

ORIGINAL
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the matter of:

TEXAS UTILITIES ELECTRIC
COMPANY, et al

Docket No. 50-445-2
50-446-2

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

Deposition of: David N. Chapman

Location: Glen Rose, Texas

Pages: 76,500-76,631

Date: Thursday, August 2, 1984

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY & LICENSING BOARD

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

Glen Rose Motor Inn
Glen Rose, Texas

August 2 , 1984

Deposition of: DAVID N. CHAPMAN

called for examination by counsel for the Applicants
taken before Glenna M. Wright, Court Reporter,
beginning at 10:27 a.m., pursuant to agreement.

MILLERS FALLS
ZENASE
COTTON CONTENT

1 APPEARANCES:

2 For the Applicants, Texas Utilities Electric
3 Company, et al:

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14 Energy:

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I N D E X

<u>WITNESS</u>	<u>DIRECT</u>	<u>CROSS</u>	<u>REDIRECT</u>	<u>RECROSS</u>
David N. Chapman	76,503	76,539 76,629	--	--

E X H I B I T S

<u>NUMBER</u>	<u>FOR IDENTIFICATION</u>
Chapman Exhibit No. 1	76,504
Chapman Exhibit No. 2	76,505
Chapman Exhibit No. 3	76,506
Chapman Exhibit No. 4	76,507
Chapman Exhibit No. 5	76,511
Chapman Exhibit No. 6	76,519
Chapman Exhibit No. 7	76,523
Chapman Exhibit No. 8	76,582

* * *

P R O C E E D I N G S

10:27 a.m.

1
2
3 MR. BELTER: On the record.

4 My name is Leonard Belter, on behalf of the
5 Applicants.

6 We're continuing here this morning with
7 the deposition of Mr. David N. Chapman, who has been
8 previously sworn.

9 Counsel present are Anthony Roisman and
10 Dick Bachmann.

11 Whereupon,

12 DAVID N. CHAPMAN

13 the deponent, having been previously duly sworn, was
14 examined and testified further upon his oath as follows:

DIRECT EXAMINATION

15
16 BY MR. BELTER:

17 Q. Mr. Chapman, in your earlier deposition
18 at transcript page 35,642, I'd like to show you that page
19 for a moment and ask you is there a clarification that
20 you would like to make with respect to your answer in
21 the middle of that page?

22 A. Yes, there is.

23 My response, actually beginning on line 16
24 and continuing through 18, was that if the individual
25 that had a concern did not feel comfortable doing any

1 of the things that I had previously mentioned, they could
2 go to the NRC, but that was a very recent addition to
3 our established policy.

4 Obviously, that's not what I intended to
5 say. I was really referring to the ombudsman which was
6 the recent addition to our policy. It had always been
7 a policy that if they wanted to, they could go to the
8 NRC.

9 Q. Mr. Chapman, at various points in the record
10 there have been questions and answers given with relation
11 to the current program or policy for dealing with allega-
12 tions of harassment or intimidation.

13 I'd like to show you several memos that
14 relate to that policy.

15 First, could I have a one-page memorandum
16 dated November 8, 1983, from D. N. Chapman to R. G. Tolson
17 titled "Assignment of Boyce Grier" marked for identification.
18 I believe this would be Chapman Exhibit 1, and I have
19 copies for the reporter and counsel.

20 (The document referred to was
21 marked Chapman Exhibit No. 1
22 for identification.)

23 Have you seen that memorandum before,
24 Mr. Chapman?

25 A. Yes, I have.

1 Q. Could you describe it briefly, please?

2 A. It is a memorandum from me to Mr. R. G. Tolson
3 notifying him of the assignment of Mr. Boyce Grier to
4 the jobsite with his primary responsibility being that
5 of investigating concerns expressed by employees, any
6 and all concerns.

7 Q. And next I'd like a three-page document,
8 the cover page of which is office memorandum dated
9 November 16, 1983, from D. N. Chapman to distribution
10 entitled "QA/QC Questionnaires for Personnel Leaving QA
11 Department" marked as Chapman Exhibit 2.

12 (The document referred to was
13 marked Chapman Exhibit No. 2
14 for identification.)

15 Do you recognize Chapman Exhibit 2 for
16 identification?

17 A. Yes, I do.

18 Q. Would you briefly describe that, please?

19 A. It is a blank questionnaire form to be
20 filled out by all employees of the Quality Assurance/Quality
21 Control Department as they leave their employment with
22 the department.

23 Q. And next, a three-page document, the cover
24 page of which is dated January 3, 1984, office memorandum
25 from D. N. Chapman to distribution entitled "Policy for

1 Investigating QA/QC Allegations" marked as Chapman Exhibit
2 3 for identification.

3 (The document referred to was
4 marked Chapman Exhibit No. 3
5 for identification.)

6 Do you recognize Chapman Exhibit 3 for
7 identification?

8 A. Yes.

9 Q. And would you briefly describe that, please?

10 A. Well, let me look at it just a minute
11 and familiarize myself.

12 Okay. This is the memo that basically for-
13 malized our system for tracking the investigation of concerns
14 that are brought to our attention through previously
15 established means. This basically set up our QAI system.

16 MR. BELTER: Counsel, I'm going to offer
17 Chapman Exhibits 1, 2, and 3 for identification into evidence.
18 Does anyone have any objection?

19 MR. ROISMAN: No objection.

20 MR. BACHMANN: No objection.

21 MR. BELTER: Thank you.

22 BY MR. BELTER:

23 Q. Mr. Chapman, you testified previously that
24 you had become aware of an allegation of harassment or
25 intimidation made by a Mr. Charles Atchison with respect

1 to his termination.

2 Let me ask you, sir, whether or not you
3 received any documents or reports from the Nuclear
4 Regulatory Commission in connection with those allegations?

5 MR. ROISMAN: Excuse me, Mr. Belter. Is
6 Mr. Chapman going to discuss the Atchison event or subse-
7 quent conduct by the company with respect to the Atchison
8 event?

9 MR. BELTER: Subsequent conduct by the
10 company.

11 MR. ROISMAN: All right. I'm sorry. I
12 just wanted to make sure we didn't have a problem.

13 THE WITNESS: And the question was did
14 I receive any NRC reports or documents relative to the
15 Atchison --

16 BY MR. BELTER:

17 Q. Yes.

18 A. Yes. I have seen some, yes.

19 MR. BELTER: Could I have a seven-page
20 document, the cover page of which is dated September 12,
21 1983, a letter from G. L. Madsen, Chief, Reactor Project
22 Branch to Texas Utilities Generating Company, attention
23 R. J. Gary, marked as Chapman Exhibit 4 for identification?

24 (The document referred to was
25 marked Chapman Exhibit No. 4
for identification.)

1 BY MR. BELTER:

2 Q. Do you recognize Chapman Exhibit 4 for
3 identification, Mr. Chapman?

4 A. Yes.

5 Q. Is there a portion of that exhibit which
6 relates to the allegations made by Mr. Atchison?

7 A. Yes, there is.

8 Q. Could you point that out to us in the exhibit,
9 please?

10 A. It is on page 3 entitled "Details,"
11 paragraph two. The beginning of the paragraph states
12 that an allegation was received by the NRC that the
13 dismissal of Mr. Atchison may have had a negative or
14 chilling effect on the preparation and/or issuance of
15 NCRs at CPSES.

16 Q. And does the relevant part conclude at
17 page 4 with the sentence that appears about a third of
18 the way down from the top of the page indicating the
19 allegation was found to be unsubstantiated and without
20 merit?

21 A. Yes, it does.

22 Q. Do you recall approximately when you received
23 this?

24 A. The latter part of 1983 sometime, probably
25 in the November/December time frame. I don't recall exactly

1 when.

2 Q. And what was your reaction, if any, to
3 receipt of this document?

4 A. Well, it didn't surprise me. It basically
5 reinforced the conclusion that I had already drawn quite
6 some time previous to that. As a matter of fact, it pointed
7 out that contrary to a chilling effect, there had been
8 an increase in the number of NCRs issued in the six-month
9 period after his dismissal compared with the six-month
10 period prior to his dismissal.

11 MR. BELTER: Could I have a --

12 MR. ROISMAN: Excuse me, Mr. Belter.

13 Can I ask a question?

14 This document, Chapman Exhibit 4, I assume
15 you're not offering it in evidence; is that correct?

16 MR. BELTER: I am going to offer it into
17 evidence, yes.

18 MR. ROISMAN: You are. Okay.

19 Well, it relates to the questions and answers
20 that you just received.

21 Is it your position that it is relevant
22 in this proceeding for the truth of the matters stated
23 in it or that it is relevant in this proceeding as evidence
24 of what Mr. Chapman believed the NRC's position was?

25 MR. BELTER: It is relevant in this

1 proceeding for two purposes. First, with respect to
2 Mr. Chapman's state of mind and reaction or lack of
3 reaction to the allegations made by Mr. Atchison.

4 And, second, it is relevant for establishing
5 at least in his mind that this investigation was conducted
6 and that these conclusions were made.

7 It is not being offered for the truth of
8 the statement, for example, in the investigation, which
9 you are free to dispute, that the allegation was
10 unsubstantiated and without merit. But, obviously, as
11 a manager, he's entitled to conclude on or take into
12 consideration the action of the NRC with respect to the
13 allegation that was made, and that's all we're offering
14 it for.

15 MR. ROISMAN: Okay. So you are offering
16 it as a part of the basis for whatever conduct he did
17 or did not take.

18 MR. BELTER: That's correct.

19 MR. ROISMAN: All right. Thank you.

20 MR. BELTER: Could I have a --

21 Do you have any objection to it on that
22 basis?

23 MR. ROISMAN: No, I do not.

24 MR. BELTER: Mr. Bachmann?

25 MR. BACHMANN: I have no objection.

1 MR. BELTER: I offer it into evidence,
2 then.

3 Could I have a large document dated
4 November 3, 1983, from the United States Nuclear Regulatory
5 Commission entitled "Report of Investigation," and it
6 is Case No. 4-83-013, marked as Chapman Exhibit 5 for
7 identification?

8 (The document referred to was
9 marked Chapman Exhibit No. 5
10 for identification.)

11 BY MR. BELTER:

12 Q. Mr. Chapman, have you seen Chapman Exhibit 5
13 for identification previously?

14 A. Yes, I have.

15 Q. Do you recall approximately when you saw
16 this document?

17 A. It was also sometime at the end of 1983.

18 Q. What was your reaction, if any, to this
19 document?

20 A. Much the same as the previous one you asked
21 me about. It substantiated what I had previously concluded
22 through my management communication channel.

23 Q. In reviewing the document, did you accept
24 the extent of the effort described in the document that
25 the NRC had undertaken to investigate this allegation?

1 A. I'm sorry. I don't understand exactly
2 what --

3 Q. Did you conclude that, for example, the
4 matters shown in the summary indicating that 62 inspectors
5 were interviewed, did you accept that as an accurate
6 portrayal of the extent of the investigation that the
7 NRC had conducted?

8 MR. ROISMAN: Objection. There's no basis
9 laid that the witness knows what the NRC's investigation
10 consisted of, whether he had any personal knowledge of
11 it.

12 MR. BELTER: Your objection is noted.
13 My question is when he read the document, in his own state
14 of mind, did he make the reasonable assumption that most
15 of us would make that 62 inspectors were interviewed.

16 BY MR. BELTER:

17 Q. Did you accept that?

18 A. I accepted it, and I accepted -- I had
19 no reason to dispute anything in the report, basically.
20 That's not the -- The report is not the basis -- the sole
21 basis for my conclusion that there was no systematic
22 harassment or intimidation at Comanche Peak. This just
23 is another independent example or independent assessment
24 that really substantiates what I had already determined
25 to be so.

1 MR. BELTER: I would offer Chapman Exhibit 5
2 into evidence.

3 MR. ROISMAN: For what purpose?

4 MR. BELTER: For the same purpose, to show
5 Mr. Chapman's state of mind, the reconfirmation of his
6 belief that no further action was necessary, and that
7 he didn't take any further action with respect to
8 Mr. Atchison.

9 MR. ROISMAN: I don't believe at this time
10 that he has testified, but maybe I am mistaken on this,
11 what, if any, portions of this report he relied upon to
12 help form the basis for that decision.

13 Therefore, before we let it in, I want
14 to know whether he relies on the whole thing or just
15 the summary or just the interview with, you know, "X"
16 or something like that.

17 Can he just be asked that as a foundation
18 question?

19 MR. BELTER: Sure, as a foundation question.

20 BY MR. BELTER:

21 Q. Mr. Chapman, with respect to this document,
22 in formulating your reaction with respect to the Atchison
23 allegations, did you basically rely on the entire document,
24 or was there only a portion of it that you relied upon?

25 A. As I recall, I read all of the summary

1 and just -- and most of the interviews or some of them,
2 I would say, and kind of looked with not a lot of great
3 detail at the signed statements in the back to see what
4 it was they were saying.

5 And so I guess I would say that I basically
6 used the whole document. I determined that the summary
7 appeared to be an accurate reflection of what was contained
8 in the details.

9 MR. BELTER: Do you have any further voir
10 dire on that, Tony? I'd rather not move off of it as
11 long as we are on it. I think that adequately --

12 MR. ROISMAN: I actually do, if it is all
13 right.

14 MR. BELTER: Fine.

15 VOIR DIRE EXAMINATION

16 BY MR. ROISMAN:

17 Q. Mr. Chapman, after you completed reading
18 the summary, you said, I believe, that you looked at some
19 of the interviews.

20 Are those the ones that are summarized through
21 page 6 or the ones that are actually set out starting
22 on page 7 in more detail, or just give me a little bit
23 more information what you really read.

24 A. I read the summary. I read the background.
25 I read the page 3 entitled "Interview of Brown & Root,

1 Incorporated, QC Inspectors," and basically a summary
2 of those. Then beginning on page 6, "Interview of Former
3 QC Inspectors," I read --

4 I don't recall whether I read all of those
5 or not. I know I didn't read word for word all of the
6 signed statements that appear after those.

7 Does that answer your question?

8 Q. Well, let's break it up. Through page 19,
9 did you read everything through page 19?

10 A. I cannot testify whether I read everything
11 through page 19 or not. It is very likely that I did
12 not. I read portions of it. Basically, the summary was
13 what I was interested in.

14 Q. All right. What about starting on page 20
15 and through the remainder of the document? How much of
16 that did you read, if any?

17 A. Probably only a handful, four or five,
18 to get a flavor of what it was that they were swearing
19 to.

20 Q. So that if there was one in there that
21 said something that was contrary to what's contained
22 in the summary, even if it was only one isolated one,
23 your review wouldn't have necessarily found that one;
24 is that correct?

25 A. My personal review --

1 Q. Yes.

2 A. -- correct. I had some staff members that
3 read it all.

4 Q. And would that also be true of the informa-
5 tion contained between pages 6 and 19, that if there was
6 a statement in those pages that was supportive of the
7 allegation that there was pervasive harassment and
8 intimidation at the site but that was not contained in
9 the summary, that you may not have read that either?

10 A. I may not have; however, I think it is
11 much more likely that I read most, if not all, of that
12 portion than this latter portion that consists of signed
13 statements.

14 END OF VOIR DIRE EXAMINATION

15 MR. ROISMAN: Okay. Thank you, Mr. Chapman.

16 MR. BELTER: Let me just ask one or two
17 more, Tony, and then if you have an objection, I think
18 we've laid enough foundation for the Board to decide
19 what they want to do.

20 MR. ROISMAN: Okay. That's fine.

21 BY MR. BELTER:

22 Q. Mr. Chapman, you indicated that you had
23 staff members read the entire document. Did they report
24 back to you?

25 A. Yes. Informally. There was no written

1 reports.

2 The reason I didn't read many of those
3 was that it appeared that the scope of those signed
4 statements was very narrow and intended to establish
5 whether or not there had been harassment and/or intimidation,
6 and I could -- by reading several at random, I could see
7 that that's basically all that was being said back there
8 and there shouldn't be a lot of details. And there was
9 no reason to believe that the summary would be disputed
10 by any of those because it would be too easy to check.

11 Q. Was it the purpose of your brief review,
12 to the extent you made one, of the materials behind the
13 summary to ascertain whether, in fact, that the backup
14 supported the summary?

15 A. I'm not --

16 Q. Were you able to determine or make a
17 conclusion as to whether or not the materials behind the
18 summary supported the summary?

19 A. Yes. My review, together with the review
20 of my staff members, I think there was adequate reason
21 to conclude that the summary adequately reflected the
22 details. There was no reason to dispute it, in my opinion,
23 in the first place.

24 MR. BELTER: I will offer it, Tony. If
25 you have any objections to part of it, I think we can

1 just note it and let the Board decide what, if anything,
2 comes in.

3 MR. ROISMAN: That's fine. I would like
4 to object to everything beyond the summary.

5 MR. BELTER: Fine.

6 MR. ROISMAN: And the basis for that, briefly,
7 is that I don't believe the witness had enough familiarity
8 with the remainder to say that his subsequent actions
9 were based upon what is contained in there, but that it
10 was based instead upon what was contained in the summary.

11 MR. BELTER: Fine. I think the entire
12 document is admissible, and we'll just note your objection.

13 MR. BACHMANN: The Staff has no objections.

14 BY MR. BELTER:

15 Q. Mr. Chapman, you're aware, of course, of
16 a number of allegations that we've been dealing with in
17 the last couple of weeks with respect to harassment and
18 intimidation.

19 A. Yes.

20 Q. Has there been a recent report received
21 from the NRC that related to this generically?

22 A. Yes, there has been.

23 MR. BELTER: Could I have a six-page
24 document marked for identification? The first page is
25 a cover letter dated July 13, 1984, from Darrell G. Eisenhut,

1 Director, Division of Licensing, NRC to Mr. M. D. Spence,
2 and attached to it are pages 60, 61, 62, 63 of that report.
3 Marked as Chapman Exhibit 6.

4 (The document referred to was
5 marked Chapman Exhibit No. 6
6 for identification.)

7 BY MR. BELTER:

8 Q. Have you seen that report, portions of which
9 are marked as Chapman Exhibit 6, before?

10 A. Yes, I have.

11 Q. With respect to the portion of the report
12 that is under the title I, Formal Interviews of QA/QC
13 Personnel, which begins at the bottom of page 60 and
14 concludes at the bottom of page 63, would you tell us,
15 please, what was your reaction to that report and what
16 action, if any, did you take?

17 A. My reaction, again, was that this was another
18 independent confirmation of the conclusions that I had
19 already reached as to whether or not there was harassment
20 and intimidation of QC inspectors at Comanche Peak.

21 As to what action I took, if any, I didn't
22 take any specific action other than to read this report.

23 MR. BELTER: Gentlemen, I'm going to offer
24 the portion of the report that I've had marked for
25 identification into evidence. Obviously, if anyone wants

1 any other items in the report, I wouldn't object to you
2 putting them in. It is our position that only the pages
3 that I have excerpted are relevant to the issue before
4 us.

5 MR. ROISMAN: Is this being offered, again,
6 for the same --

7 MR. BELTER: The same reason.

8 MR. ROISMAN: Just for the record, will
9 you just state it again so --

10 MR. BELTER: The reason is to show that
11 Mr. Chapman, Manager of Quality Assurance, received the
12 document, accepted it and its conclusions, reconfirmed
13 his own state of mind that had previously existed, and
14 felt no further action, at least in response to this portion
15 of the report, was necessary.

16 MR. ROISMAN: And may I ask the witness
17 a question?

18 MR. BELTER: Sure.

19 VOIR DIRE EXAMINATION

20 BY MR. ROISMAN:

21 Q. Mr. Chapman, is it your testimony that
22 you personally read these very pages that are attached
23 here beginning at the bottom of page 60 under the category
24 I, Formal Interviews of QA/QC Personnel, and ending at
25 the bottom of page 63?

1 A. Yes, it is.

2 Q. Was this the only portion of the report
3 that you read that had any impact on your judgments
4 regarding the existence or non-existence of harassment
5 and intimidation at the Comanche Peak site?

6 A. I'll try to answer your question. That's
7 kind of difficult to answer.

8 I did read other portions of the report.
9 Whether or not they contributed to the overall assessment
10 or whether -- I can testify that there was nothing that
11 I read elsewhere in the report that would cause me to
12 doubt what the truth of what is written in this portion.

13 END OF VOIR DIRE EXAMINATION

14 MR. ROISMAN: Okay. I have no objection
15 to it going in and, particularly, Len, with your previously
16 stated qualification. I don't have a copy of the full
17 report here in front of me. I seem to remember there
18 was another portion in the report, maybe a more summary
19 portion, that also discussed this point.

20 THE WITNESS: I think there may have.

21 MR. ROISMAN: I may want to find out
22 whether the witness and have some questions about it,
23 but we'll have to wait until we take some kind of a break
24 for me to go back and get a full copy of the report.

25 MR. BELTER: I have no objection to any

1 other portions of the report if you want to put them in
2 or if you want to get them and ask further questions on
3 it.

4 MR. ROISMAN: Okay.

5 MR. BELTER: So long as the questions are
6 relevant to the issue before us.

7 MR. ROISMAN: Right. Obviously.

8 MR. BACHMANN: The Staff has no objections
9 to moving this into evidence.

10 BY MR. BELTER:

11 Q. Mr. Chapman, sometime in mid-1983 did you
12 become aware of some allegations of threats and harassment
13 by Darlene Steiner?

14 A. Yes. I'm trying to remember the time frame,
15 whether it was mid-1983. Probably --

16 Q. '82, I meant. Did I say '82?

17 A. I think it was '82.

18 Q. I meant to say '82. Excuse me.

19 A. And I think it was in the third quarter
20 of '82, along about September.

21 Q. Did you cause an investigation to be conducted
22 with respect to those allegations?

23 A. Yes, I did.

24 MR. BELTER: Can I have a document marked
25 for identification, a multi-page document, the first

1 page of which is office memorandum dated September 24,
2 1982, to file, subject: allegations of threats and
3 harassment by Darlene Steiner? It is a five-page report
4 signed by David L. Andrews with nine attachments, each
5 attachment being a report of an interview. Marked as
6 Chapman Exhibit 7 for identification.

7 (The document referred to was
8 marked Chapman Exhibit No. 7
9 for identification.)

10 BY MR. BELTER:

11 Q. Mr. Chapman, have you seen Chapman Exhibit 7
12 before?

13 A. Yes, I have.

14 Q. And is this a report of an investigation
15 received by you with respect to the allegations made by
16 Darlene Steiner?

17 A. Yes, it is.

18 Q. Who conducted the investigation?

19 A. David Andrews did. I was also in attendance.
20 And I believe a Brown & Root attorney was there, Mr. McLain.

21 Q. Could you summarize briefly the results
22 of that investigation?

23 MR. ROISMAN: Excuse me. I'm a little
24 unclear. The question you just asked him is whether he
25 was in attendance at the interview with Ms. Steiner.

1 MR. BELTER: No. I'm sorry. He volunteered
2 that he was in attendance, and we'll clear that up.

3 MR. ROISMAN: Okay. All right.

4 BY MR. BELTER:

5 Q. Why don't we clear that up before you answer
6 my other question, Mr. Chapman.

7 Were you present at any of the interviews?

8 A. Yes, I was.

9 Q. Were you present at all of them, or do
10 you recall which ones you were present at?

11 A. I was present at all of them. There were
12 one or two of them that I stepped out of for a short period
13 of time, but, basically, the -- I know Ms. Steiner's I
14 was there throughout. Ms. Sanchez's I was there throughout.
15 Phyllis May I was there throughout.

16 And the others I would have to think a
17 little bit on and try to refresh my memory, but I was
18 there with the exception of five or ten minutes there
19 during all of them.

20 Q. As a result of the investigation, did you
21 take any further action with respect to these allegations?

22 A. None other than to make sure that the manage-
23 ment involved stayed alert to any further allegations
24 so that we could investigate them if they came up.

25 Q. Did you reach any conclusion as to the

1 validity of the allegations?

2 A. Yes. The conclusion was that the allega-
3 tions were invalid, were not true.

4 Q. And was that conclusion based upon the
5 results of the interviews that are summarized in this
6 report?

7 A. Yes.

8 MR. BELTER: I would offer Chapman Exhibit 7
9 for identification into evidence.

10 MR. ROISMAN: And the purpose?

11 MR. BELTER: The purpose is to show
12 Mr. Chapman's actions with respect to the allegations
13 he received, the scope of the investigation conducted,
14 the results of that investigation, and his state of mind,
15 his reasons for taking the action he did and not taking
16 any further action.

17 MR. ROISMAN: Are you offering any portions
18 of the document for the truth of the statements contained
19 therein?

20 MR. BELTER: No. We're offering them to
21 show that this is what the interviewed persons said and
22 that Mr. Chapman accepted their representations.

23 MR. ROISMAN: Well, I don't feel there's
24 a basis yet for indicating that this is to be the -- that
25 this is what the interviewed persons said until

1 Mr. Chapman indicates that he's reviewed each of the reports
2 of each interview and that he believes that that's what
3 was said there.

4 MR. BELTER: You may ask him that question,
5 if you wish, to decide the scope of your objection, if
6 any.

7 MR. ROISMAN:

8 VOIR DIRE EXAMINATION

9 BY MR. ROISMAN:

10 Q. Mr. Chapman, have you had occasion to review
11 the reports of interviews that are contained in the back
12 of this document?

13 A. Yes, I have.

14 Q. All right. And is it your testimony that
15 each of these reports of interview is a full and complete
16 and accurate report of what transpired at the interview?

17 A. Yes.

18 Q. And to the best of your personal knowledge,
19 there were no additional matters that transpired at that
20 interview that are not summarized here?

21 A. That's correct.

22 Q. And that the information accurately
23 summarizes the things that did transpire?

24 A. Yes.

25 Q. And that you adopt the summary as it had

1 been written by you, for all practical purposes?

2 A. Yes.

3 END OF VOIR DIRE EXAMINATION

4 MR. BELTER: Based on those answers,
5 Mr. Roisman, do you have an objection?

6 MR. ROISMAN: I have no objection.

7 MR. BACHMANN: The Staff has no objection.

8 BY MR. BELTER:

9 Q. Mr. Chapman, turning to another subject,
10 your QAI files indicated several instances where persons
11 have been counseled with respect to their conduct as a
12 result of an allegation made by another person and that the
13 person raising the allegation has been advised of the
14 action taken.

15 Can you tell us why it is that you do not
16 formally publicize such actions beyond reporting them
17 back to the person that raised the matter?

18 A. It is our policy not have public discipline,
19 for obvious reasons of rights of privacy and just basic
20 good management. We feel that if the person making the
21 complaint is satisfied with the results of our corrective
22 action that in -- unless there's some extreme circumstances
23 that I have not run into yet, there would be no reason
24 to have a public display of some disciplinary action taken.

25 Q. I'm not going to throw a hypothetical

1 at you that has not arisen yet, but do I understand from
2 your answer that a situation warranting public discipline
3 conceivably might arise? You're not eliminating all
4 possibilities of that happening?

5 A. No, I'm not. I'm just saying that it hasn't
6 arisen yet. I guess the only thing I can think of right
7 offhand is if somebody -- someone intimidated or otherwise
8 harassed a QC inspector and then proceeded to go around
9 the site bragging about it, that would warrant some public
10 discipline, at least as widespread as the original bragging.
11 But that has not happened.

12 Q. Turning to another subject, Mr. Chapman.
13 Gordon Purdy Exhibit No. 42 in this proceeding consists
14 of a series of summaries made by a body which you have
15 previously described as the management review board,
16 summaries made with respect to a series of interviews
17 conducted back in 1979.

18 Are you familiar with those documents that
19 comprise Gordon Purdy Exhibit 42?

20 MR. ROISMAN: Excuse me. I believe the
21 Exhibit is 42-1. The 42 indicates the room number that
22 the deposition was in. Without the 1, we won't know
23 which exhibit it is.

24 MR. BELTER: I can correct the record,
25 then, with respect to the panel discussion last night.

1 I think that whole discussion talked about it as 42, but
2 as long as that's clear --

3 MR. ROISMAN: I kept saying 42-1 in last
4 night's discussion.

5 MR. BELTER: Well, thank you for the
6 clarification.

7 MR. BACHMANN: The 42 did very definitely
8 refer to the room number.

9 MR. BELTER: I'm sure of that, but just
10 so that we're clear on what everybody was talking about
11 the other night, it was the same -- I think it was the
12 same exhibit. We all know what that exhibit is.

13 MR. ROISMAN: We know what we're talking
14 about, yes.

15 BY MR. BELTER:

16 Q. Did you receive copies of those documents
17 comprising Purdy Exhibit 42-1?

18 A. Are you referring to the summaries with
19 the alphanumeric codes on them that the management review
20 board used for their own personal use in note taking to
21 develop their -- to be able to develop their report?

22 Q. No, sir. Can we for purposes of clarifica-
23 tion refer to those as interview sheets, a number of which,
24 I believe, we marked as Boren Exhibit 1.

25 MR. BACHMANN: Excuse me, Mr. Belter.

1 Do you intend on fairly extensive questioning on this
2 exhibit because if so I'd like to have an opportunity
3 to get my copy?

4 MR. BELTER: I think you might want to
5 get your copy, and I have a copy here before me. I don't
6 have extensive questions on that, and I'm not going to
7 go into it.

8 MR. BACHMANN: It will just take me a moment.
9 I'll get it right outside.

10 MR. ROISMAN: Wait. Wait. Wait. Do you
11 need yours in particular because we have an extra one?

12 MR. BACHMANN: I think I do.

13 MR. BELTER: Why don't we take a short
14 break.

15 (A short recess was taken.)

16 MR. BELTER: Back on the record.

17 BY MR. BELTER:

18 Q. Mr. Chapman, would you take a look briefly,
19 please, at what is marked as Purdy Exhibit 42-1.

20 A. Okay.

21 Q. Did you discuss the contents of this exhibit
22 with the members of the management review board?

23 A. Yes, I did.

24 Q. What steps, if any, did you take in response
25 to the concerns identified in the various documents that

1 comprise Purdy Exhibit 42-1?

2 A. Well, there was several management actions
3 that took place, the most immediate of which was after
4 discussions between Mr. Tolson and me, he set about a
5 process of small group meetings in his office on a daily
6 basis. I think he had them before work hours, 7:00 o'clock
7 every morning, for several weeks until he had talked to
8 all the inspectors involved, and to solve the problems
9 that were under his jurisdiction and to -- basically,
10 to communicate the commitment that management had to them
11 on a personal basis to resolve these matters to everyone's
12 satisfaction.

13 Q. These were QC inspectors?

14 A. QC inspectors, yes.

15 In addition to that, I called a meeting
16 with TUGCO senior management. That included executive
17 vice presidents, both over QA/QC and over the construction,
18 and, also, there were site construction and QA management.
19 I was there, and the review team that did the study was
20 there. And the team member gave a presentation to this
21 senior management group going over the items that they
22 had found that needed management attention and answering
23 any questions that our senior management had.

24 Q. Were there any other meetings that you
25 attended?

1 A. Yes. Since -- As a result of this first
2 meeting there were obviously some things which needed
3 to be addressed not only through QA management that I
4 could handle directly but also through construction manage-
5 ment, and that was the purpose of having the first meeting.
6 There were some matters such as pay policies and so forth
7 that needed to be addressed through Brown & Root's corporate
8 office in Houston.

9 So after the construction senior management
10 had heard the concerns that were being expressed by the
11 inspectors -- Bear in mind, our whole intent on this
12 first cut to talk to everybody was to elicit whatever
13 was on their mind, concerns, whether -- And their charter
14 was not to determine whether their concern had merit.
15 We wanted to know what was going on in their minds, get
16 it on the table. So -- And with that -- In that context,
17 we presented it to construction management so they could
18 hear what the concerns of the QC people were, address
19 those concerns. If it involved craft/QC interface, they
20 could address those concerns from a craft management,
21 construction management standpoint. And so that all levels
22 of management were involved in reaching the objective
23 that we knew we wanted.

24 Shortly after that, I guess it was a couple
25 of weeks, roughly, we had another meeting at the site

1 with our -- again, our senior management. We had Brown &
2 Root senior management there, both construction and QA
3 corporate, and to resolve and work out the pay equity
4 considerations that we had been working on at the manage-
5 ment level for some time to finally resolve the issues
6 that needed their attention.

7 Q. Just -- Go ahead.

8 A. Well, then sometime later, I think it was
9 about five months, in order to verify that these management
10 actions that we had taken had been effective and
11 accomplished what we wanted to do, I commissioned an audit
12 by the Dallas audit group to come down and verify that
13 the things that we had done had been effective.

14 Q. Just to tie part of your answer up with
15 other depositions, Mr. Chapman, were the interview
16 sessions that Mr. Tolson had with the small groups
17 of inspectors occasionally referred to as fireside
18 chats?

19 A. Yes. That's what he -- That's his term
20 he gave them. That was a popular phrase during that
21 period of time.

22 MR. ROISMAN: This was in the early
23 forties?

24 (Laughter.)

25 THE WITNESS: No. It was during 1979

1 when the President of the United States liked to refer
2 to fireside chats.

3 MR. ROISMAN: Oh, that fireside chat.

4 MR. BACHMANN: So soon you forget.

5 BY MR. BELTER:

6 Q. With respect to this follow-up audit,
7 is that the -- Was that follow-up audit documented
8 in any fashion?

9 A. Yes, it was, just as any other audit
10 in our auditing system is documented.

11 MR. BELTER: I don't recall the exhibit
12 number, Tony.

13 MR. ROISMAN: Panel Anderson --

14 MR. BELTER: Panel Anderson --

15 MR. ROISMAN: -- Exhibit 1.

16 MR. BELTER: -- Exhibit 1. Thank you.

17 We'll -- I don't intend to get into
18 that at this point. You may.

19 MR. ROISMAN: Do you want for the record
20 to indicate why we just had that conversation? You
21 want him to say that --

22 MR. BELTER: I will recite that there
23 was discussion in other depositions about the follow-up
24 audit that he has mentioned, and the document referred
25 to is Anderson Panel or Panel Anderson Exhibit 1.

1 If we get into it, we can know what we're referring
2 to.

3 MR. ROISMAN: Okay.

4 BY MR. BELTER:

5 Q. Mr. Chapman, turning to another subject,
6 a number of allegations have been made in these depositions
7 in recent weeks relating to the issue of harassment
8 and intimidation of QC inspectors.

9 Without characterizing the validity
10 of any of these allegations, do you have an opinion
11 as to whether or not, regardless of whether the allegations
12 are valid or invalid, the quality assurance program
13 at Comanche Peak has effectively performed its function?

14 A. Yes, I do.

15 Q. And what is that opinion?

16 A. As far as the allegations, numbers of
17 them, have had no adverse effect on the effectiveness
18 of the quality assurance program at Comanche Peak.

19 Q. And what is the basis for that opinion?

20 A. Well, I think, first of all, you've
21 got to consider the numbers of situations on a project
22 of this magnitude that anyone would, I think, agree
23 could lead to a confrontational situation, and there
24 are several types. In fact, I'm sure I could think
25 of more than what I'm about to tell you.

1 First of all is the obvious relationship
2 on a day-to-day basis that a supervisor has with his
3 subordinates. We all, I think, would agree that nobody
4 always agrees with his boss.

5 Secondly, on this project you have the
6 QC inspector who is passing judgment on the work of
7 the craft, and this is the major, I guess, potential
8 for a situation where disagreement could occur. And
9 we've had hundreds of thousands of QC inspections on
10 this project.

11 Then there's also the situations where
12 auditors are constantly passing judgment on the work
13 of others, including other QA/QC people.

14 And that's just to name a few of the
15 major ones, but when you consider that -- I think on
16 this project so far we've had between 60 and 70,000
17 nonconformance reports and unsatisfactory inspection
18 reports written, those are documented, recorded instances
19 where one person has rejected another person's work.

20 When you consider that an inspection
21 report itself, for instance, may have as many as 15
22 or more attributes that the inspector looks at, coupled
23 with the number of inspections that are done down here,
24 the potential is just astronomical for disagreements
25 to arise.

1 When you look at the actual nonconformances
2 that I talked about, 60 to 70,000, you see that a lot
3 of those situations have come up.

4 Now, whether you adopt the number of
5 allegations that have been made recently as -- Whether
6 you agree or disagree with the total number -- I'm certainly
7 not prepared to agree that all of them represent, in
8 fact, instances of harassment and/or intimidation. But even
9 if you did agree, that number, whatever it is, compared
10 with the opportunities for having that situation arise,
11 whether you adopt that number or whatever number we
12 would come up with, I think you have demonstrated that
13 the record relative to harassment and intimidation
14 at Comanche Peak is outstanding and that it is not
15 an issue that has affected the quality assurance program
16 adversely.

17 Q. When you say "that number," being the
18 number of allegations, for example, raised during the
19 last several weeks of depositions, could you give us
20 an approximation of the number you're talking about
21 that pales in significance? Is it in the area of 20,
22 25?

23 A. I was thinking it's -- I don't know
24 the exact number. Probably, I guess, 20, 30. But
25 the order of magnitude is really what I'm talking about

1 as opposed to the exact number, and I'm not saying
2 that even one instance of intimidation is not -- is
3 insignificant. That's not what I'm trying to say.
4 I'm not going to take the position that it is all right
5 to intimidate or harass somebody if you don't do it
6 very often. I'm not saying that, and I think our record
7 demonstrates that we don't believe that.

8 But we are dealing with human beings
9 here who, unfortunately, aren't perfect, and given
10 as many opportunities as imperfect human beings have
11 to reach a confrontation stage that could be called
12 intimidation, then I think that is a very good record.

13 MR. BELTER: I believe that's all I
14 have.

15 Can we take a short break so I can check
16 my notes?

17 (A short recess was taken.)

18 MR. BELTER: Back on the record.

19 That is all the questions I have.

20 MR. ROISMAN: I thought you'd have something
21 more. Now I need a minute. I'm sorry.

22 MR. BACHMANN: Why don't we just go
23 off the record so we don't pick up little conversations
24 and things.

25 (A short recess was taken.)

CROSS-EXAMINATION

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BY MR. ROISMAN:

Q. Mr. Chapman, I'd like to examine first with you the last testimony that you just gave relating to your general conclusions about the quality assurance program's effectiveness at Comanche Peak. And I believe that you answered a question that you believe that it was an effective program that was performing its functions.

A. Yes, I did.

Q. Can you tell me what would the program have to indicate for you to conclude that it was not effective in performing its function?

I don't want you to tell me the worst case. I want you to tell me the first sign. What would be the things that would make you say I don't think it is working?

A. Well, I guess the first answer would be something that -- A point that I really left out in my response before is that I would expect to see an unsafe condition in the plant. And, to my knowledge, none of the allegations to date has indicated an unsafe condition in the plant, which really the bottom line is the health and safety of the public.

Q. To what extent would, in your judgment,

1 the presence of allegations about harassment and intimidation
2 make you be concerned that there might be a problem?

3 I know you discussed something about the relationship
4 between the number of allegations and the total number --

5 A. Right.

6 Q. -- of investigations and the total number
7 of opportunities for confrontation, et cetera.

8 Where in your judgment would it reach
9 the danger point in terms of the pervasive question,
10 not individually? I understand your question about
11 individually.

12 MR. BELTER: Do you understand the question?

13 THE WITNESS: I'm not sure. I thought
14 I did at first, but then as it was played out, I --

15 MR. ROISMAN: Let me try it again.

16 MR. BELTER: Are you asking him to speculate
17 on numbers or speculate on --

18 MR. ROISMAN: No. No.

19 MR. BELTER: -- the seriousness --

20 MR. ROISMAN: I'm not asking him to
21 speculate. I just want to know in his own judgment.
22 He used as an example the numbers. I don't want him
23 to give me a number answer unless that's appropriate,
24 but I want to know when in his judgment would the
25 allegations about harassment and intimidation reach the

1 point that he would begin to be concerned about the
2 pervasive nature as opposed to merely treating them
3 as the expected normal amount of friction that you
4 find on a large plant site.

5 MR. BACHMANN: Tony, excuse me. Could
6 we establish what the witness -- if the witness understands
7 the same thing that you mean by the words "pervasive
8 nature" because we've used that quite often.

9 MR. ROISMAN: I'm going to get that
10 now because he's going to give me an answer that I
11 hope is going to give us some understanding of that.

12 MR. BELTER: I don't know. The problem
13 I'm having is that if you tie -- Well, why don't you
14 go ahead and let's see where we get. You're obviously
15 asking a very hypothetical question. I'm not objecting
16 to it. Let's see what we get.

17 THE WITNESS: Let me make a statement
18 and see if it answers your question because I'm still
19 not completely clear on it.

20 MR. ROISMAN: Okay.

21 THE WITNESS: In the first instance,
22 in the first place, I, again, treat allegations, no
23 matter how many there are, as something to be serious
24 about and to deal with accordingly.

25 I would consider it affecting the quality

1 assurance program, again, when I started seeing that --
2 being able to determine that, number one, the intimidation
3 actually occurred. I'm very concerned there, numbers
4 aside.

