

DOCKET NUMBER 50-445 OL-2
DOCK & UTIL. REG. 50-446 OL-2

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY & LICENSING BOARD

IN THE MATTER OF:)
)
TEXAS UTILITIES ELECTRIC)
COMPANY, ET AL)
(COMANCHE PEAK STEAM)
ELECTRIC STATION, UNITS)
1 AND 2))

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OFFICE OF SECRETARY
DOCKETING & SERVICE
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PREFILED TESTIMONY OF
ALAN DALE JUSTICE
AUGUST 16, 1984

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PREFILED TESTIMONY OF ALAN DALE JUSTICE, taken
on the 16th day of August, 1984, in the above-styled
and numbered cause, at Glen Rose Motor Inn located
at Highway 67 & FM Road 201, in the City of Glen
Rose, County of Somervell and State of Texas, before
Janet E. Schaffer, a Certified Shorthand Reporter in
and for the State of Texas.

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APPEARANCES:

BISHOP, LIBERMAN, COOK, PURCELL & REYNOLDS
Attorneys at Law
1200 Seventeenth Street, N.W.
Washington, D.C. 20036

BY: McNeill Watkins II, Esq.

APPEARING FOR APPLICANTS

1 ALAN DALE JUSTICE,
2 the witness hereinbefore named, being first duly
3 cautioned and sworn to testify the truth the whole
4 truth and nothing but the truth, testified on his
5 oath as follows:

6 MR. WATKINS: On the record. This is
7 the prepared direct testimony of Alan Justice. Mr.
8 Justice is a general foreman for Brown & Root at
9 Comanche Peak. He is appearing here voluntarily as
10 a witness; he is not under subpoena by any party.

11 My name is McNeill Watkins, counsel for
12 Applicants in these license proceedings.

13 EXAMINATION

14 BY MR. WATKINS:

15 Q. Mr. Justice, would you state your full name,
16 please.

17 A. Alan Dale Justice.

18 Q. By whom are you employed, Mr. Justice?

19 A. Brown & Root.

20 Q. Where are you employed?

21 A. Comanche Peak Steam Electric Station.

22 Q. What is your badge number?

23 A. My badge number is 2371.

24 Q. What is your job title?

25 A. Piping general foreman.

1 Q. How long have you been a piping general
2 foreman at Comanche Peak?

3 A. Approximately five years.

4 Q. How many persons do you supervise?

5 A. Approximately 38.

6 Q. Do those include foremen?

7 A. Yes, sir.

8 Q. How many foremen do you supervise?

9 A. Three foremen.

10 Q. And what kind of craftsmen do you supervise?

11 A. I supervise pipefitters, welders and
12 helpers.

13 Q. Mr. Justice, were you responsible for
14 completing the construction work on a part of the
15 auxiliary feed system in January 1984?

16 A. Yes, sir, I was.

17 Q. Can you identify the part of the system for
18 which you were responsible?

19 A. Yes, sir. We were replacing a valve on the
20 AF-1-SB-007 line.

21 Q. Mr. Justice, I show you a document that's
22 been marked for identification as Exhibit 1 to
23 Richard Simpson's deposition. Can you identify this
24 document?

25 A. Yes, sir. This is a copy of the isometric

1 drawing that designated the work that we had to do
2 on this particular line.

3 Q. Is that a drawing with which your craftsmen
4 work in the field?

5 A. Yes, sir.

6 Q. Can you identify on that drawing the valve
7 on which your craftsmen worked in January 1984?

8 A. Yes, sir. It's 1-AF-067.

9 Q. In connection with that valve, what welding
10 operations were people under your supervision
11 responsible for?

12 A. They were responsible for making Welds 39C
13 and 40C directly on the valve, and in addition Weld
14 34A a little bit farther down the line.

