back there in the back (pointing to his
22 head), it seems like there was a question to see if there
23 was a PT report possibly on the 14th. That's the only
24 thing I can -- can remember. It seems like they were
25 asking me if I had made one out or there was one made out

1 or something like that, which there wasn't.

2 Q I think you testified that you were not at
3 that meeting for very long, is that correct?

4 A That's at the second meeting.

5 Q How about the first meeting?

6 A That's what I have been talking about.

7 Q Now the first meeting. Were you there for
8 the whole meeting?

9 A Yes, sir. Although, it seems like they
10 stayed after I left.

11 Q Who is "they"?

12 A Most of the people that were concerned or
13 the people that was in the meeting. It seemed like -- no,
14 that was the second meeting that they stayed after I left.

15 The first meeting, everybody left.

16 Q And you have no recollection at the first
17 meeting of having been instructed, requested, ordered or
18 anything to produce, look into, anything?

19 A They didn't order me to. They just asked to
20 see if there was a PT report made out on the 14th, I
21 believe.

22 Q And it was just the PT report?

23 A Yeah, that's all they -- they asked me to
24 check and see if there was one.

25 Q Did they ask you anything about a PT report?

1 A. No, sir, I don't believe so.

2 Q. I just have one more question. At the time
3 of the first meeting, I want to ask you for a very subjective
4 opinion. In your own words, what was your state of mind at
5 the first meeting after you walked in the door? Were you
6 calm? Were you agitated? Were you upset, angry? I mean,
7 just -- I'm not trying to put words in your mouth. I'm just
8 trying to give you examples. How did you feel?

9 A. Well I wasn't angry. First -- you're talking
10 about the first meeting.

11 Q. I'm talking about the first meeting, yes.

12 A. I wasn't angry. "Confused," I guess would be
13 the word I would use.

14 Q. Could you explain that, please?

15 A. Because I couldn't -- I hadn't as yet put
16 the Weld Data Card -- what all the confusion was over a
17 simple line-through, why people were getting upset. At
18 that time I had not put it all together. But I couldn't
19 figure out exactly what they were wanting from me.

20 That's when I decided I'd better do a little
21 investigating on my own and get it cleared in my mind as to
22 the events of the inspection itself.

23 Q. Do you think you were listening carefully
24 to what other people were saying at the meeting?

25 A. I think I was listening carefully but a lot

1 of it was not clear to me because I -- I guess mainly
2 because of the simple fact that I couldn't remember, like I
3 say, the inspection itself.

4 I knew it was my signature and I had performed
5 these inspection functions. But as far as the events in
6 there and what line it was and all, it was -- I just couldn't
7 put the form with the inspection.

8 And so, I left the meeting just really
9 confused. I couldn't figure out why everybody was in an
10 uproar.

11 MR. BACHMANN: I have no further questions.

12 MR. WATKINS: Ms. Garde?

13 MS. GARDE: Yeah, I have a few.

14 REDIRECT EXAMINATION

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21 (Go on to the next page-----)

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24

25

MS-23

S-4

1 BY MS. GARDE:

2 Q Mr. Stanford, you may have answered this
3 question already. But have you identified who was at the
4 second meeting?

5 A I don't believe anybody has asked me
6 specifically who was at the second meeting.

7 Q Who was at the second meeting?

8 A I knew you was going to ask me that, and I
9 can't -- can't remember. It seems like to my recollection,
10 it was about the same people that was there at the first
11 meeting.

12 Q Does it seem like there were that many people
13 there? I mean, you've testified that there were a lot of
14 people at the first meeting.

15 A Yes.

16 Q Did it seem like there was a lot of people
17 at the second meeting?

18 A Well, personally, I'll tell you the truth.
19 I didn't look around the room. I had -- I was -- I was mad
20 at the second meeting because all this -- everything led me
21 to believe I was being persecuted for a line-through. And
22 I couldn't see any reason.

23 And everybody at the meeting it seemed could
24 not identify that as a simple line-through. So when I went
25 to the second meeting, I was told that they was going to

1 have a meeting at 4:30. Well I found everything, remembered
2 everything just before the meeting. And I simply went into
3 the office and before anybody could say anything and told
4 them exactly what happened, why the line-throughs were
5 there. And I simply stated that everybody in the room had
6 done the same darned thing.