5 Then if, as a result of that intimidation,
6 an unsafe condition in the plant was the result, then
7 I would be extremely concerned, again, numbers aside.

8 BY MR. ROISMAN:

9 Q. At what point would your concern rise
10 to the level that the answer to the question that you
11 were asked by Mr. Belter would change? The question
12 was: Has the QA program performed -- effectively performed
13 it function?

14 A. I think that would, again, go to the
15 amount of -- And, again, I'm going to have a hard time,
16 I can see, putting a demarcation line between no concern
17 and a lot of concern.

18 I'm concerned if allegations of intimidation
19 are confirmed. The first one, I was concerned. I
20 did something about it personally myself. If along
21 the way some others are confirmed, I get more concerned,
22 cause investigations to take place, whatever.

23 But my concern escalates, again, if
24 there is a safety issue connected with the construction
25 of Comanche Peak.

1 MR. BELTER: Tony, I'm going to object
2 to a similar question along the same lines on the grounds
3 that you're really asking for total speculation.

4 He's able -- He's testified that he's
5 able to reach a conclusion based upon the ball park
6 situation that he has been presented with here, the
7 20 or 30, whatever the number is in that ball park
8 that has been presented to him.

9 I don't think it is fair to ask him
10 to pick a number without having the allegations in
11 front of him and some feel for what they are. I mean,
12 if you're asking him to say 200, 300 without the 50,000
13 pages of transcript that we've got to detail what the
14 200 or 300 consists of, I don't see how he can speculate
15 with respect to that.

16 MR. ROISMAN: All right.

17 THE WITNESS: I might add something
18 that might clarify the thing.

19 It involves management judgment, and
20 it is conceivable, again, without speculating, that
21 it could be one that could cause me to have a very,
22 very serious concern if it were serious enough, not
23 only what the intimidation was but what the result
24 of it was in terms of plant safety.

25 It is possible that there could be

1 several others of a less serious nature, not only with
2 regard to what the actual intimidation was but, also,
3 with regard to what the result was in terms of plant
4 safety, that collectively would not be as serious in
5 my mind as the one singular.

6 All I can say is that nothing has happened
7 to this date to make me get close at all to thinking
8 that there is a serious problem with regard to harassment
9 and intimidation, if that helps.

10 BY MR. ROISMAN:

11 Q. Are you saying that you do not have
12 either in your head or written down a set of sort of
13 objective criteria and when any of those are met, then
14 concern sets in? That it is not an objective standard
15 that you have developed.

16 A. By objective, you mean, I take it, black
17 or white. You get to a certain point, you are concerned.

18 Q. Yes.

19 A. And the answer is no, and I don't believe
20 it could be done.

21 Q. We've used and will continue to use
22 these phrases "intimidation and harassment." Would
23 you tell me what do you mean by those when you use
24 them?

25 A. If I can recall what I testified to earlier,

1 I would say harassment is any sort of deliberate annoyance,
2 for whatever reason. I think I used as an example
3 being cross-examined in the hearings is harassment.

4 The intimidation, however, I perceive
5 to be something else, and I think it requires intent
6 on the part -- It is, I would say, some action on one
7 person's part with the intent to get another person
8 or force another person to do something that they don't
9 want to do or wouldn't otherwise do or was wrong to
10 do. And I think along with that is -- must be considered
11 the intent that was in the mind of whoever was supposedly
12 or allegedly doing the intimidation, and, also, the,
13 I guess reasonableness would be the best word of how
14 the person interpreted those actions that was supposedly
15 intimidated, how reasonable was his perception of what
16 the intimidator -- the alleged intimidator was doing.

17 In other words, if a supervisor says,
18 "You need to finish this inspection this afternoon," if
19 it is 3:00 o'clock and he's got two more hours until time
20 to quit and it is an hour and 30 minute inspection and
21 he doesn't get it done, then I think it would be reasonable
22 for the supervisor to counsel him on doing his job. And
23 if he's standing by the water cooler for an extra 30 minutes
24 or something, I think it would be reasonable for the super-
25 visor to tell him to get to work.

1 Now, if he takes an admonition that he better
2 get to working instead of taking a 30 minute water break
3 as being intimidation, then I think that's unreasonable
4 on his part and, therefore, it is not intimidation.

5 Q. Let me just see if I understand the
6 distinction.

7 Harassment, in your judgment, does not require
8 that the person have the intent, the person who is doing
9 the harassing have the intent of causing any particular
10 reaction in the recipient, but is based more upon what
11 the recipient feels, they feel harassed. Your cross-
12 examination example.

13 A. I don't think it -- Again, I think, really,
14 in order for me to agree that someone was being harassed,
15 I think, again, the reasonableness of how the person
16 interpreted it would still have to be applied.

17 Just the mere fact that someone claims
18 harassment because of some act by another person to me
19 does not define harassment.

20 Q. But it would not require that the person
21 who did the harassing had intended it to be harassing?

22 A. Well, I guess -- I would say there probably --
23 There would be a threshold of intent there, too. I mean,
24 all I'm trying to say is that I don't think a determination
25 of harassment can be made unilaterally by some person

1 just so he can make a claim. I think there has to be some
2 substance to it and some reasonableness as to what his --
3 why he arrived at the solution that he did.

side 3
4 Q. Did you expect that the people who report
5 under you at -- the management level people who report
6 under you would share your perception of what constitutes
7 harassment and intimidation?

8 MR. BELTER: I am going to object to that.
9 That asks for speculation. You might ask him whether they've
10 ever gone to get together to come to a common definition.

11 MR. ROISMAN: No. I just asked him what
12 he would expect. I don't think -- I didn't ask him whether
13 they had it. That would have been speculation. I asked
14 him what he would expect them to have. That's not specula-
15 tion. That's finding out --

16 MR. BELTER: What he would expect?

17 MR. ROISMAN: -- what would he expect, would
18 he expect that they would.

19 MR. BELTER: I'll leave the objection on
20 the record.

21 You can answer it.

22 THE WITNESS: I would expect them to apply
23 basically the same standards. I would not expect them
24 to recite the same definition because we've never really
25 discussed it.

1 Based on other management discussions, though,
2 I believe that all those aspects of it are part and parcel
3 of any management determination as to whether there's harass-
4 ment or intimidation.

5 BY MR. ROISMAN:

6 Q. You testified that there were certain, and
7 you qualified it by saying you weren't trying to be
8 definitive in your list, but there were certain inherent
9 conflicts at a site such as Comanche Peak that might cause
10 friction, the boss/employee relationship, the craft/QC
11 inspector relationship, the auditor's relationship to all
12 of those.

13 Knowing that, can you tell me what steps
14 did you as the head of, as I understand it, the head of
15 QC for this plant take to seek expert advise on how one
16 should go about dealing with those inherent conflicts in
17 order to avoid problems arising?

18 A. Well, we -- As far as experts go, we have
19 had some discussions by management together with some
20 attorneys who are familiar not only with atomic energy
21 law but also with labor law because there's a very delicate
22 balance to be struck, frankly, on a nuclear plant when
23 trying to operate in compliance with all aspects of both
24 those laws.

25 Q. Any others?

1 A. Well, of course, the labor law -- What do
2 you mean "any others"?

3 Q. Any other experts that you consulted.

4 MR. BELTER: Do you -- I'm concerned, Tony,
5 that we're not having the same understanding of the term
6 "experts".

7 Are you referring to persons with management
8 experience as experts in certain subjects, or are you
9 referring to persons with degrees or --

10 MR. ROISMAN: Anybody who the witness
11 has consulted outside the plant --

12 MR. BELTER: Okay. Outside the plant.

13 MR. ROISMAN: -- who he viewed as an expert
14 who he consulted with in developing what management's
15 policies and principles should be to deal with the inherent
16 conflicts that existed on a plant site like Comanche Peak.

17 Now, he'll tell me -- He just told me that
18 one of them, they were lawyers. I know what their
19 qualifications were. He may give me someone's name later,
20 and I'll say, well, why did you think he was an expert,
21 and then he'll tell me why.

22 I'm not asking him to -- I'm not trying
23 to limit that. I'm asking him people who he thought were
24 experts.

25 THE WITNESS: Well, I guess to go back

1 to a whole lot more basic thing than just the legal aspect,
2 our company has a management development program, and it
3 was put together at the highest levels of the company some
4 years ago.

5 Mr. R. J. Gary was personally active in
6 it to a great degree. And a psychological consulting firm
7 was involved, and they worked on it for months and months.

8 And it was basically to develop not only
9 a management by objective program but a humanistic
10 approach to management that has, I think, even though
11 we in this particular case did not consult those individual
12 consultants in this instance, their involvement in the
13 development of our overall management philosophy, I think,
14 is probably a whole lot more important than going outside
15 the company for one particular matter and asking some,
16 quote, expert, unquote, how you ought to handle this.

17 I think it should be built into your
18 management philosophy.

19 BY MR. ROISMAN:

20 Q. When did the management consult with the
21 psychological consulting firm?

22 A. Oh, it has been some years ago when the
23 thing was set up, and I'm sure they -- I know they keep --
24 they have had contact with them off and on.

25 You'd have to ask the executives in TUGCO,

1 but I know that they have been in and out of the offices
2 on several occasions. We've had workshops for management
3 I've attended, or I was aware they've had sessions with
4 some of these people with individual managers and super-
5 visors that might last a couple of hours apiece just
6 devoted to the interpersonal relationships that management
7 needs to be able to deal with.

8 Q. Did you ever attend a session that focused
9 particularly on how to deal with the kinds of conflicts
10 that can arise between craft and QC personnel at a site
11 like Comanche Peak?

12 A. Well, it wasn't specific to craft and QC,
13 but it was certainly specific to conflicts that develop
14 between individuals, management and subordinates, how do
15 you deal with people that come to you with this kind of
16 problem.

17 Q. And what did they tell you? What did you
18 learn at that session?

19 A. Well, gosh, it was several years ago. I
20 can't -- In the first place, the whole aspect of managing --
21 The whole concept of managing, the emphasis is on the
22 humanistic approach, being open, open-minded.

23 Basically, it was a view toward a study
24 on how to get the job done, how to take advantage of the
25 synergistic effect of two heads are better than one.

1 If you have an open door to your subordinates and they
2 feel comfortable coming to you, then you're going to be
3 more effective.

4 And that's some of the things that we con-
5 stantly deal with out here, trying to make sure that door
6 is open, make sure they believe it is open, they understand
7 it is open, and we find that it is a battle you have to
8 fight constantly because not everybody is always going
9 to feel comfortable, but we do all these things to try
10 to make them comfortable.

11 And that's some of the issues that
12 management addresses anytime there's a question that's
13 brought up like some of these issues that we've been
14 talking about here.

15 Q. When did you have your -- this training?
16 You said it was several years ago. Can you give it any
17 more precise?

18 A. I guess maybe the first time the group
19 of managers that I was involved in got together must have
20 been five or six years ago, but we've had sessions since
21 then. The instance I alluded to previously was a smaller
22 group that got together to kind of a workshop to kind of --
23 There are various instruments there. You can analyze your
24 own thought process, see where your own weaknesses are,
25 where you need to work on things that might be a stumbling

1 block to your performance as a manager, and basically
2 it gets back to communication, openness and so forth
3 that I think factored into a management attitude are
4 extremely important.

5 Q. Were the psychological consultants at that
6 more recent gathering that you remember?

7 A. Well, they are the ones that do all of it.

8 Q. And what is it that they did? What actually
9 happened?

10 A. Well, you can fill out a certain type of
11 instrument that is between you and the consultant individually.
12 The company doesn't get it. They don't -- And the whole
13 purpose is for you to learn and understand how you react,
14 how you think about things. And then the consultant on
15 an individual basis initially takes that data, fills out
16 a little chart, and it shows you in various areas where
17 you strongly react in this way and this way and this way
18 and here's how that would affect you as a manager.

19 If you -- For instance, if you are too much
20 power oriented, then it is going to -- It is going to affect
21 you adversely as a manager because there's not going to
22 be that open door and all these sorts of things.

23 And it explains, and there's literature
24 and so forth, that here are the ways that a successful
25 manager looks at things, and here are the ways that --

1 And if you think too much in certain areas, here are the
2 ways you can improve your way of thinking so that you can
3 deal with people effectively. You can be self actualized.
4 You can be healthy. You can be achievement oriented
5 and yet not have the negative things that would hurt you
6 as a manager.

7 And then later on down the line you -- as
8 you work on the things you need to work on and try to think
9 more and more in positive ways and less and less in negative
10 ways, then later down the line there's an instrument that
11 they allow you --

12 And this is not mandatory, incidentally,
13 this program.

14 Later, there's a more detailed instrument
15 that you can hand out to I think as many as five others.
16 They fill it out and rate you and see if -- And then
17 they send those to the consultant, not to me. I never
18 see individual ones.

19 The consultant takes them, analyzes it
20 and puts it all in a composite and sends me, for instance,
21 if I am being rated, the result of that and says, "Okay.
22 Here is what you said about yourself, and here is what --"
23 And they encourage you and what I did was give one to my
24 boss and one or so to my peers and then three to various
25 subordinates.

1 So they all send it in, and none of them --
2 I never know which one of them does it because the
3 consultant fills it all out.

4 So that gives you a pretty good picture
5 of how others see you, and it helps you see that you may
6 be fooling yourself in a certain area, about how good you
7 are at communicating, for instance. And if there's
8 certain areas you need to work on, well, there's some
9 suggestions and maybe a list of things, literature that
10 you can get to help you in certain areas.

11 It is a very comprehensive program. I think
12 that is a very strong part of our management, and I think
13 it is factored in at the appropriate point in time. Before
14 people ever become managers they start going through that
15 program.

16 Q. How far down does it go in the program?

17 A. It starts out basically with all professional
18 people so that when they get ready -- Not all the in-depth --
19 Later on -- Obviously, you wouldn't go through what you --
20 You don't have any subordinates to give these instruments
21 to to tell you how good a manager you are. But you start
22 off with how you think about things. This is the way you
23 think. This is what your mind does, and this is what
24 history has shown that is good for you, and this is
25 these other areas not only that would affect you as a

1 manager but would also cause a lot of stress.

2 Q. Does it go down to people who are managers
3 at the plant site, or is it only for managers in the offices
4 in Dallas?

5 A. All of the managers in the company are
6 eligible, yes. To answer your question, it goes to the
7 site.

8 Q. Okay. Who fit into that category in the
9 QC program at the site? And I don't care whether you tell
10 me names or positions, but just what they are.

11 A. The site QA manager. Any other professional
12 TUGCO employees at the site.

13 Q. I'm just having trouble with the term
14 "professional". I don't know how you are using that term.

15 A. Engineers, auditors, the non-hourly, if
16 you will, types.

17 Q. Uh-huh.

18 A. The ones that -- Well, all the engineers.
19 In the quality assurance/quality control department, it
20 would be all engineers and auditors and managers and super-
21 visors.

22 Q. And is this a -- As I understand it, this
23 is sort of directed at personal development and as opposed
24 to an effort to evaluate a person's actual job performance
25 or programs that they implement. That's not the focus

1 of it; is that correct?

2 A. It is both because you can't separate the
3 two. If an individual is -- has the proper approach to,
4 in this instance, interpersonal relationships -- If we're
5 talking about conflicts, if he has the proper approach
6 to those, then he will have a proper approach to getting
7 the job done from management or from the company's point
8 of view.

9 Q. I understand then what you are saying is
10 the linkage. All I'm saying is the focus of the course,
11 the subject of the training experience was to look at
12 the individual themselves, not to --

13 A. I see.

14 Q. -- not to discuss the individual's
15 particular job performance.

16 A. Up to that point, now, that portion of the
17 course is primarily individual related in that it deals
18 with the way that person thinks and the way that person
19 interrelates with others.

20 However, the overall program does not stop
21 there. At one point, when an individual can get to this
22 point that I've talked about, you go through this and
23 you develop here is how I think, here is how I might need
24 improvement in certain areas. At that point in time,
25 then that person -- There's a rather lengthy number of

1 specific courses, management courses within the company
2 or without the company that a supervisor can -- or manager
3 can attend that would deal with a specific management
4 problem or supervisory problem that they have that they
5 need to work on. That would deal more with the company
6 aspect of it or this is how a manager would, you know,
7 deals with this type of thing as opposed to the individual
8 development that we were talking about up to now.

9 MR. BELTER: Tony, do you have a great deal
10 more on this subject matter?

11 MR. ROISMAN: I have some more. I don't
12 know whether it is a great deal more.

13 MR. BELTER: I would only point out to you
14 that the connection is a bit tenuous. I think it is beyond
15 the scope of direct, and it is the kind of thing that
16 if you had a great deal of detail for, I think in fairness
17 should have been listed on the subjects to depose
18 Mr. Chapman on his first deposition.

19 MR. ROISMAN: I'm sorry. I think it is
20 rather clear that he raised it himself in the context
21 of indicating what he used as his basis for responding
22 to all kinds of events that took place on the plant site.
23 He relied on this. His response was this, his evaluation
24 of the entire QA program, whether it's effectively
25 performing its function.

1 I'm trying to find out whether he's got
2 any basis, A, to have an opinion about whether the
3 responses that he was taking were appropriate; and
4 what, if any other, bases he may have had for believing
5 that the resolution of the problems was appropriate.

6 MR. BELTER: And I don't object to your
7 line of questioning. I'm only trying to indicate to you
8 that, to the extent that you exhaust Mr. Chapman's memory
9 here this morning, he wasn't prepared to discuss this subject,
10 and I think it is obvious why he wasn't prepared to discuss
11 this subject in this much detail.

12 MR. ROISMAN: Well, with all due respect,
13 I wasn't prepared to discuss the subjects either. I had
14 no briefly on what Mr. Chapman was going to say. This
15 was your rebuttal testimony, and I'm simply trying to
16 respond to it as best I can.

17 But the short answer is I don't have a whole
18 lot more in this area, in any event, but why don't we just
19 keep working along on it.

20 THE WITNESS: I might add that my getting
21 into this subject was in response to the question as to
22 what consultants had you used, as I recall.

23 MR. ROISMAN: That's correct. Yes, that's
24 right.

25 THE WITNESS: Okay. I'm just trying to

1 be responsive.

2 MR. ROISMAN: No. I have no problem with
3 your responsiveness, Mr. Chapman, at all.

4 BY MR. ROISMAN:

5 Q. Did you take any outside course work
6 specifically directed to what were the proper ways to respond
7 to allegations of harassment and intimidation?

8 A. No.

9 Q. Did you go to any particular experts outside
10 the company itself, first, just focus on outside the company
11 itself, or people who you considered to be experts to
12 seek their advice on ways to respond to allegations of
13 harassment and intimidation on the Comanche Peak site?

14 A. No.

15 Q. Did you consult any persons inside the company
16 on ways to respond to allegations of harassment and
17 intimidation that you considered to be experts?

18 A. Well, I consider anybody in management to
19 be -- that I talk with to be experts in confronting that
20 type of issues. In fact, I consider myself to be somewhat
21 of an expert in being able to communicate with people,
22 which, I think, is the best way to get at matters like
23 that.

24 Q. All right. Putting aside for a moment
25 the people who were under your supervision that you may

1 have consulted with, which persons who were above you in
2 the corporate chain did you consult with in developing
3 a response, if any, to the allegations of harassment and
4 intimidation by Mr. Atchison?

5 A. Maybe I need to get some clarification as
6 to what you mean by with whom did I consult.

7 Q. Whose advice did you seek in deciding
8 what you should do when you learned of the allegations
9 by Mr. Atchison regarding harassment and intimidation who
10 was above you in the corporate structure?

11 A. Well, I communicate on a regular basis with
12 my boss any time there's an allegation involving something
13 like that. But as far as going to him and asking him what
14 should I do in this regard, no. I expect to have some
15 plan of action made up and go to him and say, "This is
16 what we're doing in this regard and let's talk about it."
17 I don't routinely go ask him how I am going to do my job.

18 MR. BELTER: Tony, I'm confused by your
19 questions because you seem to be assuming in the question
20 that there was an established incident in Mr. Chapman's
21 mind of harassment or intimidation with respect to
22 Mr. Atchison.

23 MR. ROISMAN: I said -- What I said was
24 that there was an allegation. Are we going to dispute
25 whether Mr. Atchison made an allegation that he was

1 harassed and intimidated?

2 MR. BELTER: Absolutely not. But all of
3 your questions prior to this were how to deal with
4 instances --

5 MR. ROISMAN: That's right. But this time
6 I asked him the question -- I said the allegations of.

7 MR. BELTER: Okay.

8 BY MR. ROISMAN:

9 Q. Did you understand that? I mean, I did
10 change it, but I thought I was clear on the record. Did
11 you understand that?

12 A. Well, let me make sure that I do. Would
13 you repeat the question?

14 Q. Yeah. My question was: What persons above
15 you in the corporate chain did you consult with in deter-
16 mining what reaction, if any, you should take to the
17 allegations of harassment and intimidation that were made
18 by Mr. Atchison?

19 A. My answer is none, because in this instance
20 there had been quite a bit of not only internal talk
21 but publicity by the time his allegation of harassment
22 and intimidation became -- well, actually became known.
23 Management of the company understood the circumstances
24 surrounding his termination, and so they knew a whole lot
25 about what was going on by the time allegations of harassment

1 and intimidation surfaced.

2 I just went about and did my own -- took
3 my own look at it, and there was no occasion -- When all of
4 a sudden an allegation of harassment and intimidation from
5 Mr. Atchison came up, there was no reason for me to go to
6 management, anybody in my management and ask them what
7 they thought I ought to do.

8 Q. What about when the allegation of harassment
9 and intimidation that were made by Ms. Darlene Steiner
10 arose, and with whom above you in the management chain
11 did you consult in deciding how you should deal and respond
12 to those allegations?

13 A. As I recall -- I don't recall whether I
14 called Mr. Andrews and asked him to investigate before
15 or after I talked to Mr. Clements.

16 Q. Uh-huh.

17 A. It is really immaterial because we both
18 agreed that Mr. Andrews should do an investigation.

19 Q. Was that the sum and substance of what you
20 determined was the appropriate response at that time; that
21 is, that Mr. Andrews should do an investigation?

22 A. Yes.

23 MR. BELTER: Is this a good place for a
24 short break?

25 MR. ROISMAN: I just have a couple more

1 questions on this.

2 MR. BELTER: Go ahead.

3 BY MR. ROISMAN:

4 Q. Who did the -- Who designed the investigation
5 that Mr. Andrews undertook; that is, who decided who should
6 be interviewed? Who decided who should be present? Who
7 decided how the interview should be conducted?

8 A. He did.

9 Q. All right. It was all his doing?

10 A. Yes.

11 Q. Did he consult with you and get your input
12 or advice or concurrence on that?

13 A. I don't recall for sure. We talked about
14 it and agreed that I would sit in on it from a management
15 perspective.

16 Q. If you had felt that the process was in
17 any way not appropriate, did you feel that it was your --
18 that you had the opportunity to make those views known
19 to Mr. Andrews?

20 A. I'm not sure I understand what your question
21 is.

22 Q. I'm just trying to understand sort of the
23 chain of command.

24 A. Oh. In other words, if I disapproved of
25 what -- Mr. Andrews' methods or if I --

1 Q. If you thought he didn't interview everybody
2 he should or anything --

3 A. Could I have done something about it?

4 Q. Yes.

5 A. I assume that I could have. It didn't come
6 up, but if there was someone else that I thought he should
7 have interviewed, I am confident that he would have inter-
8 viewed them.

9 Q. Or if you thought he should have done the
10 interviews in some different way --

11 A. Yes.

12 Q. It wasn't like going to a completely outside
13 person who you just had to accept whatever they did and
14 you had no control over it. You felt that you had some
15 meaningful input?

16 A. Well, let's put it this way. I'm not saying
17 that I have control over it because he does report higher
18 in the company than I do, as he should, because he is an
19 independent investigator.

20 Bear in mind that he has an extensive back-
21 ground in investigating, and, therefore, is an expert in
22 that field.

23 MR. ROISMAN: We can stop there.

24 MR. BELTER: I would appreciate it.

25 (A short recess was taken.)

1 MR. ROISMAN: Back on the record.

2 BY MR. ROISMAN:

3 Q. All right, Mr. Chapman. What persons in
4 management above yourself did you consult, if anyone, in
5 conjunction with deciding what response should be taken,
6 if any, to the events that are summarized in what has been
7 marked as Purdy Exhibit 42-1? That is the management review
8 board document.

9 A. Well, that was -- I think as I testified
10 earlier, I had discussed with Mr. Gary, who was then my
11 boss, my immediate supervisor, of the need for not only
12 his involvement but also that of Mr. Fikar, and the result
13 of that conversation was a meeting that I called that they
14 attended and other management up both of those chains of
15 command attended.

16 Q. And the thrust of that meeting was -- What
17 issues did that meeting focus on?

18 A. Okay. It was emphasized then when the meeting
19 started that the purpose of this board that had been assigned
20 this task by me was to get everything out on the table,
21 what's on the mind of these inspectors, not for the team
22 members to pass judgment on individual perceptions, but
23 to put everything, including hearsay, down there. Well,
24 I -- You know, somebody told me that they heard somebody
25 say that.

1 And the senior managers were told that the
2 reason for this meeting was not to -- again, not to attempt
3 to necessarily put in perspective or give even a management
4 analysis or summary of the results except in some of the
5 cases where we did make conclusions, but, rather, to tell --
6 For instance, tell construction senior management, "This
7 is what the inspectors are saying. They are saying that
8 the craft puts pressure on them. They are saying the craft
9 does whatever." So that senior management would then know
10 how to deal with those types of things that they needed
11 to look into from their side of the management standpoint.

12 Q. And do you remember which particular subjects
13 were focused on at that meeting out of all the various
14 concerns and statements that are summarized in Purdy Exhibit
15 42-1?

16 A. Was your question which ones were specifically
17 emphasized or --

18 Q. Yes.

19 A. Well, I couldn't give you an all inclusive
20 list. I know the pay inequities were discussed. I know
21 that there was the matter of the QC inspectors' concern
22 about the excessive -- What am I trying to say? The
23 excessive concern with production was discussed.

24 Some of the inspectors feel like management
25 wanted production at all cost and that there was some

1 instances where craft was always arguing with them when
2 they rejected their work. And, of course, in instances
3 like that, well, as I recall, there was a discussion about
4 training of the craft, for instance. QC is going to continue
5 to reject rejectable work. Now, if there's arguments coming
6 out of something like that, then perhaps craft ought to
7 spend more time explaining what the quality requirements
8 are, and then those issues would go away.

9 Those were the types of things that we wanted
10 to discuss there so that we could get to the ultimate concern,
11 which was that of an inspector who thinks that he's always
12 being argued with when he rejects something. That's an
13 example that I recall.

14 Q. Did that meeting result in some decisions
15 being made jointly by all of those of you who attended
16 the meeting on what courses of action to take?

17 A. Well, I'm trying to go back five years,
18 and I know that there were some decisions made about what
19 management needed to do. And I recall Mr. Fikar being
20 very receptive, as were those managers under him from the
21 construction standpoint, that we're going to take these
22 concerns seriously and we're going to do what we can, what
23 needs to be done on our side to solve the thing because
24 we do not intend to put excessive pressure on QC inspectors
25 to do something they are not supposed to do. And we tell

1 our people to do it right and so forth.

2 And one of the things that I think I mentioned
3 to you just briefly was that it may be a training matter
4 where if they knew more of what the quality requirements
5 were, that would solve it.

6 Q. What exactly were the steps that were taken
7 to address the concern that the QC inspectors have that
8 there was an over-emphasis on production?

9 A. Well, the -- I guess the most important
10 step was those series of meetings that Mr. Tolson had with
11 them where it was -- he emphasized not only that they were
12 independent and so forth, but they were not to be -- to
13 feel any pressure to do less than what was required.

14 We also -- As a result of that study, we
15 concluded that there was an immediate need to improve the
16 procedures and instructions that the inspectors were working
17 to, particularly, as I recall, in the electrical area.
18 And that really wasn't totally unexpected because we were
19 just beginning to staff up in the electrical part, and
20 normally you run into your -- most of your debugging of
21 procedures at the beginning of an activity.

22 I think the electrical area was where that
23 was the case. I know we did some extensive revisions and
24 rework so that the inspectors would have some very specific
25 criteria to which to inspect.

1 Q. Was that the procedure that was principally
2 modified, was that CPM-6.9?

3 A. That was -- Well, that was one of them,
4 and one of the biggest complaints was CPM-6.9 because it
5 was a very large unwieldy document.

6 Now, what I'm saying in the electrical area,
7 it is my recollection that basically we went in and did
8 a total procedure review across-the-board. And I'm not
9 even sure CPM-6.9 is an -- I don't think it is an electrical
10 procedure. I think it is an across-the-board procedure.

11 But we went in and reviewed and basically
12 restructured all of the electrical inspection procedures
13 and gave the inspectors something that was a whole lot
14 better to work with.

15 Now, I think I've forgotten your original
16 question.

17 Q. Okay. I was still trying to get your
18 specific steps taken to respond to the QC inspector concern
19 of too much production, that there was too much emphasis
20 on production.

21 A. Well, the fireside chats we talked about
22 that Mr. Tolson had with them re-emphasized to them that
23 they were not to be concerned with production, and,
24 incidentally, that they could expect craft to want to meet
25 production goals. That's what their job is. But it

1 is not our job and you as an inspector have inspection
2 requirements that are independent of production goals,
3 and we expect you to maintain that independence, and your
4 management is going to support you.

5 Now -- And it is not just any one thing.
6 That coupled with, "All right. Here's what we're going
7 to do with the procedures. We realize some of them are
8 vague." And we don't want to put an inspector out in the
9 field responsible for making a bunch of interpretations
10 of requirements. Insofar as possible, we'd like to give
11 them something that contains clearcut acceptance or
12 rejection criteria.

13 And then at the same time as a result of
14 our meeting with senior management we knew that the
15 construction management was meeting with their people in
16 order to re-emphasize that just because they have production
17 goals doesn't mean that there's going to be any less QC
18 than there was -- than there always has been. It was
19 several things.

side 4
20 Q. And am I correct that the specific response,
21 in addition to whatever effects the things you just listed
22 might have, to the concern that craft would over-argue,
23 I think was the word that you used, when an inspector would
24 say, "I see a problem here," that in addition to these other
25 items, the specific thing that responded to that was to

1 try to better train craft to do their job in a way that
2 there wouldn't be a defect that the QC inspector would
3 have to find?

4 A. Well, that's true. Better train them plus
5 better train the inspectors and arm them with the tools
6 they need; that is, inspection instructions that give them
7 as clearcut accept/reject criteria as possible and requires
8 few subjective judgments on the part of that inspector
9 as possible. So that if you've got very clearcut acceptance
10 criteria, then that in itself cuts down on a lot of arguments.

11 And that was one of the issues, as I recall,
12 that was -- that really was addressed by the rewriting
13 of the procedures. We made much more clearcut the
14 inspector's acceptance criteria, and that gave them a lot
15 of help.

16 Q. I take it, though, that there's still a
17 significant portion of the QC inspector's job which must
18 involve judgment.

19 A. I wouldn't know whether I would characterize
20 it as significant. In large part, it depends upon what
21 discipline we're talking about. If it can be measured
22 easily, it is pretty cut and dried. You can measure a
23 weld length. You can measure a weld fill-it size. But
24 when you do a visual inspection and one person says that's
25 a coarse ripple and it is too coarse to render an appropriate

1 judgment of a VT test or whatever, then there's some
2 subjectivity there.

3 By and large, things you can measure, weld
4 length size, fitup, tolerance and so forth. Coarseness
5 of a weld, paint, for instance, there are some subjective
6 judgments that the amount of which varies from discipline
7 to discipline.

8 Q. All right. Mr. Chapman, do you know whether
9 as part of the response to the management review board
10 summaries, Purdy Exhibit 42-1, that there was an effort
11 on the part of Brown & Root to bring in someone to speak
12 to the Brown & Root employees? Do you have any knowledge
13 of that?

14 A. As a result of the summaries?

15 Q. Yes.

16 A. Bring somebody in to speak to them?

17 Q. That's correct.

18 A. The only person that I recall having spoken
19 to them as a group, I believe was about that time frame,
20 was one of their senior vice presidents from Houston.

21 Q. Would that have been Mr. Munisteri?

22 A. Yes.

23 Q. Except for knowing that you think he came
24 in to speak, did you have any connection with that? For
25 instance, did you attend the speech?

1 A. No, I didn't.

2 Q. Did you know whether any effort was made
3 either before or after the speech to find out the employees'
4 feelings about the subject of the speech or after it occurred
5 about what happened with the speech?

6 A. I don't recall offhand whether that
7 specific subject was part of our re-audit to determine
8 the effectiveness of our management actions or not. It
9 may have been. It has been a long time since I looked
10 at that.

11 Q. I'm sorry. Since you looked at?

12 A. Since I looked at anything like the audit
13 report or what have you.

14 Q. But you don't remember seeing any question-
15 naires filled out by Brown & Root employees who attended,
16 if there were such, who attended the speech given by
17 Mr. Munisteri expressing their reactions to the speech?

18 A. If I did, it would have been as a result
19 of the re-audit because that's the only other instance
20 where anything was documented that I know of.

21 So I very well could have, but --

22 Q. All right.

23 MR. ROISMAN: If you think he has -- I think
24 he hasn't, but I'm not going to --

25 MR. BELTER: No, I don't. I have no idea

1 what you're talking about.

2 MR. ROISMAN: All right. So far, I don't
3 either. I'm just trying to find out. These were one of
4 the surprises in your numerous discovery packages,
5 Mr. Belter, and we don't have any identification on them.

6 BY MR. ROISMAN:

7 Q. All right. You testified that there were
8 a substantial number of NCRs and IRs that had been written
9 at the plant site and a relatively few number of allegations
10 of harassment and intimidation made. Is that correct?

11 A. Yes.

12 Q. Did you make any effort to compare the number
13 of NCRs and IRs reported at this plant and a comparable
14 plant to see how Comanche Peak was doing at this stage
15 in its program vis-a-vis other plants?

16 A. No.

17 Q. In your judgment as a manager, would you
18 expect that there would be a certain number of incidents
19 of at least perceived to be harassment or intimidation
20 that would never be reported by the person who perceived
21 that they had been harassed and intimidated?

22 A. Well, you are asking me to speculate, and
23 you are also asking me to say that there never would be
24 any. I presume that there could be some.

25 Q. No. I'm just asking what your judgment

1 would be. Would you -- What would you expect?

2 I don't want you to speculate as to whether
3 there were or weren't --

4 A. Okay.

5 Q. -- but just your judgment as to would you
6 expect that there would be some that would not get reported?

7 A. Okay. I can answer relative to Comanche
8 Peak because I'm intimidately familiar with the type of
9 management approach that we have.

10 And I would expect that if anyone has felt
11 harassed or intimidated at Comanche Peak and has not reported
12 it, that there would be very few cases of that. We have
13 gone to too many -- taken too many steps. Some like the
14 1979 review that were on our own. We planned that ourselves.
15 We've done too many things, in my opinion, and tried too
16 hard to get -- to elicit from these folks any concerns
17 they have to have any significant number of them who have
18 not raised those allegations to us.

19 Q. Would you -- Would you expect that the number
20 that would go unreported would be higher or lower after
21 you implemented the hot line program at the plant site?

22 MR. BELTER: Could I -- Do you understand
23 the question?

24 THE WITNESS: As I perceive, the question
25 is: Do I think the hot line program would result in

1 fewer unreported cases.

2 Is that the question?

3 BY MR. ROISMAN:

4 Q. Yes. That's right. In other words, would
5 the hot line act as a mechanism for some that might have
6 otherwise been unreported before you had the hot line to
7 now become reported?

8 A. Yes. I think that's certainly true.

9 Q. Do you think it would be a substantial
10 contributor?

11 A. No, I wouldn't think so.

12 Q. Do you think the hot line was a substantial
13 improvement in terms of the company's response to allegations
14 of harassment and intimidation?

15 A. I don't know what -- I'm hanging on the
16 word "substantial" because I think we had an extremely
17 comprehensive program before, and to say it was a substantial
18 improvement -- It was another dimension we added as it
19 came up to try to add visibility to what was already our
20 policy.

21 Bear in mind, we've had the same policy
22 all along. It is just a question of we get allegations
23 and we come up, well, let's try to come up with some other
24 way that if they don't want to talk to these people, these
25 people, or these people, let's put a hot line in and try

1 that.

2 I guess I would say that it was a -- It
3 was another dimension. I wouldn't say it was a significant
4 change one way or the other to what was already in place.

5 Q. But you wouldn't have done it if you didn't
6 think there was some need for it, would you?

7 A. Well, again, I think I said that it was
8 an additional means to give visibility to what was already
9 our policy.

10 If you are asking me was it an improvement,
11 I'll say yes. As to whether it was a significant improve-
12 ment, I don't know how you quantify the improvement. We
13 have had some allegations expressed through the hot line,
14 I guess. There's been some calls. I'm not in that --

15 Q. Was any of the motives for the hot line
16 an attempt to bring the allegations that were being made
17 to persons off site into the site and have them made to
18 people -- I don't mean on site, but within the company
19 as opposed to outside the company.

20 A. Well, I don't recall that as being a stated
21 reason for having a hot line. The management reason for
22 having a hot line is to provide another avenue to someone
23 to express concerns about quality matters, the objective
24 being to have a problem, if it exists, brought to our atten-
25 tion so it can be fixed.

1 I'm sure we like to solve all of our problems
2 ourselves. No doubt about that.

3 Q. Chapman Exhibit 1 is the memorandum that
4 announces the establishment of essentially the ombudsman
5 on the plant site; is that correct?

6 MR. BELTER: Is that the one, assignment
7 of Boyce Grier?

8 MR. ROISMAN: It is Chapman Exhibit 1.

9 MR. BELTER: Yes. I just wanted to make
10 sure we've got it.

11 MR. ROISMAN: Okay.

12 BY MR. ROISMAN:

13 Q. Why was this done, Mr. Chapman? I don't mean
14 why was the announcement made. Why was the -- Why was
15 Boyce Grier brought onboard? Why was this ombudsman program
16 set up?

17 A. Well, basically the same reason as the hot
18 line. It was just an additional method by which we felt
19 we could provide people with concerns an avenue that had
20 not already existed to express their concerns so that we
21 could address them as expeditiously as possible.

22 Q. And there was no specific event or series
23 of events that made you think you needed something more?

24 A. Well, I don't recall. I think it was about
25 the time we instituted our so-called eight-point program.

1 I believe Mr. Clements may have talked about that. But
2 it was just an additional dimension that we thought of
3 at the time to give -- provide anyone with a concern
4 just any avenue that we could think of for them to address
5 that concern.

6 Q. But why 1983 instead of 1979?

7 A. Well, as I testified about the '79 management
8 review or management actions taken after that, I think
9 results of the other reports, for instance, the results
10 of the NRC investigation into the Atchison allegations
11 of intimidation -- My own talks with my own management
12 about how they perceived -- Bear in mind, my people at
13 the site have a strong incentive not to have intimidation
14 and harassment, and they are the first people that would
15 know about it if it was there.

16 I had a lot of different reasons for believing
17 that the problem didn't exist anyway during those years
18 prior to when this was done.

19 Q. Did you believe that there was anything
20 revealed in the summaries of the management review board,
21 the so-called Purdy Exhibit 42-1, that disclosed what you
22 would call harassment and intimidation?

23 A. That was not included in --

24 Q. No. No.

25 A. -- the summaries?

1 Q. No. That was included. Were there any
2 things that were included in there that you consider
3 harassment and intimidation?

4 A. Certainly.

5 Q. Were there a lot, a few? Do you --

6 A. There was one incident that I have already
7 testified to which involved a craft person grabbing a QC
8 inspector, female QC inspector by the coat. And I addressed
9 that, and that is in my previous testimony.

10 Q. And is that the only incident that you are
11 aware of in this report that in your judgment represented
12 harassment and intimidation?

13 A. Intimidation. Now, again, harassment to
14 my mind is some kind of deliberate annoyance, picking on
15 somebody, and there may have been others. But if I get
16 into what I consider a real problem, that was a real problem,
17 and that's the only one of that magnitude that was in there.

18 Q. All right. And the others were not real
19 problems?

20 A. Well, they were real problems, yes. Any
21 time -- And this is part of basically one of the things
22 that we -- was brought out to our managers during these
23 various workshops that we took with these psychological
24 consultants.

25 Any time your people perceive that they

1 have a problem, then you've got to be serious about it
2 and address it as a problem. And we took the things
3 that were in those summaries -- I, as a manager, took them
4 seriously.

5 Now, none of the other ones amounted to
6 somebody physically threatening another one with violence,
7 but still, I'm not saying and I'm not trying to minimize
8 and say that they were not problems. Otherwise, we wouldn't
9 have taken the management steps that we did to get together
10 and decide to take some corrective action.

side 5 11 Q. Mr. Chapman, I'm going to ask you to take
12 a look at a document of which I have a lot of similar docu-
13 ments here. I don't want to mislead you. I'm just going
14 to give you a representative one to look at and ask you
15 if this document, which I'll ask the reporter to mark as
16 Chapman Exhibit 8, I believe is our next number.