15 Q. When did this work take place?

16 A. This work took place between January the
17 13th and January the 17th, 1984.

18 Q. What were your instructions regarding this
19 valve replacement?

20 A. My instructions were to get this valve
21 replaced and the system on line as soon as possible.

22 Q. Was there a reason for the necessity for
23 speedy work?

24 A. Yes, sir. The Startup Test Engineers were
25 planning some kind of test over in the Containment

1 Building, and this line was directly involved with
2 that test.

3 Q. By what date were you instructed that this
4 valve replacement had to be completed?

5 A. January the 14th.

6 Q. Do you recall what day of the week that was?

7 A. That was on a Saturday.

8 Q. When were you given these instructions?

9 A. I was given these instructions January the
10 13th.

11 Q. On Friday?

12 A. Yes, sir.

13 Q. Who gave you these instructions?

14 A. Gene Everson, my piping superintendent.

15 Q. To whom did you assign the responsibility
16 for performing this valve replacement?

17 A. I assigned it to Ron McBee, one of my
18 piping foremen.

19 Q. When did you assign him this work?

20 A. January the 13th.

21 Q. Do you recall whether any work was done on
22 this valve operation or on the associated welds on
23 Friday, January the 13th?

24 A. No, sir. I had many responsibilities at
25 that time, and I could not devote my full attention

1 to this one project.

2 Q. When were you able to devote your full
3 attention to this project?

4 A. Saturday, January the 14th I became
5 directly involved with this.

6 Q. Was Saturday a normal workday for welders
7 and pipe fitters under your supervision?

8 A. No, sir.

9 Q. Did you instruct Mr. McBee to have a
10 welding crew report to work on Saturday?

11 A. Yes, I did.

12 Q. Was Saturday a normal workday for QC
13 inspectors during this time period?

14 A. No, sir.

15 Q. Did you request that a QC inspector report
16 for work on Saturday in connection with this welding
17 operation?

18 A. Yes, sir, I did.

19 Q. Who did Mr. McBee have report for work on
20 these welds on Saturday the 14th?

21 A. He had Richard Simpson as a fitter, Jackie
22 Ables as a welder.

23 Q. Did you report for work on Saturday the
24 14th?

25 A. Yes, I did.

1 Q. What time did you commence work?

2 A. 7 o'clock in the morning.

3 Q. Do you recall the name of the QC inspector
4 who reported for work?

5 A. Yes, sir. It was Jack Stanford.

6 Q. What work did your crew perform on Saturday
7 morning in connection with this valve replacement?

8 A. Cleanliness and fit-up.

9 Q. Do you know when actual welding commenced
10 on Saturday?

11 A. I believe it was mid-morning.

12 Q. Mr. Justice, were you satisfied with the
13 progress of your crew on this operation by noon on
14 Saturday?

15 A. No, sir, I wasn't.

16 Q. What was the nature of your concern?

17 A. The nature of my concern was it was
18 becoming apparent that I would not be able to
19 complete this work as planned.

20 Q. Did it become apparent to you at some point
21 Saturday that your crew would not finish this job on
22 Saturday, the date by which you have testified you
23 were assigned responsibility for completing it?

24 A. Yes, it did.

25 Q. And what time did that become apparent to

1 you?

2 A. 3:30 that afternoon.

3 Q. What action, if any, did you take on the
4 basis of that realization?

5 A. I got a conference together with myself,
6 Ron McBee and Jack Stanford. We discussed all
7 aspects of being possible to make this deadline. At
8 that time I decided I couldn't possibly make it. So
9 I decided to send Jack Stanford home.

10 Q. Why did you do that?

11 A. The reason was that I would not be able to
12 complete both -- all the welds, get them prepped and
13 have all the NDE requirements met by that date. I
14 realized that my crew was not going to be able to
15 finish its work on this job for many hours. We had
16 called a QC inspector in especially to provide QC
17 support for this operation, and if we asked him to
18 stay, he would just be sitting around doing nothing. I
19 didn't believe Brown & Root should pay anyone to sit
20 around, so I told him he could go.

21 Q. Was this a difficult decision for you to
22 make, Mr. Justice?

23 A. Yes, it was.

24 Q. Why was it difficult?

25 A. It was difficult because at that time I

1 realized that I didn't meet the time limit that I
2 and my superintendent had set for myself and I
3 realized I was not going to make it.