7 Q And that's the line-through when you made a
8 mistake?

9 A Yes.

10 Q Like "in error"?

11 A Right.

12 Q Now let's go back to the attendees at the
13 second meeting. Do you remember Suzie Neumeyer being at
14 the second meeting?

15 A No, ma'am.

16 Q Do you remember Greg Bennetzen being at the
17 second meeting?

18 A I know Bob Sievers was at the meeting, and
19 I believe Greg Bennetzen was.

20 Q Was there more than the three of you?

21 A I believe there was a couple -- maybe a
22 couple more people there but I don't remember.

23 Q Was Terry Metheny at the second meeting?

24 A I don't know.

25 Q Was Dwight Woodyard at the second meeting?

1 A. I couldn't say.

2 Q. Okay. Now do I understand that your testi-
3 mony is that you left the second meeting to go find Robbie
4 Duncan?

5 A. Yes.

6 Q. And when you found Robbie Duncan, what did
7 you tell him?

8 A. I just told him that he was -- Bob Sievers
9 had requested that he go to a meeting in his office imme-
10 diately.

11 Q. Uh-huh.

12 A. He was doing something else entirely.

13 Q. Uh-huh.

14 A. And he said, "Oh, wow, okay."

15 Q. Uh-huh.

16 A. And he went directly to the meeting.

17 Q. Did you walk back to the meeting with him?

18 A. No.

19 Q. Did you tell him what the meeting was about?

20 A. I don't remember saying anything to him
21 about the -- he knew that a meeting had transpired earlier
22 in the day.

23 Q. Now let's go back to the end of the first
24 meeting. You said that broke off and everybody left
25 together.

1 A. I believe so.

2 Q. Did you go back to your work area?

3 A. I believe I did. I believe I went back to
4 the call board at that present time.

5 Q. And then did you go on a work assignment
6 or did you -- did you go out on a work assignment?

7 A. I don't remember.

8 Q. Okay. It was after the first meeting but
9 before the second meeting that you went investigating this
10 situation.

11 A. Yes.

12 Q. And you said you went and talked to the
13 foreman, pipehanger foreman?

14 A. Yes.

15 Q. And who was that?

16 A. Ron McBee was who I was looking for.

17 Q. And you found him?

18 A. I found him and it just so happened that the
19 crew that did the welding and all were there too --

20 Q. Uh-huh.

21 A. -- in the same -- same area.

22 Q. Do you remember how long after the first
23 meeting it took you to find them?

24 A. No, ma'am, I don't. I'm going to say it
25 was probably possibly an hour or two.

1 Q Uh-huh. Do you remember going back to your
2 desk when you were doing your investigation about what was
3 going on with regard to this Weld Data Card?

4 A Going back to my desk, no, because it was --
5 my desk was on top of the hill --

6 Q Uh-huh.

7 A And my call board was down in the plant.

8 Q Uh-huh.

9 A So I don't think I went back until I talked
10 -- after I talked to the piping hands.

11 Q Uh-huh.

12 A And it was getting close for the other
13 meeting --

14 Q Uh-huh.

15 A -- in which they had told me to be at.

16 Q Uh-huh. Do you remember going to your desk
17 before the second meeting?

18 A I thought that's the question I just answered.

19 Q Okay. You said you didn't go right after the
20 first meeting. And it was getting close to the second
21 meeting. Did you go back to your desk then, is that your
22 testimony?

23 A I don't believe I went back to my desk.

24 Q Between the first meeting and the second
25 meeting.

1 A. Except maybe -- maybe after the first meeting
2 I went back to my desk and picked up my belt and my tools
3 and went to the call board. Possibly I dropped them off on
4 my way to the other meeting because I didn't take them with
5 me.

6 Q. You don't remember spending a lot of time at
7 your desk --

8 A. Oh, no.

9 Q. -- looking through papers?

10 A. Huh-uh. I didn't look at any papers, in fact,
11 between the two meetings.

12 Q. Uh-huh. Now you said that there was --
13 strike that.

14 You were asked some questions about the
15 different type of RTs or your -- my notes, which are
16 admittedly not very good on this particular question. It
17 was that Mr. Bachmann asked you about an RT falling within
18 or without of the QC organization. And you responded that
19 there were different types of RTs. And one of the --

20 MR. WATKINS: Was that his testimony?

21 MS. GARDE: I think that was his testimony.
22 That's what my notes say.

23 MR. WATKINS: Perhaps you could ask him.

24 BY MS. GARDE:

25 Q. Is that your recollection?

1 A. Can I clarify that?

2 Q. Sure. Please do.

3 A. What I meant by "different types of RTs,"
4 some -- I'm saying some of them have a required RT.

5 Q. Uh-huh.

6 A. And then the others are just strictly informa-
7 tion type only.

8 Q. Uh-huh.

9 A. You know, just for -- and when I say for
10 information --

11 Q. Uh-huh.

12 A. -- it's not a requirement that they have to
13 RT it in other words.

14 Q. Uh-huh. I think that I had asked you --
15 maybe it was Mr. Bachmann -- if RTs were contained in the
16 packages. Do you recall being asked that question? If not,
17 I'll ask you that question.

