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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 )  
 )  
(COMANCHE PEAK STEAM )  
ELECTRIC STATION, UNITS )  
1 AND 2) )

DOCKETED  
USNRC  
DOCKET NOS.  
50-445<sup>05</sup>84 AGO 20 P5:04  
50-446<sup>05</sup>84  
OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

PREFILED TESTIMONY OF  
ROBERT MARSHALL DUNCAN  
AUGUST 15, 1984

PREFILED TESTIMONY OF ROBERT MARSHALL DUNCAN,  
taken on the 15th 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

I N D E X

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WITNESS: ROBERT MARSHALL DUNCAN

Examination by Mr. Watkins

Page 4

DEPOSITION EXHIBITS

PAGE

Exhibit Number 1, Weld Data Card for Weld 34A	5
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Exhibit Number 5, NDE request chit for Field Weld 40C	11
Exhibit Number 6, Liquid Penetrant report for Field Weld 40C	12

1                   ROBERT MARSHALL DUNCAN,  
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: My name is McNeill  
7     Watkins, with the law firm of Bishop, Liberman,  
8     Cook, Purcell & Reynolds. We represent Applicants  
9     in this licensing proceeding. This is the prefiled  
10    direct testimony of Robert M. Duncan, a Brown & Root  
11    employee at Comanche Peak. Mr. Duncan is appearing  
12    voluntarily as a witness; he is not under subpoena  
13    by any party.

14   EXAMINATION

15    BY MR. WATKINS:

16           Q. Will you state your full name, please.

17           A. Robert Marshall Duncan.

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

19           A. Brown & Root, Incorporated.

20           Q. And where are you employed?

21           A. Currently at Comanche Peak Steam Electric  
22    Station.

23           Q. What is your job title?

24           A. I'm an ASME Quality Control inspector.

25           Q. What certifications do you hold?

1           A.    I'm a Level II MIFI, VT, PT, VI, MEI and  
2 hilti bolt.

3           Q.    How long have you been a QC inspector at  
4 Comanche Peak?

5           A.    Approximately one year.

6           Q.    Who's your current supervisor?

7           A.    My direct supervisor is Melvin Todd.

8           Q.    And who is Mr. Todd's supervisor?

9           A.    Douglas Snow.

10          Q.    And who is Mr. Snow's supervisor?

11          A.    Bob Siever.

12          Q.    Mr. Duncan, let me show you this document  
13 that's been marked as Duncan Exhibit 1. It's a weld  
14 data card for Weld 34A. Does your signature appear  
15 anywhere on that weld data card?

16          A.    Yes, sir, it does.

17          Q.    In what connection does your signature  
18 appear?

19          A.    I bought the final visual of that weld.

20          Q.    What is the date of your inspection?

21          A.    1/16/84.

22          Q.    From examining that document, Mr. Duncan,  
23 do you conclude that you did perform that inspection  
24 of that hold point on January the 16th, 1984?

25          A.    Yes, sir, I do.

1 Q. I'll show you a document that's been marked  
2 for identification as Duncan Exhibit 2 and ask you  
3 if you can identify the form of document that that  
4 is.

5 A. Yes, sir. That's an NDE chit -- they call  
6 it -- used by craft.

7 Q. Is that a QC document?

8 A. No, sir.

9 Q. Do you know what the craft uses those  
10 documents for?

11 A. More or less of statusing where they are.  
12 It's more or less of a progress report.

13 Q. Does your signature appear on that chit?

14 A. Yes, sir, it does.

15 Q. What is the date that you signed it?

16 A. 1/16/84.

17 Q. What weld does that chit identify?

18 A. Weld 34A.

19 Q. Is that the same weld and the same  
20 inspection that is identified by your signature on  
21 the hold point on Exhibit 1?

22 A. Yes, sir.

23 Q. Would you, on either of these documents,  
24 have put down a date different than the date that  
25 you actually signed it?

1 A. No, sir.

2 Q. I will show you a document that's been  
3 marked for identification as Duncan Exhibit 3, which  
4 is a weld data card. Does your signature appear on  
5 that document, Mr. Duncan?

6 A. Yes, sir, it does.

7 Q. In what connection?

8 A. Again, I bought final visual.

9 Q. What is the weld identified on this  
10 document?

11 A. The weld is Field Weld 39C.

12 Q. What is the date of your signature?

13 A. 1/16/84.

14 Q. From your signature and that date, can you  
15 conclude that you performed that inspection on  
16 January 16, 1984?

17 A. Yes, sir.

18 Q. Would you put any other date in connection  
19 with your inspection than the date that you actually  
20 performed the inspection?