17 (The document referred to was
18 marked Chapman Exhibit No. 8
19 for identification.)

20 All right. Mr. Chapman, I'm now going to
21 hand you what is marked as Chapman Exhibit 8, and would
22 you just tell me have you seen anything that looks like
23 that? Look just at the first cover sheet for a moment.
24 Does that look familiar to you?

25 (Pause.)

1 Let the record reflect that once Mr. Chapman
2 has turned past the first page, what appears is different
3 on his copy to the extent that there are penned additions
4 to it than what is on the copy that his counsel is looking
5 at or Staff counsel is looking at. But the printed questions
6 are the same.

7 MR. BELTER: What was your question to him?

8 MR. ROISMAN: I'm asking him if he's ever
9 seen this before or seen anything that looks like this
10 before.

11 THE WITNESS: I don't recall having seen
12 this ever, no.

13 MR. ROISMAN: I'd like to just -- So that
14 I'm sure that there isn't some confusion in this form,
15 if you have no objection, I'd just like to state for the
16 record what I have been told that this is to see if that
17 in any way refreshes his memory.

18 MR. BELTER: Well, why don't you ask him
19 a question? Obviously, he has stated he hasn't seen it
20 before.

21 THE WITNESS: I say I don't recall having
22 seen it.

23 BY MR. ROISMAN:

24 Q. All right. Are you familiar with any survey
25 that was done by Mr. Brandt of the QC personnel under

1 his supervision during the -- around the summer of 1983?

2 A. I recall his having testified that -- in
3 some proceeding or another that he has conducted several
4 interviews with his people, but I don't really recall --

5 The summer of '83?

6 Q. Yes.

7 A. All I know is he has talked with his people.
8 At least, I'm aware that he has talked with his people
9 about their concerns several times. As to whether or not
10 he used a survey or not, I don't know.

11 Q. If he did use a survey, and if he learned
12 things about his people's attitudes and concerns about
13 QC at the plant site, would you expect in the relationship
14 that you have with Mr. Brandt that that would come to your
15 attention?

16 MR. BELTER: Why don't you ask what his
17 relationship is with Mr. Brandt first because I don't know
18 what that is.

19 MR. ROISMAN: Okay.

20 BY MR. ROISMAN:

21 Q. First, tell me what your relationship is
22 with Mr. Brandt.

23 A. At that point in time --

24 Q. At that point, that's right.

25 A. -- he reported to Mr. Tolson, and Mr. Tolson

1 reported to me. I would expect him to bring those concerns
2 to Mr. Tolson's attention.

3 Q. And would you expect Mr. Tolson to bring
4 them to your attention?

5 A. Well, I think you mentioned the word
6 "attitude," and, again, we're getting back to our management
7 training. I try not to deal in attitudes because the only
8 person that knows what my attitude is is myself.

9 We try to deal in actions and what people
10 believe, and, as I read that questionnaire, that's what
11 it does. There's not a whole lot of attitude that I saw
12 in there.

13 But, at any rate, if he used a questionnaire
14 and if he got some startling responses from it, or even
15 if he got whatever he expected, I would assume that he
16 would bring it to Mr. Tolson's attention, particularly
17 if there was a big problem.

18 Q. And what about Mr. Tolson bringing it to
19 your attention?

20 A. We would discuss and that's how I find out
21 about things like that, that he would call -- We would
22 talk on a daily basis, sometimes more than once a day.
23 And if someone had expressed concerns to the extent that
24 Mr. Brandt felt compelled to talk with each other,
25 and, most particularly, in something like that, he would

1 tell me, and he would tell me what Mr. Brandt did, and
2 he would communicate the summary of the results.

3 Q. I'm trying to find out from you, and I don't
4 want to make any surprises out. I want to find out whether
5 or not the nature of your relationship with Mr. Tolson
6 and through Mr. Tolson with Mr. Brandt is that when they
7 learn that a 10 percent of the QC inspectors who report
8 to Mr. Brandt think that management is not supportive of
9 their efforts to report QC violations, would you believe
10 that they should be telling you that as well as telling
11 each other that?

12 MR. BELTER: Tony, I'm going to object to
13 it unless you tell us before you go any further with this
14 is this an exhibit in another deposition yet?

15 MR. ROISMAN: This will be an exhibit in
16 Mr. Brandt's deposition, and it just happens that the order-
17 ing of this makes it not possible to have it marked that
18 way.

19 MR. BELTER: All right.

20 MR. ROISMAN: And I'm just trying to make
21 clear what I think is the case, which is that Mr. Chapman
22 is not aware of this information.

23 THE WITNESS: Okay. I will now answer your
24 question.

25 I would certainly expect Mr. Tolson to

1 communicate that information to me. I would not expect
2 him to provide details such as that questionnaire unless
3 I asked for it because I want the bottom line, is there
4 a problem down there, what is the nature of it, if it is
5 something that management needs to do something about,
6 what is being done and so forth.

7 But, no, I would not expect to see that.

8 BY MR. ROISMAN:

9 Q. Did Mr. Tolson ever communicate anything
10 to you about a survey done by Mr. Brandt in the summer
11 of 1983, to the best of your recollection?

12 A. Well, I don't know whether he called it
13 a survey, but in the past he has told me on occasions
14 that Brandt is checking with all his people. He's got some
15 people that are uneasy about something, and so he checks
16 with them.

17 Without any more specifics other than summer
18 of '83, I'd have a hard time coming to grips with a
19 response to your question. If it was related to some
20 specific allegation or something, I might could be a little
21 bit more helpful.

22 Q. Well, let me try it a different way. Do
23 you have a recollection of any information coming to your
24 attention in the summer or early fall of 1983 that you
25 believe warranted special attention that related to QC

1 inspectors feeling that they were in any way inhibited
2 or not adequately supported in doing their job?

3 MR. BELTER: Was there some more specific
4 directive, Tony, that you --

5 THE WITNESS: I think --

6 MR. ROISMAN: I cannot --

7 MR. BELTER: All right.

8 MR. ROISMAN: Let me be very clear. I can
9 find no evidence that Mr. Brandt communicated this informa-
10 tion to anybody. That is, I can't find anything in writing,
11 and I'm not suggesting that there is one that Mr. Chapman
12 knows about. I just want to find out whether he had heard
13 anything about it.

14 MR. BELTER: Well, look, my question is
15 that I am assuming here, because you've hit us with a document
16 that we haven't seen, that it may well --

17 MR. ROISMAN: Well, it is produced by you.

18 MR. BELTER: I understand that.

19 MR. ROISMAN: You understand, I didn't get
20 these --

21 MR. BELTER: It may well relate to a specific
22 problem or a specific incident that Mr. Chapman has already
23 discussed, and if you think that's the case, I think you
24 ought to direct his attention to that specific incident.

25 MR. ROISMAN: No, I do not think so. I

1 have no reason to believe that Mr. Chapman knows anything
2 about this, but I don't want to use my speculation. I
3 want to see if I can get him to tell me.

4 THE WITNESS: Okay. Yeah. Now, there have
5 been occasions when he has told me that there are some
6 inspectors that are claiming that they are not being allowed
7 to write NCRs, they are being suppressed and so forth.
8 And that has occurred -- During that time frame, it did
9 occur, yes. I believe it was the coatings inspectors where
10 the problem was mainly.

11 BY MR. ROISMAN:

12 Q. And did you yourself direct that any
13 particular action be taken, or did you yourself take any
14 particular action in response to that?

15 A. I didn't direct any particular action then
16 because he assured me that Mr. Brandt had already taken
17 care of it and he gave me a summary of what had taken place,
18 as I recall.

19 Q. What did he tell you had taken place?

20 A. Again, and I can't -- I'm not tying this --
21 And I feel pretty sure that Mr. Brandt talked with his
22 people on more than one occasion. So we may be talking
23 apples and oranges here, but let me do the best I can.

24 There were some concerns raised by the
25 inspectors relating to writing -- not being able to write

1 nonconformance reports and instead putting it on inspection
2 reports, unsat IRs. There were some concerns relative
3 to loosening of acceptance criteria, for want of a better
4 phrase. There were concerns relative to the coatings
5 engineers, some of the -- the changes made to inspection
6 documents by engineering. It appeared to some, at least,
7 that they were loosening the requirements, lessening the
8 requirements.

9 And after hearing what all was done, and
10 I asked Mr. Tolson several questions, and he explained
11 to me what the details of it were, and he felt that in
12 large part what needed to be done was to communicate with
13 the inspectors better the reasons for the spec changes,
14 specification changes, that part of it was a communication
15 problem.

16 But he did indicate to me that Mr. Brandt
17 had looked into it very thoroughly, and he was satisfied
18 that, number one, there was no -- absolutely no suppression
19 of the ability to identify nonconformances. There seemed
20 to be an obsession on the part of one or two of them
21 with writing a nonconformance report as opposed to an
22 unsat inspection report as a matter of principle.

23 And, as I recall, he said they even --
24 Tolson even had a meeting with the inspectors to explain
25 to them that our program in those specific instances

1 required the use of inspection reports and explained to
2 them why it was except in certain instances that they were
3 appropriate and an NCR was not. But it seemed that one
4 or two individuals never really accepted that programmatic
5 decision.

6 So, yes, he had me cut in on these types
7 of things all along, but as far as the details go, I didn't
8 expect nor did I receive any summaries like those written
9 questionnaires.

10 Q. Did he tell you exactly which actions he
11 took to respond to that group of concerns from the paint
12 coatings department?

13 MR. BELTER: Which concern are you talking
14 about?

15 MR. ROISMAN: The one that he just -- The
16 ones that he's just been talking about. He said --

17 THE WITNESS: Well, I know that --

18 MR. ROISMAN: -- there were a group of concerns.

19 MR. BELTER: He has mentioned several.

20 THE WITNESS: I know that Mr. Brandt talked
21 to them at least on one occasion, according to Mr. Tolson.

22 I know Mr. Tolson had a meeting on at least
23 one occasion, and that was, I think, mostly the purpose
24 of his meeting was to again explain our program which allowed
25 the use of inspection reports in certain instances rather

1 than the more cumbersome nonconformance report. And he
2 tried to communicate with them the reasons as to why we
3 did it that way.

4 BY MR. ROISMAN:

5 Q. And were you satisfied that that was a
6 satisfactory response to whatever the problem was?

7 A. Yes. He satisfied me that he and/or Brandt
8 had resolved the concerns of the individuals and, also,
9 he indicated that there may have been individuals that
10 would even after all that explanation just simply would
11 not accept the answer as to inspection report versus
12 nonconformance report, for whatever reason.

13 Q. Did you -- In the briefing that he gave you
14 of both the nature of the problem and the types of
15 solutions, did you see any parallels between the nature
16 of the problem that he described there and any of the problems
17 which had been identified in the 1979 survey?

18 A. Not really. As I recall, the people, as he
19 described to me, that were having the worst, the biggest
20 trouble, the most heartburn with the NCR versus IR issue
21 simply would not accept the word of the approval authority.

22 There was an instance where an inspector
23 simply would not accept the word of a coatings engineer
24 whose duty, whose job it is to assign the acceptance
25 criteria by which the inspector does his job, and as he

1 related it to me, this inspector -- I don't remember the
2 name -- simply does not accept what engineering says.
3 And there's not much you can do when there's an individual
4 like that.

5 Q. But isn't that just one of the problems
6 that he reported to you that they had uncovered among the
7 paint coatings inspectors? That was just one, wasn't it?

8 A. That's one, yes.

9 Q. You saw no parallel between any of the others
10 and any of the kinds of problems identified in the 1979
11 survey?

12 A. Well, originally, I assumed that there might
13 be because, as I said earlier, when people make
14 allegations or they have concerns, I take them seriously.

15 All right. We talked about the one about
16 the inspector who would not accept engineering's decisions.

17 We had at least one, maybe more -- I don't
18 recall numbers, but the problem persisted after Mr. Tolson
19 had a meeting and explained to them that, as he related
20 to me, that there is no requirement anywhere in 10 CFR 50,
21 Appendix B to write nonconformance reports, to write a
22 piece of paper that says nonconformance report on it.

23 Appendix B requires that nonconformances
24 be dealt with and dispositioned accordingly, according
25 to the --

1 Q. Excuse me, Mr. Chapman. I don't want to
2 interrupt you, but I'm trying to ask about problems other
3 than --

4 A. Okay. I'm trying to go --

5 Q. -- between the NCR and IR.

6 MR. BELTER: Well, ask him a specific --

7 MR. ROISMAN: I can't ask about a specific
8 problem if I don't -- he can't tell me what it was
9 Mr. Tolson told him the problems were. I don't want to
10 create problems for him.

11 MR. BELTER: You told him before that he'd
12 mentioned several concerns. Why don't you direct a specific
13 question to him and stop cutting him off on his answer?

14 MR. ROISMAN: I don't want to cut him off.
15 I just want him to focus on my question so we can get through
16 it faster. That's all.

17 THE WITNESS: I'm not trying -- I'm trying
18 not to ramble, but I'm also trying to talk about the
19 issues that he related to me.

20 BY MR. ROISMAN:

21 Q. Tell me another problem that he identified
22 other than the inspector who would not accept the fact
23 that you could use an IR instead of an NCR.

24 A. Plus the one that the inspector would not
25 accept engineering decisions.

1 Q. All right. That's a second one.

2 A. That's another one.

3 Q. All right. Tell me a third one.

4 A. Gosh, again, I'm going from memory.

5 Q. Did he tell you that there was any inspector --
6 that there was any supervisor inspector who had told his
7 inspectors not to nit-pick?

8 A. Oh, I recall that issue.

9 Q. That refreshes your memory about that one?

10 A. Yes.

11 Q. And what did he tell you he was doing about
12 that problem?

13 A. I asked him -- Well, I'm not characterizing
14 what may or may not have been said as a problem. I remember
15 the incident when it came up, and I believe you're referring
16 to the pump skimmer room incident where the inspectors
17 in the judgment of the supervisor, at least, and this was
18 what was reported to me by Mr. Tolson. There was apparently
19 an inordinately large amount of time spent doing the
20 inspection, that there were a large number of hold tags
21 when in the supervisor's opinion what they should have
22 done was reject the whole room and go on with it instead
23 of putting a tag every so many feet.

24 And Mr. Tolson relayed that incident to
25 me, and there had been a charge that the supervisor made

1 a statement that if you're going to nit-pick like this,
2 then I'll jerk -- yank your certifications or whatever.

3 And he also related to me that there was
4 concern on the part of the supervisor that not only had
5 they put all those hold tags on it and spent a lot more
6 time than they should have, they should have just rejected
7 the whole room, but they had actually missed some rejectable
8 areas.

9 And I remember asking Mr. Tolson if he felt
10 as though that the supervisor was trying to keep them from
11 identifying nonconforming conditions, and he said no, because
12 the supervisor had pointed out that they had missed some
13 rejectable areas, too.

14 And I asked him if he had looked into it,
15 and he had looked into it to some extent at that time
16 and said he felt like that there were some communications
17 problems with the supervisor, obviously, but he felt like
18 that the large part of it was that some of them just didn't
19 like their supervisor. But he and Brandt had looked into
20 it.

21 MR. BELTER: Could we just clarify the record
22 at this point, Tony, with the name of the supervisor?

23 MR. ROISMAN: Sure.

24 BY MR. ROISMAN:

25 Q. Do you know who that person was, the

1 supervisor in question?

2 A. I presume that -- based on the incident
3 you're talking about that it was Harry Williams.

4 Q. Did you find out what, if any, steps
5 Mr. Tolson and/or Mr. Brandt were going to take in response
6 to this problem?

7 A. Well, we had -- This problem, are you talking
8 about --

9 Q. Strike the word. You don't want to call
10 it -- This event.

11 A. I was trying to decide whether you're talking
12 about communications techniques of Mr. Williams as opposed
13 to this particular inspection event.

14 Q. Let's talk about the communications techniques.

15 A. Okay. Mr. Tolson and I had talked about
16 that before. We felt that Mr. Williams was a good quality
17 man. He had no intention of having anybody accept poor
18 quality work. But we talked about his communications
19 and supervisory techniques and felt like that he needed
20 to work on them some, and we talked about it then.

21 Again, every discussion that I had with
22 Mr. Tolson on this subject he would always conclude that
23 the bottom line with Harry Williams was that he did not
24 in any way feel that he was intimidating any inspectors
25 into accepting unacceptable work.

1 Q. Did he tell you that anything -- any action
2 was going to be taken against Mr. Williams?

3 A. Well, action taken against Mr. Williams ...
4 I think what was happening over that period of time was
5 that we were -- at the same time we were trying to get him
6 to improve his communication and supervisory skills, we
7 also recognized that his particular area of expertise,
8 which was civil work, was dwindling down, and his employer,
9 Gibbs & Hill, was looking for another assignment for him.
10 That all came about at about the same time. He left the
11 site, as I recall, sometime late last August or September.

12 Q. But was it your understanding that that
13 leaving was in any nature disciplinary action by
14 Mr. Tolson or Mr. Brandt?

15 A. No. Now, together with the -- our attention
16 to what appeared to be a communications problem, I am
17 convinced it wasn't all Harry Williams' fault. But there
18 was a gradual unloading of responsibilities from Harry
19 Williams from the first of the year until he wound up with
20 basically only protective coatings reporting to him, which
21 was the situation at the time he left.

22 But, no, our conclusion that it wasn't only
23 Harry Williams' fault I think was pretty well substantiated
24 by the inspectors who refused to accept engineering
25 decisions even after it's been explained to them in detail

1 what those decisions are and why they were made.

2 Q. Mr. Chapman, in Mr. Tolson's discussions
3 with you, as best you remember them, during the summer
4 and early fall of 1983, did he ever tell you that of 45
5 QC inspectors asked the question, "Do you feel that upper
6 management (QA) has a hostile or uncomplimentary attitude
7 toward inspection personnel?" that almost one-third answered
8 mostly yes?

9 A. I don't recall ever being told that piece
10 of information.

11 Q. Did he ever tell you that in answer to the
12 question, "Do you have confidence that your supervisor
13 will pursue problems you submit to them that require
14 time for resolution?" made to a QC inspector, that the
15 inspector answered, "They are too busy going to management
16 meetings. Mostly no"?

17 MR. BELTER: Is this one incident?

18 MR. ROISMAN: Yes, it is an incident.

19 BY MR. ROISMAN:

20 Q. Did he ever tell you that?

21 A. No.

22 MR. ROISMAN: Give me a second here, please.

23 BY MR. ROISMAN:

24 Q. Did he ever tell you that a QC inspector
25 in response to the question, "Do you feel that upper

1 management (QA) has a hostile or uncomplimentary attitude
2 toward inspection personnel?" answered, "They really don't
3 give a damn as long as you make them look good. Never
4 have anything good to say about you. Only if you screw
5 up"?

6 A. No, I don't recall having read that.

7 Q. Or that in answer to the same question
8 another QC inspector said, "More uncomplimentary than
9 hostile." The question being, "Do you feel that upper
10 management has a hostile or uncomplimentary attitude
11 toward inspection personnel?"

12 A. No.

13 Q. Or that in response to the question, "Do
14 you feel that upper management (QA) has a hostile or un-
15 complimentary attitude toward inspection personnel?" that
16 out of 28 people asked that question and another group
17 of QC people, 10 said mostly yes.

18 A. No.

19 Q. As far as you know, is the only event involv-
20 ing a concern by QC personnel about the attitudes towards
21 them on their job that was brought to your attention in
22 the summer or late fall of 1983 by Mr. Tolson the event
23 that you've been -- you and I have been discussing
24 involving the paint coatings department inspectors?

25 A. Yes. But I know I had more than one

1 discussion with Mr. Tolson on the issue. Whether it was --
2 You know, it is hard for me to characterize it as one event,
3 but we had several discussions relative to it.

4 Q. Or did he report to you that in answer to
5 the question, "Do you feel that upper management (QA)
6 has a hostile or uncomplimentary attitude toward inspection
7 personnel?" one QC inspector said, "We seem to be stifled
8 when attempting to pursue a nonconforming condition"?

9 A. No. Any of those things, those responses
10 in those questionnaires specifically I have never seen
11 them and I don't know any -- I have never been told any
12 of the details in them other than unless perhaps in one
13 of my conversations with Mr. Tolson he summarized it in
14 some other context and I don't recognize it as having
15 been, you know, a response in a questionnaire, if you under-
16 stand what I mean.

17 Q. Would it be fair to say that to the best
18 of your recollection there was no event or series of events
19 in the summer or late fall of 1983 that gave you any reason
20 to doubt that at that time the QC program at Comanche Peak
21 was functioning properly?

22 A. That's correct. There was no event to
23 indicate that the QC program was not functioning properly.

24 I had trouble with the negatives.

25 Q. Yeah. I'm sorry. I have a little trouble

1 with them myself.

2 You testified that in Chapman -- Let me
3 see if I've got the right exhibit.

4 MR. BELTER: Why don't you identify it?

5 MR. ROISMAN: Yeah, I am. I'm looking just
6 to get the exhibit number.

7 BY MR. ROISMAN:

8 Q. Chapman Exhibit No. 4, which is the inspection
9 report relating to the Atchison matter dated September 12,
10 '83, a letter to Texas Utilities from G. L. Madsen.

11 I believe you indicated that you had read
12 this report and that it supported your own belief that
13 the events surrounding Mr. Atchison's departure from the
14 Comanche Peak site had not had a chilling effect on the
15 reporting of nonconforming conditions; is that correct?

16 A. That is correct.

17 Q. And do I understand that part of the basis
18 for that -- for your conclusion that this report was
19 supportive of that is the discussion of the number of non-
20 conforming reports issued in non-ASME and ASME areas
21 as disclosed in that report?

22 A. That's part of my -- Let me see if I --
23 I think I got you, but that is part of the basis for my
24 conclusion that there had been no chilling effect.

25 Q. All right. Did you make any attempt

1 to independently evaluate whether those statistics as
2 reported there were supportive of the conclusion that
3 there had been no chilling effect?

4 A. Well, I did ask a question, as I recall,
5 and I'm not sure whether I would -- I think it was
6 probably Mr. Tolson -- as to the level of work activity
7 during that 12 months they used, and, as I recall, the
8 answer was there had been no significant fluctuations
9 in work activity which might have biased the study.

10 Q. How about in terms of number of QC inspectors
11 on site or number of inspections conducted? Did you check
12 into that?

13 A. Well, not really, because I, frankly, didn't
14 use this -- I didn't put a whole lot of weight on this
15 to reach the conclusion that I did as to the level of our
16 QA/QC program and whether or not there's a chilling effect
17 on the writing of nonconformance reports.

18 Q. But you would agree that if you wanted to
19 put any substantial weight on it, it would be important
20 to know what the number of NCRs reported -- what the ratio
21 of NCRs issued was to inspections conducted; isn't that
22 true?

23 A. Well, not necessarily because -- And I'm
24 not trying to be argumentative, but there are a lot of
25 factors that could go into this.

1 There could be inspection reports, and maybe
2 I'm not the person to deal with the specifics of how to
3 analyze this particular piece of information. I think
4 work activity is probably the best measure because if the
5 work activity in the areas doesn't change drastically,
6 then you would expect the number of inspections to trail
7 along roughly the same.

8 So that, again, if I were using this report
9 as the basis for a conclusion as to the effects of this
10 on my QA program, I certainly would go into a lot of detail.
11 But I am testifying that I did not do that.

12 Q. So that really what this report, the portion
13 of this report that really you focused on was the bottom
14 line.

15 A. The chilling effect issue.

16 Q. That the NRC had said that they didn't think
17 that -- I think their conclusion, which is on page 4, the
18 allegation was found to be unsubstantiated and without
19 merit. That's really what you focused on.

20 A. That's true. I had already done my own --
21 made my own conclusions as to Mr. Atchison relative to
22 his writing nonconformance reports.

23 Q. Okay. But let me just be clear. You did
24 not wait and look at this data and find that this data
25 was what persuaded you that your original judgment was

1 right that there had been no chilling effect. You already
2 had that opinion, didn't you, before you got this report?

3 A. Yes.

4 Q. And all this report really did was that
5 it told you that the NRC agreed with that conclusion; isn't
6 that correct?

7 A. Yes.

8 Q. And not that you independently determined
9 whether the NRC had a really good basis for that conclusion
10 or not. You didn't make a judgment about that, did you?

11 A. That's true.

12 Q. Now, I'd like for you to look at Chapman
13 Exhibit No. 5, which is the Report of Investigation dated
14 November 3, 1983, also prepared by the Nuclear Regulatory
15 Commission.

16 A. Okay.

17 Q. Here again, did you make an attempt to
18 evaluate whether what the NRC had done was a competent
19 review that would support its conclusion, or did you
20 instead merely note that the conclusion was one that agreed
21 with your position and that it had come from the NRC?

22 MR. BELTER: Do you understand the two parts
23 of that question? I had a little difficulty following
24 it.

25 THE WITNESS: I can attempt an answer.

side 7

1 I think I might.

2 Again, I did not undertake to verify or
3 validate this investigation report by the NRC. I noted
4 the results of it and noted that it -- that its conclusion
5 was the same basically as I had concluded quite some time
6 ago independently.

7 Q. So you didn't try to look through the
8 interviews, for instance, and see, well, if that's what
9 the interview said, then this is the right conclusion that
10 one should have reached from that. That was not what you
11 attempted to do with the document.

12 A. No.

13 Q. Now, I'd like to direct your attention
14 to Chapman Exhibit 7.

15 THE WITNESS: Can we take a short break?

16 MR. BELTER: Can we take a short break?

17 MR. ROISMAN: Sure. Of course.

18 (A short recess was taken.)

19 MR. ROISMAN: We're back on the record.

20 BY MR. ROISMAN:

21 Q. Mr. Chapman, I think we were going to start
22 now with Chapman Exhibit No. 7, and the question I had
23 for you was:

24 You say you did attend all of the interviews
25 that are identified here in the first page of the exhibit;

1 is that correct?

2 A. Yes.

3 Q. Can you tell me who was in attendance at
4 those interviews other than the person themselves being
5 interviewed?

6 A. Mr. Andrews and I were there, and I believe
7 Mr. McLain, an attorney for Brown & Root, was there, I
8 believe in all of them, also.

9 Q. Anyone else?

10 A. I don't recall. It may say in some of these.

11 Q. Yes. I see -- Yes. At the very top of
12 each of the interview sheets.

13 A. Yes. I believe --

14 Q. Okay. Do you know why Mr. McLain was present?

15 A. No.

16 Q. Do you know if the people who were interviewed
17 were advised in advance of the interview that an attorney
18 would be there from -- representing their employer?

19 A. I don't know.

20 Q. Do you know if the people were advised of
21 their -- that if they wished they may bring somebody with
22 them to the interview?

23 A. I do not know.

24 Q. Do you know could they have brought someone
25 to the interview if they wanted?

1 A. Oh, as far as I know, yes. I think that's
2 policy.

3 Q. And the policy is that a person being
4 interviewed by the company security officer may bring anybody
5 to the interview they wish?

6 A. I presume. I have never been told otherwise.
7 I see Mr. Purdy was here on some of these.

8 Q. Yes, I noted that.

9 A. I had thought that he was. Yes, he was
10 there in some of them.

11 Q. Does it seem possible to you that any
12 persons who were attending those interviews would have
13 felt in any way inhibited because there was an attorney
14 present and the attorney did not represent them?

15 A. Did you say could they have been?

16 Q. Did it occur to you that they might be?

17 A. It occurred to me before we went in there,
18 yes. Anyone could always be afraid of talking to an attorney,
19 and I was conscious of that.

20 Q. Did you make any efforts to correct that
21 problem or possible problem?

22 A. The main thing we did was make sure they
23 were at ease, and I was convinced in every case, with
24 particular attention to Ms. Steiner that she was very much
25 at ease, in my opinion. I've never seen anyone any more

1 confident and at ease when they were talking to someone
2 than I think she was.

3 Q. Do you think if they had felt inhibited
4 by the presence of the attorney that that inhibition might
5 have included their unwillingness to say that they were
6 inhibited by the presence of the attorney?

7 A. Not in this case. Again, due to the nature
8 of -- Due to her demeanor, really, the way she answered
9 them and --

10 Q. Well, I wasn't talking just about her. I
11 was talking about any of the people there.

12 A. Again, the question?

13 Q. Do you think that any of the people
14 if they were inhibited by the presence of an attorney
15 might have been inhibited sufficiently to not say that
16 they were inhibited by the presence of the attorney?

17 A. Well, if a person was inhibited by the attorney,
18 would they have been inhibited as to what they said, the
19 answer to that question would have to be yes.

20 Q. But based upon your management training
21 and experience, you don't see anything unusual about having
22 a person brought in to be interviewed by the plant security
23 officer and have in attendance a person at the level of
24 management as yourself and an attorney representing the
25 company who they are employed by? That doesn't strike

1 you as something that would be contradictory to your
2 training about interpersonal relationships?

3 A. Not the way it was done, no.

4 Q. What was it that was done about it that
5 made it seem so comfortable?

6 A. It was explained to her the reason why we
7 were there. The reason why we were there was that we were
8 conducting an investigation into the charge that she was
9 intimidated and we wanted to -- If that, in fact, she had
10 been intimidated or there were some threats that she had
11 heard of, it turned out, she claims she'd heard of second
12 hand, if those threats, in fact, were made, we intended
13 to do something about it to her satisfaction.

14 Q. What about the other people who were
15 interviewed other than Ms. Steiner? What was it that you
16 did to make them feel at ease in the presence of the people
17 who were there?

18 A. I personally didn't conduct the interviews.
19 Mr. Andrews did the interviewing and investigation.

20 Q. Well, what did he do?

21 A. Basically told them what he was looking
22 into, charges that there had been instances of intimidation
23 and we wanted to ask them some questions.

24 Q. And you feel that they -- in your judgment
25 that those people felt perfectly free to speak up even

1 though their bosses and their -- and Brown & Root's lawyer
2 were present?

3 A. They appeared to me to have no reservation
4 about responding openly to the questions.

5 Q. And you feel that was a reasonable likelihood
6 that they should not feel any reluctance to speak up in
7 that setting?

8 A. Certainly. As long as they are telling
9 the truth, I don't.

10 Q. You were asked a question by Mr. Belter
11 whether it is the policy of the company to formally
12 publicize disciplinary actions. I believe you stated that
13 it was not normally the policy to do that. Gave an
14 example of an exception to that.

15 And when asked the basis, one of the bases
16 that you stated was the person's right to privacy; is that
17 correct?

18 A. (Nodded affirmatively.)

19 Q. Can you explain to me the relationship
20 between the person's right of privacy and the decision
21 to have the Circuit Breaker report on the names of the
22 employees at the plant site who were appearing as witnesses
23 in the Comanche Peak Steam Electric Station licensing pro-
24 ceedings in Fort Worth?

25 A. Okay. Are you referring to the Circuit Breaker

1 that related -- that had some information in it regarding
2 Darlene Steiner by name?

3 Q. Well, she was one, but as I understand it,
4 the Circuit Breakers also were published that indicated
5 other people who were attending the hearings.

6 A. My understanding that that particular
7 Circuit Breaker, and I seem to recall about when it was,
8 was probably about September hearings of '82, reported
9 on her testimony, which, in my opinion, and I looked at
10 that. I read the Circuit Breaker. In my opinion, that
11 testimony was public domain.

12 Any attempt by our company to disseminate
13 testimony from a public hearing is most certainly not
14 intimidation of any sort.

15 Q. I'm sorry. I didn't use the word "intimida-
16 tion."

17 A. Oh, I'm sorry.

18 Q. I'm talking about right of privacy here.

19 A. I think when someone voluntarily appears
20 at a hearing and gives testimony -- It wasn't in camera --
21 it would seem to me that they had not asked for privacy.
22 Newspaper reporters were at those hearings. What sort
23 of privacy are you protecting?

24 I didn't consider it a violation of privacy
25 at all.

1 Q. But when a person engages in conduct that
2 warrants discipline, in your judgment, they are not in
3 any way waiving their right of privacy if that conduct
4 is later -- disciplinary action is later taken with respect
5 to that conduct?

6 A. I think the matter of whether or not to
7 make it public has nothing to do with whether or not they
8 committed some transgression against company policy. I
9 think that the matter of protecting someone's right of
10 privacy is a given. In our society, we gave up public
11 floggings years ago.

12 Unless someone has gone out of his way
13 to brag about having done something contrary to established
14 laws or custom or company policy or whatever, then I think
15 prudent management is to reward in public and discipline
16 in private.

17 Q. Well, Mr. Chapman, we didn't get rid of
18 the public floggings because of the public nature, did
19 we? Wasn't it the flogging part that was so objectionable?

20 MR. BELTER: Well, I don't think you need
21 to argue with him about that, Mr. Roisman.

22 MR. ROISMAN: Well, I'm not arguing with
23 him. He stuck it in there. I wouldn't have said anything
24 about public floggings here. I don't think this company
25 is flogging anybody. I don't see how it is responsive,

1 but if he wants to explain it, it is his words. I'm asking
2 for him to explain it.

3 THE WITNESS: I don't know of any company
4 or any management philosophy or any management text any-
5 where that would recommend publicizing discipline, whenever
6 someone does something wrong, make it a matter of record
7 to all the members -- people in that company.

8 To the contrary, there's every reason not
9 to unless he has -- in the commission of the misdeed has
10 made a public issue out of what he did.

11 BY MR. ROISMAN:

12 Q. What about disciplining the person involved
13 in front of the person who was the object of their
14 improper conduct?

15 MR. BELTER: I don't think there has been
16 any testimony of a disciplining in front of. You mean
17 reporting back the discipline that had been imposed?

18 MR. ROISMAN: No. I'm asking him --

19 MR. BELTER: A different situation?

20 THE WITNESS: I can answer it, yeah.

21 It has been my practice as a manager that
22 the only time that I will do that, discipline somebody
23 who reports to me in front of, say, a bunch of peers
24 is when that individual by what he does and the nature
25 of the way he says it does it in front of those peers,

1 and then I feel obliged to say, "Wait a minute. You are
2 out of line right there. Whoa."

3 If he does the same thing when there's nobody
4 else around, I'm not going to get his peers together and
5 jump on him.

6 Is that what you mean?

7 BY MR. ROISMAN:

8 Q. No. I'm afraid I wasn't clear.

9 Let's say that a craft person has acted
10 in a harassing manner towards a QC inspector, and in your
11 judgment the craft person's conduct was improper. And
12 you contact the appropriate people on the craft side,
13 and you say, "I think your guy was out of line." And you
14 explain the situation.

15 And they look into it, and they determine
16 that that's right, he was out of line.

17 Do you think that the appropriate way
18 to discipline the craft person, if it is -- Let's assume
19 that it is a -- What is the term of art to use? A
20 counseling.

21 A. A counseling. Okay.

22 Q. A counseling. That the appropriate way
23 to do that would be to counsel the craft person in the
24 presence of the QC person who complained of the harassing
25 condition.

1 A. Not necessarily, because that coin has an
2 obverse side.

3 I think the main thing is once you've
4 counseled him -- We'll assume for the moment it is in
5 private -- and you have gotten back with the person who
6 was offended by it, and you've determined that person was
7 right.

8 Now, if that person is satisfied with what
9 you did, assures you that that person is satisfied, then
10 I think what you did is adequate because there have been
11 instances, confrontations, arguments wherein the inspector
12 was wrong and the craftsman was right. I certainly am
13 not going to adopt a policy of disciplining a QC inspector
14 that was wrong with the craftsman standing there.

15 Now, the issue, I think, gets down to is
16 the offended party satisfied. If they are, that, to me,
17 goes a long way toward what is a proper counseling.

18 Q. Are you confident that the offended party
19 when they are the employee and you are the supervisor
20 will tell you that they don't think that your disciplinary
21 action is enough? Do you feel that that would be freely
22 expressed to you?

23 A. Certainly, if they felt free enough to bring
24 the problem to us in the first place, and they were not
25 satisfied with our resolution, I think it is perfectly

1 logical to believe that they would at least give an
2 indication if they did not agree with our resolution of
3 it.

4 Q. I would like you to take a look at
5 Chapman Exhibit 6, which is the excerpts from the special
6 review team report by the NRC, and I'd like to direct
7 your attention to page 62.

8 Look at the paragraph about in the middle
9 of the page that begins, "Many of the inspectors...."
10 Do you see that paragraph?

11 A. Yes.

12 Q. What do you understand the -- What was
13 your understanding of what the NRC was talking about when
14 they said that communications were approving -- excuse
15 me -- were improving?

16 A. Well, they were, obviously, alluding to
17 the management change that occurred recently involving
18 Mr. Tolson being replaced by Mr. Vega.

19 Q. Did you concur in the implication of that
20 paragraph that with Mr. Tolson in that position there were,
21 quote, communication problems, unquote?

22 A. I'm not so sure how much of it was that
23 and how much of it is that Mr. Vega may be a better
24 communicator. It may be some of both.

25 I think I testified earlier that in the

1 coatings area some of the problems the inspectors had
2 was in that case communications with Harry Williams.

3 There may have been some communication
4 problems with Mr. Tolson, but I think a whole lot of it
5 was due to the fact that Mr. Vega is an outstanding
6 communicator.

7 Q. Well, prior to Mr. Tolson's transfer from
8 that position, had you reached any judgment about whether
9 you thought Mr. Tolson was not a good communicator and
10 that there were problems there because of the lack of
11 proper communication?

12 A. Yes, I had reached a judgment.

13 Q. And what was that judgment?

14 A. That judgment was that typically
15 Mr. Tolson went out of his way, as with the coatings
16 inspectors, to communicate with them reasons for the
17 decisions that had been made that I testified to that some
18 of them did not accept. So that he was doing everything
19 he could to communicate.

20 Now, for whatever reasons, I can't speculate.
21 It may have been personality conflicts between him and
22 the inspectors or whatever. But even though he explained
23 in detail, some of them were not satisfied for whatever
24 reason.

25 It seems that Mr. Vega has -- somehow has

1 the ability to -- however to communicate and, in most cases,
2 satisfy even the most reluctant of people that yes, this
3 is why we did it and this is the reason for it and so forth.

4 I don't consider -- So, to try to answer
5 your question, I never concluded that Mr. Tolson was not --
6 had a communication problem.

7 Q. Did you recommend his transfer?

8 A. I approved his request for transfer.

9 Q. Does that mean that you did not recommend
10 the transfer?

11 A. Oh, no. I'm sorry.

12 Q. I'm sorry. We had a double negative there.

13 A. Yes.

14 Q. Let me ask the question so it is clear.

15 Did you recommend his transfer?

16 A. I recommended his transfer, yes.

17 MR. BELTER: Let me try and clarify that.

18 MR. ROISMAN: Okay.

19 BY MR. ROISMAN:

20 Q. What I'm trying to find out is: If he hadn't
21 requested a transfer, would it have been your position
22 that he should be transferred?

23 A. You're asking me to speculate. At some
24 point in time, I may have. I don't know. I may have.
25 But not at that time. The issue never came up.

1 Q. In other words, at that time you had no
2 information that would have warranted you on your own
3 to recommend that he be transferred even if he had not
4 requested it.

5 A. Right.

6 Q. Do you agree or disagree with the statement
7 on page 62 of Chapman Exhibit 6 and the same paragraph
8 that we were looking at, the second sentence, "It was clear
9 that some communications problems had existed in the past
10 and rapport between inspectors and their management had
11 been strained previously in some areas"?

12 A. Yes. I'll agree with that.

13 Q. And who do you understand was being referred
14 to when they say "their management," or which persons?

15 A. That I don't know.

16 Q. How can you agree with it, then?

17 A. Well, looking back at some of the exhibits
18 we've got in this -- looking back all the way to '79,
19 there were some -- It was obvious that some of the
20 inspectors had problems, perceived problems with their
21 management.

22 The instance that we discussed relative
23 to Mr. Brandt, Mr. Williams, those were other instances
24 where inspectors and their management had a strained
25 relationship.

1 I felt like it was pretty clear that in
2 those instances that those types of things were what this
3 report was referring to.

4 Q. When you use the terminology "communications
5 difficulty," would you include within that a situation
6 in which a person was feeling that they were being
7 harassed in their job even though the person who they felt
8 was harassing them had no intent of doing so? Is that
9 part of the communications problem?

10 MR. BELTER: Do you understand the question,
11 or do you need an example? I'm having difficulty seeing
12 how you are going to get any kind of meaningful answer
13 out of that.

14 THE WITNESS: I'm not sure I understand
15 exactly what the question is. If you could --

16 BY MR. ROISMAN:

17 Q. All right. Let's --

18 (Pause.)

19 All right. I'm going to direct your
20 attention to Purdy Exhibit 42-1 and to a portion of the
21 summary in the protective coatings QC personnel area.
22 And there is on the page marked "Management" that
23 subsection, I'm going to show it to you, a paragraph 2
24 that says construction -- This is -- These are complaints
25 received, you understand?