4 Q. Now, you've testified that your crew was
5 behind your schedule on these welding operations.
6 Did you send help to the crew at some time Saturday?

7 A. Yes, sir, I did. I had another welder
8 available when he completed another project in
9 another area. When he did this, I brought him over
10 to assist in the welding operations.

11 Q. And who was that welder?

12 A. The welder was Danny Wright.

13 Q. Mr. Justice, when did your crew complete
14 its welding on these three welding operations?

15 A. Approximately midnight.

16 Q. Were the welds then ready for QC final
17 inspection?

18 A. No, sir.

19 Q. What additional steps had to be taken?

20 A. These welds had to be prepped where they
21 could perform -- where they could perform the NDE
22 requirements on them.

23 Q. Would you describe the prep process?

24 A. Yes, sir. The weld is flat-topped, and the
25 edges of the beads are blended into the adjoining

1 pipe or valve, which gives the weld a smooth
2 configuration.

3 Q. Is prepping a weld a standard operation in
4 connection with welding?

5 A. Yes, sir.

6 Q. What is the purpose of this process?

7 A. The purpose is to prepare the weld for NDE
8 inspections. The procedure is to make the weld as
9 smooth as possible where, when they perform a PT,
10 there is no possible indications on the surface of
11 the weld that might give a wrong indication. Or
12 when the weld is RT'd, that a surface indication
13 would not show up on the film, give them a false
14 reading.

15 Q. What is a PT?

16 A. Penetrant test.

17 Q. What is an RT?

18 A. Radiographic test.

19 Q. Did your crew complete its weld prep
20 process some time that night?

21 A. Yes, sir, we did.

22 Q. At what time did they complete it?

23 A. Approximately 2:15.

24 Q. Were all of the crew still there, still at
25 work?

1 A. No, sir.

2 Q. Who had left?

3 A. I had sent Ron McBee, Richard Simpson and
4 Danny Wright home around 1:30.

5 Q. So that left you and Mr. Ables; is that
6 correct?

7 A. Yes, sir.

8 Q. Now, you've testified that the purpose of
9 the weld prep process is to prepare the welds for QC
10 inspection. Were there any QC inspectors available
11 to perform NDE examinations at 2:30 Sunday morning?

12 A. Not to my knowledge.

13 Q. Why then did you prepare the welds?

14 A. For expediency sake. I wanted these welds
15 ready for final visual and penetrant inspections
16 first thing Monday morning. Also, I was going to
17 submit these welds for RT when I was leaving. We
18 had RT inspectors working on Sunday nights then. If
19 they could get these welds shot, then I would have
20 that much less work to do on Monday morning when we
21 came in.

22 Q. Was it your intent that the final VT or PT
23 on these welds be performed at any time Sunday?

24 A. No, sir.

25 Q. When did you request that RT be performed

1 on these welds?

2 A. Sunday night.

3 Q. Is there a form for such RT requests?

4 A. Yes, sir, there is.

5 Q. Did you prepare the form for these welds?

6 A. No, sir, I didn't.

7 Q. Who did prepare the requests?

8 A. Ron McBee.

9 Q. Did Mr. McBee submit these forms to the
10 radiographers?

11 A. No, sir, he didn't.

12 Q. Who did?

13 A. I did.

14 Q. Mr. Justice, I'll show you three exhibits
15 that have been marked for identification as McBee
16 Exhibits 1, 2 and 3, and I'll ask you to identify
17 those, please.

18 A. These are the RT requests that were made up
19 by Ron McBee that I submitted to the RT trailer the
20 night of the 14th.

21 Q. Was anyone at the RT trailer at that time?

22 A. No. I left the forms where they would be
23 sure to see them.

24 Q. Where is the RT trailer?

25 A. The RT trailer is up on the hill about 150

1 yards east of the plant site.