18 A. I'm not --

19 MR. WATKINS: If I could verify what -- you
20 said an "RT." RT stands for a radiographic test.

21 MS. GARDE: Right, right. I mean the
22 documentation with the results of the radiographic test.

23 MR. BACHMANN: My question was, "Was the RT
24 in the package that he used to examine the weld on January
25 17th."

1 MS. GARDE: Okay, okay. Then let me ask you
2 a question that I'm interested in your answer on.

3 BY MS. GARDE:

4 Q Are required -- the results of required RTs,
5 which I believe are on an NDE form, contained in packages
6 which you would use when you were conducting an inspection?

7 A I would say yes.

8 Q Okay.

9 A Not --

10 Q All right.

11 MR. WATKINS: "Not" what? Let him finish
12 his answer.

13 THE WITNESS: Not knowing their procedure on
14 it.

15 Q You mean the NDE?

16 A The RT --

17 Q RT.

18 A -- portion of it.

19 Q Okay.

20 A Yes.

21 Q Okay. Are "Information Only" RTs or the
22 results of "Information Only" RTs put into the package?

23 A I don't know, to tell you the truth.

24 MS. GARDE: I have no further questions.

25 MR. WATKINS: A few clarifying questions,

1 RE-CROSS-EXAMINATION

2 BY MR. WATKINS:

3 Q Mr. Stanford, does "NDE" stand for Non-
4 Destructive Examination?

5 A Yes, sir.

6 Q Is radiography a Non-Destructive Examination?

7 A Yes, sir.

8 Q Is penetrant testing a Non-Destructive
9 Examination?

10 A Yes, sir.

11 Q Is visual testing a Non-Destructive
12 Examination?

13 A Yes.

14 Q Is magnetic particle testing a Non-Destructive
15 Examination?

16 A Yes.

17 Q All of those are NDE examinations.

18 A Yes, sir.

19 Q Have you ever been certified to perform
20 radiography?

21 A No, sir.

22 Q Are the people who perform radiographic
23 examinations part of the ASME QA/QC organization?

24 A Yes, sir, I believe they are.

25 Q You testified that they mostly work at night.

1 Do you know why they mostly work at night?

2 A. The reason being because the areas are clear.
3 No craft, no work being done in the areas that they're doing
4 their RT, which doesn't expose anybody to the heavy x-ray.

5 Q. You currently work day shift, is that correct?

6 A. Yes, sir.

7 Q. Were you working day shift in January 1984?

8 A. Yes, sir.

9 Q. Are you familiar with procedures at Comanche
10 Peak that state when and where radiographic examinations are
11 required?

12 A. Restate that again.

13 Q. I will restate it. Do you hold yourself out
14 as an expert on when radiographic examination of a weld is
15 necessary at Comanche Peak?

16 A. No, sir.

17 MR. WATKINS: I have no further questions.

18 MR. BACHMANN: I have no questions. But I
19 would like to state for the Board's information and for the
20 record that during my questioning, in an attempt to either
21 -- to somehow corroborate, perhaps, Mr. Purdy's previous
22 testimony, I questioned Mr. Stanford about his relationship
23 with Mr. Duncan.

24 The pertinent sites by Mr. Purdy are found
25 in his transcript at 41,166 and 41,187. That is merely

1 for the Board's information, for the parties' information.

2 I have no further questions of this witness.

3 MR. WATKINS: Ms. Garde?

4 MS. GARDE: No further questions.

5 MR. WATKINS: That will conclude Mr. Stanford's
6 examination. Thank you, Mr. Stafford.

7 MR. BACHMANN: Thank you, Mr. Stafford.

8 MS. GARDE: Thank you, Mr. Stafford.

9 (Whereupon, at 5:50 p.m. the deposition was
10 concluded.)