1 A. Right.

2 Q. "Construction applies excessive pressure
3 on QC inspectors to buy off rejectable work. An example
4 cited was missed spots in sandblasting."

5 Do you call that -- Just what you have there,
6 is that a communications problem?

7 A. In that particular case, I recall what
8 example that was. No, that was not a communications problem.
9 That turned out to be a craft training problem. The
10 craftsman did not understand the quality requirements,
11 and, in fact, that particular case it was rejectable work,
12 and the craftsman -- The corrective action was to educate
13 the craft as to what is expected of them, and, again,
14 through Tolson's interviews with the inspectors, to
15 reiterate to keep doing what you are doing. If it is
16 rejectable, reject it.

17 Q. By that specific, you mean the example cited,
18 missed spots in sandblasting?

19 A. Yes. I recall having addressed that with --

20 Q. Well, what about the next --

21 MR. BELTER: Let me finish.

22 MR. ROISMAN: I'm sorry. I thought he had.

23 THE WITNESS: Yes. It just happens that
24 I recall what that was.

25 //

1 BY MR. ROISMAN:

2 Q. Okay. What about the third one? "Upper
3 level management applies excessive pressure on engineering
4 to loosen specification requirements to accommodate
5 construction activities."

6 A. I alluded to this earlier. That was an
7 instance where the inspectors perceived that if craft
8 were having too much work rejected, they'd go back to
9 engineering, either get a use as-is or get a change in
10 the inspection accept/reject criteria or whatever.

11 And this is, frankly, one of the major
12 issues that for the life of a nuclear plant, any nuclear
13 plant, I'm sure you always have to deal with because from
14 an engineering standpoint there are always many, many
15 different ways to do a particular job acceptably.

16 It is engineering's responsibility to
17 determine what engineering requirements the job needs.
18 They translate those requirements into accept/reject
19 criteria and provide those to the inspectors to go out
20 and judge whether these criteria have been met.

21 Any time that you change those criteria,
22 the engineer who is authorized and qualified to do so,
23 any time that you lessen those to, say, a less stringent
24 level or less stringent standard, then you expect to have
25 these kinds of concerns, and this is communication. And

1 it is not just at the upper management level. It must
2 go all the way from whatever level the decision was made
3 all the way down to the people having the concerns, the
4 inspectors, and those are some of the management type things
5 that we got to in this survey that -- Those are the kinds
6 of things we wanted to get to that you don't really ever
7 get to when you do, say, just a procedure audit. Well,
8 the procedure says this and this and this.

9 Getting to these issues are the kinds of
10 things that we wanted to so that we could recognize any
11 work we had to do from a management standpoint.

12 Q. So just to give me a short answer to the
13 question, then that is what you would call a communications
14 problem, the example, this No. 3, that we read just a moment
15 ago?

16 A. Yes.

17 Q. All right. I'm going to show you just a
18 couple of others and see by using specifics if we can get
19 just a good understanding.

20 I'm still looking at Purdy Exhibit 42-1,
21 and now I'm looking at the summary QA/QC staff personnel
22 and the page marked also "Management."

23 And take a look at item No. 2, complaint
24 item No. 2. "There is a power struggle in the field between
25 construction and QC personnel."

1 Does that sound to you like a communications
2 problem?

3 A. No. And I don't know really what example,
4 what specific that comment referred to. Again, keep in
5 mind that these are comments that the people made and for
6 management to digest, and I don't know whether that is
7 a communications problem. It doesn't really strongly suggest
8 that it is.

9 I think whenever there's a comment like
10 that, I think in this case the construction and QC personnel
11 being involved, I think both of their managements need
12 to be aware that there has been expressed this feeling
13 by someone out there and that they need to periodically
14 through their management channels emphasize what your job
15 is. Your job is to construct. His job is to inspect
16 or visa versa, depending upon which management chain you
17 are in.

18 Q. But you don't think that that -- Even though
19 what you just described as a solution is a, quote,
20 communications solution, you don't think that that is
21 indicative of a communications problem?

22 A. Well, I guess what I'm saying is: The
23 solution to it is to communicate down. It may have been
24 something a -- The thing that may have prompted this may
25 have been something that somebody observed that really

1 didn't involve communications. I think communications
2 is the solution to a lot of problems, and we may be splitting
3 hairs here. I don't know.

4 Q. No. I'm just -- You used and this other
5 report uses and there are other depositions that use
6 the communications problem idea. And I'm just trying to
7 get an understanding of what --

8 A. I think, in general --

9 Q. -- at least you, as the head of the QA/QC
10 program at TUGCO -- I think --

11 A. That's correct.

12 Q. -- that is not the formal name of your
13 title but the functional --

14 A. Yeah, I understand.

15 Q. -- name of it.

16 To get an understanding of what you under-
17 stand it means to say that something, "Well, that's a
18 communications problem" --

19 A. I --

20 Q. -- versus it is some other kind of problem.

21 A. I don't mean to minimize the problem by
22 calling it a communications problem.

23 Q. I didn't mean to suggest that you did.
24 I just wanted to try to understand what falls into that
25 category.

1 A. I think many, many things that become issues
2 of controversy between people, you could always in many
3 cases mitigate any misunderstanding if you communicate
4 properly between two reasonable people.

5 So I'll concede that communication is a
6 constant thing that needs to be addressed in any management
7 situation.

8 Q. All right. Look at No. 4, "Lack of support
9 by construction and QC management is resulting in poor
10 communication between craft and QC personnel."

11 Is that a communications problem, or does
12 that describe a communications problem?

13 A. Well, without any specifics, I'd be hard
14 pressed to say yes or not. It could be.

15 I think, again, what we did, each of the
16 two management chains go back and re-emphasize and in some
17 cases retrain.

18 If you want to call the incident of awhile
19 ago a communications problem, the fact that the person,
20 the craft person was re-educated or retrained, if you will,
21 as to what the quality requirements are, you could call
22 that communication, if you wanted to, or you could call
23 it retraining, either one.

24 Q. Well, I guess it is not something that
25 I want to call it. I'm just trying to understand what

1 in your definition falls into that. Now, let's see if
2 we can draw any generic principles from the examples.

3 It is not a communications problem merely
4 because the solution to it may be to improve communications,
5 is that correct?

6 A. I think that's what I'm trying to say.

7 Q. All right. And it is a communications
8 problem, in your judgment, when the very nature of the
9 problem reflects that the problem arose because of a lack
10 of communication between the people directly involved in
11 the problem.

12 A. That's correct, yes.

13 Q. All right.

14 A. An inspection criteria was relaxed by an
15 engineer, and it was certainly appropriate. Yet, the
16 inspector may not have been told.

17 There wasn't a violation of any procedure.
18 Maybe there wasn't a violation of any QA requirement, but
19 it wasn't good management, perhaps. It would be better
20 if you went and communicated with the person as to why,
21 and that's what we're trying to do.

22 Q. And the one that you just gave, that's
23 a communications problem --

24 A. Yes.

25 Q. -- and a communications solution.

1 A. Yes. Correct.

2 MR. ROISMAN: No further questions.

3 CROSS-EXAMINATION

4 BY MR. BACHMANN:

5 Q. I have just a couple of questions which
6 relate to Chapman Exhibit No. 7, the Darlene Steiner
7 investigation.

8 Mr. Chapman, did you have any conversations
9 with Mr. Gordon Purdy concerning the Steiner -- the
10 incidents that were involved in the Darlene Steiner
11 investigation?

12 A We talked about in general several of them.
13 I don't recall any specific ones. He was in on some sort of
14 these interviews, as I recall.

15 Q. Do you know if Mr. Purdy based on your
16 conversations with him -- Or let me put it another way.

17 Did Mr. Purdy indicate to you in any of
18 these conversations that he had -- he himself had taken
19 any action with regard to Darlene Steiner?

20 A. Action in what regard? Decisions to --

21 Let me say this. At the time, she was working
22 in the non-ASME side of the house, and I did have some
23 conversations with Mr. Brandt. In fact, I even had
24 I believe it was Mr. Brandt or someone go with me up to
25 the place, the little building she was employed in where

1 she worked at the time because I remember part of her
2 allegation was that -- at least in the ASLB hearings
3 through some CASE filings was that we were harassing her
4 by moving her around all over the site and so forth, and
5 it was pointed out to me that each move was an attempt
6 to get her closer to her work area and to accommodate her
7 physical condition.

8 And I went up and observed the last place
9 where she had a building all by herself about 15 feet from
10 where the fab shop was.

11 So I had much more conversation with
12 Mr. Brandt than I did Mr. Purdy relative to this investiga-
13 tion.

14 Q. You mentioned her physical condition.
15 Would you explain that to us?

16 A. Yeah. Tolson had explained to me before
17 that she was pregnant and had expressed to someone a history
18 of miscarriages. And so we had already at that time
19 had taken her out of the field so she wouldn't have to
20 climb, wouldn't have to do all these things, and had taken
21 some extraordinary action at that point.

22 The incident, as I recall, that instigated
23 this particular investigation was that it was brought to
24 my attention, I think it was during the September ASLB
25 hearings themselves that Mr. Brandt, I believe, told me

1 that she had made a statement to someone on site -- I
2 think to Mr. Brandt -- that she heard that there was some
3 people threatening her. And that's when I decided to get
4 Mr. Andrews involved.

5 Q. Okay. Did Mr. Purdy ever indicate to you
6 that he had personally arranged some form of transportation
7 for Ms. Steiner from the gate to her work place?

8 A. I don't recall his having said that.

9 MR. BACHMANN: That's all the questions
10 I have.

11 MR. BELTER: Can we take a short break?

12 (A short recess was taken.)

13 MR. BELTER: Back on the record.

14 We have no further questions.

15 Thank you very much, Mr. Chapman.

16 MR. BACHMANN: Thank you, Mr. Chapman.

17 (Whereupon, at 2:50 p.m., the deposition
18 was concluded.)

19 * * *

CERTIFICATE OF PROCEEDINGS

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

3 In the matter of: TEXAS UTILITIES ELECTRIC COMPANY, et al.

4 Date of Proceeding: August 2, 1984

5 Place of Proceeding: Glen Rose, Texas

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

9
10 Glenna M. Wright

Official Reporter - Typed

11
12 
13 Glenna M. Wright
Official Reporter - Signature

TEXAS UTILITIES GENERATING COMPANY

OFFICE MEMORANDUM

To R. G. Tolson

Dallas, Texas November 8, 1983

Subject ASSIGNMENT OF BOYCE GRIER

Beginning November 9, 1983, Mr. Boyce Grier will be available as a consultant onsite to assist TUGCO management in a number of areas. His primary responsibility will be to have investigated all concerns expressed by any employee relative to the quality of construction of Comanche Peak Steam Electric Station. He will have full access to all levels of TUGCO management at all times.

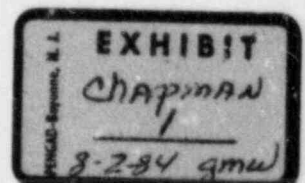
Mr. Grier's background includes 21 years with the Atomic Energy Commission and Nuclear Regulatory Commission. During ten of those years he was Regional Director (six in Region III and four in Region I).

We anticipate that Mr. Grier will be at the jobsite an average of three days per week. Please assure that appropriate managers at the site are introduced to him and that his availability to all personnel is communicated down through the ranks.

D. N. Chapman
D. N. Chapman

DNC:ln

cc: B. R. Clements



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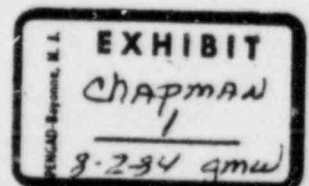
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DN Chapman
D. N. Chapman

DNC:ln

cc: B. R. Clements



TEXAS UTILITIES GENERATING COMPANY

OFFICE MEMORANDUM

To DISTRIBUTIONDallas, Texas November 16, 1983Subject QA/QC QUESTIONNAIRES FOR PERSONNEL LEAVING QA DEPARTMENT

Attached you will find a QA/QC questionnaire that all Dallas based Quality Assurance personnel must complete if, for any reason, they leave the Quality Assurance Department. It is your responsibility to see that the employee completes the form before departure from the department. Please return the completed forms to me for evaluation and/or action. Additional forms may be obtained from the QA secretary.

Thank you.

DN Chapman
D. N. Chapman

DNC:ln

DISTRIBUTION: L. M. Bielfeldt
A. H. Boren
A. Vega



"QUESTIONNAIRE FOR PERSONS LEAVING QA/QC"

EMPLOYEE: _____ INTERVIEWER: _____

EMPLOYEE NO: _____ DATES OF EMPLOYMENT: _____

Instructions: Please respond to the following questions. If your answer is yes, please provide specific details and the names of supervisory personnel to whom you reported these concerns. If additional space is required, use additional pages as necessary.

1. Are you aware of any problems in the implementation of the quality assurance/quality control program?

YES _____ NO _____

- If yes, explain: _____

2. Are you aware of any defects in the design, manufacture, fabrication, placement erection, installation, modification, inspection, or testing of safety related/nonsafety related components and/or structures?

YES _____ NO _____

3. Are you aware of any other matters related to the design, construction, or quality assurance program which should be brought to the attention of management?

YES _____ NO _____

If yes, explain: _____

EMPLOYEE'S SIGNATURE

DATE

INTERVIEWER'S SIGNATURE

DATE

QTQ-548

TEXAS UTILITIES GENERATING COMPANY

OFFICE MEMORANDUM

To Distribution

Dallas, Texas January 3, 1984

Subject POLICY FOR INVESTIGATING QA/QC ALLEGATIONS

Ref: QTQ-540
TUQ-1887

The attached forms are to be used when in the opinion of the appropriate QA supervisor, an allegation or concern brought to your attention warrants an in depth investigation.

It is necessary for the form to state what assistance is needed and the person that is being requested to provide the assistance. All pertinent information that would be helpful in resolving the allegation should be attached to the form. A QAI number can be obtained from the Quality Engineering Group by contacting Jerry C. Walker at (214) 653-4967. It will be the responsibility of the QE group to monitor the status of all investigations to assure that allegations are resolved.

Distribution of all correspondence relating to the investigation of an allegation will be per the instructions on the form. When an investigation has been completed, it will be the responsibility of the QA supervisor who initiated the investigation to communicate with the person(s) who made the allegation and explain the results of the investigation. If, at this time, they are not satisfied with the results of the investigation, the QA supervisor should fully explain the remaining options open to the individuals. (i.e. TUGCO Hot-Line, or Nuclear Regulatory Commission offices).

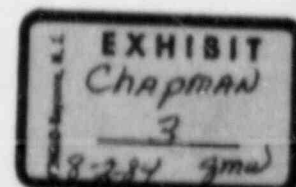
Thank You.

D. N. Chapman

D. N. Chapman

DNC:ln

DISTRIBUTION: A. Vega
R. G. Tolson
L. M. Bielfeldt



TEXAS UTILITIES GENERATING COMPANY

OFFICE MEMORANDUM

To Distribution QAI# _____

Subject REQUEST FOR ASSISTANCE IN RESOLVING QUALITY ASSURANCE ALLEGATIONS

Investigation Requested by _____ Date _____

Corporate Security Assistance Requested Yes () No ()

Allegation Made by (Name, Dept., Badge #) _____

Confidentiality Requested Yes () No ()

Allegation Made to (Name, Dept., Badge #) _____

The attached allegation has been received by the TUGCO Quality Assurance Department. The following individuals are asked to provide the assistance requested in order to resolve the allegation.

Multiple horizontal lines for handwritten notes or signatures.

All correspondence relating to this matter shall reference the above QAI number and will be distributed as detailed below.

Distribution - Confidential

- D. N. Chapman/Dallas QA/QE File
- D. L. Andrews/Corporate Security
- Boyce Grier/CPSES QA Initiator

3. Are you aware of any other matters related to the design, construction, or quality assurance program which should be brought to the attention of management?

YES _____ NO _____

If yes, explain: _____

EMPLOYEE'S SIGNATURE

DATE

INTERVIEWER'S SIGNATURE

DATE



NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE, SUITE 1000
ARLINGTON, TEXAS 76011

SEP 12 1983

In Reply Refer To:

Dockets: 50-445/83-34
50-446/83-18

Texas Utilities Generating Company
ATTN: R. J. Gary, Executive Vice
President & General Manager
2001 Bryan Tower
Dallas, Texas 75201

Gentlemen:

This refers to the inspection conducted by Mr. D. M. Hunnicutt of this office during the period August 12-19, 1983, of activities authorized by NRC Construction Permits CPPR-126 and CPPR-127 for Comanche Peak, Units 1 and 2, and to the discussion of our findings with Messrs. J. T. Merritt and R. G. Tolson, of your staff at the conclusion of the inspection.

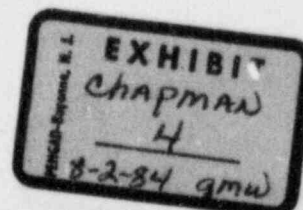
Areas examined during the inspection included a detailed review of nonconformance reports, determining that the reactor vessel outer wall did not contact the containment shield wall at any point, and determining that no "secret meetings" related to the reactor vessel outer wall contacting the containment shield wall had occurred. Within these areas, the inspection consisted of selective examination of procedures and representative records, interviews with personnel, and observations by the inspector. These findings are documented in the enclosed inspection report.

Within the scope of the inspection, no violations or deviations were identified.

In accordance with 10 CFR 2.790(a), a copy of this letter and the enclosure will be placed in the NRC Public Document Room unless you notify this office, by telephone, within 10 days of the date of this letter, and submit written application to withhold information contained therein within 30 days of the date of this letter. Such application must be consistent with the requirements of 2.790(b)(1).

SEP 15 1983

B. R. CLEMENTS



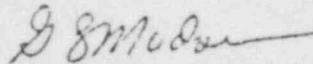
Texas Utilities Generating
Company

-2-

SEP 12 1983

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,



G. L. Madsen, Chief
Reactor Project Branch 1

Enclosure:

Appendix - NRC Inspection Report
50-445/83-34
50-446/83-18

cc w/enclosure:

Texas Utilities Generating Company
ATTN: H. C. Schmidt, Project Manager
2001 Bryan Tower
Dallas, Texas 75201

Texas Utilities Generating Company
ATTN: B. R. Clements, Vice President, Nuclear
2001 Bryan Tower, Suite 1735
Dallas, Texas 75201

APPENDIX

U. S. NUCLEAR REGULATORY COMMISSION
REGION IV

NRC Inspection Report: 50-445/83-34
50-446/83-18

Dockets: 50-445; 50-446

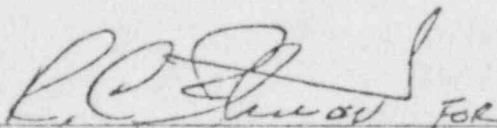
Construction Permits: CPPR-126
CPPR-127

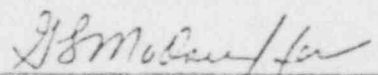
Licensee: Texas Utilities Generating Company (TUGCO)
2001 Bryan Tower
Dallas, Texas 75201

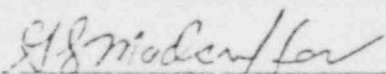
Facility Name: Comanche Peak Steam Electric Station (CPSES) Units 1 and 2

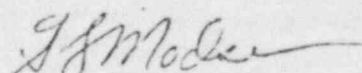
Inspection At: Glen Rose, Texas

Inspection Conducted: August 12-19, 1983

Inspectors:  For 9/6/83
D. M. Hunnicutt, Chief
Reactor Project Section A
Date

 For 9/10/83
D. L. Kelley, Senior Resident Inspector-Operations
Date

 For 9/10/83
W. B. Jones, Engineering Aide
Date

Approved:  For 9/10/83
G. L. Madsen, Chief
Reactor Project Branch 1
Date

Inspection Summary

Inspection Conducted August 12-19, 1983 (Report 50-445/83-34; 50-446/83-13)

Areas Inspected: Special, unannounced inspection of (1) detailed review of nonconformance reports for the period October 12, 1981, through October 12, 1982; (2) inspection to determine that the reactor vessel outer wall did not contact the containment vessel shield wall at any point; and (3) determining that no "secret meetings" related to the reactor vessel wall contacting the containment vessel shield wall at any point had occurred. The inspection involved 14 inspector-hours onsite by three NRC inspectors.

Results: Within the three areas inspected, no violations or deviations were identified.

Details1. Persons ContactedPrincipal Licensee Personnel

- *J. T. Merritt, Manager of Startup
- **R. G. Tolson, Site Quality Assurance Supervisor

- *Denotes exit interview on August 19, 1983.
- **Denotes exist interview on August 17, 1983.

2. Review of Nonconformance Reports (NCR)

An allegation was received by the NRC that the dismissal of Mr. Atchin: may have had a negative (chilling) affect on the preparation and/or issuance of NCR's at CPSES. The NRC inspector made a detailed review of all NCR's for the period between October 12, 1981, and October 12, 1982. This review was performed to determine whether there was an indication that the issuance of NCR's (quality deficiency reports) at the CPSES had been affected by the dismissal of Mr. Atchinson on April 12, 1982. The NRC inspector reviewed the NCR's between the dates of October 12, 1981 and April 12, 1982, and from April 12, 1982, through October 12, 1982. All NCR's issued (six were issued) on April 12, 1982, were purposely omitted from this review to remove any data bias. The results obtained from this review are summarized below:

NCR's Issued in Non ASME Areas

October 12, 1981, through April 11, 1982 = 637
 April 13, 1982, through October 12, 1982 = 1342

There was an increase of about 110 percent (210 percent of the prior 6 months) in the NCR's issued during the subsequent 6 month period.

NCR's Issued in ASME Areas

There was an increase of about 70 percent (170 percent of the prior 6 months) in the NCR's issued during the subsequent 6 month period.

Due to the large increase in the number of NCR's (both in the ASME areas and in the non-ASME areas) in the 6 months immediately following Mr. Atchinson's dismissal, there appears to be no negative (chilling) affect on the issuance of NCR's at CPSES due to the dismissal of Mr. Atchinson.

The NRC inspector found during this review that the CPSES issued NCR's been issued in all areas related to CPSES construction and for the same general and specific activities (deficient areas of items) both prior

and subsequent to the dismissal of Mr. Atchinson on April 12, 1982. Construction activities and the number of construction type employees remained approximately at the same level during this 1 year period (October 1981 through October 1982).

This inspection was performed, in part, as a result of a letter dated July 14, 1983, from Mr. Joseph P. Scinto to Mr. Peter B. Block, Chairman, ASLB, in the matter of TUGCO, et. al. (CPSES, Units 1 and 2).

The allegation was found to be unsubstantiated and without merit.

3. Reactor Vessel Outer Wall Clearance From the Containment Vessel Shield Wall

An allegation had been received that the reactor vessel outer wall had been or was in contact with the containment vessel shield wall. Two NRC inspectors visually inspected the Unit 1 reactor vessel/containment vessel for clearances between the two walls. The Containment Building and all systems were at ambient temperature (less than 100°F). The reactor vessel is covered with a mirror shield (this shield is approximately 6-inches thick and is insulation to reduce the loss of heat from the reactor vessel during operation). The NRC inspectors visually inspected the periphery of the reactor vessel mirror shield and the inner surface of the containment vessel shield wall. There appeared to be about 4 inches of clearance at all points on the reactor vessel outer wall (covered with about 6 inches of mirror shield) and the inner surface of the containment vessel shield wall. There were no visible points of contact nor any indications of previous contact. This visual inspection was accomplished by shining a light beam between the mirror shield and the shield wall and seeing reflected light from the reactor vessel hot and cold legs.

An NRC inspector repeated this inspection process on the Unit 2 reactor vessel mirror shield and the containment vessel shield wall.

These visual inspections revealed that the reactor vessel mirror shields for both reactor vessels (Units 1 and 2) were in place. There were no areas of contact between the mirror shield and the containment vessel shield wall in either Units 1 or 2.

This allegation was found to be without merit and was unsubstantiated.

4. Allegation That a "Secret Meeting" Related to the Reactor Vessel Wall Contacted the Containment Vessel Shield Wall

The Senior Resident Inspector-Operations (SRI0) contacted licensee management and requested information on "secret meeting(s)" related to a reactor vessel outer wall contacting the containment vessel shielding inner wall. Licensee management denied that any "secret meeting(s)" had been held. Licensee management stated that a meeting had been held that involved several corporate level personnel and that this meeting was not "secret" nor had any attempts been made to keep this meeting "secret." Apparently

the reactor vessel mirror shield did touch the shield wall during hot functional testing (HFT) and a related potential 10 CFR Part 50.55(e) report was transmitted to the NRC Senior Resident Inspector-Construction. The subject of this potential 50.55(e) was that there was insufficient heat removal capacity in the reactor vessel cavity. This condition was identified during the scheduled HFT.

The SRI0 reviewed the HFT log for any notation on shield wall/reactor vessel interface. There were no entries related to this specific subject in the log. There was a notation that PT-45-06 "Containment Ventilation" failed to meet its acceptance criteria because the following areas were too hot (thermally):

- (1) All vessel supports
- (2) Neutron Instrument Detector Wells
- (3) Pressurizer Room
- (4) All Steam Generator Compartments

The licensee's management reported that Westinghouse (contractor personnel) is presently evaluating the heat removal problem that has been identified in the reactor vessel cavity.

The allegation was found to be without merit and generally inaccurate. However, the mirror shielding did touch the shield wall during the HFT. The occurrence was identified by the licensee and reported to the NRC and corrective action is in progress.

5. Exit Interviews

Exit interviews were held on August 17 and 19, 1983, with licensee representatives (denoted in paragraph 1). The NRC inspectors summarized the purpose and scope of the inspection and discussed the inspection findings.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
OFFICE OF INVESTIGATIONS FIELD OFFICE, REGION IV

Enclosure 2a

811 RYAN PLAZA DRIVE, SUITE 1000
ARLINGTON, TEXAS 76011

DATE: NOV - 3 1983

REPORT OF INVESTIGATION

TITLE: COMANCHE PEAK STEAM ELECTRIC STATION:
ALLEGED INTIMIDATION OF QC PERSONNEL

SUPPLEMENTAL: DN 50-445/50-446

CASE NUMBER: 4-83-013

CONTROL OFFICE: OIFO: Region IV STATUS: PENDING

PERIOD OF INVESTIGATION: July 13 to August 3, 1983

REPORTING INVESTIGATOR: H. Brooks Griffin
H. Brooks Griffin, Investigator
Office of Investigations Field Office, Region IV

PARTICIPATING PERSONNEL
Wendel E. Frost, Investigator
Office of Investigations Field Office, Region IV

REVIEWED BY: Richard K. Herr
Richard K. Herr, Director
Office of Investigations Field Office, Region IV

William J. Ward
William J. Ward, Director
Division of Field Operations
Office of Investigations

Roger Fortuna
Roger Fortuna, Deputy Director
Office of Investigations

APPROVED BY: Ben B. Hayes
Ben B. Hayes, Director
Office of Investigations

EXHIBIT
CHAPMAN
5
8-2-84 gmw

SUMMARY

The U.S. Secretary of Labor (DOL) recently ruled that the termination of a former QC inspector, Charles ATCHISON, by Brown & Root, Inc. (B&R), the construction contractor at the Comanche Peak Steam Electric Station (CPSES), constituted a discriminatory practice. Subsequently, the Region IV Administrator requested the resumption of an investigation which was suspended pending a ruling by DOL regarding the ATCHISON case and the expansion of the investigation to determine if ATCHISON's termination discouraged other B&R QC inspectors from properly performing their QC responsibilities in reporting deficiencies.

Fifty-five QC inspectors currently working at CPSES were initially interviewed along with seven former B&R QC inspectors. Of these 62 QC inspectors, all testified that they had never failed to report a deficiency. Sixty-one of the 62 inspectors testified that the circumstances of ATCHISON's termination by B&R did not discourage them from reporting nonconforming conditions. Further, 61 of the 62 inspectors stated that no one intimidated or attempted to intimidate them into accepting deficiencies or nonconforming conditions.

One QC inspector stated that he had become more cautious in evaluating what he reported as a nonconformance, and stated he felt that his supervisor and his QC lead had unsuccessfully attempted to harass and/or intimidate him as a result of his inspections. This inspector described NCR conditions which he said were examples of instances where he was subjected to such intimidation, but he was unable to provide sufficiently specific information to permit NRC inspection verification.

This same QC inspector also identified two other former inspectors who he believed had been intimidated. The two former QC inspectors were subsequently located and interviewed. One denied that he had been intimidated by anyone, that anyone attempted to intimidate him, or that Charles ATCHISON's termination discouraged him from writing NCRs. The second former QC inspector stated he had been terminated

by B&R for excessive absences, but said he had already made arrangements to leave before his termination. This inspector denied that anyone had attempted to intimidate him, and stated the knowledge of Charles ATCHISON's QC inspector's termination had not had any effect on his reporting deficiencies, nor had it discouraged him from writing NCRs.

Based on the concerns raised by the 62nd inspector, supra, eleven additional interviews were conducted. Six electrical QC inspectors who were under the supervision of the lead and supervisor accused of attempted intimidation by this inspector were interviewed and signed, sworn statements were obtained. Two of the six inspectors related instances in which they had disagreed with their lead or supervisor; however, none of the six inspectors indicated they had been intimidated, that such disagreements were attempts to intimidate, or that they had failed to report a deficiency as a result of their conflicts with their supervisors. Five additional electrical QC inspectors who worked under different leads but the same supervisor were interviewed. The five inspectors stated they had not been discouraged from reporting deficiencies as a result of the discriminatory firing of the B&R QC inspector (supra), and had not been intimidated nor had anyone attempted to intimidate them.

The QC lead and the QC supervisor identified by the 62nd QC inspector as responsible for the attempted harassment and intimidation were interviewed and signed, sworn statements were obtained. The QC lead denied ever telling an inspector not to write an NCR, but stated that in many cases craft was called to rework a deficiency rather than write an NCR.

The QC supervisor admitted that he may have, on occasion, told an inspector not to write an NCR, but in those instances the deficiencies were reported as unsatisfactory on inspection reports or identified on deficiency reports. The QC supervisor stated that until a room was ready for final inspection, QC had the option of calling craft to rework deficiencies that could be handled in a timely manner. The QC supervisor stated that he had never attempted to discourage QC inspectors from reporting deficiencies. The QC supervisor indicated he strongly encouraged

inspectors to take the time to research procedures on potential nonconformances in the "gray areas."

The Non-ASME (non-safety related work) QA/QC Supervisor for B&R at Comanche Peak stated he had never instructed QC inspectors to have craft correct deficiencies rather than report them. This supervisor stated that deficiencies were normally reported as unsatisfactory on inspection reports, whereas deficiencies identified during unscheduled inspections were reported on NCRs. This supervisor indicated that his subordinate supervisors in the division had the authority to make recommendations regarding NCRs, but that only he had the authority to void them. This supervisor stated that he voided NCRs on a regular basis because many NCRs written by the QC inspectors were incorrect as a result of the inspectors' inexperience. This supervisor indicated that in many of the instances in which inspectors believed they had not been allowed to write NCRs, their conflict with their supervisor was really over what method should be used to report the deficiency, rather than whether it should be reported.

In summary, a total of 76 past and present QC inspectors were interviewed. None of the 76 inspectors indicated they had ever failed to report a deficiency or document a nonconforming condition. Only one assented that there were attempts to intimidate him. No one indicated that knowledge of Charles ATCHISON's termination had caused them to improperly perform inspections, but three inspectors did state that as a result of ATCHISON's termination, they were more careful in their inspections and writing NCRs.

This investigation continues pending the interview of former craft and QC inspectors.

DETAILS

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Purpose of Investigation

The purpose of this investigation was to determine whether the co-workers of a former Brown & Root, Inc., QC inspector at the Comanche Peak Steam Electric Station (CPSES), Glen Rose, Texas, were discouraged from properly reporting nonconforming conditions or deficiencies as the result of a former QC inspector's discriminatory termination. The purpose of this investigation was also to determine if any QC inspectors had been intimidated into accepting nonconforming conditions or deficiencies.

Background

On July 13, 1983, the Region IV Regional Administrator advised that the U.S. Secretary of Labor (DOL) recently ruled in favor of a former Brown & Root, Inc., (B&R) QC inspector, identified as Charles ATCHISON, in a suit involving a violation of protection provision (employee discrimination). The Regional Administrator stated that results of the Labor Department's ruling indicated a need to resume the former NRC investigation (Docket: 50-445/82-10 and 50-445/82-05, dated July 7, 1982) conducted in April and May of 1982, which was suspended pending a ruling by DOL regarding the ATCHISON case.

Interview of Brown & Root, Inc., QC Inspectors

Between July 13 and August 3, 1983, 55 Brown & Root, Inc., QC inspectors were interviewed and signed, sworn statements obtained. The inspectors were asked the same two questions, which were as follows: (1) Did the termination of Charles ATCHISON in April 1982 discourage you from properly carrying out your QC responsibilities in writing NCRs or identifying deficiencies and; (2) Are you now or have you ever been intimidated, or has anyone attempted to intimidate you that caused you not to carry out proper QC inspection responsibilities? The following is a list of the QC inspectors interviewed:

<u>NAME</u>	<u>POSITION</u>	<u>TIME EMPLOYED</u>
Phillip Warren ATKINS	ASME: Task Force	4 years 8 months
Alfred Ray BAGLEY	ASME: Task Force	1 year
Don BISHOP	Non-ASME: Structural	1 year 6 months
William Dow BISHOP, JR.	ASME: Mechanical Equipment	1 year
Dave BROWN	Non-ASME: Mechanical	1 year 6 months
John Aivin CALDWELL	ASME: Task Force	1 year 4 months
William Charles CAMPBELL	ASME: Task Force	1 year
Billy CECIL	Non-ASME: Instrumentation	5 years 6 months
Brian David COFFIN	ASME: Task Force	2 years
Paul DELANEY	Non-ASME: Mechanical	5 months
Catherine Cheryl DENMAN	ASME: Call Board	1 year
John A. DIVETRO	ASME: Electrical	1 year 6 months
Thomas Clark ELLIS	ASME: Task Force	4 years 6 months
REDACTED	REDACTED	REDACTED
John Howard FRAZIER	ASME: Task Force	5 years
Derrell Vaughn FROST	ASME: In-Process	3 months
David GRAY	Non-ASME: Electrical Supports	4 years
Harlow Jackson HALL	ASME: Mechanical Equipment	3 years
Sheree HARDING	Non-ASME: Electrical	4 years
Richard D. HEUER	ASME: Task Force	1 year

Melinda Sue HOLDER	ASME: Task Force	5 years 3 months
Richard Dee ICE	ASME: Task Force	5 years 6 months
Michael Vance IVEY	ASME: Task Force	2 years
William A. KATTNESS	Non-ASME: Mechanical	1 year 6 months
Marian L. KIERNAN	Non-ASME: Conduit support	1 year 4 months
Darla Sue LANKFORD	ASME: Task Force	3 years
Jeffery Scott McCOMMAS	ASME: Task Force	3 years 6 months
David H. MacDONALD, JR.	ASME: Task Force	4 years
Ki Anthony MARLEY	ASME: Instrumentation	1 year 6 months
George Laigle MORRIS, JR.	ASME: Quality Engineering	1 year
John Howard MORTON	ASME: Materials Receiving	7 years
Donald A. NISICH, SR.	ASME: Task Force	1 year 6 months
Rex Edward ONDRACEK	ASME: Task Force	1 year 3 months
David OSBORNE	Non-ASME: Civil	4 years
Mary Helen OSTERDAY	ASME: In-Process	2 years 6 months
Stan PERRY	Non-ASME: Mechanical	3 months
Pat RABON	Non-ASME: Electrical	2 years
Satish Y. RANADIVE	ASME: Quality Engineering	1 year
Clair C. RANDALL	Non-ASME: QC Supervisor	1 year
John L. REED	ASME: Fab Shop	3 years 6 months
Michael RHODES	Non-ASME: Structural	1 year
Charles R. SAENGERHAUSEN	ASME: Task Force	1 year
Duane SANDERS	Non-ASME: Electrical	5 months
J. D. SCOTT	ASME: Completions	1 year
Marshall SEXTON	Non-ASME: Mechanical	7 months
Bobby Scott SHAMBLIN	Non-ASME: Electrical	8 months
Shirley STARR	Non-ASME: Electrical	2 years
Jimmy D. STAUS	ASME: In-Process	1 year
Jan SWEAT	Non-ASME: Instrumentation	3 years 6 months
Melvin Ray TODD	ASME: Task Force	7 years 6 months
Scott WARNER	Non-ASME: Conduit Support	1 year
Matthew Carlton WELCH	ASME: In-Process	6 months

Larry Gene WILKERSON	ASME: Finals Lead	7 years
Charles WOLF	Non-ASME: Conduit Supports	1 year 6 months
Clint Dee YARGER	Non-ASME: Design Verification	1 year

All but one of the present B&R inspectors interviewed answered "no" to both questions. The one inspector, [REDACTED] (confidentiality requested), indicated that [REDACTED] had been discouraged by ATCHISON's termination and believed that [REDACTED] supervisors had attempted to intimidate [REDACTED]. [REDACTED] provided two signed, sworn statements to the NRC and signed a Confidentiality Agreement, and these documents are included with this report as Attachments (1), (2) and (3) respectively. [REDACTED] concerns are detailed in this report under Interview of [REDACTED] (infra).

The inspectors were also questioned about their knowledge of the possible intimidation or attempted intimidation of other QC inspectors. Five of the inspectors interviewed indicated that craft employees (unidentified) attempted to intimidate them into signing off on inspections. The five inspectors all stated that they had not been intimidated and had not signed off on improper work. The above listed inspectors' signed, sworn statements are included with this report as Attachments (4) through (59) (this includes one Confidentiality Agreement).

INVESTIGATOR'S NOTE: The majority of the inspectors interviewed indicated it was their understanding that because their inspections were not final inspections, the deficiencies they reported would later have to be reinspected before the work was finally accepted.

Interview of Former QC Inspectors

A list of all QC inspectors who had left employment with Brown & Root, Inc., at CPSES between July 1982 and July 1983, was received from the B&R Vault Document Section. The list contained 77 names and addresses of QC inspectors that had left their positions. Attempts were made to locate 38 of the former inspectors, but only seven were successfully located and telephonically interviewed. The following is a list of those former QC inspectors interviewed:

<u>NAME</u>	<u>POSITION</u>	<u>TIME EMPLOYED</u> (Start - Termination)
Richard D. ALLSTRUM	Non-ASME: Mechanical	1979-83
Edward L. HOLLAND	Non-ASME: Civil Superintendent	1976-83
Jo Ann AMUNDSON	Non-ASME: Hilti Bolts	Apr. 1982-Mar. 1983
Garland OSBORNE	ASME: Mechanical Equipment	1977-83
James PATTON	Non-ASME: Civil Superintendent	1976-83
Albert Lee McDOWELL	ASME: Pipe Hangers	Jan. 1981-Jan. 1983
Andrew GANZMANN	Non-ASME: Fab Shop	1976-83

All seven former B&R inspectors interviewed indicated that they had not been discouraged by ATCHISON's termination, intimidated as related to carrying out their QC responsibilities, nor had anyone attempted to intimidate them. ALLSTRUM indicated he had disagreements with craft personnel over inspections he had conducted, but he stated that he had not accepted improper work as a result of the disagreements. AMUNDSON stated that a QC inspector named Phyllis MAY had possibly been intimidated by the Non-ASME Civil QC Supervisor Harry WILLIAMS.

INVESTIGATOR'S NOTE: This instance of the potential intimidation of Phyllis MAY was addressed in ROI 4-83-001.

Interview of [REDACTED]

On [REDACTED], [REDACTED], a Quality Control inspector for Brown & Root, Inc., at the Comanche Peak Steam Electric Station in Glen Rose, Texas, was interviewed by NRC Investigator Wendel FROST. [REDACTED] executed two signed, sworn statements which are included in this report as Attachments (1) and (2), and also signed a Confidentiality Agreement which is included in this report as Attachment (3).

[REDACTED] stated that the firing of Charles ATCHISON in April 1982 had discouraged [REDACTED], but [REDACTED] had not failed to report deficiencies [REDACTED] identified.

[REDACTED] indicated that [REDACTED] did have some concerns [REDACTED] believed constituted intimidation against two of [REDACTED] former co-workers who had since left their positions with B&R.

[REDACTED] stated [REDACTED] had a conversation with Ron STINES, a QC inspector in the electrical group, in which STINES stated he felt he was being intimidated by his Lead, Bill FORD, who worked for Eddie DANZLER, a former QC supervisor. FORD said that STINES told him the deficiencies that he (STINES) had uncovered were not being properly corrected.

[REDACTED] said that STINES left his position with B&R at the end of May 1983, although [REDACTED] did not know the reason STINES left.