2 Q. When did you leave work on Sunday morning?

3 A. At 2:30.

4 Q. When was the next time you reported back to
5 work?

6 A. Monday morning at 7 o'clock.

7 Q. Did you learn at that time whether an RT
8 had been performed on these welds?

9 A. Yes, sir, I did.

10 Q. What were the results?

11 A. We had two accepted RT's and one rejected
12 RT.

13 Q. Which welds had been accepted?

14 A. Field Weld 39C and Weld 34A on AF-1-SB-7
15 were accepted.

16 Q. Did you order any further action with
17 respect to those welds?

18 A. No, sir.

19 Q. Did you take any further action with
20 respect to the weld that had been rejected?

21 A. Yes, sir.

22 Q. What weld was that?

23 A. That was Field Weld 40C.

24 Q. What action did you take?

25 A. I instructed Ron McBee to get the weld

1 fixed as soon as possible.

2 Q. Did you personally participate in that
3 process?

4 A. Later that afternoon I got directly
5 involved with making sure the weld repair was
6 completed.

7 Q. When did your crew complete its work on
8 that repair?

9 A. Approximately 7 o'clock that night.

10 Q. Do you know whether another RT was
11 requested with respect to that weld?

12 A. Yes, sir.

13 Q. Was a form similar to McBee Exhibit 3
14 prepared for an RT request?

15 A. Yes, sir.

16 Q. Did you prepare it?

17 A. No, sir.

18 Q. Who did prepare it?

19 A. Ron McBee.

20 Q. Who submitted that request to RT?

21 A. I did.

22 Q. I'll show you a document that's been
23 identified as McBee Exhibit 4 and ask you if you can
24 identify that document.

25 A. Yes, sir. This is the document that we

1 submitted.

2 Q. Would you describe your submittal of this
3 document to RT?

4 A. Yes, sir. When we finished this weld and
5 got the prep completed, I was walking out the door
6 of the room and there was two radiographers in the
7 direct areas that we were at. At that time I did
8 not have to take it up the hill and present it
9 personally to the RT group.

10 Q. When did you learn the results of the
11 second RT on Field Weld 40C?

12 A. Tuesday morning.

13 Q. And what was that result?

14 A. It was an accepted RT.

15 Q. Mr. Justice, prior to the time that you
16 learned that the second RT had been accepted as
17 satisfactory, had a final visual test or a final
18 penetrant test been performed by QC on Field Weld
19 40C?

20 A. No, sir, it had not.

21 Q. Mr. Justice, is there any way that a final
22 visual test or penetrant test could have been
23 performed on Field Weld 40C on Saturday, January the
24 14th?

25 A. No, sir.

1 Q. Why is that?

2 A. Because the welds were not completed.

3 Q. Mr. Justice, did you ever discuss with Jack
4 Stanford changing the dates on the QC hold points on
5 a weld data card with respect to Field Weld 40C?

6 A. No, sir.

7 Q. Does that conclude your testimony, Mr.
8 Justice?

9 A. Yes, it does.

10 MR. WATKINS: Thank you, Mr. Justice.

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1 STATE OF TEXAS)

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3 I, Janet E. Schaffer, RPR, Certified Shorthand
4 Reporter in and for the State of Texas, do hereby
5 certify that there came before me on the 16th day of
6 August, A. D., 1984, at the Glen Rose Motor Inn,
7 Glen Rose, Texas, the following named person, to-wit:
8 Alan Dale Justice, who was by me duly sworn to
9 testify the truth and nothing but the truth of his
10 knowledge touching and concerning the matters in
11 controversy in this cause; and that he was thereupon
12 examined upon his oath and his examination reduced
13 to writing; same to be sworn and subscribed to by
14 said witness before any notary public.

15

16 I further certify that I am neither attorney or
17 counsel for, nor related to or employed by, any of
18 the parties to the action in which this deposition
19 is taken, and further that I am not a relative or
20 employee of any attorney or counsel employed by the
21 parties hereto, or financially interested in the
22 action.

23

24 In witness whereof, I have hereunto set my hand
25 and affixed my seal this _____ day of August , A.D.,

1 1984.

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JANET E. SCHAFFER, 1543, RPR, CSR
IN AND FOR THE STATE OF TEXAS
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My commission expires December 31, 1985

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