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Jack R. Stanford
Deponent

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CERTIFICATE OF PROCEEDINGS

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

In the matter of: TEXAS UTILITIES ELECTRIC COMPANY, et al
(Deponent: Jack R. Stanford)
Date of Proceeding: Wednesday, July 25, 1984
Place of Proceeding: Glen Rose, Texas

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

Margaret K. Schneider
Official Reporter - Typed

Margaret K. Schneider
Official Reporter - Signature

CERTIFICATE OF PROCEEDINGS

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transcript for the file of the Commission.

Sandra Harden
Official Reporter - Typed

Sandra Harden
Official Reporter - Signature

CLEARANCE REQUIRED

Change affects system turn-over and clearance must be obtained by Startup Engineer prior to starting work.

INSTALLATION TO BE IN ACCORDANCE WITH PROCEDURES REFERENCED IN CPM-6.11

WELD DATA CARD

WDC Serial No. 40851

Drawing No. AF-1-SB-007 R.1

Weld No. FU400

LINE #	WPS #	REV#/ICN#	FABRICATION CODE & CLASS/ACC. STD.
<u>6: AF-1-SB-007 R.1</u>	<u>11030</u> <u>11031</u> <u>11010</u>	<u>7/0</u> <u>5/0</u> <u>3/0</u>	ASME III CPM 6.9 <u>3</u>

BASE MATERIAL	POSTWELD HEAT TREATMENT
HT # <u>3/215W-73</u> to HT# <u>NA</u> PC # <u>1AF-027</u> to PC# <u>303</u> P # <u>1</u> to P # <u>1</u>	TIME <u>NA</u> Hrs., TEMP. <u>NA</u> °F HEATING RATE <u>NA</u> °/Hr. <u>NA</u> SPECIFICATION WPS/CPM 6.9D

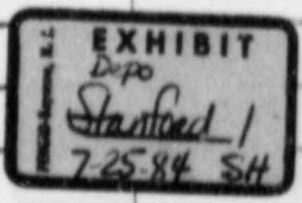
QT-QAP/REV	VT/11.1-26	PT/10.2-1	MT/10.2-2	RT/10.2-3	UT
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QC VERIF. DATE:	M.&T.E.	CALIB. DUE DATE	QC	WELD FILLER MATERIAL REQUIRED
				ROOT CLASS <u>E-7018</u> FILL CLASS <u>E-7018</u>

NOTES: (1) Applicable QC/ANI hold points shall be indicated by checkmark ✓.
 (2) ANI inspection points indicated by (X).
 (3) Denote Satisfactory inspection by an "S"; Unsatisfactory inspections by a "U".

PRODUCTION RELEASE

OPER. NO.	OPERATION	HOLD POINTS			CON	SAT. or UNSAT.	INSPECTION RESULTS (SIGN AND DATE)		
		WT	QC	ANI			QC or WT	NDE CERT. LEVEL	ANI
1	Verify Cut	X	NA	NC		Sat. JWR 1-3-84			
2	Cleanliness	NA	✓	NC		*UNSAT. JWR 1-3-84	II		
3	Fitup	NA	✓	NC		Sat. Stanford 1/14/84	II		452/1/14/84
4	Preheat	NA	✓	NC		Sat. Stanford 1/14/84	II		
5	Final VT	NA	✓	NC		Sat. Stanford 1/14/84	II		
6	Final MRP	NA	✓	NC		Sat. Stanford 1/14/84	II		
Reviewed: JWR 1-5-84									JWR 1-3-84
7A	Cleanliness	NA	✓	NC		*Sat. Stanford 1/14/84	II		
Reviewed: JWR 1-14-84									JWR 1-14-84
WE A.K. 11/3/84									



Approval signatures shall be affixed on the line immediately below the last stamp in each sequence:
 CMC # NA
 SWA # 15633 dty 1-5-84
 *Ref. NCR # M-12,382-S-11-3-84
 *Ref. Report of VCR # M-12,382-15-1/84

Stanford 1/14/84



Brown & Root, Inc.

Post Office Box 1001, Glen Rose, Texas 76043

QUALITY ASSURANCE DEPARTMENT
VISUAL EXAMINATION CHECKLIST

PROJECT: COMANCHE PEAK JOB NO. 35-1195 UNIT 1 PAGE 1 OF 1

DRAWING <u>AF-1-SB-007 NA</u>	SYSTEM <u>AF</u>	CLASS 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> OTHER <input checked="" type="checkbox"/>
WELD/ITEM NUMBER <u>FW-400</u>	LOCATION <u>EL 805' SB#1</u>	<u>Am T2</u>

Enter NA adjacent to attribute when not applicable. Enter Sat./Unsat. or NA above results in each section 1 through 4 as applicable.