[REDACTED] also stated that [REDACTED] had a conversation with Arnold SMART, a former Ebasco electrical QC inspector, who indicated to [REDACTED] that he had been intimidated by his Lead, Randy McGAUGHY. [REDACTED] also indicated SMART had told [REDACTED] that he was receiving pressure from DANZLER and DANZLER's boss, Ron TOLSON, the QA Manager for B&R. [REDACTED] said SMART told [REDACTED] the deficiencies that he had uncovered were not being corrected. [REDACTED] said [REDACTED] did not remember the particular problems that SMART had uncovered, but [REDACTED] thought [REDACTED] remembered SMART had been made to "buy off" on items that should not have been accepted. [REDACTED] said that SMART had a meeting with an Ebasco official and that after the meeting, SMART left his position with Ebasco. [REDACTED] indicated [REDACTED] did not know whether SMART quit or was terminated.

[redacted] indicated there were several instances in which [redacted] felt pressure had been exerted on [redacted] not to write NCRs. [redacted] stated that within the past month, [redacted] learned of a problem in the Control Room of Unit-I in which electrical cables were being removed without proper documentation. [redacted] indicated that [redacted] wanted to write an NCR on the lack of documentation, but that J. B. LEUTWYLER, a QC supervisor, had instructed [redacted] not to write the NCR.

[redacted] told of another situation which occurred within the past month in the Safeguards Building in which cable was removed without documentation. [redacted] said [redacted] again tried to write an NCR and that it was rejected [redacted] by LEUTWYLER. [redacted] said that after the [redacted] submitted the NCR, it was accepted but that [redacted] did not know if it was placed in the system.

[redacted] described another situation within the last couple of weeks involving flex conduit in the Fuel Building. Conduit was replaced and not repaired as described by an NCR. [redacted] said [redacted] had been told by [redacted] BILL FORD, to disposition the NCR, but that [redacted] had not yet complied with [redacted] orders.

[redacted] recalled another occasion in which [redacted] FORD, directed [redacted] to "close out" an NCR that [redacted] to do. [redacted] said that this NCR concerned conduit and that [redacted] told FORD [redacted] to do the job, but that FORD told [redacted] to do it anyway. [redacted] said [redacted] closed out the NCR and it was later "kicked back" and corrected.

[redacted] recalled another situation, in April 1983 in Unit 1, in which craft needed an NCR closed so they could proceed with the pulling of cable. [redacted] said that problems with the cable tray had not been corrected. [redacted] said [redacted] remembered there was trash in the cable tray, cuts in parts of the cable, and the cable was also interwoven. [redacted] said [redacted] refused to close out the NCR. [redacted] said that [redacted] FORD, was contacted by someone in craft (identification unknown) who told him (FORD) to have [redacted] close out the NCR. [redacted] said that FORD told [redacted] "I'm not telling you that you have to do it, I'm telling you that they want it done." [redacted]

stated [redacted] refused to close out the NCR. [redacted] indicated [redacted] was directed by FORD to reinspect again, and that [redacted] again refused to close out the NCR. [redacted] said that FORD got another inspector to close out the NCR, and that JOE PERRY (no longer employed by B&R) was the general foreman who was a witness to this incident. [redacted] concluded that based on these above instances, [redacted] felt [redacted] had been harassed as a QC inspector and that [redacted] supervisor had made attempts to intimidate [redacted] to keep [redacted] from performing [redacted] duties. [redacted]

[redacted] stated that when [redacted] came to work at CPSES, Eddie DANZLER, the supervisor, told him, "This company does not care about people, it just cares about getting the job done. You'll do your job as you're told and nothing more." [redacted] said it was [redacted] opinion that quality control was not their first concern, but rather production was the important thing.

[redacted] was asked for the NCR identification numbers, but stated [redacted] did not recall the NCR numbers. [redacted] said [redacted] would obtain the identification numbers of the NCRs and give them to the Nuclear Regulatory Commission.

INVESTIGATOR'S NOTE: Subsequently, [redacted] was contacted on four different occasions and explained [redacted] had not been able to identify the NCRs in question.

Interview of Ronald G. STINES

On July 25, 1983, Ronald STINES, a former Brown & Root, Inc., QC inspector, was telephonically interviewed by NRC Investigator H. Brooks GRIFFIN. STINES stated that he was presently employed by McDonald Douglas in Tulsa, Oklahoma.

STINES stated that he had been layed off by McDonald Douglas and accepted employment with B&R at CPSES as a QC inspector in February, 1983. STINES was asked about his knowledge of the termination of Charles ATCHISON, to which STINES answered he was aware of the case from articles he had read in the newspaper. STINES stated that the firing of ATCHISON had not discouraged him from reporting deficiencies nor caused him to alter his inspection procedures.

STINES was asked whether anyone had ever intimidated or attempted to intimidate him into accepting deficiencies or nonconforming conditions as related to his QC responsibilities, and STINES stated that they had not. STINES was asked whether his Lead, Bill FORD, had ever refused to let him report deficiencies or nonconforming conditions or if he knew of defects that existed at CPSES that had not been reported, and STINES answered, "No." STINES was informed that the Nuclear Regulatory Commission had received specific information from a confidential source which indicated that he had been intimidated by FORD into not reporting certian deficiencies, and STINES said the NRC source of information was not correct.

STINES said that after working at CPSES for 2 months, his old job with McDonald Douglas became available and he left B&R to return to his former position in Oklahoma. STINES stated that he left B&R under good circumstances and was listed as eligible for rehire.

Interview of Arnold G. SMART

On July 26, 1983, Arnold G. SMART, a QC inspector for the Pullman Company at the Diablo Canyon Nuclear site, was telephonically interviewed by NRC Investigator H. Brooks GRIFFIN. SMART stated that he had worked for Ebasco as a QC inspector at the CPSES site from March 1982 until February 1983. SMART stated that he conducted inspections as part of the start-up group in the ASME section for 10 months, and then was transferred to construction for 1 month and worked for J. B. LEUTWYLER. When asked why he had left his position with Ebasco, SMART stated he had become dissatisfied with Ebasco management and disliked the fact he was required to report to B&R supervisors. SMART also stated that his mother was diagnosed as having cancer during this time, and he returned to California to be with her. SMART stated that the reason for his termination, as listed by B&R, was excessive absences.

SMART was asked about his knowledge of the Charles ATCHISON case, and SMART stated he was aware of the ATCHISON case only from what he had read in the newspapers. SMART stated that he was not affected or discouraged by ATCHISON's termination, and that most of the people he knew at CPSES thought ATCHISON was a troublemaker.

SMART was asked whether he had ever been intimidated or if anybody had ever attempted to intimidate him as related to his QC responsibilities. SMART stated that on one occasion, he had an argument with a QC supervisor by the name of O. B. RUSSOM who complained that he (SMART) was not working fast enough, but that they were able to settle their differences. SMART stated he had no other problems other than the one argument. SMART was asked if he had ever been intimidated by his Lead, Randy McGAUGHY, or received pressure from a QC supervisor identified as Eddie DANZLER. SMART stated he did not recall any incidents involving those men attempting to intimidate or pressure him. SMART was asked whether he had ever uncovered any deficiencies at CPSES which were not corrected or that he had failed to report, and he said that he had not. SMART was asked whether he had held a meeting with Ebasco officials to complain about the fact the NCRs that he had written had not been processed properly or corrected, and he stated that he did

did not recall any such meetings. SMART was asked whether he believed QC inspectors at CPSES had adequate freedom to conduct their inspections and report deficiencies, and SMART stated he believed they had adequate freedom.

Interview of Brown & Root, Inc., Electrical QC Inspectors

JONES identified William FORD, an electrical lead, as having attempted to harass and/or intimidate him. Five QC inspectors who worked for FORD were interviewed and signed, sworn statements obtained along with two Confidentiality Agreements, which are included with this report as Attachments (60) through (67), in which they stated that FORD had not intimidated them into not reporting deficiencies or not writing NCRs, and had never attempted to intimidate them. The following is a list of the QC inspectors interviewed:

<u>NAME</u>	<u>POSITION</u>	<u>TIME EMPLOYED</u>
Armando CAMACHO	Non-ASME: Electrical	1 year 7 months
John Albert HUNTER III	Non-ASME: Electrical	6 months
Hubert Dwayne KING, JR.	Non-ASME: Electrical	8 months
	Non-ASME: Electrical	
	Non-ASME: Electrical	

CAMACHO identified KING as having possibly been intimidated by FORD, but KING denied having been intimidated and said that he and FORD had settled their disagreement.

JONES also identified J. B. LEUTWYLER, a B&R supervisor, as having attempted to harass and/or intimidate him into not writing NCRs. Four additional QC inspectors who worked for LEUTWYLER but were not under FORD were interviewed and signed, sworn statements obtained, which are included with this report as Attachments (68) through (71). All four inspectors stated that LEUTWYLER had not intimidated them into not reporting deficiencies or not writing NCRs, and had never attempted to intimidate them. The following is a list of the QC inspectors interviewed:

Bruce Allen HEAFN	Non-ASME: Electrical	6 months
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Billy Robert HOLMES	Non-ASME	Electrical	1 year 9 months
Debra Ellen MABE	Non-ASME:	Electrical	3 years 2 months
Robert Warner WIGGS	Non-ASME:	Electrical	3 years

██████████ stated that HEARN and ██████████ my have been intimidated by LEUTWYLER, but when they were interviewed they denied having been intimidated.

When ██████████ was interviewed ██████████ stated ██████████ believed John HUNTER may have been intimidated by FORD, but when HUNTER was interviewed he denied that FORD had tried to prevent him from writing an NCR.

MABE testified that a Quality Assurance Engineer named POPPLEWELL had, on one occasion, made a comment to her to the effect, "You are not really going to write an NCR on that are you?" MABE stated she subsequently reported the deficiency as an "unsat" on an Inspection Report. MABE said she believed she had adequate freedom to write NCRs.

Interview of William H. FORD

On July 27, 1983, William H. FORD, a Brown & Root, Inc., electrical QC lead working under J. B. LEUTWYLER, was interviewed by NRC Investigator H. Brooks Griffin at CPSES, Glen Rose, Texas. FORD executed a signed, sworn statement which is included in this report as Attachment (72). FORD stated that he had worked in Quality Control at CPSES since December of 1981, and had been promoted to a QC lead in March of 1983.

FORD stated that since he had been the lead, he had never told an inspector not to write an NCR, nor had he personally taken-over an inspection from an inspector who identified a nonconforming condition, nor had he transferred an inspection from one inspector to another inspector in order to by-pass an NCR. FORD stated that when an inspector identified a deficiency they would look at the item together. FORD stated: "We either write an NCR, or sometimes we call craft to fix it if it is a small problem, or sometimes we put an NCR "pending" hold tag on it and give craft time to fix it." FORD denied he had ever intimidated or attempted to intimidate anyone.

FORD stated that LEUTWYLER had never instructed him or pressured him to lower the number of NCRs written by his inspectors. FORD indicated he believed that his inspectors had adequate freedom to report deficiencies.

Interview of Jayhugh B. LEUTWYLER, JR.

On July 28, 1983, Jayhugh B. LEUTWYLER, JR., Brown & Root, Inc., an electrical QC inspection supervisor, was interviewed by NRC Investigator H. Brooks GRIFFIN at CPSES, Glen Rose, Texas. LEUTWYLER executed a signed, sworn statement which is included with this report as Attachment (73). LEUTWYLER stated that he had been transferred by B&R from another project to CPSES in December 1981.

LEUTWYLER stated there may have been instances in which he told inspectors not to write an NRC, although he said he could not recall any such instances. LEUTWYLER stated that if an inspector felt strongly about a deficiency, the problem was usually referred to Quality Engineering in the form of an NCR.

LEUTWYLER stated he defined a nonconformance as something that altered the form, fit or function of an item (the design) and/or the certifying paperwork. LEUTWYLER stated that many QC inspectors believed that anything wrong with an item constituted a nonconformance. LEUTWYLER stated that he believed that most deficiencies should be reported as unsatisfactory on an Inspection Report or Deficiency Report. LEUTWYLER stated that in instances where he had discouraged inspectors from writing NCRs, the deficiencies were still reported on inspection reports which remained as open items and were tracked.

LEUTWYLER stated it was his understanding that until a room was ready for "turnover" for final inspection, QC had the option of having craft rework identified deficiencies. LEUTWYLER stated that if the deficiency could not be reworked in a timely manner, then an NCR was prepared.

LEUTWYLER said he never attempted to pressure his leads or inspectors into lowering the number of NCRs written, nor had he ever had one inspector take-over an inspection when another inspector refused to "sign off" on the inspection. LEUTWYLER stated that he believed that his QC inspectors had adequate freedom to report deficiencies and write NCRs. LEUTWYLER denied that he intimidated or attempted to intimidate anyone.

Interview of C. Thomas BRANDT

On August 3, 1983, C. Thomas BRANDT, the Non-ASME QA/QC Supervisor for B&R at CPSES, Glen Rose, Texas, was interviewed by NRC Investigators D. D. DRISKILL and H. Brooks GRIFFIN at the CPSES site. BRANDT said that B&R used Construction Deficiency Lists, Inspection Reports and NCRs to report deficiencies at CPSES. BRANDT stated that inspectors working on cable tray hangers and classified piping supports were only permitted to use Inspection Reports for reporting deficiencies, but the rest of the inspectors under his supervision were allowed to write NCRs when reporting nonconformances. BRANDT stated that during scheduled inspections, deficiencies were normally reported as "unsatisfactory" on Inspection Reports. BRANDT said that deficiencies found on unscheduled inspections were normally reported on an NCR.

BRANDT stated that in some cases an "unsatisfactory" on an Inspection Report was reported directly to craft for rework, and once the rework was completed, a QC inspector was requested to conduct an inspection. BRANDT stated that another option for an "unsatisfactory" on an Inspection Report was the dispositioning by an engineer on Component Modification Cards (CMCs) or Design Change Authorizations (DCAs). BRANDT stated that the inspection instructions he has given his inspectors are that the inspectors should use an Inspection Report unless the deficiency is identified on other than a programmatic required inspection. BRANDT was asked whether "pending" NCRs were used at Comanche Peak, and he stated there was no such thing as a "pending" NCR in the procedures. BRANDT stated he recently became aware of several instances in which hold tags were used referencing a "pending" NCR, and he stated that this was not proper and that "pending" NCRs were not acceptable. BRANDT stated he had recently instructed his subordinates that there was no such thing as a "pending" NCR.

BRANDT was asked whether inspectors were encouraged to call craft to correct problems rather than report the deficiencies. BRANDT said that he was sure this had occurred, but he had never instructed anyone to call craft rather than report

the deficiency. BRANDT stated he did not know of any instances in which one inspector was substituted for another inspector who refused to sign off on an inspection. BRANDT stated that since he was a Level-III inspector, he had authority to override lower level inspectors if he knew that a deficiency or nonconformance did not exist.

BRANDT stated that all NCRs generated by inspectors under his supervision were reviewed by their immediate supervisors, and that those supervisors made recommendations relating to the validity of the NCRs. BRANDT said he was the only one who had authority to void an NCR, and that he voided NCRs on a regular basis on reports that were not truly nonconformances. BRANDT was asked whether the accepted definition of an NCR at CPSES was "something that altered the form, fit or function of an item (the design) and/or the certifying paperwork." BRANDT stated he did not think this was an adequate definition for a nonconforming condition, and pointed out there were additional deficiencies that did not involve problems with design or certifying paperwork which could be reported as nonconforming conditions. BRANDT stated he believed that QC inspectors at CPSES had adequate freedom to report deficiencies.

STATUS OF INVESTIGATION

This investigation is submitted in a PENDING status. Interviews of additional former QC inspectors and craft personnel are planned as a result of recent information obtained from David Preister, Assistant Attorney General, State of Texas, and an intervenor regarding the identification of individuals with possible knowledge of intimidation and/or harassment.

ATTACHMENTS

(1) Statement of [REDACTED]	[REDACTED]
(2) Statement of [REDACTED]	[REDACTED]
(3) Confidentiality Agreement of [REDACTED]	[REDACTED]
(4) Statement of Phillip Warren ATKINS	7-20-83
(5) Statement of Alfred Ray BAGLEY	7-14-83
(6) Statement of Don BISHOP	7-14-83
(7) Statement of William Dow BISHOP, JR.	7-14-83
(8) Statement of Dave BROWN	7-14-83
(9) Statement of John Alvin CALDWELL	7-14-83
(10) Statement of William Charles CAMPBELL	7-20-83
(11) Statement of Billy CECIL	7-15-83
(12) Statement of Brian David COFFIN	7-20-83
(13) Statement of Paul DeLANEY	7-14-83
(14) Statement of Catherine Cheryl DENMAN	7-19-83
(15) Statement of John A. DiVETRO	7-14-83
(16) Statement of Thomas Clark ELLIS	7-14-83
(17) Statement of [REDACTED]	[REDACTED]
(18) Confidentiality Agreement of [REDACTED]	[REDACTED]
(19) Statement of John Howard FRAZIER	7-14-83
(20) Statement of Derrell Vaughn FROST	7-15-83
(21) Statement of David GRAY	7-19-83
(22) Statement of Harlow Jackson HALL	7-19-83
(23) Statement of Sheree HARDING	7-15-83
(24) Statement of Richard D. HEUER	7-15-83
(25) Statement of Melinda Sue HOLDER	7-14-83
(26) Statement of Richard Dee ICE	7-14-83
(27) Statement of Michael Vance IVEY	7-14-83
(28) Statement of William A. KATTNESS	7-14-83
(29) Statement of Marvin KIERNAN	7-19-83
(30) Statement of Darla Sue LANKFORD	7-20-83

ATTACHMENTS (Continued)

(31) Statement of Jeffrey Scott McCOMMAS	7-15-83
(32) Statement of David H. MacDONALD, JR.	7-14-83
(33) Statement of Ki Anthony MARLEY	7-15-83
(34) Statement of George Laigle MORRIS, JR.	7-19-83
(35) Statement of John Howard MORTON	7-20-83
(36) Statement of Donald A. NISICH, SR.	7-19-83
(37) Statement of Rex Edward ONDRACEK	7-19-83
(38) Statement of David OSBORNE	7-19-83
(39) Statement of Mary Helen OSTERDAY	7-14-83
(40) Statement of Stan PERRY	7-19-83
(41) Statement of Pat RABON	7-19-83
(42) Statement of Satish Y. RANADRIVE	7-14-83
(43) Statement of Clair C. RANDALL	7-14-83
(44) Statement of John L. REED	7-14-83
(45) Statement of Mike L. RHODES	7-14-83
(46) Statement of Charlie Robert SAENGERHAUSEN	7-15-83
(47) Statement of Duane SANDERS	7-19-83
(48) Statement of J. D. SCOTT	7-15-83
(49) Statement of Marshall SEXTON	7-14-83
(50) Statement of Bobby Scott SHAMBLIN	8-09-83
(51) Statement of Shirley STARR	7-14-83
(52) Statement of Jimmy D. STAUS	7-15-83
(53) Statement of Jan SWEAT	7-14-83
(54) Statement of Melvin Roy TODD	7-14-83
(55) Statement of Scott WARNER	7-14-83
(56) Statement of Matthew Carlton WELCH	7-20-83
(57) Statement of Larry Gene WILKERSON	7-14-83
(58) Statement of Charles WOLFE	7-14-83
(59) Statement of Clint DEE YARGER	8-09-83

ATTACHMENTS (Continued)

(60) Statement of Armando CAMACHO	7-27-83
(61) Statement of John Albert Hunter III	7-27-83
(62) Statement of Hubert Dwaine KING, JR.	7-27-83
(63) Statement of [REDACTED]	[REDACTED]
(64) Confidentiality Agreement of [REDACTED]	[REDACTED]
(65) Statement of [REDACTED]	[REDACTED]
(66) Statement of [REDACTED]	[REDACTED]
(67) Confidentiality Agreement of [REDACTED]	[REDACTED]
(68) Statement of Bruce Allen HEARN	7-28-83
(69) Statement Billy Robert HOLMES	7-28-83
(70) Statement of Debra Ellen MABE	7-28-83
(71) Statement of Robert Warner WIGGS	7-28-83
(72) Statement of William H. FORD	7-27-83
(73) Statement of Jayhugh B. LEUTWYLER	7-28-83

Alan Rose, Texas

DATE :

I hereby make the following voluntary statement to Mr. W. E. Frost, who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I am currently employed at the CPSES, Allen Pass, Texas as a quality control inspector in the area of [redacted]. I have been employed by Brown and Root since [redacted]. I did not know Charles Atchison, but I am aware of his situation. I have read newspaper articles and I have heard comments from Co-workers or the wire. The termination of Charles Atchison in April of 1982 has had a chilling effect on me personally. I have become very cautious in performing my duties as a quality control inspector. I know that the potential for termination is present. I feel that I have not changed my job performance over the Charles Atchison termination and that I still properly perform the writing of NCR's and the identifying of deficiencies.

I also feel that attempts have been made to intimidate me by using agencies, but that this attempt was not successful as I continued to carry out my QC inspection duties in a responsible manner. I do have some detailed concerns I will bring to the N.R.C. in a separate statement. I have read the foregoing statement consisting of 1 handwritten page.

I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on [redacted] at [redacted] (date) (time)

(SIGNATURE: TYPED OR PRINTED)

Subscribed and sworn to before me this [redacted] day of [redacted] at [redacted]

INVESTIGATOR: W. E. Frost

WITNESS: [redacted]

DATE: _____

I, _____, hereby make the following voluntary statement to Mr. W.E. Frost, who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely with no threats or promises of reward having been made to me.

I am currently employed at the CPSES, ^{the} Pore, Texas as a quality control inspector - the [redacted]

[redacted] I have been employed by Brown at Port [redacted]

[redacted] I am presently employed by [redacted] in their Q.C. program for approximately [redacted]

I have already given a sworn statement to Mr. W.E. Frost concerning this case. I have concerns about intimidation that occurred at CPSES - the concerns two fellow co-workers and attempts at intimidation that have occurred to myself by my supervisors.

I feel that Ron Stinis, Q.C. inspector electrical, ^{Brown at Port} and Arnold Smart, Q.C. inspector electrical, Ebasco, both left this job site ^{in May of 1983} as a result of intimidation ^{and other reasons} I was told ^{by} Ron Stinis that he left ^{the} ~~intimidated by Phil [redacted]~~ ^{Bill [redacted]} ^{at} ^{Port} ^{who} ^{received} instructions from Eddy Dangler, Q.C. supervisor, electrical, Brown at Port. Ron Stinis also expressed concerns that the deficiencies that he ~~was~~ ^{was} concerned over not being pursued and properly corrected. Ron Stinis then left

the job site at the end of May of 1983.

I was told in conversation in April of 1983 by Arnold Smart that his balloons intimidated by his lead, E. Rudy, but that he is receiving papers from Etelle Parker, Branch, Branch and Branch. Arnold Smart also expressed concern that

deficiencies that he had measured were not being assessed and properly corrected. I do not remember the exact issue, but he felt he had to buy off on it in a meeting with an Ebasco official that I don't know the name of at after the meeting Arnold Smart left the site. I do not know if Arnold Smart was terminated or if he quit.

I am also concerned about several situations where papers he expected or no right to write NCR's about permit the papers procedures to be performed. Recently in the control room of unit 1, electrical cables are being removed without the proper documentation. I have been instructed by T. B. Fulkerson, Branch, Branch and Branch not to write NCR's. This is a very serious situation. Another situation is in the control room where I Branch is a cable was removed without documentation. I tried to write NCR at it was rejected by T. B. Fulkerson, Branch and Branch. The situation was rejected, but I still can not verify it is in the system.

Another situation involves flex conduit, fuel billing. The
conduit was replaced and not repaired as directed by the
NCR. I have refused to deposit it even though I have been
told to do so by [redacted] Bill Ford. This item remains
on my desk as I am still receiving papers to deposit
the NCR.

Another situation occurred ^{May 1983} when I was directed by [redacted]
Bill Ford to close out a NCR that [redacted]
closed out. This NCR concerned conduit. I refused Bill
Ford that I was not [redacted] to do the job. I was
told to do it anyway. I closed out the NCR as it was
later [redacted] back and properly closed.

Another situation occurred in Unit #1. Crafts needed an
NCR ^{in April 1983} so they could proceed to pull coats. The
problems with the coats they had not been corrected. I
remember that (1) they were told in the tray, (2) tray to fuel company
coats come and (3) coats in interview. I refused to
close it as directed by the craft supervisor [redacted]
I do not recall. [redacted] Bill Ford was contacted by
craft and I was told to close it out by Bill Ford. I refused to
close it out. I was told by Bill Ford that, "I'm not telling
you to do it, I'm telling you that they want it done."
I still refused to do it and I was directed to reinspect it.

refused to do it at Bill Ford got another inspector to close the
NCR. Joe Perry, et General Friend was a witness to the
incident.

Based on this incident I feel that I have been
harassed as a quality control inspector and that my assignment
has been attempts to intimidate me to keep me from
performing my duties.

When I first came to work at CPSES
Eddie Kaugler told me "The company does not care about
people, just care about getting the job done." "And do you
care as you talk and nothing more." I now know exactly
what Eddie Kaugler meant as regard to quality control
inspector: Quality control is not their first concern,
production is more important.

I have read the foregoing statement consisting of 5 handwritten/~~typed~~ pages. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on at
(date) (place)

SIGNATURE:

Subscribed and sworn to before me this day of 19

at La Brea, Texas

INVESTIGATOR: W. C. [unclear]

WITNESS: _____

(Original to source of information, NRC to retain signed copy of duplicate original)

I have information that I wish to provide in confidence to the U. S. Nuclear Regulatory Commission (NRC). I request an express pledge of confidentiality as a condition of providing this information to the NRC. I will not provide this information voluntarily to the NRC without such confidentiality being extended to me.

It is my understanding, consistent with its legal obligations, the NRC, by agreeing to this confidentiality, will adhere to the following conditions:

(1) The NRC will not identify me by name or personal identifier in any NRC initiated document, conversation, or communication released to the public which relates directly to the information provided by me. I understand the term "public release" to encompass any distribution outside of the NRC with the exception of other public agencies which may require this information in furtherance of their responsibilities under law or public trust.

(2) The NRC will disclose my identity within the NRC only to the extent required for the conduct of NRC related activities.

(3) During the course of the inquiry or investigation the NRC will also make every effort consistent with the investigative needs of the Commission to avoid actions which would clearly be expected to result in the disclosure of my identity to persons subsequently contacted by the NRC. At a later stage I understand that even though the NRC will make every reasonable effort to protect my identity, my identification could be compelled by orders or subpoenas issued by courts of law, hearing boards, or similar legal entities. In such cases, the basis for granting this promise of confidentiality and any other relevant facts will be communicated to the authority ordering the disclosure in an effort to maintain my confidentiality. If this effort proves unsuccessful, a representative of the NRC will attempt to inform me of any such action before disclosing my identity.

I also understand that the NRC will consider me to have waived my right to confidentiality if I take any action that may be reasonably expected to disclose my identity. I further understand that the NRC will consider me to have waived my rights to confidentiality if I provide (or have previously provided) information to any other party that contradicts the information that I provided to the NRC or if circumstances indicate that I am intentionally providing false information to the NRC.

Other Conditions: (if any):

I have read and fully understand the contents of this agreement. I agree with its provisions.

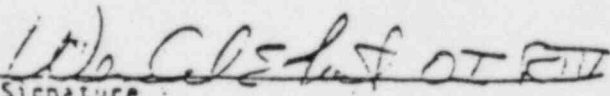

Date


Signature of source of information.

Typed or Printed Name and Address

Agreed to on behalf of the US Nuclear Regulatory Commission.


Date


Signature

Typed or Printed Name and Title

PLACE: Glen Rose, Texas

CPSES

DATE: 7-20-83

I, Phillip Warren Atkins, hereby make the following voluntary statement to Mr. H. Brooks Griffin who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I have been employed as a QC inspector for Brown & Root at Comanche Peak for about four years and eight months. I am presently inspecting as part of the Task Force in Unit I.

I know Charles Atchinson and am aware of his termination by Brown & Root. Atchinson's dismissal did not discourage me from performing my inspection duties or reporting nonconforming conditions.

Since I have worked as a QC inspector at Comanche Peak, nobody has attempted to intimidate me, nor have I been intimidated as relates to my inspection responsibilities.

I have read the foregoing statement consisting of 1 handwritten/~~two~~ pages. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-20-83 at 11:44 AM
(date) (time)

Phillip Warren Atkins
(SIGNATURE) (TYPED OR PRINTED)

Subscribed and sworn to before me this 20th day of July, 1983,
at Comanche Peak

INVESTIGATOR: H. Brooks Griffin
(NAME: TYPED OR PRINTED)

WITNESS: _____
(NAME & TITLE: TYPED OR PRINTED)

PLACE: Glen Rose, Texas
CPSS

DATE: 7-14-53

I, Sited Ray Pauley, hereby make the following voluntary statement to Mr. H. B. Griffin, who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I have been employed as a CIC inspector for Brown + Root at Comanche Peak for about one year. I am presently conducting inspections as part of a Task Force in Unit I.

I did not begin working as a CIC inspector at Comanche Peak until I was hired in a recent year. I am aware of the circumstances of my hiring but a termination did not occur. I am reporting on the conditions of my working conditions.

Since I have been employed at Comanche Peak I have not been intimidated or had anyone attempt to intimidate me to not report my nonconforming conditions.

I have read the foregoing statement consisting of 1 handwritten page(s). I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-14-53 at 6:57 p
(date) (time)

[Signature]
(SIGNATURE: TYPED OR PRINTED)

Subscribed and sworn to before me this 14 day of July, 1953
at Glen Rose, Texas

INVESTIGATOR: [Signature]
(NAME: TYPED OR PRINTED)

WITNESS: _____
(NAME & TITLE: TYPED OR PRINTED)

PLACE: CPSES

Allen, Texas

DATE: July 14, 1983

I, Don Bishop, hereby make the following voluntary statement to Mr. W. E. Frost, who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I am currently employed at the CPSES, Allen, Texas as a quality control inspector in the area of structural inspection. I have been employed by C.C. Randall since December of 1982. I did not know Charles Atchison, but I have read about him in the newspapers.

The fact that Charles Atchison was terminated in April of 1982 has not discouraged me from properly carrying out my Q.C. responsibilities in writing NCR's or identifying deficiencies. I have not now nor have I ever been intimidated by anyone at CPSES that would cause me not to carry out my proper Q.C. inspection responsibility.

In February of 1983 I had difficulty with getting my certification signed off by Ralston Smith, lead for structural (class fire), Brown at Rot. I do not know what caused the problem that delayed my certification by a week, but I do know that the difficulty has not caused me not to carry out my proper Q.C. inspection responsibility.

I have read the foregoing statement consisting of 1 handwritten page. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-14-83 at 7:45 am.
(date) (time)

Don Bishop
(SIGNATURE: TYPED OR PRINTED)
284-38-7528

Subscribed and sworn to before me this 14th day of July, 1983.

at Allen, Texas

INVESTIGATOR: W. E. Frost CI RIII
(NAME: TYPED OR PRINTED)

WITNESS: [Signature]
(NAME & TITLE: TYPED OR PRINTED)

Charles Atchison

PLACE: Glen Rose, Texas

CPSES

DATE: 7-14-83

I, William New Bishop, Jr, hereby make the following voluntary statement to Mr. H. B. Griffin, who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I have been employed as a Brown & Root QC Inspector on a mechanical equipment inspection crew for about one year. Before that I worked as welder for Brown & Root.

I worked on the same crew ~~with~~^{with} that Charles Atchinson had been transferred from, and I assumed many of his inspections on moment restraints, and whip supports. Atchinson's termination did not cause me to accept nonconforming conditions or cause me to fail to report deficiencies. I have never knowingly failed to report a nonconforming condition, nor do I know of any other QC inspectors who indicated that Atchinson's termination caused them to alter their inspection procedures.

Since I have been a QC inspector, there have not been any instances in which anyone has intimidated or attempted to intimidate me to accept deficiencies other than occasional craft personnel. ~~3/14/83~~^{7/14/83}

I have read the foregoing statement consisting of 1 handwritten/~~3~~ pages. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-14-83 at 3:25pm
(date) (time)

William New Bishop Jr.
(SIGNATURE: TYPED OR PRINTED)

Subscribed and sworn to before me this 7th day of July, 1983,
at Glen Rose, Texas.

INVESTIGATOR: H. B. Griffin
(NAME: TYPED OR PRINTED)

WITNESS: _____
(NAME & TITLE: TYPED OR PRINTED)

PLACE: CPSES

Glen Rose, Texas

DATE: July 14, 1983

I, DAVE BROWN, hereby make the following voluntary statement to Mr. W. E. Frost, who has identified himself to me as an investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I am currently employed at the CPSES, Glen Rose, Texas as a quality control inspector in the area of mechanical inspection. I have been employed by United Engineers as a quality control inspector since January of 1982. I worked with Charles Atchison for approximately two months in the same inspection group, ~~before~~ he was terminated. The fact that Charles Atchison was terminated in April of 1982 has not dissuaded me from properly carrying out my QC responsibilities in unity NCR's a identifying deficiencies. I have not nor have I ever been intimidated by anyone at CPSES that would cause me not to carry out my proper QC inspection responsibilities. DB

I have read the foregoing statement consisting of 1 handwritten ~~two~~ pages. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-14-83 at 3:05pm.
(date) (time)

David Brown

(SIGNATURE: TYPED OR PRINTED)

152-32-1851

14th day of July, 1983.

Subscribed and sworn to before me this

at Glen Rose, Texas

INVESTIGATOR: W. E. Frost

(NAME: TYPED OR PRINTED)

WITNESS:

(NAME & TITLE: TYPED OR PRINTED)

PLATE: Glow Rose
CPSES

DATE: 7-14-83

I, John Alvin Caldwell, hereby make the following voluntary statement to Mr. H. B. Griffin, who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I am employed as a QC inspector for Brown & Root working on the Task Force for final inspections in Unit I. I have been working as a QC inspector at Comanche Peak for about 1 year and 4 months.

I know who Charles Atkinson is, and I am aware of his dismissal by Brown & Root in 1982. Atkinson's termination did not cause me to alter my inspection procedures or accept substandard working conditions.

Other than disagreements with craft employees, nobody has intimidated me or attempted to intimidate me into accepting deficiencies.

I have read the foregoing statement consisting of 1 handwritten page. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-14-83 at 1:30
(date, (time))

John A. Caldwell
(SIGNATURE: TYPED OR PRINTED)

Subscribed and sworn to before me this 14 day of July, 1983,
at Comanche Peak

INVESTIGATOR: H. B. Griffin
(NAME: TYPED OR PRINTED)

WITNESS: _____
(NAME: TYPED OR PRINTED)

PLACE: Glen Rose, Texas
CPSES

DATE: 7-20-83

I, William Charles Campbell ^{MC 7-20-83}, hereby make the following voluntary statement to Mr. H. Brooks Griffin who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I have been employed as a QC inspector for Brown & Root at Comanche Peak for a little over one year, and I am working as part of the Task Force in Unit I.

I am vaguely aware of Atchinson's problems with Brown & Root. Atchinson's termination did not affect the performance of my inspection duties nor did it discourage me from reporting nonconforming conditions.

Since I have worked at Comanche Peak, nobody has attempted to intimidate me as relates to my inspection duties, nor have I been intimidated. ^{MC 7-20-83}

I have read the foregoing statement consisting of 1 handwritten/
~~two~~ pages. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-20-83 at 11:25 AM
(date) (time)

William C Campbell
(SIGNATURE: TYPED OR PRINTED)

Subscribed and sworn to before me this 20th day of July, 1983,
at Comanche Peak

INVESTIGATOR: H. Brooks Griffin
(NAME: TYPED OR PRINTED)

WITNESS:
(NAME & TITLE: TYPED OR PRINTED)

ATTACHMENT (S)

PLACE: CPSES

Alan Rose, Texas

DATE: July 15-1983

I, Billy Cecil, hereby make the following voluntary statement to Mr. W. E. Frost, who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I am currently employed at the CPSES, Alan Rose, Texas as a quality control inspector in instrumentation. I have been employed by Brown & Root since December of 1977.

I knew Charles Atchison for approximately two years before his termination. I have been kept ^{partially} current on his situation by reading numerous newspaper articles.

The fact that Charles Atchison was terminated in April of 1982 has not dissuaged me from properly carrying out my Q.C. responsibilities in writing NCR's or identifying deficiencies. I have not nor have I ever been intimidated by anyone at CPSES that would cause me not to carry out my proper Q.C. inspection responsibility.

Billy Cecil

I have read the foregoing statement consisting of 1 handwritten/~~typed~~ pages. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-15-83 at 10:20am (date) (time)

Billy Cecil
(SIGNATURE: TYPED OR PRINTED)

Subscribed and sworn to before me this 15th day of July, 1983, at Alan Rose, Texas

INVESTIGATOR: W. E. Frost CI R III
(NAME: TYPED OR PRINTED)

WITNESS:
(NAME & TITLE: TYPED OR PRINTED)

PLACE: Glen Rose, Texas

CPSES

DATE: 7-20-83

I, Brian David Coffin, hereby make the following voluntary statement to Mr. H. Brooks Griffin who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I have been employed as a QC inspector for Brown & Root at Comanche Peak for a little over 2 years, and I am presently inspecting on the Task Force conducting final inspections in Unit I.

I know who Charles Atchinson is, and am familiar with his termination by Brown & Root from newspaper articles. Atchinson's problems with Brown & Root did not discourage me from reporting nonconforming conditions.

Since I have worked at Comanche Peak, nobody has attempted to intimidate me as related to my inspection duties.

I have read the foregoing statement consisting of 1 handwritten/
~~two~~ page(s). I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-20-83 at 11 AM.
(date) (time)

Brian David Coffin
(SIGNATURE: TYPED OR PRINTED)

Subscribed and sworn to before me this 20th day of July, 1983,
at Comanche Peak.

INVESTIGATOR: H. Brooks Griffin
(NAME: TYPED OR PRINTED)

WITNE : _____
(NAME & TITLE: TYPED OR _____)

PLACE: CPSES
Glen Rose, Texas

DATE: July 14 1983

I, Paul Delaney, hereby make the following voluntary statement to Mr. W. E. Frost, who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I am currently employed at the CPSES, Glen Rose, Texas as a quality control inspector in the area of mechanical inspection. I have been employed by N.F.S. Service since March of 1983 on site.

I did not know Charles Atchison, but I am aware of his situation. Most of my information comes from the newspaper article about him. I have heard my little talk among my co-workers about him.

The fact that Charles Atchison was terminated in April of 1982 has not discouraged me from properly carrying out my Q.C. responsibilities in writing NCR's or identifying deficiencies. I have not nor will I ever be intimidated by anyone at CPSES that would cause me not to carry out my proper Q.C. inspection responsibility.

I have read the foregoing statement consisting of 1 handwritten 1 pages. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-14-83 at 6:45pm.
(date: (time)

Paul Delaney
(SIGNATURE: TYPED OR PRINTED)
300-38-0894

Subscribed and sworn to before me this: 14th day of July, 1983,
at Glen Rose, Texas

INVESTIGATOR: W. E. Frost CI RTI
(NAME: TYPED OR PRINTED)

WITNESS:
(NAME & TITLE: TYPED OR PRINTED)

PLACE: Glen Rose, Texas

CPSFS

DATE: 7-19-83

I, Catherine Cheryl Denman hereby make the following voluntary statement to Mr. H. Brooks Griffin who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I have been working as a QC inspector for Brown & Root at Comanche Peak for about one year. I presently work mainly on the call board inspecting in different areas.

I am aware of Charles Atchinson's dismissal as a QC inspector by Brown & Root, but his termination did not cause me to alter my inspection ~~procedures~~ procedures, nor did it discourage me from reporting deficiencies.

Since I have worked as a QC inspector, nobody has attempted to intimidate me as relates to my QC duties, nor have I been intimidated.

I have read the foregoing statement consisting of 1 handwritten/
~~two~~ pages. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-19-83 at 1:25p
(date) (time)

Cheryl Denman
(SIGNATURE: TYPED OR PRINTED)

Subscribed and sworn to before me this 19th day of July, 1983,
at Comanche Peak

INVESTIGATOR: H. Brooks Griffin
(NAME: TYPED OR PRINTED)

WITNESS: _____
(NAME & TITLE: TYPED OR PRINTED)

ATTACHMENT (14)

PLACE: Glow Rose, Texas
CPSES

DATE: 7-14-83

I, John A. Diletto, hereby make the following voluntary statement to Mr. H. B. Griffin, who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I have been employed as a QC inspector in the mechanical electrical group at Comanche Peak for about a year and a half. 7-14-83

I am aware of Charles Atchinson's termination from Brown & Root in 1982, but his dismissal did not discourage or cause me to accept non conforming conditions during my inspections.

During the time that I have worked as a QC inspector at Comanche Peak, nobody has intimidated or attempted to intimidate me into accepting deficiencies or not report non conforming conditions.

I have read the foregoing statement consisting of 1 handwritten/~~two~~ pages. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-14-83 at Glow Rose, Texas

(date) (place)

John A. Diletto
(SIGNATURE: TYPED OR PRINTED)

Subscribed and sworn to before me this 14th day of July, 1983, at Comanche Peak

INVESTIGATOR: H. B. Griffin
(NAME: TYPED OR PRINTED)

WITNESS: _____
(NAME & TITLE: TYPED)

PLACE: Glon Rose, Texas

CPSFS

DATE: 7-14-83

I, Thomas Clark Ellis, hereby make the following voluntary statement to Mr. H. B. Griffin, who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I am employed as a QC Lead on the Task Force Aux/Safeguard area. My supervisor is Dwight Woodyard. I have worked as a QC inspector for Brown & Root for about 4 1/2 years.

I am aware that Charles Atchinson was terminated by Brown & Root in 1982. Atchinson's termination did not cause me to alter my inspection activities, nor did it discourage me from reporting deficiencies.

Since I have been employed as a QC Inspector at Concho Peak, I have never been intimidated by anyone or failed to report deficiencies that came to my attention.

I have read the foregoing statement consisting of 1 handwritten/~~and~~ 1 page. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-14-83 at 11:45 am.
(date) (time)

T. C. Ellis
(SIGNATURE: TYPED OR PRINTED)

Subscribed and sworn to before me this 14th day of July, 1983,
at Concho Peak

INVESTIGATOR: [Signature]
(NAME: TYPED OR PRINTED)

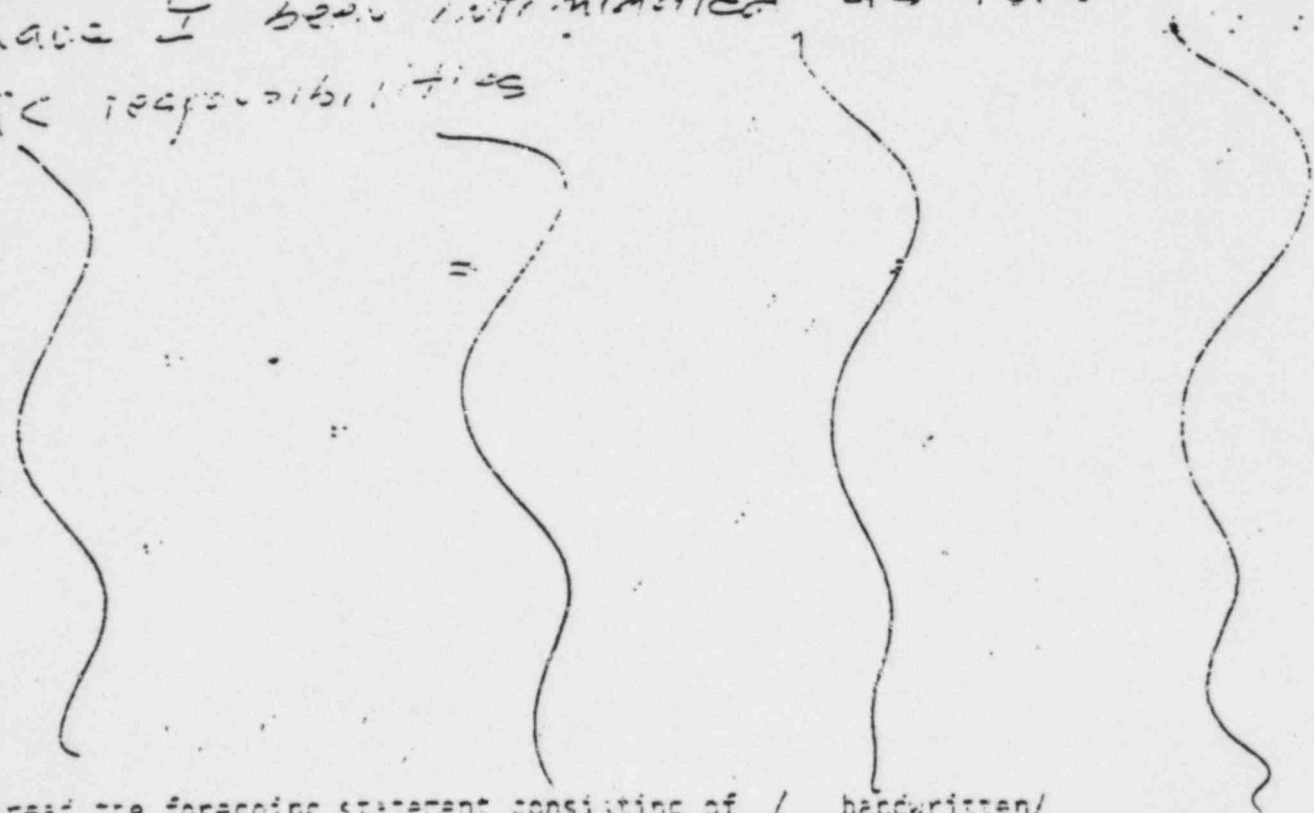
WITNESS: _____
(NAME & TITLE: TYPED)

DATE :

I, _____, hereby make the following voluntary statement to Mr. H. B. Griffin, who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I have been employed as a coatings QC inspector at Brown & Root for about [redacted] I am familiar with Charles Hutchinson and his unfortunate dismissal, but I do not believe his termination discouraged me from reporting deficiencies or accepting non-conforming conditions.

During my career as a QC inspector at Comanche Peak, nobody has attempted to intimidate me; nor have I been intimidated as related to my QC responsibilities.



I have read the foregoing statement consisting of 1 handwritten/~~typed~~ pages. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on at
(date) (time)

Subscribed and sworn to before me this day of
at

INVESTIGATOR:

H. B. Griffin
(NAME: TYPED OR PRINTED)

WITNESS:

(NAME & TITLE: TYPED)

I have information that I wish to provide in confidence to the U. S. Nuclear Regulatory Commission (NRC). I request an express pledge of confidentiality as a condition of providing this information to the NRC. I will not provide this information voluntarily to the NRC without such confidentiality being extended to me.

It is my understanding, consistent with its legal obligations, the NRC, by agreeing to this confidentiality, will adhere to the following conditions:

- (1) The NRC will not identify me by name or personal identifier in any NRC initiated document, conversation, or communication released to the public which relates directly to the information provided by me. I understand the term "public release" to encompass any distribution outside of the NRC with the exception of other public agencies which may require this information in furtherance of their responsibilities under law or public trust.
- (2) The NRC will disclose my identity within the NRC only to the extent required for the conduct of NRC related activities.
- (3) During the course of the inquiry or investigation the NRC will also make every effort consistent with the investigative needs of the Commission to avoid actions which would clearly be expected to result in the disclosure of my identity to persons subsequently contacted by the NRC. AT a later stage I understand that even though the NRC will make every reasonable effort to protect my identity, my identification could be compelled by orders or subpoenas issued by courts of law, hearing boards, or similar legal entities. In such cases, the basis for granting this promise of confidentiality and any other relevant facts will be communicated to the authority ordering the disclosure in an effort to maintain my confidentiality. If this effort proves unsuccessful, a representative of the NRC will attempt to inform me of any such action before disclosing my identity.

I also understand that the NRC will consider me to have waived my right to confidentiality if I take any action that may be reasonably expected to disclose my identity. I further understand that the NRC will consider me to have waived my rights to confidentiality if I provide (or have previously provided) information to any other party that contradicts the information that I provided to the NRC or if circumstances indicate that I am intentionally providing false information to the NRC.

Other Conditions: (if any)

I have read and fully understand the contents of this agreement. I agree with its provisions.

Date

Signature
Information Address

Agreed to on behalf of the US Nuclear Regulatory Commission

Date

H. B. ...

Signature
Typed or Printed Name and Title

PLACE: Glen Rose, Texas
CPSFS

DATE: 7-14-83

I, John Howard Frazier, hereby make the following voluntary statement to Mr. H. B. Griffin, who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I have been employed as a QC inspector for Brown & Root on the Task Force inspecting in containment on Unit I. I have been working at Comanche Peak for about five years.

I know Charles Atchinson and am aware of the circumstances surrounding his termination. Atchinson's termination had no effect on my inspection procedures nor did it cause me to fail to report any deficiencies. To my knowledge none of the QC inspectors were adversely affected by Atchinson's termination resulting in their accepting nonconforming conditions. Atchinson worked on the same crew with me for about two months.

Other than craft personnel, I have never had anyone at Comanche Peak attempt to intimidate me or force me to accept deficiencies.

I have read the foregoing statement consisting of 1 handwritten/~~two~~ pages. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-14-83 at 3:41, pm.
(date) (time)

John Howard Frazier
(SIGNATURE: TYPED OR PRINTED)

Subscribed and sworn to before me this 14th day of July, 1983,
at Comanche Peak.

INVESTIGATOR: H. B. Griffin
(NAME: TYPED OR PRINTED)

WITNESS: _____
(NAME & TITLE: TYPED)

PLACE: Glen Rose, Texas
CPSFS

DATE: 7-15-83


^{07/15/83}
I, Derrell Vaughn Frost, hereby make the following voluntary statement to Mr. H. B. Griffin, who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I have been employed as a QC inspector with Brown & Root for about 3 months. I work on an "in process" inspection crew conducting Final inspections on auxiliary Feedwater systems.

I am vaguely aware of Charles Atchinson's termination based on media coverage and talk among co-workers. It is my understanding that Atchinson threatened to write an NCR if he was not given a raise by Brown & Root. My knowledge of Atchinson's termination was not cause me to fail to report deficiencies or write NCRs.

Since I have been at Comanche Peak, nobody has attempted to intimidate me, nor have I been intimidated as related to my QC responsibilities.

I have read the foregoing statement consisting of 1 handwritten/
~~two~~ pages. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-15-83 at 11:27 am.
(date) (time)


(SIGNATURE: TYPED OR PRINTED)

Subscribed and sworn to before me this 15th day of July, 1983,
at Comanche Peak

INVESTIGATOR: 
(NAME: TYPED OR PRINTED)

WITNESS: _____
(NAME & TITLE: TYPED)

PLACE: CPSES
Allen Rose, Texas

DATE: July 19, 1983

I, David Gray, hereby make the following voluntary statement to Mr. W. E. Frost, who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

✓
copy

I am currently employed at the CPSES, Allen Rose, Texas as a quality control inspector in the area of electrical support. I have been employed by Brown and Root since July of 1979. I knew Charles Atchison, but did not closely work with him. I have heard of his recent situation thru newspaper articles and some conversation with co-workers.

The fact that Charles Atchison was terminated in April of 1982 has not discouraged me from properly carrying out my Q.C. responsibilities in writing NCR's or identifying deficiencies. I have not now nor have I ever been intimidated by anyone at CPSES that would cause me not to carry out my proper Q.C. inspection responsibility.

David W. Gray

I have read the foregoing statement consisting of 1 handwritten and pages. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-19-83 at 11:30 am.
(date) (time)

David W. Gray
(SIGNATURE: TYPED OR PRINTED)
458-94-7303

Subscribed and sworn to before me this 19 day of July, 1983,
at Allen Rose, Texas

INVESTIGATOR: W. E. Frost CI RTU WITNESS: _____
(NAME: TYPED OR PRINTED) (NAME & TITLE: TYPED)

PLACE: Glen Rose, Texas
CPSES

Harlow Jackson Hall, DATE: 7-19-83
hereby make the following voluntary statement to Mr. H. Brooks Griffin who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I have been employed as a QC inspector by Brown & Root at Comanche Peak for about 3 years. I inspect in the mechanical equipment group.

I am aware of Atchinson's termination by Brown & Root, and his dismissal had no adverse affects on me as relates to my inspection responsibilities.

Since I have been employed as a QC inspector at Comanche Peak, nobody has attempted to intimidate me, nor have I been intimidated.

I have read the foregoing statement consisting of 1 handwritten/~~2~~ pages. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-19-83 at 2:34pm
(date) (time)

Harlow Hall
(SIGNATURE: TYPED OR PRINTED)

Subscribed and sworn to before me this 19th day of July, 1983,
at Comanche Peak

INVESTIGATOR: H. Brooks Griffin
(NAME: TYPED OR PRINTED)

WITNESS: _____
(NAME & TITLE: TYPED)

PLACE: CPSES

Helen Rose, Texas

DATE: July 15 1983

I, Sherice Harding, hereby make the following voluntary statement to Mr. W. E. Frost, who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

S.D.

I am currently employed at the CPSES, Helen Rose, Texas as a quality control inspector in the area of electrical inspection. I have been employed by Brown and Root since September of 1978. I did not know Charles Atchison, but I have read newspaper articles on his situation.

The fact that Charles Atchison was terminated in April of 1982 has not discouraged me from properly carrying out my Q.C. responsibilities in writing NCR's or identifying deficiencies. I have not nor have I ever been intimidated by anyone at CPSES that would cause me not to carry out my proper Q.C. inspection responsibility.

Sherice Harding

I have read the foregoing statement consisting of 1 handwritten/
one pages. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-15-83 at 10:35am.
(date) (time)

Sherice Harding
(SIGNATURE: TYPED OR PRINTED)
165-04-8590

Subscribed and sworn to before me this 15th day of July, 1983,
at Helen Rose, Texas

INVESTIGATOR: W. E. Frost
(NAME: TYPED OR PRINTED)

WITNESS: _____
(NAME & TITLE: TYPED)

PLACE: Clear Lake, Texas
CPSES

DATE: 7-15-83

I, Richard D. Hauer, hereby make the following voluntary statement to Mr. H. B. Griffin, who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I have been employed as a QC inspector by Brown & Root at Comanche Peak for about 1 year and 3 months. I work on a Task Force crew inspecting hangers in the auxiliary building.

I know about Charles Atchinson's dismissal by Brown & Root from newspaper articles and talk among co-workers. Atchinson's termination did not discourage me from reporting deficiencies or reporting nonconforming conditions ^{not 7/15/83} other than disagreements with craft personnel, nobody has attempted to intimidate me, ^{not 7/15/83} not have I been intimidated as relates to my QC inspection responsibilities.

I have read the foregoing statement consisting of 1 handwritten/~~two~~ pages. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-15-83 at 11:40 am
(date) (time)

Richard D Hauer
(SIGNATURE: TYPED OR PRINTED)

Subscribed and sworn to before me this 15th day of July, 1983,
at Comanche Peak.

INVESTIGATOR: H. B. Griffin
(NAME: TYPED OR PRINTED)

WITNESS: _____
(NAME & TITLE: TYPED)

PLACE: Glen Rose, Texas
CPSFS

DATE: 7-14-83

I, Melinda Sue Holder, hereby make the following voluntary statement to Mr. H. B. Griffin, who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I have been employed as a Brown & Root QC inspector at Comanche Peak for five years and 3 months, and am presently conducting inspections as part of a Task Force in Unit I.

I am aware of Charles Atkinson's termination, and the fact of his termination did not affect my inspection procedures or cause me to accept non-conforming conditions.
7/14/83

Since I have been employed in QC at Comanche Peak nobody has intimidated me or attempted to intimidate me into accepting defective or failing to report non-conforming conditions.

I have read the foregoing statement consisting of 1 handwritten, 2 typed pages. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-14-83 at 6:45pm
(date) (time)

Melinda Sue Holder
(SIGNATURE: TYPED OR PRINTED)

Subscribed and sworn to before me this 14 day of July, 1983,
at Comanche Peak.

INVESTIGATOR: H. B. Griffin
(NAME: TYPED OR PRINTED)

WITNESS: _____
(NAME & TITLE: TYPED)

ATTACHMENT (25)

PLACE: Glan Rose, Texas
CPSES

DATE: 7-14-83

I, Richard Dee Ice, hereby make the following voluntary statement to Mr. H. B. Griffin, who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I am presently employed as a Quality Engineer for Brown & Root temporarily assigned to Task Force on Containment I. For final inspection prior to code certification I have worked in QC at Comanche Peak for about 5 1/2 years.

I worked as the QC lead on the mechanical equipment crew with Charles Atchinson in 1982. The inspection of pipe whip restrainers was changed from ASME quality inspections to the new ASME Quality Inspection organization. I had to shift one of two inspectors to the new ASME organization, and I recommended to Jones, the QC Superintendent that he transfer Atchinson. Atchinson was subsequently transferred.

Since I have worked in Quality Control at Comanche Peak, nobody has attempted to make me not report ~~the~~ deficiencies or attempted to intimidate me into accepting non-complying conditions to my knowledge Atchinson's termination did not cause any QC inspectors to alter their

I have read the foregoing statement consisting of 1 handwritten page. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-14-83 at 2:19pm.
Inspector
Procedures

Richard D. Ice
(SIGNATURE: TYPED OR PRINTED)

Subscribed and sworn to before me this 14th day of July 1983,
at Comanche Peak

INVESTIGATOR: H. B. Griffin
(NAME: TYPED OR PRINTED)

WITNESS: _____
(NAME & TITLE: TYPED)

PLACE: Glad Rose, Texas

CPSES

DATE: 7-14-83

I, Michael Vance Juey, hereby make the following voluntary statement to Mr. H. B. Griffin, who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I am a QC Inspector for Brown & Root presently working on the Task Force Aux / Safeguards / Fuel Building. I have worked as a QC Inspector at Comanche Peak for almost two years.

I worked on the same crew with Charles Atchinson inspecting moment restraints and equipment installation just before he was terminated. Atchinson's termination caused me concern because I believed Atchinson was fired for "over inspecting". Atchinson's problems did not cause me to not report deficiencies or over look other conditions.

Other than occasional arguments with craft personnel, I have never had anyone at Comanche Peak try to intimidate me into not reporting deficiencies or identifying faulty conditions.

I have read the foregoing statement consisting of 1 handwritten / ~~two~~ pages. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-14-83 at 1:35pm.
(date) (time)

Michael Vance Juey
(SIGNATURE: TYPED OR PRINTED)

Subscribed and sworn to before me this 14th day of July, 1983,
at Comanche Peak.

INVESTIGATOR: H. B. Griffin
(NAME: TYPED OR PRINTED)

WITNESS: _____
(NAME & TITLE: TYPED)

PLACE: CPSES

Allen Rose, Texas

DATE: July 14, 1983

I, William A. KATTNESS, hereby make the following voluntary statement to Mr. W. E. Frost, who has identified himself to me as an investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I am currently employed at the CPSES, Allen Rose, Texas as a quality control inspector in the area of mechanical inspections. I have been employed by Brown and Root as a quality ~~inspector~~ ^{insp.} control inspector since December of 1981. I knew Charles Atchison for approximately one year and worked with him in the same area of Charles Atchison terminated and personally felt that Charles Atchison had not been intimidated. The fact that Charles Atchison was terminated in April of 1982 has not discouraged me from properly carrying out my Q.C. responsibilities in writing NCR's or identifying deficiencies. I have not now nor have I ever been intimidated by anyone at CPSES that would cause me not to carry out my proper Q.C. inspection responsibilities.

William A. Kattness

I have read the foregoing statement, consisting of 1 handwritten 1 page. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-14-83 at 3:15pm.
(date) (time)

William A. Kattness
(SIGNATURE: TYPED OR PRINTED)

457-82-5150
1426 day of July, 1983.

Subscribed and sworn to before me this _____ day of _____ at Allen Rose, Texas

INVESTIGATOR: W. E. Frost
(NAME: TYPED OR PRINTED)

WITNESS: _____
(NAME & TITLE: TYPED)

PLACE: CPSES

Allen Rose, Texas

DATE: July 19, 1983

I, MARIAN KIERMAN, hereby make the following voluntary statement to Mr. W. E. Frost, who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

W. E. Frost

I am currently employed at the CPSES, Allen Rose, Texas as a quality control inspector in the area of conduct support (S-9-10). I have been employed by Bryson and Root since April of 1982 ^{as a quality control inspector}. I knew Charles Atchison, but did not closely work with him. I have been kept aware of Atchison thru newspaper articles and conversations between co-workers.

The fact that Charles Atchison was terminated in April of 1982 has not discouraged me from properly carrying out my Q.C. responsibilities in writing NCR's or identifying deficiencies. I have not nor have I ever been intimidated by anyone at CPSES that would cause me not to carry out my proper Q.C. inspection responsibility. *mk*

M. Kierman

I have read the foregoing statement consisting of 1 handwritten ~~two~~ pages. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-19-83 at 12:55pm (date) (time)

M. Kierman / Marian L. Kierman
(SIGNATURE: TYPED OR PRINTED)

Subscribed and sworn to before me this 19 223-74-7152 day of July, 1983.
at Allen Rose, Texas

INVESTIGATOR: W. E. Frost WITNESS: _____
(NAME: TYPE OR PRINTED) (NAME & TITLE: TYPED)

PLACE: Glen Rose, Texas
CPSES

DATE: 7-20-83

J. Duffa Sue Lankford, hereby make the following voluntary statement to Mr. H. Brooks Griffin who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I have been employed as a QC inspector at Comanche Peak for about 3 years, and I am presently inspecting as part of a Task Force in Unit I.

I am aware of Charles Atchinson's termination with BROWN ROOT, but Atchinson's dismissal had no effect on my inspection duties nor did it discourage me from writing NCRs.

Since I have worked as a QC inspector at Comanche Peak, nobody has attempted to intimidate me nor have I been intimidated as relates to my QC responsibilities.

I have read the foregoing statement consisting of 1 handwritten/
~~two~~ pages. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-20-83 at 9:45am
(date) (time)

Carla J. Lankford
(SIGNATURE: TYPED OR PRINTED)

Subscribed and sworn to before me this 20th day of July, 1983,
at Comanche Peak.

INVESTIGATOR: H. Brooks Griffin
(NAME: TYPED OR PRINTED)

WITNESS: _____
(NAME & TITLE: TYPED)

PLACE: Glen Rose, Texas

CPSFS

DATE: 7-15-83

I, Jeffrey Scott McComas, hereby make the following voluntary statement to Mr. H. B. Griffin, who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I have been employed as a Brown & Root QC Inspector at Comanche Peak for about 3 1/2 years. I am presently inspecting as part of a Task Force in Unit I.

I knew Charles Atchinson and have worked with him inspecting whip restraints. Atchinson was also my instructor on ~~the~~ sections of hanger and pipe inspection procedures. Atchinson's termination did not cause me to alter my inspections or cause me to not report deficiencies. I am aware of the circumstances of Atchinson's dismissal, and I believe that his termination had no effect on the QC inspectors performance of their duties.

Since I have been an inspector at Comanche Peak, nobody has attempted to intimidate me into accepting non conforming conditions or not reporting deficiencies.

I have read the foregoing statement consisting of 1 hardwritten/ ~~typed~~ pages. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-15-83 at 10:10am
(date) (time)

Jeffrey Scott McComas
(SIGNATURE: TYPED OR PRINTED)

Subscribed and sworn to before me this 5th day of July, 1983,
at Comanche Peak.

INVESTIGATOR: L.P. [Signature]
(NAME: TYPED OR PRINTED)

WITNESS: _____
(NAME & TITLE: TYPED)

PLACE: Glen Rose, Texas
CPSES

DATE: 7-14-83

I, David H. MacDonald, Jr., hereby make the following voluntary statement to Mr. H. B. Griffin, who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I have been employed as a QC inspector for Brown & Root working on the Task Force in Unit I. ~~For~~ I have worked in QC for about 4 years.

I worked on a mechanical equipment inspection crew with Charles Atkinson several months before he was terminated, and I was aware of some of the details of his dismissal. Atkinson's termination had no affect on my inspection procedures, nor did it cause me to not report any non conforming conditions.

Other than disagreements with craft personnel, I have not had anyone intimidate me or attempt to intimidate me into accepting deficiencies.

I have read the foregoing statement consisting of 1 handwritten/~~two~~ pages. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-14-83 at 7:12 pm
(date) (time)

D. H. MacDonald, Jr.
(SIGNATURE: TYPED OR PRINTED)

Subscribed and sworn to before me this 14th day of July, 1983,
at Lawrence Park.

INVESTIGATOR: H. B. Griffin
(NAME: TYPED OR PRINTED)

WITNESS: _____
(NAME & TITLE: TYPED)

PLACE: Glen Rose, Texas

CPSES

DATE: 7-15-83

I, Li Anthony Marley, hereby make the following voluntary statement to Mr. H. B. Griffin, who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I have been employed as an instrumentation QC inspector for Brown & Root for about 1 1/2 years.

I knew Charles Atchinson, and am familiar with the circumstances surrounding his dismissal by Brown & Root. Atchinson's termination did not discourage me from reporting nonconforming conditions or writing NCRs.

Since I have worked in QC at Comanche Peak I was, on one occasion, threatened by a craft employee (not further identified). This employee had damaged a stainless steel pipe while installing a Hilti bolt, and when I confronted him, he asked if I had a family. I called a foreman, and the employee was fired on the spot.

On another occasion, I found two Babson craft personnel loading Hilti bolts to fit hangers. I called a Brown & Root QC foreman over Hilti bolts to determine if Babson's installation and inspection requirements were the same as Brown & Root's. I was told they were the same, and I referred the matter to a Babson QC inspector. The two craft personnel (not further identified) confronted me several weeks later and told me to not worry about Babson bolts, but I continued my inspections as before and I was not intimidated.

I have read the foregoing statement consisting of 1 handwritten 1 page(s). I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-15-83 at 1:30pm

(date) (time)

Li A. Marley

(SIGNATURE: TYPED OR PRINTED)

Subscribed and sworn to before me this 15th day of July, 1983, at Comanche Peak.

INVESTIGATOR: H. B. Griffin
(NAME: TYPED OR PRINTED)

WITNESS: _____
(NAME & TITLE: TYPED)

PLACE: Glen Rose, Texas
CPSES

DATE: 7-19-83

I, COLLEGE MOORE, JR., hereby make the following voluntary statement to Mr. H. Brooks Griffin who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I have been employed as the Quality Engineer responsible for maintaining the QA manual and administering QC training and ^{the} certification of QC inspectors for Brown + Root at Comanche ^{Peak}. I have worked at Comanche Peak for about one year.

I am a Level ^{III} inspector and I resolve conflicting "calls" by other inspectors. I am aware of Charles Atchinson's termination by Brown + Root, but to my knowledge the QC inspectors at Comanche Peak have been encouraged, rather than discouraged, in reporting deficiencies. I was not discouraged from reporting non conforming conditions as a result of Atchinson's dismissal.

Since I have worked at Comanche Peak, nobody has attempted to intimidate me as relates to my inspection duties, nor have I been intimidated.

I have read the foregoing statement consisting of 1 handwritten/~~and~~ page(s). I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-28-83 at 2:20pm
(date) (time)

[Signature]
(SIGNATURE: TYPED OR PRINTED)

Subscribed and sworn to before me this 19th day of July, 1983,
at Comanche Peak

INVESTIGATOR: H. Brooks Griffin
(NAME: TYPED OR PRINTED)

WITNESS:
(NAME & TITLE: TYPED)

PLACE: Glen Rose, Texas
CPSES

DATE: 7-20-83

John Howard Morton hereby make the following voluntary statement to Mr. H. Brooks Griffin who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I have been employed as a QC inspector in "receiving" related to quality materials by Brown & Root for almost seven years.

I have on one occasion worked on an audit with Charles Atchinson and I am aware of his problems with Brown & Root. Atchinson's termination did not discourage me from reporting non conforming conditions.

Since I have been employed at Comanche Peak, nobody has attempted to intimidate me or pressure me as relates to my QC responsibilities.

I have read the foregoing statement consisting of 1 handwritten/
~~and~~ page[s]. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-20-83 at 10am.
(date) (time)

John H. Morton
(SIGNATURE: TYPED OR PRINTED)

Subscribed and sworn to before me this 20th day of July, 1983.
at Comanche Peak

INVESTIGATOR: H. Brooks Griffin
(NAME: TYPED OR PRINTED)

WITNESS:
(NAME & TITLE: TYPED)

PLACE: Glen Rose
CREFS

DATE: 7-19-83

Donald A. Nisch, Sr., hereby make the following voluntary statement to Mr. H. Brooks Griffin who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I have been employed ^{at Comanche Peak} as a QC inspector by Brown + Root for about ^{DU 7.19.83} 2 years. I am presently conducting final inspections as part of a Task Force in Unit I.

I am somewhat aware of Charles Atchinson's work and termination by Brown + Root. Atchinson's dismissal as a QC inspector had no effect ^{DU 7.19.83} on my reporting non-conforming conditions or identifying deficiencies.

Since I have been employed at Comanche Peak, nobody has attempted to intimidate me as relates to my inspection responsibilities, ^{DU 7.19.83} not have I been intimidated.

I have read the foregoing statement consisting of 1 handwritten/~~two~~ pages. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-19-83 at 12:10pm
(date) (time)

Donald A. Nisch, Sr.
(SIGNATURE: TYPED OR PRINTED)

Subscribed and sworn to before me this 19th day of July, 1983,
at Comanche Peak.

INVESTIGATOR: H. Brooks Griffin
(NAME: TYPED OR PRINTED)

WITNESS:
(NAME & TITLE: TYPED)

PLACE: Glen Rose, Texas
CPSFS

DATE: 7-19-83

I, Rex Edward Onchacek, hereby make the following voluntary statement to Mr. H. Brooks Griffin who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I have been working as a QC inspector for Brown & Root at Cananche Peak for about one year and three months. I am presently inspecting as part of the Task Force on Final inspections in Unit I.

I have heard about Charles Atchinson's termination as a QC inspector and his court suit, but his problems with Brown & Root did not cause me to alter my QC inspection procedures or fail to report nonconforming conditions.

Since I have been employed as a QC inspector at Cananche Peak, nobody has attempted to intimidate me, nor have I been intimidated as relates to my inspection responsibilities.

I have read the foregoing statement consisting of 1 handwritten/~~two~~ pages. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-19-83 at 1:40pm.
(date) (time)

Rex Edward Onchacek
(SIGNATURE: TYPED OR PRINTED)

Subscribed and sworn to before me this 19th day of July, 1983
at Cananche Peak

INVESTIGATOR: H. Brooks Griffin
(NAME: TYPED OR PRINTED)

WITNESS:
(NAME & TITLE: TYPED)

ATTACHMENT (37)

PLACE: CPSES

Allen Rose, Texas

DATE: July 19, 1983

I, DAVID OSBORNE, hereby make the following voluntary statement to Mr. W. E. Frost, who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I am currently employed at the CPSES, Allen Rose, Texas as a quality control inspector in the area of air inspections. I have been employed by Brown and Root since July of 1978. I did ~~not~~ know Charles Atchison, but I did not work with him closely. I have read newspaper articles about him and have had conversations with co-workers about his situation.

The fact that Charles Atchison was terminated in April of 1982 has not discouraged me from properly carrying out my Q.C. responsibilities in writing NCR's or identifying deficiencies. I have not seen nor has I ever been intimidated by anyone at CPSES that would cause me not to carry out my proper Q.C. inspection responsibility.

I have read the foregoing statement consisting of 1 handwritten/~~typed~~ pages. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-19-83 at 3:15 pm.
(date) (time)


(SIGNATURE: TYPED OR PRINTED)
461-11-7160

Subscribed and sworn to before me this 19 day of July, 1983, at Allen Rose, Texas

INVESTIGATOR: W. E. Frost PIU WITNESS:
(NAME: TYPED OR PRINTED) (NAME & TITLE: TYPE)

PLACE: Glen Rose

CPSFS

DATE: 7-14-83

I, Mary Helen Osterday, hereby make the following voluntary statement to Mr. H. B. Griffin, who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I am presently employed as a Brown & Root QC inspector working on the call board for "in process" inspections. I have been ~~in~~ in QC ~~inspector~~ ^{for 7-14-83} for about nine weeks, and before that I worked for about 2 1/2 years as a welder at Comanche Peak.

I am aware that Charles Atchinson was terminated from his job as a Brown & Root QC inspector from talk among co-workers and media coverage. My knowledge of Atchinson's termination has not caused me to not report discrepancies or non-compliance forms nor have any of my co-workers expressed any such failure to report on inspections.

Since I have been working in QC I have never had anyone attempt ~~to~~ to intimidate me into accepting or not reporting non-compliance conditions.

I have read the foregoing statement consisting of 1 handwritten/~~two~~ page(s). I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-14-83 at 4:30pm
(date) (time)

Mary Helen Osterday
(SIGNATURE: TYPED OR PRINTED)

Subscribed and sworn to before me this 14th day of July, 1983,
at Comanche Peak

INVESTIGATOR: H. B. Griffin
(NAME: TYPED OR PRINTED)

WITNESS: _____
(NAME & TITLE: TYPED) ATTACHMENT (39)

PLACE: CPSES
Allen Rose, Texas

I, STAN PERRY, hereby make the following voluntary statement to Mr. W. E. Frost, who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

DATE: July 19, 1983

I am currently employed at the CPSES, Allen Rose, Texas as a quality control inspector in the area of ~~and~~ ^{of} mechanical inspection. I have been employed by EBASCO since April of 1983. I did not know Charles Atchison as he left before I came to work at CPSES. I have been aware of his situation thru newspaper articles and talk with fellow workers.

The fact that Charles Atchison was terminated in April of 1982 has not discouraged me from properly carrying out my Q.C. responsibilities in writing NCR's or identifying deficiencies. I have not nor have I ever been intimidated by anyone at CPSES that would cause me not to carry out my proper Q.C. inspection responsibility.

I have read the foregoing statement consisting of 1 handwritten/~~two~~ pages. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-19-83 at 2:30 pm.
(date) (time)

Stan Perry
(SIGNATURE: TYPED OR PRINTED)

Subscribed and sworn to before me this 19 day of July, 1983, at Allen Rose, Texas

INVESTIGATOR: W. E. Frost, CI, NRC
(NAME: TYPED OR PRINTED)

WITNESS:
(NAME & TITLE: TYPED)

PLACE: CPSES
Helen Rose, Texas

DATE: July 19, 1983

I, PAT RABON, hereby make the following voluntary statement to Mr. W. E. Frost, who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

Pat

I am currently employed at the CPSES, Helen Rose, Texas as a quality control inspector in the area of electrical inspection. I have been employed by Brown and Root as a quality control inspector since November of 1981. I did not know Charles Atchison, but I have seen newspaper articles about Atchison and talked to co-workers about his situation.

Pat Rabon

The fact that Charles Atchison was terminated in April of 1982 has not discouraged me from properly carrying out my Q.C. responsibilities in writing NCR's or identifying deficiencies. I have not nor have I ever been intimidated by anyone at CPSES that would cause me not to carry out my proper Q.C. inspection responsibility.

I have read the foregoing statement consisting of 1 handwritten/
~~two~~ pages. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-19-83 at 1:15 pm
(date) (time)

Pat Rabon
(SIGNATURE: TYPED OR PRINTED)
409-68-2431

Subscribed and sworn to before me this 19th day of July, 1983, at Helen Rose, Texas

INVESTIGATOR: Wendell E. Frost CPSES WITNESS: _____
(NAME: TYPED OR PRINTED) (NAME & TITLE: TYPED)

PLACE: Glen Rose, Texas

CPSES

DATE: 7-14-83

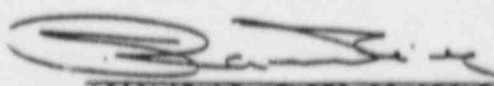
I, Satish Y. Ranadive, hereby make the following voluntary statement to Mr. H. B. Griffin, who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I am employed as a Quality Engineer by Brown & Root at Comanche Peak. I have been employed at Comanche Peak for about one year, and before that I was a Q.E. for Brown & Root at South Texas project.

I was not employed at Comanche Peak ^{Q. 7/14/83} at the time of Atchinson's termination, but I am aware of the incident ^{Q. 7/14/83} because of the talk among co-workers and media coverage. In my job as a Q.E. I have a continuing contact with QC inspectors, and to my knowledge none of them has ever expressed that they failed to report deficiencies based on Atchinson's firing. My knowledge of the incident did not cause me to accept non-conforming conditions or not report deficiencies.

Since I have been at Comanche Peak, nobody has attempted to intimidate me into accepting non-conforming conditions or into not reporting deficiencies.

I have read the foregoing statement consisting of 1 handwritten/~~two~~ pages. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-14-83 at 4:00pm.
(date) (time)


(SIGNATURE: TYPED OR PRINTED)
(SATISH Y. RANADIVE)

Subscribed and sworn to before me this 14-1 day of July, 1983,
at Comanche Peak

INVESTIGATOR: H. B. Griffin
(NAME: TYPED OR PRINTED)

WITNESS: _____
(NAME & TITLE: TYPED)

PLACE: CPSES

Allen Rose, Texas

DATE: July 14, 1983

I, Chair C Randall, hereby make the following voluntary statement to Mr. W. E. Frost, who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

^{CCR} I am currently employed at the CPSES, Allen Rose, Texas as night shift Q.C. supervisor. I have been employed by EBASCO since November of 1981 with the exception of a two month break on another nuclear site. I was a quality control inspector at CPSES until my promotion in June of 1982.

I personally knew Charles Atchison and was close to his situation when he was terminated in April of 1982. I personally feel that Charles Atchison was not intimidated on this job site. I was working as a quality control inspector at the time. The fact that Charles Atchison was terminated in April of 1982 has not discouraged me from properly carrying out my Q.C. responsibilities in writing NCR's or identifying deficiencies. I have not now nor have I ever been intimidated by anyone at CPSES that would cause me not to carry out my proper Q.C. inspector responsibility. ^{CCR}

Handwritten signature/initials on the right margin.

I have read the foregoing statement consisting of 1 handwritten/~~two~~ pages. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7/14/83 at 8:30 ^{am}.

Chair C Randall
(SIGNATURE: TYPED OR PRINTED)

Subscribed and sworn to before me this 14th day of July, 1983.
at Allen Rose, Texas

INVEST: ATOR: W. E. Frost
(NAME: TYPED OR PRINTED)

WITNESS:
(NAME & TITLE: TYPED)

PLACE: Glen Rose, Texas
CPSES

DATE: 7-14-83

I, John L. Reed, hereby make the following voluntary statement to Mr. H. B. Griffin, who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I am employed as a QC inspector for Brown & Root in the iron fab shop, and have worked at Comanche Peak in QC for about 3 1/2 years.

I know Charles Atchinson and am aware of the circumstances surrounding his termination by Brown & Root. His termination did not cause me to alter my QC inspections or accept nonconforming conditions.

Since I have worked in QC at Comanche Peak I have never had anyone attempt to intimidate me into accepting deficiencies. My co-workers in QC at Comanche Peak have not expressed any knowledge of deficient work having been accepted as a result of Atchinson's termination.

I have read the foregoing statement consisting of 1 handwritten/~~2~~ page(s). I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-14-83 at 5:07pm
(date) (time)

John L. Reed 7-14-83
(SIGNATURE: TYPED OR PRINTED)

Subscribed and sworn to before me this 14th day of July 1983,
at Comanche Peak.

INVESTIGATOR: H. B. Griffin
(NAME: TYPED OR PRINTED)

WITNESS: _____
(NAME & TITLE: TYPED)

PLACE: CPSES

Helen Rose, TEXAS

DATE: July 14, 1983

I, Mike Rhodes, hereby make the following voluntary statement to Mr. W. E. Frost, who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

MS I am currently employed at the CPSES, Helen Rose, Texas as a quality control inspector in the area of structural inspection. I have been employed by EBASCO since October of 1982.

I did not know Charles Atchison, but I am aware of his situation thru newspaper articles and a small amount of co-worker conversation. The fact that Charles Atchison was terminated in April of 1982 has not discouraged me from properly carrying out my Q.C. responsibilities in writing NCR's or identifying deficiencies. I have not now nor have I ever been intimidated by anyone at CPSES that would cause me not to carry out my proper Q.C. inspector responsibility.

I have read the foregoing statement consisting of 1 handwritten/~~typed~~ pages. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-14-83 at 4:38 pm
(date) (time)

Mike Rhodes
(SIGNATURE: TYPED OR PRINTED)
463-58-8836

Subscribed and sworn to before me this 14th day of July, 1983 at Helen Rose, Texas

INVESTIGATOR: W. E. Frost OI RIT
(NAME: TYPED OR PRINTED)

WITNESS:
(NAME & TITLE: TYPED)

PLACE: Glen Rose, Texas
CPSES

I, Charlie Robert Saengerhausen, DATE: 7-15-83, hereby make the following voluntary statement to Mr. H. B. Griffin, who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I have been employed as a QC inspector by Brown + Root at Comanche Peak for a little over one year. I work on a Task Force inspection crew inspecting in Unit I.

I am aware of Charles Atchinson's termination by Brown + Root, and his dismissal has had no effect on my reporting deficiencies or writing NCRs. It also has not discouraged me from reporting non-conforming conditions.

Since I have worked in QC at Comanche Peak, nobody has attempted to intimidate me as relates to my QC responsibilities, nor have I been intimidated by anyone.