WDC#40851

SKETCH AND REMARKS (8) QI-QAP 11.1-26 Rev. 14

CHECK LIST

1. FITUP (Prior and During)

Base Material	_____	Results	_____
Joint Design	_____	Sat	_____
Cleanliness	_____	Stanford II	1/16/84
Core Surface	_____	Inspector	Level
Joint Fitup	_____	DATE	_____
Joint Alignment	_____	QI-QAP 11.1-26 Rev. _____	_____
Socket Engagement	_____	Results	<u>NA</u>
Socket End Gap	_____	Inspector	Level
Inservice Inspection Stamp	_____	DATE	_____
<u>PURGE</u>	_____	QI-QAP 11.1-26 Rev. _____	_____
Orientation/Direction of Flow	_____	Results	_____

2. AFTER WELDING OF ROOT

External Surface	_____	Inspector	Level	DATE
Internal Surface	_____	QI-QAP 11.1-26 Rev. _____	_____	_____

3. COMPLETION OF WELD (ID)

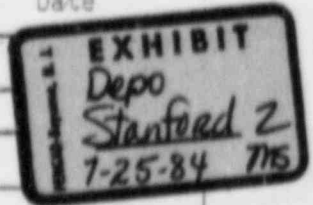
Surface	_____	Results	_____
Reinforcement	_____	NA	_____
Concavity	_____	Inspector	Level
Oxidation	_____	DATE	_____
Crater Fit	_____	QI-QAP 11.1-26 Rev. _____	_____
Unconsumed Inert	_____	Results	_____
In. Fusion (Ips, Penetration)	_____	Inspector	Level
Burn-Through	_____	DATE	_____
Undercut	_____	QI-QAP 11.1-26 Rev. <u>14</u>	_____

4. COMPLETION OF WELD (OD)

Surface	_____	Results	_____
Reinforcement	_____	Sat	_____
Undercut	_____	Stanford II	1/17/84
Filler Size	<u>NA</u>	Inspector	Level
Handing of Surface	_____	DATE	_____
Joint/Welder Inlets	_____	QI-QAP 11.1-26 Rev. _____	_____
Suitability of Surface for NDT	_____	Results	_____
Removal of Taps, Attachments	<u>NA</u>	Inspector	Level
Surface free from Arc Strikes	_____	DATE	_____
Weld Spatter, etc.	_____	QI-QAP 11.1-26 Rev. _____	_____
Purge Dam Removed	<u>NA</u>	Results	_____

QC Supervision _____ Date _____

WELDER PROCEDURE QI-QAP 11.1-26 Rev. _____ CERTIFICATION LEVEL _____





Brown & Root, Inc.


19726

QUALITY ASSURANCE DEPARTMENT MT/PT REPORT

PROJECT: COMANCHE PEAK JOB NO. 35-1195

UNIT 1 PAGE 1 OF 1

MT PT

Drawing AF-1-SB-007  System A.F.

WDC/Traveler # 40851
Class 3

View Item # F.W. 40C Location Ele. 805'-3 1/8" S.G.1 Rm. # 72

Mfg Stage FINAL NDE Procedure No API 10.2.1 Rev. 3

Equip/Mat'ls Mfg. MAGNAflux Acceptance Std. ASME Sec. III

Penetrant Batch # B1L071 Cleaner Batch # 83H100 Developer Batch # 82C090

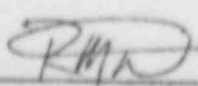
AC Yoke DC Prods NA Model # NA M&TE IRC # NA

Mat'l Type P-1 Mat'l Thickness 1/20 Diameter Length 6"