I have read the foregoing statement consisting of 1 handwritten/~~2~~ pages. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-15-83 at 10:57A
(date) (time)

Charlie Saengerhausen
(SIGNATURE: TYPED OR PRINTED)

Subscribed and sworn to before me this 15th day of July, 1983,
at Comanche Peak

INVESTIGATOR: H. B. Griffin
(NAME: TYPED OR PRINTED)

WITNESS: _____
(NAME & TITLE: TYPED)

PLACE: CPSES
Glen Rose, Texas

I, DIANE SAUNDERS, hereby make the following voluntary statement to Mr. W. E. Frost, who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

DATE: July 19, 1983

✓
Swis
I am currently employed at the CPSES, Glen Rose, Texas as a quality control inspector in the area of electrical start up. I have been employed by Brown & Root as a quality control inspector since March of 1983. I did not know Charles Atchison, but I have read newspaper articles on his situation. I have however, paid little attention to his situation and have not even overhead co-workers discuss him.

The fact that Charles Atchison was terminated in April of 1982 has not discouraged me from properly carrying out my Q.C. responsibilities in writing NCR's or identifying deficiencies. I have not nor have I ever been intimidated by anyone at CPSES that would cause me not to carry out my proper Q.C. inspection responsibility. *Swis*

I have read the foregoing statement consisting of 1 handwritten/
3 typed pages. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-19-83 at 7:00
(date) (time)

Diane Saunders
(SIGNATURE: TYPED OR PRINTED)
458-30-0999

Subscribed and sworn to before me this 19 day of July, 1983,
at Glen Rose, Texas

INVESTIGATOR: Wanda E. Frost CI RTU WITNESS:
(NAME: TYPED OR PRINTED) (NAME & TITLE: TYPED)

PLACE: Glen Rose, Texas
CPSES

I, J.D. Scott

DATE: 7-15-83

hereby make the following voluntary statement to Mr. H. B. Griffin, who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I am a Quality Assurance Engineer for Brown + Root at Comanche Peak, and have 30 employees for about 14 months. I am presently working in the completions group in Unit I.

I am aware of Charles Atchinson's termination by Brown + Root, but the dismissal of Atchinson ^{CPSES} has not caused me to fail to report deficiencies or non conforming conditions ^{CPSES} since I have been employed at Comanche Peak, nobody has attempted to intimidate me as relates to my Quality work, nor have I been intimidate by anyone.

Since I have been employed at Comanche Peak, nobody has attempted to intimidate me as relates to my Quality work, nor have I been intimidate by anyone.

I have read the foregoing statement consisting of 1 handwritten/1 pages. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-15-83 at (date) (time)

J.D. Scott
(SIGNATURE: TYPED OR PRINTED)

Subscribed and sworn to before me this 15th day of July, 1983,
at Comanche Peak

INVESTIGATOR: H. B. Griffin
(NAME: TYPED OR PRINTED)

WITNESS:
(NAME & TITLE: TYPED)

PLACE: CPSES
Allen Rose, Texas

DATE: July 14, 1983

I, Marshall Sexton, hereby made the following voluntary statement to Mr. W. E. Frost, who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

712 I am currently employed at the CPSES, Allen Rose, Texas as a quality control inspector in the area of mechanical inspection. I have been employed by Ebasco since January of 1983. I did not know Charles Atchison, ^{the way} ~~that~~ now work in his former inspection group. I am aware of his termination from recent newspaper articles and co-worker conversation. The fact that Charles Atchison was terminated in April of 1982 has not discouraged me from properly carrying out my Q.C. responsibilities in writing NCR's or identifying deficiencies. I have not now nor have I ever been intimidated by anyone at CPSES that would cause me not to carry out my proper Q.C. inspection responsibilities.

Marshall W. Sexton 7/14/83

I have read the foregoing statement consisting of 1 handwritten/~~typed~~ pages. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7/14/83 at 3:40pm
(date) (time)

Marshall D. Sexton 7-14-83
SIGNATURE: (TYPED OR PRINTED)
206-90-6404

Subscribed and sworn to before me this 14th day of July, 1983.
at Allen Rose, Texas

INVESTIGATOR: W. E. Frost CI RTV
(NAME: TYPED OR PRINTED)

WITNESS:
(NAME & TITLE: TYPED)

PLACE: Glen Rose, Texas

Comanche Peak

8/9/83

DATE: 8-9-83

I, Robby Scott Stanblin, hereby make the following voluntary statement to Mr. H. Brooks Griffin who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I have been employed as an electrical QC inspector by Brown + Root at Comanche Peak for ~~7~~ ^{7 to 8} months. My lead is Stan Vore, and my supervisor is J.B. Lentwylor.

I am aware of Charles Atchison's termination, but his dismissal did not discourage me from reporting deficiencies.

Since I have worked as an inspector at Comanche Peak, nobody has attempted to intimidate me into not writing an NCR or reporting a deficiency. I am aware of the cost of an NCR, and there are times when I am performing an inspection where I might ask the craft if they are really ready for an inspection. In some cases they say they are not, and I come back later and perform the inspection.

I have read the foregoing statement consisting of 1 handwritten/~~3~~ page. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 8-9-83 at _____ (date) (time)

Robby Scott Stanblin
(SIGNATURE: TYPED OR PRINTED)

Subscribed and sworn to before me this 9th day of August 1983 at Comanche Peak.

INVESTIGATOR: H. Brooks Griffin
(NAME: TYPED OR PRINTED)

WITNESS:
(NAME & TITLE: TYPED OR PRINTED)

PLACE: CPSES
Allen Ross, Texas

DATE: July 14, 1983
hereby make the following voluntary statement to Mr. W. E. Frost, who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

we must
I, Shirley Starr, am currently employed at the CPSES, Allen Ross, Texas as a quality control inspector in the area of start-up electrical inspection. I have been employed by Brown & Root since August of 1981.

I did not know Charles Atchison personally, but I am aware of his termination. My understanding of the situation was that Charles Atchison's termination may have been the result of personality problems and not the result of intimidation. The fact that Charles Atchison was terminated in April of 1982 has not discouraged me from properly carrying out my QC responsibilities, either in the writing of NCR's or identifying deficiencies in any other manner. I do not now nor have I ever been intimidated by anyone at CPSES that would cause me not to carry out my proper QC inspection responsibilities.

I have read the foregoing statement consisting of 1 handwritten/typed pages. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-14-83 at 2:09 pm
(date) (time)

Shirley W. Starr
(SIGNATURE: TYPED OR PRINTED)
065-345462

Subscribed and sworn to before me this 14th day of July 1983 at Allen Ross, Texas

INVESTIGATOR: Wanda L. ...
(NAME: TYPED OR PRINTED)

WITNESS: _____
(NAME & TITLE: TYPED)

PLACE: Glen Rose, Texas
CPSES

DATE: 7-15-83

I, Jimmy D. Staus, hereby make the following voluntary statement to Mr. H. B. Griffin, who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I have been employed by Brown & Root as a QC inspector for about one year. My crew conducts "in process" as well as mechanical equipment inspections.

I am aware of some of the details regarding the dismissal of Charles Atchinson, and his termination had no affect on my inspection procedures nor did it discourage me from reporting non conforming conditions or writing NCRs.

Since I have been in QC at Comanche Peak, nobody has attempted to intimidate me regarding my QC responsibilities, nor have I been intimidated by anyone.

I have read the foregoing statement consisting of 1 handwritten/
~~2~~ pages. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-15-83 at 10:47 AM.
(date) (time)

Jimmy D. Staus
(SIGNATURE: TYPED OR PRINTED)

Subscribed and sworn to before me this 15th day of July, 1983,
at Comanche Peak.

INVESTIGATOR: H. B. Griffin
(NAME: TYPED OR PRINTED)

WITNESS: _____
(NAME & TITLE: TYPED)

PLACE: CPSES

Allen Rose, Texas

I, ^{QBS VB} TAN SWEAT, DATE: Jul 14, 1983, hereby make the following voluntary statement to Mr. W. E. Frost, who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I am currently employed at the CPSES, Allen Rose, Texas as a quality control inspector in the area of instrumentation and Rad-waste. I have been employed by Brown and Root as a quality control inspector since January of 1980. I did know Charles Atchison personally and I am aware of his termination. The fact that Charles Atchison was terminated in April of 1982 has not discouraged me from properly carrying out my QC responsibilities in the writing of NCR's or identifying deficiencies in any other manner. I have not nor have I ever been intimidated by anyone at CPSES that would cause me not to carry out my proper Q.C. inspection responsibilities.

I have read the foregoing statement consisting of 1 handwritten/~~typed~~ pages. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-14-83 at 2:30 pm.
(date) (time)

Tan Sweat
(SIGNATURE: TYPED OR PRINTED)

Subscribed and sworn to before me this 14th day of July, 1983, at Allen Rose, Texas

INVESTIGATOR: W. E. Frost
(NAME: TYPED OR PRINTED)

WITNESS:
(NAME & TITLE: TYPED)

PLACE: Glen Rose, Texas
CPSFS

I, Melvin Roy Todd, DATE: 7-14-83, hereby make the following voluntary statement to Mr. H. B. Griffin, who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I am employed as a QC lead on a Task Force on Service Water and Diesel Oil For the Final inspection on hangers I have worked in QC at Comanche Peak for about 7 1/2 years.

I worked as a QC inspector on a mechanical equipment crew with Charles Atchinson before he was transferred to the non-ASME organization. Atchinson's termination did not cause me to alter my inspection activities or cause me to fail to report deficiencies.

Since I have worked in QC at Comanche Peak, nobody has attempted to intimidate me into signing off on deficiencies or accepting non-conforming conditions. To my knowledge I have never failed to report any deficiencies that come to my attention. To my knowledge no QC inspectors have expressed to me that they had accepted non conforming conditions or deficiencies as a result of Atchinson's termination.

I have read the foregoing statement consisting of 1 handwritten page. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-14-83 at 2:45pm (date) (time)

Melvin R. Todd
(SIGNATURE: TYPED OR PRINTED)

Subscribed and sworn to before me this 14th day of July, 1983, at Comanche Peak.

INVESTIGATOR: H. Griffin
(NAME: TYPED OR PRINTED)

WITNESS:
(NAME & TITLE: TYPED OR PRINTED)

PLACE: CPSES

Allen Rose, Texas

DATE: July 14, 1983

I, SCOTT WARNER, hereby make the following voluntary statement to Mr. W. E. Frost, who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I am currently employed at the CPSES, Allen Rose, Texas as a quality control inspector in the area of condenser support. I have been employed by EBASCO since June of 1982.

I did not personally know Charles Atchison, but I am aware of his situation. The fact that Charles Atchison was terminated in April of 1982 has not discouraged me from properly carrying out my duties, either the writing of NCRs or identifying deficiencies in any other manner. I am not sure how I have been intimidated by anyone at CPSES that would cause me not to carry out my proper QC inspection responsibilities.

Scott Warner

I have read the foregoing statement consisting of 1 handwritten/~~typed~~ pages. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-14-83 at 1:00 pm.
(date) (time)

Scott Warner
(SIGNATURE: TYPED OR PRINTED)

536-54-6181

14 day of July, 1983.

Subscribed and sworn to before me this
at Allen Rose, Texas

INVESTIGATOR: W. E. Frost CIRU
(NAME: TYPED OR PRINTED)

WITNESS:
(NAME & TITLE: TYPED)

PLACE: Glen Rose, Texas

CPSES

DATE: 7-20-83

I, Matthew Carlton Welch, hereby make the following voluntary statement to Mr. H. Brooks Griffin who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I have been employed as a QC inspector at Comanche Peak for about six months, and have been inspecting as part of the "in process" group.

I am aware of Charles Atchinson's problems with Brown & Root from the articles I have read in the newspaper, but Atchinson's termination has not cause me to accept non conforming conditions nor did it discourage me from writing NCRs.

Since I have worked as a QC inspector at Comanche Peak, nobody has attempted to intimidate or pressure me nor have I been intimidated as relates to my QC responsibilities.

I have read the foregoing statement consisting of 1 handwritten/
~~and~~ pages. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. - Signed on 7-20-83 at 10:15 AM
(date) (time)

Ch. Welch

(SIGNATURE: TYPED OR PRINTED)

Subscribed and sworn to before me this 20th day of July, 1983,
at Comanche Peak

INVESTIGATOR: H. Brooks Griffin
(NAME: TYPED OR PRINTED)

WITNESS:
(NAME & TITLE: TYPED)

ATTACHMENT (56)

PLACE: Glen Rose, Texas

CPSES

DATE: 7-14-83

I, Larry Gene Wilkerson, hereby make the following voluntary statement to Mr. H. B. Griffin, who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I am a .QC lead for Brown & Root working on final inspections in Unit I. I have worked in QC at Comanche Peak for about 7 years.

I am aware of Charles Atchinson's termination from Brown & Root and I have seen coverage of his story in the media. I was not caused to alter my inspections procedures or accept non-conforming conditions as a result of Atchinson's termination. To my knowledge, no other inspectors reacted to Atchinson's firing by accepting deficiencies. SW
7-14-83

Other than disagreements with craft personnel I have never had anyone attempt to intimidate me at Comanche Peak as related to my inspection responsibilities, nor have I ever knowingly accepted deficiencies or non conforming conditions.

I have read the foregoing statement consisting of 1 handwritten/~~typed~~ pages. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-14-83 at 4:53pm
(date) (time)

Larry Gene Wilkerson
(SIGNATURE: TYPED OR PRINTED)

Subscribed and sworn to before me this 14th day of July, 1983,
at Comanche Peak

INVESTIGATOR: H. B. Griffin
(NAME: TYPED OR PRINTED)

WITNESS: _____
(NAME & TITLE: TYPED)

PLACE: CPSES
Allen Pore, Texas

DATE: July 14, 1983

I, Charles Wolfe, hereby make the following voluntary statement to Mr. W. E. Frost, who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I am currently employed at the CPSES, Allen Pore, Texas as a quality control inspector in the area of conduit support. I have been employed by United Engineers since February of 1982.

I did not know Charles Atchison, but I am aware of his situation thru mostly newspaper articles and a small amount of co-worker conversation. The fact that Charles Atchison was terminated in April of 1982 has not discouraged me from properly carrying out my Q.C. responsibilities in writing NCR's or identifying deficiencies. I have not nor have I ever been intimidated by anyone at CPSES that would cause me not to carry out my proper Q.C. inspector responsibility. CEW¹⁰

Charles Wolfe

I have read the foregoing statement consisting of 1 handwritten/
~~two~~ pages. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-14-83 at 6:20 pm.
(date) (time)

Charles Wolfe
(SIGNATURE: TYPED OR PRINTED)
144-50-4851

Subscribed and sworn to before me this 14th day of July, 1983
at Allen Pore, Texas

INVESTIGATOR: W. E. Frost OF RII
(NAME: TYPED OR PRINTED)

WITNESS:
(NAME & TITLE: TYPED)

PLACE: Comanche Peak
Glen Rose, Texas

DATE: 8-7-83

I, Clint Joe Yarger, hereby make the following voluntary statement to Mr. H. Brooks Griffin who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I am employed as a QA specialist by Ebasco at the Comanche Peak site. I have worked in the design verification group for about 1 year. Peter Bush is my immediate supervisor.

I am aware of Charles Atchison's termination by Brown & Root ~~co~~ through newspaper articles and talk among co-workers. Atchison's dismissal did not alter my inspection reporting procedures or discourage me from ~~reporting~~ reporting deficiencies.

Since I have worked at Comanche Peak, nobody has attempted to intimidate me or intimidated me into accepting deficiencies. I have had disagreements with supervisors over inspection issues, but I have not been prevented from reporting what I believed were deficiencies.

I have read the foregoing statement consisting of 1 handwritten/
1 ~~2~~ pages. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 8-7-83 at 12pm.
(date) (time)

Clint Joe Yarger
(SIGNATURE: TYPED (OR PRINTED))

Subscribed and sworn to before me this 9th day of August 1983.
at Comanche Peak.

INVESTIGATOR: H. Brooks Griffin
(NAME: TYPED OR PRINTED)

WITNESS: _____
(NAME & TITLE: TYPED)

PLACE: Comanche Peak
Glen Rose, Texas

DATE: 7-27-83

Armando Camacho, hereby make the following voluntary statement to Mr. H. Brooks Griffin who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me. A.C. 7-27-83

I have been employed as an electrical QC inspector at Comanche Peak for about 19 months. I recently transferred to nights about 4 weeks ago, and Bill Ford is my lead.

Since I have worked for Ford, he has not attempted to prevent me from writing NCRs, nor have I ever heard Ford tell any of the other inspectors not to write an NCR.

There was one incident about 1 1/2 weeks ago, when Hubert King, an inspector, found moisture in a conduit in a manhole. I heard part of a conversation between Ford and King, and in the conversation King said he had a problem with the conduit and was uncomfortable with signing off on the inspection. Ford told King that he (Ford) would handle the inspection. I believe Ford ~~signed~~ ^{handled} the inspection. A.C. 7-27-83

I have read the foregoing statement consisting of 1 handwritten/
1 page. I have made and initialed any necessary corrections and
7-27-83 have signed my name in ink in the margin of each page. I swear that the
foregoing statement is true and correct. Signed on 7-27-83 at 8:00 P.M.
(date) (time)

Armando Camacho
(SIGNATURE: TYPED OR PRINTED)

Subscribed and sworn to before me this 27th day of July 1983
at Comanche Peak

INVESTIGATOR: H. Brooks Griffin
(NAME: TYPED OR PRINTED)

WITNESS:
(NAME & TITLE: TYPED)

PLACE: Comanche Peak

Glen Rose, Texas

DATE: 7-27-83

I, John Albert Hunter III

hereby make the following voluntary statement to Mr. H. Brooks Griffin who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I have been employed as a QC inspector for Brown & Root since February 1983. I was transferred to nights in May, and Bill Ford is my lead. I worked in craft before QC.

Ford has ^{JAN 7/10/83} never prevented me from writing NRCs or reporting non conforming conditions nor to my knowledge has he prevented other inspectors from doing so. Ford has ^{JAN 7/10/83} never taken over one of my inspection when I wanted to write an NCR.

I recently ^{JAN 7/10/83} discovered a cable tray that was bent and I placed a red tag on it. I have not as yet written an NCR on it, but I will. Ford did not tell me not to write an NCR ^{JAN 7/10/83} off the cable tray.

I believe QC inspectors at Comanche Peak have adequate freedom to report deficiencies. Ford encourages me to conduct random spot checks, and report deficiencies I find.

I have read the foregoing statement consisting of 1 handwritten/~~5~~ 1 page(s). I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-27-83 at
(date) (time)

John Albert Hunter III
(SIGNATURE: TYPED OR PRINTED)

Subscribed and sworn to before me this 27th day of July, 1983,
at Comanche Peak.

INVESTIGATOR: H. Brooks Griffin
(NAME: TYPED OR PRINTED)

WITNESS:
(NAME & TITLE: TYPED)

-PLACE: Comanche Peak
Glen Rose, Texas

DATE: 7-27-83

I, Hubert Dwayne King, hereby make the following voluntary statement to Mr. H. B. Griffin, who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I have been employed as an electrical QC inspector at Comanche Peak for about 8 months. I have been inspecting on Bill Ford's crew for about 3 months.

Ford has never prevented me from writing an NCR on a condition I felt required reporting, nor do I know of any other QC inspectors he prevented from doing so.

I did have one incident in which I found moisture in a conduit ^{in a manhole} and would not "buy off" on the inspection. Ford had another inspector (Fred Ringe who is no longer employed at Comanche Peak) have craft clean out the conduit and Ringe wrote an NCR on the ~~the sub in the manhole~~ ^{the sub in the manhole} Ford has, in one instance, had craft fix an over filled cable tray rather than ~~let~~ ^{write} write an NCR.

I have read the foregoing statement consisting of 1 handwritten page(s). I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7/27/83 at 9:16.
(date) (time)

Hubert King
(SIGNATURE) (TYPE OR PRINTED)

Subscribed and sworn to before me this 27 th day of July, 1982, at Comanche Peak.

INVESTIGATOR: H. B. Griffin
(NAME: TYPED OR PRINTED)

WITNESS: _____
(NAME & TITLE: TYPED)

STATEMENT

PLACE: [redacted]

DATE: [redacted]

I, [redacted] hereby make the following voluntary statement to M. Brooks GRIFFIN who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely with no threats or promises of reward having been made to me.

I have been employed as an electrical QC inspector for Brown & Root at Comanche Peak for [redacted] Most of my present inspections are in [redacted] and [redacted] in [redacted] since [redacted] on [redacted] the [redacted]

Since I have worked [redacted] Ford's [redacted] I have never seen him forbid a QC inspector from writing an NCR, but I have heard other inspectors (Bruce Lunn + [redacted]) say that [redacted] would not let them write an NCR on the [redacted] I have had three or four instances where I refused to sign off on an inspection, and Ford had the non conforming condition fixed by craft and then he signed off on the inspection. I do not know of any non conforming conditions that Ford "fought off" that had not been corrected.

I am not surprised to hear that someone has complained on Ford because he has a grumpy attitude. I believe that most of the instructions that Ford gives regarding not writing NCRs are instructions he is passing on from J. B. Lentwyler ^{an} electrical QC supervisor. Ford keeps a log of Lentwyler instructions from the [redacted] About a month ago Lentwyler put out the word to "back off on NCRs". Lentwyler was also the one who recently asked the question "do you know ~~how much~~ it costs of an NCR?"

Since I have been inspecting on the [redacted] I have written about two NCRs. In spite of some of the differences of opinion, I believe I have adequate freedom to write NCRs and I believe the other inspectors have the same Freedom.

I have read the foregoing statement consisting of 2 handwritten/~~typed~~ pages. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on _____ at _____
(date) (time)

Subscribed and sworn to before me this _____ day of _____
at _____

INVESTIGATOR: H. B. [Signature]
(NAME: TYPED OR PRINTED)
WITNESS: _____
(NAME & TITLE: TYPED OR PRINTED)

CONFIDENTIALITY AGREEMENT

I have information that I wish to provide in confidence to the U. S. Nuclear Regulatory Commission (NRC). I request an express pledge of confidentiality as a condition of providing this information to the NRC. I will not provide this information voluntarily to the NRC without such confidentiality being extended to me.

It is my understanding, consistent with its legal obligations, the NRC, by agreeing to this confidentiality, will adhere to the following conditions:

- (1) The NRC will not identify me by name or personal identifier in any NRC initiated document, conversation, or communication released to the public which relates directly to the information provided by me. I understand the term "public release" to encompass any distribution outside of the NRC with the exception of other public agencies which may require this information in furtherance of their responsibilities under law or public trust.
- (2) The NRC will disclose my identity within the NRC only to the extent required for the conduct of NRC related activities.
- (3) During the course of the inquiry or investigation the NRC will also make every effort consistent with the investigative needs of the Commission to avoid actions which would clearly be expected to result in the disclosure of my identity to persons subsequently contacted by the NRC. AT a later stage I understand that even though the NRC will make every reasonable effort to protect my identity, my identification could be compelled by orders or subpoenas issued by courts of law, hearing boards, or similar legal entities. In such cases, the basis for granting this promise of confidentiality and any other relevant facts will be communicated to the authority ordering the disclosure in an effort to maintain my confidentiality. If this effort proves unsuccessful, a representative of the NRC will attempt to inform me of any such action before disclosing my identity.

I also understand that the NRC will consider me to have waived my right to confidentiality if I take any action that may be reasonably expected to disclose my identity. I further understand that the NRC will consider me to have waived my rights to confidentiality if I provide (or have previously provided) information to any other party that contradicts the information that I provided to the NRC or if circumstances indicate that I am intentionally providing false information to the NRC.

Other Conditions: (if any)

I have read and fully understand the contents of this agreement. I agree with its provisions.

Date

Signature of source of information
Typed or Printed Name and Address

Agreed to on behalf of the US Nuclear Regulatory Commission

Date

H. Brooks

Signature
Typed or Printed Name and Title

Revision 1.

PLACE: /

Allen Rose, Texas

DATE: /

Statement to Mr. W. E. Frost, who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I am currently employed at the CPSES, Allen Rose, Texas as a quality control inspector in the area of electrical inspection. I have been employed by Brown and Root as a quality control inspector since [redacted]

I did not know Charles Atchison, but I am aware of his situation thru newspaper articles and a small amount of co-worker conversation. To the fact that Charles Atchison was terminated in April of 1982 has not discouraged me from properly carrying out my Q.C. responsibilities writing NCR's or identifying deficiencies. I have not now nor have I ever been intimidated by anyone at CPSES that would cause me not to carry out my proper Q.C. inspection responsibilities.

I have read the foregoing statement consisting of 1 handwritten/
~~typed~~ pages. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on /

Subscribed and sworn to before me this

at Allen Rose, Texas

INVESTIGATOR: W. E. Frost OIR II

Glow Rose, Texas

DATE: []

I hereby make the following voluntary statement to Mr. H. Brooks Griffin who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I have worked as an electrical QC inspector for Brown & Root for about 1 year before I became a QC inspector. I worked in [] starting in [] About [] I transferred to the [] Bill Ford []

In the [] time I have worked for Ford, he has not prevented me from reporting deficiencies or writing NCRs. There is one situation in which I identified a deficient situation on a termination, and [] documentation on a termination, and [] asked me to wait to write the NCR until we get some others. I do not believe I should be made to wait, although it will continue to appear on a deficiency list.

Another inspector (John Hunter) found a deficient [] on a rung of a cable tray. Ford told [] Hunter not to write an NCR and said he (Ford) would let craft fix it. This is still pending. I heard Ford tell Hunter not to write the NCR. I believe that Ford's attitude about writing NCRs comes down from J.B. Lewyler.

I have read the foregoing statement consisting of 1 handwritten/ [] page(s). I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on []

(RTED)

Subscribed and sworn to before me this [] at []

INVESTIGATOR: H. Brooks Griffin
(NAME: TYPED OR PRINTED)

WITNESS:
(NAME & TITLE: TYPED)

CONFIDENTIALITY AGREEMENT

I have information that I wish to provide in confidence to the U. S. Nuclear Regulatory Commission (NRC). I request an express pledge of confidentiality as a condition of providing this information to the NRC. I will not provide this information voluntarily to the NRC without such confidentiality being extended to me.

It is my understanding, consistent with its legal obligations, the NRC, by agreeing to this confidentiality, will adhere to the following conditions:


- (1) The NRC will not identify me by name or personal identifier in any NRC initiated document, conversation, or communication released to the public which relates directly to the information provided by me. I understand the term "public release" to encompass any distribution outside of the NRC with the exception of other public agencies which may require this information in furtherance of their responsibilities under law or public trust.
- (2) The NRC will disclose my identity within the NRC only to the extent required for the conduct of NRC related activities.
- (3) During the course of the inquiry or investigation the NRC will also make every effort consistent with the investigative needs of the Commission to avoid actions which would clearly be expected to result in the disclosure of my identity to persons subsequently contacted by the NRC. AT a later stage I understand that even though the NRC will make every reasonable effort to protect my identity, my identification could be compelled by orders or subpoenas issued by courts of law, hearing boards, or similar legal entities. In such cases, the basis for granting this promise of confidentiality and any other relevant facts will be communicated to the authority ordering the disclosure in an effort to maintain my confidentiality. If this effort proves unsuccessful, a representative of the NRC will attempt to inform me of any such action before disclosing my identity.

I also understand that the NRC will consider me to have waived my right to confidentiality if I take any action that may be reasonably expected to disclose my identity. I further understand that the NRC will consider me to have waived my rights to confidentiality if I provide (or have previously provided) information to any other party that contradicts the information that I provided to the NRC or if circumstances indicate that I am intentionally providing false information to the NRC.

Other Conditions: (if any)

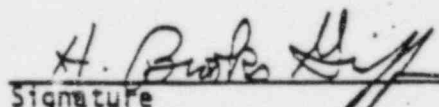
I have read and fully understand the contents of this agreement. I agree with its provisions.


Date


Signature of source of information
Typed or Printed Name and Address

Agreed to on behalf of the US Nuclear Regulatory Commission


Date


Signature
Typed or Printed Name and Title

PLACE: Comanche Peak
Glen Rose, Texas

I, Bruce Allen Hearn^{BH}, DATE: 7-28-83, hereby make the following voluntary statement to Mr. H. B. Griffin, who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I have been employed as an electrical QC inspector for Brown & Root at Comanche Peak for about 6 months. Before, I had worked in the electrical department in craft. Whitman is my head and Lentwyler is my supervisor.

I am vaguely aware of the Charles Atchinson case, but his termination did not discourage me from writing NCRs.

Since I have been employed at Comanche Peak, nobody has intimidated me or attempted to intimidate me into not reporting deficiencies.

Since I have worked in QC I have written about 20 NCRs. S.B. Lentwyler has never made any statements in my presence indicating he would rather I not write NCRs. To my knowledge, QC inspectors at Comanche Peak have adequate freedom to report non conforming conditions.

I have read the foregoing statement consisting of 1 ~~two~~ handwritten/typed pages. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-28-83 at 1:25pm
(date) (time)

Bruce A. Hearn
(SIGNATURE: TYPED OR PRINTED)

Subscribed and sworn to before me this 28th day of July, 1983, at Comanche Peak

INVESTIGATOR: H. B. Griffin
(NAME: TYPED OR PRINTED)

WITNESS: _____
(NAME & TITLE: TYPED)

PLACE: Comanche Peak
Glen Rose, Texas

DATE: 7-28-83

I, Billy Robert Holmes, hereby make the following voluntary statement to Mr. H. Brooks Griffin who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I have been an electrical QC inspector for Brown & Root at Comanche Peak for one year and nine months. Randy Whitman is my lead, and J.B. Lentwyler is my supervisor.

I am aware of the Charles Atchinson case from what I read in the newspapers, but Atchinson's termination did not discourage me from writing NCRs.

Since I have been at Comanche Peak in QC nobody has attempted to intimidate me, nor have I been intimidated as relates to my QC responsibilities.

J.B. Lentwyler has never told me not to write and NCR, but he has requested that the inspectors take the time to research the problem before writing one. If Lentwyler questions an inspector's NCR and the inspector continues to believe it is a non conformance the NCR is issued. I believe that all QC inspectors at Comanche Peak have adequate freedom to report deficiencies and write NCRs.

I have read the foregoing statement consisting of 1 handwritten/
2 pages. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-28-83 at 12:50pm
(date) (time)

Bill Holmes
(SIGNATURE: TYPED OR PRINTED)

Subscribed and sworn to before me this 28th day of July 1983
at Comanche Peak.

INVESTIGATOR:
(NAME: TYPED OR PRINTED)

WITNESS:
(NAME & TITLE: TYPED)

ATTACHMENT (69)

PLACE: Comanche Peak

Glen Rose

DATE: 7-28-83

I, Debra Ellen Mabe

hereby make the following voluntary statement to Mr. H. Brooks Griffin who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I have been employed as an electrical QC inspector for Brown + Root at Comanche Peak for 3 years and 2 months. Prior to working in QC I worked as a clerk for Brown + Root handling DCAs to the craft. Rowdy McGaughey is my leader and J.B. Lentwyler is my supervisor.

I am somewhat aware of the Charles Atchinson case, but Atchinson's termination did not discourage me from reporting nonconforming conditions.

Since I have been employed at Comanche Peak, nobody has attempted to intimidate me nor have I been intimidated as relates to writing NCRs.

About 8 months ago I went to engineering with a question on a solenoid. One of the lead engineers who handles dispositions of NCRs made a statement questioning my writing an NCR on the problem. I believe the engineer, Larry Fopkewell, was attempting to get me to not write an NCR. I ended up writing an unsatisfactory inspection report. I believe QC inspectors have

I have read the foregoing statement consisting of 1 handwritten adequate free pages. I have made and initialed any necessary corrections and to report have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-28-83 at Comanche Peak (date) (time)

Debra Mabe
(SIGNATURE: TYPED OR PRINTED)

Subscribed and sworn to before me this 28th day of July, 1983, at Comanche Peak.

INVESTIGATOR: H. Brooks Griffin
(NAME: TYPED OR PRINTED)

WITNESS: _____
NAME & TITLE: TYPED

PLACE: Comanche Peak

Glen Rose, Texas

DATE: 7-28-83

I, Robert Warner Wisas, hereby make the following voluntary statement to Mr. H. Brooks Griffin who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I have been employed as an electrical QC inspector for Brown & Root at Comanche Peak for about 3 years. Randy Whitman is my lead, and J.B. Lentwyler is my supervisor.

I am aware of Charles Atchinson's case through the newspapers, but his termination did not discourage me from reporting nonconforming conditions.

Since I have been employed as a QC inspector at Comanche Peak, nobody has intimidated me or attempted to intimidate me into accepting nonconforming conditions.

About two months ago, I had a conversation with J.B. Lentwyler regarding the writing of NCRs. I got the impression from Lentwyler that if the deficiency could be fixed, it would be better to call craft and let them fix it rather than writing an NCR. Lentwyler nor Whitman has never told me not to write an NCR. I am a little more cautious in ~~what~~ NCRs I do write to Lentwyler. I believe QC inspectors at Comanche have adequate freedom to report deficiencies and write NCRs.

I have read the foregoing statement consisting of 1 handwritten/
~~2~~ pages. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-28-83 at

(date) (time)

Robert Warner Wisas
(SIGNATURE: TYPED OR PRINTED)

Subscribed and sworn to before me this 28th day of July, 1983,
at Comanche Peak

INVESTIGATOR: H. Brooks Griffin
(NAME: TYPED OR PRINTED)

WITNESS: _____
(NAME & TITLE: TYPED)

ATTACHMENT (71)

PLACE: Comanche Peak
Glen Rose, Texas

DATE: 7-27-83

I, William H. Ford, hereby make the following voluntary statement to Mr. H. B. Griffin, who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely, with no threats or promises of reward having been made to me.

I have been employed as a QC inspector at Comanche Peak since December of 1981. In March of 1983, I was promoted to lead and my present supervisor is J.B. Lentwyler.

Since I have been a QC lead I have never told an inspector not to write an NCR, nor have I ever taken over an inspection from one of my inspectors who identified a nonconforming condition.

When an inspector calls me on a deficiency, I go and look at it with the inspector. We either write an NCR, sometimes we call craft to fix it if it is a small problem, or sometimes we put an NCR pending hold tag on it and give craft time to fix it. I can think of two occasions we put a hold tag on it, and let craft fix it).

Last night an inspector identified a bent cable tray. I subsequently had an inspector (John Hunter) put a hold tag on it and I called an engineer to look at it. This is pending.

I have never had one inspector take over an inspection on a nonconformance from another inspector. J.B. Lentwyler nor any of the supervisors above me have ever instructed me or pressured me to lower the number of NCRs written by my inspector.

I have read the foregoing statement consisting of 1 page. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on 7-27-83 at 10:30 am (date) (time)

William H. Ford
(SIGNATURE: TYPED OR PRINTED)

Subscribed and sworn to before me this 27th day of July 1983, at Comanche Peak.

INVESTIGATOR: H. Brooks Guff
(NAME: TYPED OR PRINTED)

WITNE : _____
(NAME & TITLE: TYPED)

STATEMENT

PLACE: Comanche Peak

DATE: 7-28-83

I, Jayhuch Beecher Leutwyler hereby make the following voluntary statement to H. Brooks GRIFFIN who has identified himself to me as an Investigator with the U. S. Nuclear Regulatory Commission. I make this statement freely with no threats or promises of reward having been made to me.

I am employed as an electrical QC supervisor for Brown & Root at ~~the~~ Comanche Peak. I was previously employed as a supervisor at the South Texas Project, and I was transferred to Comanche Peak in December of 1981. I am now the supervisor over electrical QC inspection at Comanche Peak.

There have been instances where QC inspectors have identified conditions that they believed to be nonconformances. There may have been occasions where I disagreed with the inspector and told the inspector not to write an NCR. I do not specifically recall any such instances, but it may have happened. Usually if an inspector feels strongly about a deficiency it is referred to Quality Engineering in the form of an NCR.

An NCR is something that alters the form, fit, or function of an item (the design) and for the certifying paperwork.

ATT... 7/28/83

Many of the inspectors think that if anything is wrong with an item, it constitutes a nonconforming condition. In many of these instances I believe the deficiency should be handled as an "unsatisfactory" on an inspection report or on a deficiency report rather than an NCR. In those instances when I have discouraged inspectors from reporting a deficiency as an NCR, the condition is still reported and remains an "open item".

It is my understanding that until a room is ready to turnover for a final inspection, QC has the option of bringing craft in to rework the deficiency until the final. If the deficiency cannot be reworked in a timely manner, then an ~~NCR~~^{NCR} is usually generated.

I have never attempted to pressure my leads or inspectors into lowering the number of NCRs. I have never had one inspector take over an inspection when

another inspector refused to sign off on an inspection.

I believe that the inspectors under my supervision have adequate freedom to report deficiencies or non conforming condition and freedom to write NCRs.

I have read the foregoing statement consisting of 3 handwritten/
~~two~~ pages. I have made and initialed any necessary corrections and
have signed my name in ink in the margin of each page. I swear that the
foregoing statement is true and correct. Signed on 7-28-83 at 4:11 PM
(date) (time)

[Signature]
(SIGNATURE: TYPED OR PRINTED)

Subscribed and sworn to before me this 28th day of July, 1983,
at Comanche Peak

INVESTIGATOR: H. Brooks Huff
(NAME: TYPED OR PRINTED)

WITNESS:
(NAME & TITLE: TYPED OR PRINTED)



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20545

JUL 13 1984

Docket Nos.: 50-445
and 50-446

Mr. M. D. Spence
President
Texas Utilities Generating Company
400 N. Olive Street, L. B. 81
Dallas, Texas 75201

Dear Mr. Spence:

Subject: Comanche Peak Special Review Team Report

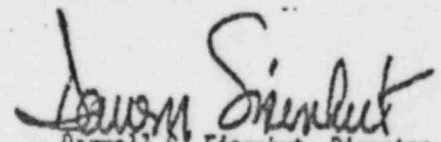
Enclosed is the Special Review Team Report that resulted from the special review conducted during the period of April 3-13, 1984 at the Comanche Peak site. The purpose of the review was to: 1) evaluate the current implementation of the applicant's management control of the construction, inspection and test programs, 2) provide an indepth understanding and background information to the NRC management team established by the Executive Director for Operations, and 3) obtain information necessary to establish a management plan for resolution of all outstanding regulatory actions.

The review identified a number of actions to be followed by the Technical Review Team established pursuant to the management plan. Additionally, three potential enforcement actions were identified during the review. These actions will be referred to the Administrator of Region IV for appropriate action.

The Special Review Team found during this limited review that your management control over the construction, inspection, and testing programs is generally effective and is receiving proper management attention. The Special Review Team concluded that your programs are being sufficiently controlled to allow continued plant construction while the NRC completes its review and inspection of the facility.

Should you have any questions concerning this review, we will be pleased to discuss them with you.

Sincerely,


Darrell G. Eisenhut, Director
Division of Licensing

Enclosure: As stated

cc w/encl.: See next page



a. General

The reviewer conducted tours of containment, auxiliary building, safeguards building, and control building for both units to generally observe quality, work in progress, material control, and protection of HVAC equipment, as well as weld rod control. Discussions were held with craft and inspection personnel during these tours relative to plant quality.

b. Review Effort

Previous discrepancies identified by NRC regarding HVAC installation served as a driving force for this review effort. A review was made of evaluations and calculations performed as a result of the previously identified problems. In addition, the reviewer observed HVAC ducting and supports for conformance to applicable drawings, specifications, and standards.

The reviewer generally observed ducting in various areas of the containments, auxiliary building, safeguards buildings, and control building for both units for proper bolting, proper gaskets, and structural integrity. In addition, the inspector observed duct and equipment supports for conformance to requirements. Supports reviewed included unit 2 duct hangers 2J-1R, 2J-1V, and 2J-R1B; Unit 1 duct hangers 1J-R1L, 1J-10C, 1E-1A, 1E-1L, and 1H-R1G; floor mount of Unit 1 Train A Containment Spray Pump Room fan coil unit; and the two unit 1 Safety Injection Pump Room Fan Coil unit hangers.

c. Conclusion

No significant problems were identified relative to ducting. Only minor problems, well within previous discrepancies evaluated, were found in duct supports. Dimensional variations were noted in the hangers for Safety Injection Pump Room Coolers. These deviations were analysed during the review indicating that these hangers were acceptable. Several minor drawing errors were also noted which were corrected during the review. The evaluations and corrective actions performed as a result of previously identified problems with HVAC installation appear to be adequate.

I. Formal Interviews of QA/QC Personnel

- a. Formal interviews were conducted of QA/QC personnel in order to assist in assessing site quality and management support of site quality. It was felt that discussions with inspection personnel would give a good conservative insight into whether or not the plant was being constructed properly. Interviews of five management personnel and twenty-eight inspectors were conducted. Inspectors were selected at random with one exception. Electrical inspectors were primarily selected from a group of inspectors which had recently been involved in a personnel

incident involving a dress code "(Tee Shirt)" issue in order to assess whether these persons had significant technical concerns. In addition, two electrical inspectors indicated a desire to talk to NRC and were interviewed. Several additional electrical inspectors were chosen in addition to inspectors in various other disciplines.