Sketch & Comments ID OD

No rejectable indications noted

EXHIBIT
Depo
Stanford 3
7-25-84 mw



Inspector Stanford Certification Level II Date 1-17-84 Results Accept Reject

DRAWING/IDENTIFICATION (REV)	TAG/ID NUMBER	LOCATION OR ELEVATION	RIR NO.
BAP AF-1-SB-007R/18	FW 40C	805'3 SB-1	

NONCONFORMING CONDITION	SUBSYSTEM	ROOM NO.
DOCUMENT VIOLATED: QIGAP 11-1-26	1 AF	72
REV. 14	PARA 5.2.1.1	TREND CATEGORY

WDC #40851 FOR FW 40C SHOWS A FINAL PT & VT SIGNED ORIGINALLY 1/14/84, BECAUSE OF AN INFORMATION RT REJECT, DATED 1/15/84 IN RT 30964, AN "IN PROCESS WELD REPAIR" WAS ISSUED BY WELD ENGINEERING WITH WELD TECH HOLD POINTS: PT AND VT HOLD POINTS ON WDC #40851 WERE SIGNED BY G.C. ENTRIES ON VT & PT WERE LINED THROUGH INITIALED AND DATED 1/17/84. BECAUSE IT APPEARS FINAL NDE WAS SIGNED AT TIME OF ISSUANCE OF RPS 1/16/84 ALL HOLD POINTS NEEDED TO BE ESTABLISHED & REVIEWED BY ANI

REPORTED BY: <i>[Signature]</i>	DATE: 1/24/84	REVIEW/APPROVAL	DATE:	C.A.R. NUMBER:
ACTION ADDRESSEE	'N' STAMPED ITEM YES <input checked="" type="checkbox"/> NO	NIS-2 REQUIRED YES <input checked="" type="checkbox"/> NO	ASME CODE ITEM: <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	

DISPOSITION: A-REWORK B-REPAIR C-USE AS IS D-SCRAP E-RETURN TO VENDOR

ENG. REVIEW/APPROVAL:	DATE:	QA REVIEW:	DATE:
CONST. REVIEW/APPROVAL:	DATE:	ANI REVIEW/CONCURRENCE:	DATE:
QC VERIFICATION:	DATE:	TUGCO QA REVIEW/APPROVAL:	DATE:
ANI CONCURRENCE:	DATE:	WESTINGHOUSE CONCURRENCE:	DATE:
QA REVIEW/CLOSURE:	DATE:		

EXHIBIT
 Depo
 Standard 4
 7-25-84 TRO

Change affects system turn-over and clearance must be obtained from the Startup Engineer prior to starting work.

REPAIR PROCESS SHEET

WDC Serial No. 40851
 Drawing No. AF-1-SB-002
 Weld No. FW-40C

RT REJECT # 30964

IN-PROCESS REPAIR CYCLE - DESCRIPTION OF DEFECT (SKETCH)

4-G, 6-8: POROSITY WITH TAILS
 E = .531
 RE-SHOOT 4-G, 6-8 AFTER REPAIR

RECORDED DIMENSIONS:
 Area of excavation measured 3 1/2" x 7 1/8" WDX -
 3/8" DP leaving an approximate root thickness of
 3/16" RBE



INSTALLATION TO BE IN ACCORDANCE WITH PROCEDURES REFERENCED IN CPM-6.11

OPER. NO.	OPERATION	HOLD POINTS			COM	"S" or "I"	INSPECTION RESULTS (SIGN AND DATE)			
		WT	QC	ANI			QC or WT	NDE CERT LEVEL	ANI	
WDC WELD MAJOR REPAIR										
4A	LAYOUT	X	NA	NA		S				
4B	GRIND	X	NA	NA		Sgt.			JWR 1-16-84	
4C	NT/PT CAVITY	X	NA	NA		Sgt.			Red Daming 1-16-84 PT II	
4D	EVALUATE EXCAVATION	X	NA	NA		Sgt.			Red Daming 1-16-84	
4E	CLEAN	X	NA	NA		Sgt.			Red Daming 1-16-84	
4F	PREHEAT	X	NA	NA		Sgt.			Red Daming 1-16-84	
4G	WELD: HOLD TO ^{12.00}	NA	NA	NA						
4H	GRIND & BLEND	NA	NA	NA						
4I	FINAL VT	X	NA	NA		Sgt.			JWR 1-17-84	
RETURN TO STEP # 5 OF WDC										
PREP: <u>QC 3/10/84</u>										
REVIEW: <u>Red Daming 1-16-84</u>										
AK Sta 1/18/84		OC			ANI			G&H		

Approval signatures shall be affixed on line immediately below the last step in each repair sequence.
 Base Metal Repair - WE, QC, COM, ANI
 Weld Metal Repair - WE, QC, ANI

EXHIBIT
 Depo
 Stanford 5
 7-25-84 mo