The group included inspectors working for eight different supervisors. Experience of these personnel ranged from persons who had been in QC less than a year, to persons who had been at Comanche Peak from early construction (mid 1970s). Most had some previous experience such as site craft, non-nuclear industry or military experience. Some had worked at other nuclear facilities.

The major thrust of the interviews was to determine if the personnel had any plant safety or quality concerns. Concerns in these areas were solicited from all those interviewed. Discussions of other subjects were also held with most of the individuals interviewed. These subjects included intimidation, support for identifying problems, ability to have problems evaluated and corrected as necessary, feedback on evaluation of problems, adequacy of training program, and relationship with NRC.

All but two inspectors stated they felt the plant would be safe which meant they had no significant quality problems which they felt would compromise safe operation. One inspector, who was not sure of the plant's safety, stated he was assigned to an area which was less controlled than he was used to, e.g., non-ASME code work versus ASME code work (which has the most stringent requirements), and was uncomfortable with the leeway allowed in this area. This person also indicated he had doubts about QA at nuclear plants in general. The other individual who was unsure of plant safety indicated he was satisfied with quality with one exception. This involved a specific problem which he was not sure was adequately evaluated. This item was described to the NRC:RIV Senior Resident Inspector for followup. Two inspectors who stated they had decided on their own that they wanted to talk to NRC, expressed very strongly that the plant quality was "excellent" and there was no plant safety concern. Another inspector, with over twenty-years' experience, who was at his fifth nuclear plant said Comanche Peak was the "best" plant he had seen.

Seven inspectors expressed one or more specific concerns. These concerns involved questions on whether a particular procedure requirement or whether a particular technical evaluation was appropriate, documentation problems not involving quality of construction, questions whether certain personnel transfers were discriminatory, inaccuracies in some written Nonconformance Report (NCR) evaluations, and concerns which had recently been brought up and were yet to be evaluated by the licensee. All concerns have been forwarded to the Comanche Peak Project Director for followup for review and evaluation as necessary. Several concerns were given to NRC:RIV personnel during this inspection and followup showed that there was no technical problem identified.

The NRC Resident Inspector was familiar with one of the concerns and had already evaluated the condition as technically acceptable. Several additional concerns were given to RIV personnel verbally on the 1st day of this inspection for timely followup.

The special team interviewer reviewed the concern regarding transfers of six of seven individuals mentioned in the personnel transfer concerns. These transfers appeared to be non-discriminatory. It should be noted that in all cases of concerns involving specific hardware discrepancies these discrepancies had been identified to appropriate licensee personnel and had been or were being evaluated.

All inspectors questioned (21) as to their ability to identify problems such as via NCRs, indicated no suppression in this area. Several inspectors indicated that NCR written evaluations could be more clear and complete in some cases.

Feedback regarding problems, such as via explanations of NCR evaluations, was considered good by 19 of the individuals questioned. One individual indicated he did not always receive complete feedback but these items did not involve significant technical concerns. Two individuals stated they felt uncomfortable with some "use-as-is" NCR evaluations. One stated that more feedback was needed as to reasons for procedure changes.

Many of the inspectors indicated that communications were improving and the assignment of the new site QA manager was a positive step in improving communications. It was clear that some communications problems had existed in the past and rapport between inspectors and their management had been strained previously in some areas. Communications in the ASME code construction area appeared to be exceptionally positive.

All but a few inspectors were questioned regarding intimidation by craft. No significant problems were identified although two individuals mentioned two incidents when the craft were upset with inspectors when problems were found. No threats were made during these incidents. Generally, the rapport between craft and inspection appeared to be very good.

Adequacy of the training program was discussed with approximately half of the inspectors. Several indicated that the formal training could be better, i.e., tougher (not necessarily more extensive) but formal training, plus on-the-job training was adequate to perform the inspection functions. Many stated that the training was excellent.

Twenty inspectors felt no hindrance at all to talking with NRC and indicated that the freedom to talk with NRC has been continually stressed by management. Several indicated some apprehension about talking with NRC which appeared to be a natural fear of the position

NRC holds. Several were under the impression for a short while that they must have their "act together" if they were going to see the NRC, but now appear to feel no hindrance. Most indicated they saw NRC inspectors regularly in the field but a majority indicated that they had not talked directly with NRC in the field.

Interviews of management indicated they were very supportive of inspectors and sensitive to inspector concerns. There appeared to be a strong encouragement for personnel to come forward with any concerns, as evidenced by a memorandum dated March 22, 1984, to all QA/QC personnel from the Site QA Manager. Postings indicating management support for inspectors and other personnel in identifying problems were prominently displayed along with NRC Form 3, NRC Information Notice 84-07 and 10 CFR 21 information.

In summary, although some concerns were expressed requiring further review, these concerns did not appear to be excessive in number or serious and would be normally expected during the interview process. Generally, the most experienced inspectors had a high confidence in the quality of the plant. Past problems in communication and some past apprehension about management support had existed but there seems to have been a marked improvement in this area. No one indicated that past communication problems had caused them to not perform inspections properly or not to identify problems when found. Inspector freedom to identify problems and freedom to talk with NRC has apparently been strongly stressed. Management appeared to be sensitive to employee concerns and appeared to be seriously evaluating existing concerns.

- b. In addition to formal interviews, numerous informal discussions were held between the NRC team personnel and site managers, craft, inspectors, engineers, and office personnel as indicated previously in other sections of this report. The comments received from these individuals were consistent with those received during the formal interviews. These discussions covered topics such as plant quality, training, management support, and document control.

Appendix A, which follows, is a sanitized listing of concerns raised by individuals during the interview process. The concerns are only those which will require followup by the Comanche Peak Project Director. The interviews were sanitized only so far as confidentiality is related.

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TEXAS UTILITIES SERVICES INC.

OFFICE MEMORANDUM

To FileDallas, Texas Sept. 21, 1982Subject Allegations of Threats and Harassment by Darlene Steiner
(Employee, Brown & Root, QC-CPSES)1. INTRODUCTION

On September 20, 1982 Mr. Dave Chapman (TUGCO-QA) contacted this office regarding Darlene Steiner, an employee of Brown & Root, CPSES. Mr. Chapman stated that he had recently learned that Darlene Steiner had told several people at CPSES that she was being harassed and threatened because she had recently testified at hearings held by the Atomic Safety and Licensing Board (ASLB). He had not yet learned the specific details of the incident.

Mr. Chapman requested that I conduct any inquiry in order to (1) determine the specific nature of the allegations made by Mrs. Steiner and (2) to identify any persons who may have been threatening or harassing her so that appropriate action could be taken to resolve the problem.

The requested inquiry was initiated on September 21, 1982.

II. CONDUCT OF INQUIRY

The information obtained during this inquiry was developed through the conduct of interviews with the following individuals at CPSES:

Mr. James Compton (B&R)
Mr. Jim Fortune (B&R)
Mr. Doug Frankum (B&R)
Mr. Sam Hoggard (B&R)
Mr. Jerry Lamb (B&R)
Ms. Phyllis Anita May (B&R)
Mr. Gary Orfield (B&R)
Ms. Leslie Ann Sanchez (B&R)
Mrs. Darlene Steiner (B&R)

The interviews pertinent to the subject of the inquiry were reduced to writing.

III. DETAILS OF ALLEGATIONS

In an interview with Mrs. Darlene Steiner on September 21, 1982, the details of her allegations of threats and harassment were determined. They are briefly summarized as follows:

Chapman 7
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- A. That Jerry Lamb, a B&R-CPSES employee, had obtained information that two (2) black females at CPSES were "waylaying" for her. She concluded that these black females were Phyllis May and Leslie Sanchez.
- B. That on September 16, 1982 (1) she was unjustly denied permission to ride a private bus operated by James Compton; (2) she was "elbowed" as she exited the bus, (3) she was subjected to "yelling" and lewd gestures by the occupants of the bus, and (4) that people kept "snickering" at her and "saying things" behind her back.
- C. That on September 20, 1982, she had difficulty in obtaining escorts (as promised to her by B&R management) to and from the front gate and her work area.
- D. That on the evening of September 20, 1982, she received a "threatening" phone call at her home.
- E. That she felt the above-described incidents were the result of her recent testimony before the ASLB in Fort Worth, Texas.

IV. CONCLUSIONS AND FINDINGS

- A. This inquiry failed to substantiate or corroborate Mrs. Steiner's allegation that Mr. Lamb discovered that two (2) black female CPSES employees (Phyllis May and Leslie Sanchez) were "waylaying" for her. This conclusion is based upon the findings summarized below:
 - 1. Mrs. Steiner, in an interview on September 21, 1982, withdrew her allegation against Ms. May and Ms. Sanchez and stated that she then felt that neither Phyllis May nor Leslie Sanchez had any involvement in threatening her as she had previously believed.
 - 2. Both Ms. May and Ms. Sanchez deny ever threatening Mrs. Steiner. Both offered evidence that they had been friends with Mrs. Steiner in the past and believed that friendship to still be intact.

3. In interviews on September 21, 1982 and September 23, 1982 both Mrs. Steiner and Ms. May acknowledged that they had recently discussed this matter and both considered that Mrs. Steiner's allegation against Ms. May to be resolved.
 4. Mr. Jerry Lamb stated (1) that he had never obtained any information that Darlene Steiner was going to be "waylaid," (2) that he had never heard anyone of CPSES threaten Mrs. Steiner and (3) that he had never told Mrs. Steiner's father-in-law that she was going to be "waylaid" by two black females.
- B. This inquiry failed to substantiate or corroborate Mrs. Steiner's allegation that she was improperly denied a ride on a private bus and was subsequently physically and verbally abused. This conclusion is based upon the findings summarized below:
1. The owner and driver of the bus involved, Mr. James Compton, acknowledges that Mrs. Steiner was denied access to his bus on September 16, 1982 but states that this was only due to the fact that he felt his insurance wouldn't cover him because Mrs. Steiner was pregnant and would be required to stand on the bus trip. Mr. Compton contradicted virtually all other aspects of Mrs. Steiner's account of this incident.
 2. Mrs. Steiner specifically named Mr. Gary Orfield as a witness to the bus incident. In an interview Mr. Orfield contradicted virtually every aspect of Mrs. Steiner's account of the incident. Mr. Orfield's account of the incident is highly corroborative of the description given by Mr. Compton. Both witnesses state that Mrs. Steiner was not pushed "elbowed" or otherwise physically or verbally abused.
 3. In an interview on September 21, 1982, Mrs. Steiner acknowledged that she could not identify anyone who had "snickered" or "hollered" at her on September 16, 1982 and that this alleged verbal abuse may have been her "imagination."

- C. This inquiry failed to substantiate or corroborate Mrs. Steiner's allegation that she was promised escorts from the plant entrance to her workplace and then had difficulty obtaining them. This conclusion is based upon the findings summarized below:
1. In an interview on September 21, 1982 Mrs. Steiner acknowledged that CPSES Security Supervisor Jim Fortune had told her on September 16, 1982 that he had no one available for escort.
 2. In the same interview Mrs. Steiner acknowledged that, on September 20, 1982, Mr. Brandt (B&R-CPSES) told her that obtaining an escort required special authorization.
 3. Statements made by Mr. Sam Hoggard (B&R Safety-CPSES) contradict several aspects of Mrs. Steiner's account of a phone conversation between him and Mrs. Steiner. Mr. Hoggard denied that he ever suggested, recommended or attempted to arrange security escorts for Mrs. Steiner. Hoggard's statements were corroborated by Messrs. Jim Fortune and Doug Frankum (B&R-CPSES), who both denied knowledge of any agreement or decision to provide Mrs. Steiner with a regular security escort.
- D. No conclusion is rendered regarding Mrs. Steiner's allegation that she received a threatening phone call at her residence on September 20, 1982.
- E. In summary, this inquiry has failed to substantiate or corroborate Mrs. Steiner's general allegation that she is the victim of harassment and threats because of her testimony before the ASLB. This conclusion is based upon the findings summarized above as well as the following:
1. In an interview on September 21, 1982, Mrs. Steiner acknowledged (1) that she no longer felt threatened by Ms. Phyllis May or Leslie Sanchez, (2) that she had never been personally threatened by anyone at CPSES, (3) that she had no idea of the identity of anyone at CPSES who

wants to harm her, (4) that she could not identify any specific person who had verbally abused or harassed her and that such harassment may have been the result of her "imagination," and (5) that her allegations about threats and harassment were "flimsy and "based on rumors."

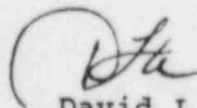
2. Mrs. Steiner's accounts of virtually every incident in which she has perceived threats and/or harassment has been contradicted by the statements of the other parties involved.

RECOMMENDATIONS

The conclusions and findings of this inquiry were verbally reviewed with Mr. Dave Chapman (TUGCO) on September 23, 1982. The following recommendations were made to Mr. Chapman:

1. Any future allegations of a similar nature by Mrs. Steiner should also be investigated by this office.
2. Due to the volatile nature of Henry Steiner, and the fact that he has apparently brought weapons near the front gate area of CPSES; Brown & Root management should be encouraged to undertake measures to limit Steiner's potential contact with Brown & Root workforce members.

No further activity with regard to this inquiry is planned at this time.



David L. Andrews
Director of Corporate Security

REPORT OF INTERVIEW

With Mr. James Compton, Employee, Brown & Root, CPSES. Made on September 21, 1982 at CPSES by David L. Andrews (Corporate Security-TUSI) in the presence of Mr. Dave Chapman (TUGCO) and Mr. Peter McLain (Attorney, Brown & Root).

Mr. Compton was interviewed at approximately 3:15 p.m. on September 21, 1982. Prior to the interview Mr. Compton was advised of the identity of all persons present and that the purpose of the interview was to investigate allegations by Mrs. Darlene Steiner that she had been threatened and harassed.

Mr. Compton was then asked by Andrews to provide all available information regarding an incident on September 16, 1982 in which Darlene Steiner was refused a ride on his bus. Mr. Compton responded to this request substantially as follows:

That he is an employee of Brown & Root at CPSES and additionally, he operates a private bus in which he transports workers to the CPSES jobsite. He is an independent contractor and no one with Brown & Root tells him who can or cannot ride in his bus.

He has a regular group of riders who always utilize his bus and who pay in advance. It is understood by all riders that these "regulars" are guaranteed a seat because they pay in advance. If other seats are available, then "occasional" riders are allowed on his bus.

On Thursday, September 16, 1982 Darlene Steiner, who is not a regular rider and who had not ridden his bus in a number of days, attempted to board his bus in Walnut Springs. At the time she attempted to board Compton knew that he already had a full bus of "regulars" and that Mrs. Steiner would have to stand up all the way from Walnut Springs to CPSES. He felt that due to Mrs. Steiner's pregnancy, and the fact that she would have to ride standing up; his insurance would not cover him if she was injured on his bus. He told Mrs. Steiner this and said that he couldn't let her ride his bus. He told her this before she ever entered his bus.

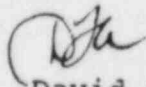
After being denied a ride, Mrs. Steiner immediately turned and said something about "catching Henry before he leaves." She then went to Henry Steiner's pickup and got in.

As he was driving from Walnut Springs to Glen Rose the pickup occupied by Henry and Darlene Steiner passed his bus and then slowed down. As he attempted to pass the pickup it increased its speed to prevent his passing. After he dropped back Steiner repeated this maneuver several times. Eventually, he was able to pass Steiner, as he did so Henry Steiner made an obscene gesture to him. Steiner then followed his bus all the way to CPSES.

During the entire trip to CPSES, he heard no one on his bus yell anything at either of the Steiners. He saw no one punch, elbow or otherwise strike Darlene Steiner.

After arriving at CPSES he again explained to Darlene Steiner why he could not allow her to ride on his bus. She seemed satisfied with his explanation and didn't seem mad at him.

The interview with Mr. Compton was then terminated.



David L. Andrews
Director of Corporate Security

REPORT OF INTERVIEW

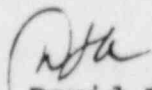
With Mr. Jim Fortune (Security Supervisor, Brown & Root-CPSES).
Made on September 21, 1982 by David L. Andrews (Corporate Security-TUSI) in the presence of Dave Chapman (TUGCO) and Peter McLain (Attorney-Brown & Root).

Mr. Fortune stated substantially as follows:

That no one in Brown & Root Management had ever instructed him or suggested to him that he provide a security escort for Darlene Steiner. He does not have the available security personnel to provide a "bodyguard" for Mrs. Steiner.

That as the Chief of Security at Brown & Root-CPSES he has many reliable sources of information within the workforce. To date, he has received no information that would lead him to believe that Darlene Steiner is in any danger from anyone at CPSES.

The interview with Mr. Fortune was then terminated.



David L. Andrews
Director of Corporate Security

/la

REPORT OF INTERVIEW

With Mr. Doug Frankum (Brown & Root-CPSES). Made on September 21, 1982 by David L. Andrews (Corporate Security-TUSI) in the presence of Mr. Dave Chapman (TUGCO) and Peter McLain (Attorney-Brown & Root).

Mr. Frankum stated substantially as follows:

That, to his knowledge, no one at Brown & Root-CPSES has instructed James Compton, a private bus driver, to deny ride privileges to Darlene Steiner. Compton's bus is a private, independent operation that is not regulated by Brown & Root Management.

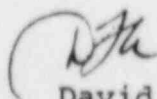
It is his understanding that Compton operates a limited service in which he drives his bus directly from his home to CPSES and will only pick up passengers along that direct route.

Mr. Frankum further stated substantially as follows:

That he had never authorized his Security Chief, Jim Fortune, to provide a permanent security escort for Darlene Steiner. He was also not aware of any other person making such an authorization.

Brown & Root management has recently "gone out of its way" to accommodate Mrs. Steiner but could not reasonably provide her with a full time security guard as an escort.

The interview with Mr. Frankum was then terminated.



David L. Andrews
Director of Corporate Security

REPORT OF INTERVIEW

With Sam Hoggard, Manager of Safety (Brown & Root, CPSES). Made on September 21, 1982 by David L. Andrews (Corporate Security-TUSI) in the presence of Dave Chapman, (TUGCO) and Peter McLain (Attorney, Brown & Root)

Mr. Hoggard was interviewed on September 21, 1982 at CPSES. Prior to the interview Mr. Hoggard was advised of the identity of those present and told the interview was part of an inquiry into allegations by Darlene Steiner that she was the victim of threats and harassment. Mr. Hoggard was asked by Andrews to review his recollection of a telephone conversation between him and Darlene Steiner on September 15, 1982.

Mr. Hoggard responded to this request by stating substantially as follows:

That on Thursday, September 16, 1982 he was contacted by phone by an individual who identified herself as Darlene Steiner, a Brown & Root "QC" employee.

That Mrs. Steiner immediately began telling him that she was "5 months pregnant" and had been subject to harassment and threats coming to and from work. She stated if something happened to her baby that would "really be bad."

That he advised Mrs. Steiner that she could leave her workplace for the gate "after the first whistle" in order to avoid the big crowds at quitting time.

That he told Mrs. Steiner this because he felt that her main concern was that she would be "jostled" in the rush to the gate at the regular quitting time.

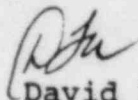
That Mrs. Steiner seemed satisfied with this and the conversation was ended.

In response to specific questions regarding this incident Mr. Hoggard stated substantially as follows:

That he, at no time, suggested that Darlene Steiner ask for an escort from Brown & Root Security. He did not, at any time during the conversation, suggest that Mrs. Steiner contact Jim Fortune, the Brown & Root Security Supervisor.

That he did not recall Mrs. Steiner mentioning anything about a security escort during their conversation.

The interview with Mr. Hoggard was then terminated.



David L. Andrews
Director of Corporate Security

/la

REPORT OF INTERVIEW

With Jerry Lamb, Employee, Brown & Root, CPSES. Made on September 23, 1982 at CPSES by David L. Andrews (Corporate Security-TUSI) in the presence of Mr. Dave Chapman (TUGCO) and Mr. Gordon Purdy (Brown & Root).

Mr. Lamb was interviewed at approximately 11:45 a.m. on September 23, 1982. Prior to the interview Mr. Lamb was advised of the identity of all persons present and that the purpose of the interview was to investigate allegations by Mrs. Darlene Steiner that she was the victim of threats and harassment. Mr. Lamb was further advised that Mrs. Steiner had alleged that he (Lamb) had told her father-in-law that two black female CPSES employees were "waylaying" for her. Mr. Lamb responded substantially as follows:

That Mrs. Steiner was lying.

That he had never made any such statement to Darlene Steiner's father-in-law.

That he was good friends with Mrs. Steiner's father-in-law but hasn't talked with him for a long time.

That he knows her father-in-law well enough that he is sure that he would never accuse him (Lamb) of saying something like that.

In response to specific questions about this matter, Mr. Lamb stated substantially as follows:

That he never heard any black females at CPSES make any threats against Darlene Steiner.

That he has never heard anyone at CPSES make any threats against either Darlene or Henry Steiner. Neither of them are well-liked at CPSES because they are a "couple of radicals."

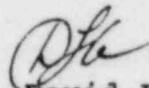
After making the above responses Mr. Lamb further stated substantially as follows:

That he would give a sworn statement about the incident.

That he knew Mrs. Steiner's father-in-law well enough that he was sure that he would give a sworn statement confirming that he (Lamb) had never said anything similar to what Darlene Steiner alleged.

That he was very upset that "radicals" like the Steiner's could "stir up so much trouble by going around spreading lies."

The interview with Mr. Lamb was then terminated.



David L. Andrews
Director of Corporate Security

/la

REPORT OF INTERVIEW

With Phyllis Anita May, (Employee Brown & Root, QC, CPSES). Made on September 23, 1982 by David L. Andrews (Corporate Security-TUSI) in the presence of Dave Chapman (TUGCO) and Gordon Purdy (Brown & Root).

Ms. May was interviewed at 10:30 a.m. on September 23, 1982 in the office of Mr. Gordon Purdy at CPSES. Prior to the interview Ms. May was advised of the identity of all parties present and told that the interview was part of an investigation of allegations by Darlene Steiner that she was being harassed and threatened. Ms. May was asked to review her relationship with Mrs. Steiner. She responded substantially as follows:

That she has been employed by Brown and Root for about three (3) years and has been in the "QC" operation for about two (2) years.

That she has known Darlene Steiner ever since she was assigned to "QC" and considers her a good friend. She was planning to give Darlene a baby shower because she is now expecting a baby.

That she also knows Darlene's husband, Henry Steiner, and that she is afraid of him because he is violent and is an ex-convict.

In response to specific questions about her above-noted statements Ms. May responded substantially as follows:

That she knows that Henry Steiner is violent because Darlene has told her that he has beaten her up many times and that she (Darlene) is afraid he will beat her up again while she is pregnant.

That Darlene has also told her that Henry has shot out their television set one time when he was mad.

That Darlene had an affair with someone some time ago and Henry found out and beat her severely. Darlene was unable to come to work

and called in and told Brown & Root that she had been "jumped" as she left her trailer-house by someone she didn't recognize. Darlene wanted everyone to think that she had been beaten by a welder named "Dan" who had been fired from CPSES because Darlene had written an "NCR" on his work. However, she (Phyllis) knows that it was Henry who beat her.

That another reason she felt that Henry Steiner was dangerous was because Darlene had told her that he had been shot by one of her relatives. Darlene had gone to the relative's house to hide from Henry and he had come to the house and tried to break in to get her. The relative had then shot him. Darlene has told her that this is the reason that she is afraid to leave Henry again.

That she knows that Henry Steiner has gone to the penitentiary in Arkansas for "pushing dope." Darlene has told her this and Henry has "bragged" about it to her.

Ms. May was advised of Mrs. Steiner's claim that two black females had threatened her and was asked if she had any knowledge of this. She responded substantially as follows:

That she was already aware that Darlene had told people that she (Phyllis) and Leslie Sanchez (another Brown & Root employee) may have threatened her.

When she heard this she was "very hurt" that Darlene would make such an allegation.

She has never made any threat of any kind against Darlene nor is she aware of any threats against Darlene by Leslie Sanchez or anyone else at CPSES.

She has already talked to Jerry Lamb about this and he has told her that he never told anyone that she or anyone else had threatened Darlene.

Darlene had recently called her and told her about what she had said and after the discussion she wasn't upset with Darlene and she was sure that Darlene now believed that she and Leslie had not threatened her.

Ms. May was asked if she knew of anyone at CPSES who wanted to harm Mrs. Steiner or who was angry at her because of her testimony at the ASLB hearings. She responded substantially as follows:

That she had heard some rumors that Darlene had said in the hearings that some people weren't doing their jobs and some people at CPSES were afraid that they might lose their jobs because of "stuff like that."

She had also heard a rumor that Darlene may have named her as a "QC" employee who wasn't doing her job.

She was not mad at Darlene because "everyone knows" that "she (Darlene) is only testifying because Henry told her to and she is scared not to."

She is not personally worried about losing her job because of anything Darlene says.

Ms. May further stated substantially as follows:

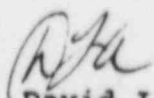
That "the last thing in the world" she would ever do is to threaten Darlene; because she is afraid that Henry Steiner would come to her home in Cleburne and try to hurt her.

Darlene had told her that Henry had carried a claw hammer with him when he walked Darlene to the "chute" (front gate) recently.

That Henry Steiner was "crazy" and would do anything to "get even with Brown & Root for firing him."

That "everyone out here knows about Henry and they don't blame Darlene for any of this."

The interview with Ms. May was then terminated.



David L. Andrews
Director of Corporate Security

REPORT OF INTERVIEW

With Mr. Gary Orfield, Employee,
Brown & Root, CPSES. Made on
September 23, 1982 by David L.
Andrews (Corporate Security-TUSI)
in the presence of Mr. Dave Chapman
(TUGCO) and Mr. Gordon Purdy (Brown
& Root).

Mr. Orfield was interviewed on September 23, 1982. Prior to the interview Mr. Orfield was advised of the identity of all persons present and that the purpose of the interview as to obtain information regarding an incident on September 16, 1982 in which Darlene Steiner was not allowed to board a bus in Walnut Springs. Mr. Orfield was also told that Mrs. Steiner had named him as a witness to the incident.

Mr. Orfield was then asked by Andrews to describe what happened with regard to that incident. Mr. Orfield responded by stating substantially as follows:

That he had worked for Brown & Root at CPSES since 1979 and was a regular rider on James Compton's bus.

That Compton's bus was privately owned and there was a "regular" group of riders who paid in advance and were "guaranteed" a seat. James Compton always gave these riders preference because he felt like they had helped "pay for his bus." Darlene Steiner was not a "regular" but did ride the bus occasionally.

That he did not recall Darlene Steiner riding the bus for "quite a while" prior to the September 16, 1982 incident.

That on the day Darlene was denied a ride he was standing behind her. As she started to get on the bus he heard James Compton, who was driving, say something to her. He did not hear what Compton said.

That he heard Darlene say something like "I hope he hasn't left." She then turned and went back to a pickup that was driven by Henry Steiner.

That he then got on the bus and the bus left Walnut Springs headed toward Glen Rose. He recalls that Henry Steiner's pickup was in front of the bus on the highway and repeatedly slowed down and then increased speed to keep the bus from passing him. When the bus finally did pass he saw Steiner make an obscene gesture at the bus.

In response to specific questions regarding this incident Orfield stated substantially as follows:

That Darlene Steiner never entered the bus but may have put her foot on the first step.

That no one kicked or punched her or "elbowed" her as she was standing at the bus door. No one, except him, was near Darlene during this incident.

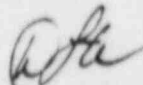
That he heard no one on the bus yell at Darlene or Henry Steiner at any time on that date.

That he heard no one yell at or threaten Darlene or Henry Steiner after the bus had arrived at CPSES.

After responding as above Mr. Orfield was asked if he had any further information about this incident. He responded substantially as follows:

That he couldn't remember anything else about the incident and that he "hadn't thought much about it" until the interview because he "didn't think it was any big deal."

The interview with Mr. Orfield was then terminated.



David L. Andrews
Director of Corporate Security

REPORT OF INTERVIEW

With Leslie Sanchez, (Employee-Brown & Root, CPSES). Made on September 23, 1982 by David L. Andrews (Corporate Security-TUSI) in the presence of Dave Chapman (TUGCO) and Gordon Purdy (Brown & Root).

Ms. Sanchez was interviewed at 11:05 a.m. on September 23, 1982 in the office of Mr. Gordon Purdy at CPSES. Prior to the interview Ms. Sanchez was advised of the identity of each person present and was further advised that the interview was being conducted as a part of an investigation into allegations by Darlene Steiner that she was being threatened and harassed. Ms. Sanchez was asked to review her relationship with Mrs. Steiner. She responded by stating substantially as follows:

That she has known Darlene Steiner since about December, 1981. She met her through a mutual friend, Phyllis May.

She is a friend of Darlenes' and has bought "Tupperware" from her on occasion. She has not personally met Henry Steiner but knows him by his "reputation."

She has never had any "trouble" with Darlene and they have always gotten along well. Darlene is a much closer friend with Phyllis than with her.

Ms. Sanchez was asked if she had any knowledge of any threats against Darlene by anyone at CPSES. She responded substantially as follows:

That she had heard that Darlene had said that she (Leslie) and Phyllis May had threatened her.

She had never told anyone that she was going to beat up Darlene or anyone else. She had never heard Phyllis May say anything to anyone about beating up Darlene.

Ms. Sanchez was then asked if she had any reason to believe that Darlene Steiner was in any danger. She replied as follows:

"Not from nobody but her husband. Nobody out here is mad at her."

In response to a question as to why she felt Darlene was in danger from her husband, Ms. Sanchez stated substantially as follows:

That Phyllis May has told her that Darlene is "scared of Henry" and that "Henry beats her up all the time."

Ms. Sanchez further stated:

"Henry put her up to this whole mess."

The interview with Ms. Sanchez was then terminated.



David L. Andrews
Director of Corporate Security

REPORT OF INTERVIEW

With Mrs. Darlene Steiner, Employee,
Brown & Root, CPSES. Made on
September 21, 1982 at CPSES by
David L. Andrews (Corporate Security-
TUSI) in the presence of Mr. Dave Chapman
(TUGCO) and Mr. Peter McLain (Attorney,
Brown & Root).

Mrs. Darlene Steiner was interviewed at 2:00 p.m. on September 21, 1982 in the office of Mr. Gordon Purdy, (Brown & Root). Prior to the interview each person participating identified himself to Mrs. Steiner. She was advised that the purpose of the interview was to discuss her recent charges of threats and harassment. Mrs. Steiner was further advised by Messrs. Chapman and Andrews that it was TUGCO's intention to fully investigate any such allegation.

Mrs. Steiner acknowledged that she fully understood our reasons for talking to her, that she was appreciative of our concern, and that she would "tell us all she knew." Mrs. Steiner appeared calm, relaxed and fully cooperative.

Mrs. Steiner was then asked to fully describe, in chronological order, those incidents which had led her to believe that she was the victim of threats and harassment. In response to this request she stated substantially as follows:

That on the Thursday before the ASLB hearings her father-in-law was told by Jerry Lamb, a Brown & Root foreman, that two black female Brown & Root employees were "waylaying" for Darlene. Mrs. Steiner's father-in-law gave her this information on the same date.

As a result of this information she concluded that the two black females involved were Phyllis May and Leslie Sanchez.

She later communicated this information to Mr. Brandt (Brown & Root) on the day of the ASLB hearings.

In response to questions regarding this matter Mrs. Steiner additionally stated:

That she had spoken to Phyllis May on September 20, 1982 and no longer believed that these two women were involved in threatening her.

That neither Phyllis May nor Leslie Sanchez has ever personally threatened her in any way.

That her reason for naming these women to Mr. Brandt was because they were the only black women she knew at CPSES.

That no one at CPSES has ever threatened her personally and she has no idea as to the identity of anyone at CPSES who wants to harm her.

Mrs. Steiner was also requested to discuss her allegations regarding threats and harassment which resulted from her attempts to ride a bus to the CPSES jobsite on September 16, 1982. With regard to this matter Mrs. Steiner stated substantially as follows:

That on the morning of September 16, 1982 she attempted to board a private bus in Walnut Springs. This bus is owned and operated by James Compton for the purpose of taking Brown & Root workers to and from CPSES. As she was walking up the steps of the bus Mrs. Steiner was advised by James Compton, the driver that she could not ride the bus because she was pregnant and that his insurance would not cover her. As she turned to go down the steps and exit the bus, she was "elbowed" by someone standing on the steps. She did not see who elbowed her. She returned to her husband's truck and he took her to work at CPSES.

Her husband, Henry Steiner, became very angry over her being denied a ride and followed the bus all the way to CPSES. At one point during the trip Henry Steiner took out a claw hammer from under the seat of his truck and indicated that he wanted to fight someone on the bus.

Several individuals on the bus yelled at her to "leave Brown & Root alone" and some made lewd gestures to her and her husband.

Upon arrival at CPSES, her husband approached a Brown & Root guard whom she believed to be a Sergeant and told him that she was being harassed by men on the bus. The guard was very courteous and took Mrs. Steiner to the building in which she worked in his guard truck.

During the remainder of the day Mrs. Steiner felt that people were "snickering" at her and "saying things" about her behind her back. As a result of this she contacted Sam Hoggarty (Brown & Root Safety Manager) and asked if she could leave work early. Hoggarty told her that he wanted her to have an "escort." He instructed her to call Jim Fortune (Brown & Root Security Supervisor) and arrange for such an escort. She did so, however, Fortune advised her that he had no one available for an escort. She then walked to the gate herself. She again heard people "hollaring" and felt they were yelling at her.

In response to specific questions regarding this incident, Mrs. Steiner stated substantially as follows:

That although she knew most of the people who ride Compton's bus, she could only remember one person who was boarding the bus at the time she was denied a ride. That individual was Gary Orfield. She knew that Orfield was not the one who "elbowed" her because he was not on the bus yet and was behind her.

She could not identify any of the persons who had "snickered" or "hollared" at her during the day on September 16, 1982 and that it may have been her "imagination."

She did not hear anyone make a threat against her on September 16, 1982.

Mrs. Steiner further related that she had no problems with anyone, nor did she receive any threats or harassment, from September 16, 1982 to September 20, 1982. With regard to the incidents which occurred on September 20, 1982, Mrs. Steiner stated substantially as follows:

It was her understanding that, upon her arrival at the CPSES jobsite on September 20, 1982 (Monday morning), she would receive an escort from Brown & Root Security from the gate to the "fab-shop" where she worked. When she and her husband arrived at the gate Henry Steiner contacted Jim Fortune with Brown & Root Security and was advised that no escort would be furnished. Steiner then contacted Mr. Doug Frankum, who arranged for an escort for Mrs. Steiner.

Later in the day Mrs. Steiner asked Mr. Brandt to arrange for an escort. He advised her that until he could obtain an authorization she could leave work early to avoid problems.

On the evening of Monday, September 20, 1982 Mrs. Steiner was at her home when she received an anonymous telephone call. The caller stated: "It would be advisable if you didn't show up for work tomorrow." The caller then hung up.

In response to questions regarding this matter, Mrs. Steiner additionally stated substantially as follows:

She had not reported the phone call to either the phone company or the sheriff's office. Additionally, she had not reported any of her allegations about threats or harassment to the police because they were "flimsy" and "based on rumors."

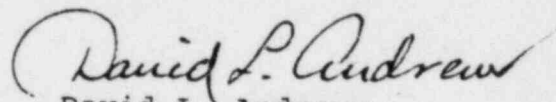
She has never had any problem with anyone in the "fab-shop", where she works. The people there treat her "nice."

She is nervous and afraid to walk from the "chute" (employee entrance gate) to the fab-shop where she works. This is her only concern. She is not afraid once she gets to her workplace.

She does not feel that Brown & Root management is in any way involved in threatening or harassing her. Brown & Root supervisors have gone out of their way to see that she is treated fairly. "The problem is with the craft."

She knows of no other incidents of threats or harassment other than those she has discussed with us.

At the conclusion of the interview with Mrs. Steiner she was asked to immediately contact any of the persons present in the event that she had any further problem or obtained any further information about who might be harassing her. She was given Mr. Andrews' business card which contains the "24-hour answering service" number for Texas Utilities Corporate Security. She thanked all persons present for their concern and agreed to immediately contact someone if problems continued. The interview was then terminated.


David L. Andrews
Director of Corporate Security

/la

Cappy Lawrence

WHITE PAPER REPORT

This is not an examination nor a method of identifying individuals with specific attitudes. This report is your opportunity to communicate with Site Quality Assurance Management your view of the job you are required to do at CPSES. It is an attempt to examine areas that make all our jobs at CPSES difficult.

Candid answers are encouraged. Do not write your name or group on this report. Circle the letter of the answer which is most appropriate. A comment section is provided for each question; if it is not large enough continue on the reverse side of the sheet. The last question is of particular interest to management. Please make your best effort at communicating your concerns.

20 people

cc: Quality Control Personnel

Foldstone

Chapman 8
8-2-84 gmw

1. Do you feel that your immediate supervisor (not lead) provides adequate technical backing to your inspection decisions?

A. Mostly yes ~~||||~~ ~~||||~~ ~~||||~~ ~~||||~~ ~~||||~~ ~~||||~~
B. Mostly no

Comments: _____

2. Do you feel reluctant to approach your immediate supervisor with technical problems?

A. Mostly yes /
B. Mostly no ~~||||~~ ~~||||~~ ~~||||~~ ~~||||~~ ~~||||~~ ~~|||~~

Comments: _____

3. Do you have confidence that your supervisor will pursue problems you submit to them that require time for resolution?

A. Mostly yes ~~||||~~ ~~||||~~ ~~||||~~ ~~||||~~ ~~||||~~ ~~|||~~
B. Mostly no /

Comments: _____

4. Do you feel that upper management (QA) has a hostile or uncomplimentary attitude toward inspection personnel?

A. Mostly yes ~~|||~~
B. Mostly no ~~||||~~ ~~||||~~ ~~||||~~ ~~||||~~ ~~||||~~

Comments: _____

5. Do you consider yourself better qualified than Craft?

A. Mostly yes ~~||||~~ ~~||||~~ ~~||||~~ ~~||||~~ ~~||||~~
B. Mostly no ~~||~~

Comments: _____

6. Do you understand the purpose of turnover activities?

- A. Mostly yes ~~||||~~ ~~||||~~ ~~||||~~ ~~||||~~ ~~||||~~
B. Mostly no ~~||||~~

Comments: _____

7. Do you understand the directions you are given by your immediate supervisor?

- A. Mostly yes ~~||||~~ ~~||||~~ ~~||||~~ ~~||||~~ ~~||||~~ ~~||||~~
B. Mostly no

Comments: _____

8. Do you feel that the inspection instructions provide clear and adequate directions?

- A. Mostly yes ~~||||~~ ~~||||~~ ~~||||~~ ~~||||~~ ~~||||~~ ~~||||~~
B. Mostly no ~~||~~

Comments: _____

9. Do you feel that by procedure you are denied discretion, sound judgement, or common sense decisions in you inspections?

- A. Mostly yes ~~||||~~ ~~||~~
B. Mostly no ~~||||~~ ~~||||~~ ~~||||~~ ~~||~~

Comments: _____

10. Do you feel that supervision denies you discretion, sound judgement, or common sense decisions in your inspections?

- A. Mostly yes
B. Mostly no ~~||||~~ ~~||||~~ ~~||||~~ ~~||||~~ ~~||||~~ ~~||||~~

Comments: _____

11. Do you feel Craft constantly conceals defects from QC?

- A. Mostly yes ~~||||~~ ~~||~~
B. Mostly no ~~||||~~ ~~||||~~ ~~||||~~ ~~||||~~ ~~||~~

Comments: _____

12. Do you feel that Craft purposely attempts to violate procedures and design documents?

A. Mostly yes ||

B. Mostly no ~~||||~~ ~~||||~~ ~~||||~~ ~~||||~~ ~~||||~~ |

Comments: _____

13. Do you usually trust what journeymen and foremen relate to you about Construction activities?

A. Mostly yes ~~||||~~ ~~||||~~ ~~||||~~ ~~||||~~ |

B. Mostly no ~~||||~~ |||

Comments: _____

14. Have you ever been told by your current supervisor to accept something you felt was rejectable or questionable?

A. Mostly yes

B. Mostly no ~~||||~~ ~~||||~~ ~~||||~~ ~~||||~~ ~~||||~~ - ||||

Comments: _____

15. Do you have professional respect for Craft supervision?

A. Mostly yes ~~||||~~ ~~||||~~ ~~||||~~ ~~||||~~ ||

B. Mostly no ~~||||~~ ||

Comments: _____

16. Do you feel your suggestions are ignored or given minor attention?

A. Mostly yes ~~||||~~

B. Mostly no ~~||||~~ ~~||||~~ ~~||||~~ ~~||||~~ ||||

Comments: _____

17. Do you feel you have adequate access to any level of Quality Management?

A. Mostly yes ~~||||~~ ~~||||~~ ~~||||~~ ~~||||~~ ~~||||~~

B. Mostly no ||||

Comments: _____