21 A. No, sir.

22 Q. I'll show you a document that's been marked  
23 for identification as Duncan Exhibit 4. Would you  
24 identify the form of that document, please, Mr.  
25 Duncan?

1           A.    Again, that's a craft NDE chit, used for  
2 progress report.

3           Q.    Does your signature appear on that document?

4           A.    Yes, sir.

5           Q.    What is the date?

6           A.    1/16/84.

7           Q.    What is the weld to which that document  
8 relates?

9           A.    Field Weld 39C.

10          Q.    So that chit and the weld data card that's  
11 been identified as Duncan Exhibit 3 relate to the  
12 same weld?

13          A.    Yes, sir.

14          Q.    And do they relate to the same inspection?

15          A.    Yes, sir.

16          Q.    Mr. Duncan, do you recall performing an  
17 inspection of Field Weld 40C on Tuesday, January  
18 17th, 1984?

19          A.    Yes, sir.

20          Q.    Would you describe your recollection of  
21 that inspection?

22          A.    Yes, sir. Let's see. Jack Stanford and I  
23 were working the call board. I was in the process  
24 of getting 175 hours required PT time under a Level  
25 II so that I could become a certified Level II.



1 They came up and signed up.

2 Q. Who is "they" when you say they signed up?

3 A. The craft. Craft came and signed up for an  
4 inspection, and I noticed they had signed up for  
5 final visual and PT. I was on the lookout for more  
6 PT time, so Jack and I both went on the inspection.

7 Q. Were you training under Mr. Stanford?

8 A. I was getting PT time from him, yes.

9 Q. Please continue.

10 A. We went down to the auxiliary feedwater  
11 room where they were working, and we went up on the  
12 scaffold. I performed the PT. PT takes anywhere  
13 from 30 minutes to an hour, depending on the  
14 inspection. The time was up for the developer.

15 Jack was not on the scaffold at that time.  
16 He had climbed down off the scaffolding to make out  
17 all the necessary reports. When he was down there,  
18 I told Jack, "Jack, I don't have any indications.  
19 You want to come look at it before I clean it up?"

20 Q. At this time you were on top of the  
21 scaffold?

22 A. I was in the scaffold about ten foot in the  
23 air. Jack was on the ground.

24 Jack said, "No. If you don't have any  
25 indications, that's good enough for me. Go ahead

1 and clean it up."

2 I was in the process of cleaning it up, and  
3 I heard Jack say something along the lines of, "Oh,  
4 shit, today's not the 14th, is it?" I said, "No,  
5 Jack. Today is the 17th."

6 I heard him remark, "Well, hell, I put the  
7 wrong dates down. I got to change them." I said,  
8 "Yes, you do." And that's about the extent of it.  
9 We made out the paperwork, signed everything off and  
10 left.

11 Q. Do you recall whether you signed the weld  
12 data card hold point for either the visual or  
13 penetrant test for that inspection?

14 A. No, sir, not offhand.

15 Q. Let me show you the document that's been  
16 marked as Duncan Exhibit 5 and ask if you can  
17 identify that document.

18 A. Yes, sir. That's an NDE chit for Field  
19 Weld 40C.

20 Q. Is your signature on that document?

21 A. Yes, sir, it is.

22 Q. What is the date that you signed it?

23 A. 1/17/84.

24 Q. Does your signature next to the date  
25 indicate to you, beyond a doubt, that you performed

1 the inspection on the 17th?

2 A. Yes, sir, beyond a doubt.

3 Q. Mr. Duncan, when you sign an NDE chit such  
4 as Duncan Exhibits 2, 4 and 5, where do you sign  
5 them, normally?

6 A. Usually at the place of inspection.

7 Q. And is that at the time the inspection is  
8 performed?

9 A. Yes, sir. That's after the inspection is  
10 performed.

11 Q. Mr. Duncan, I'll show you a document that's  
12 been marked for identification as Duncan Exhibit 6  
13 and ask you to identify the form of that document.

14 A. It's a liquid penetrant report.

15 Q. Does your signature or your initials appear  
16 on that document?

17 A. Yes, sir, my initials do.

18 Q. Where do they appear?

19 A. They appear right above Jack Stanford's  
20 name, who was the Level II PT.

21 Q. And to what weld does that penetrant report  
22 relate?

23 A. Field Weld 40C.

24 Q. When did you initial that report?

25 A. I initialed it 1/17/84.

1 Q. Mr. Duncan, did you hear anything further  
2 about this inspection on the 17th?

3 A. No, sir, I don't think so.

4 Q. After the 17th, did you hear anything  
5 further regarding this inspection?

6 A. Yes, sir, I did.

7 Q. And from whom did you hear it?

8 A. Jack Stanford.

9 Q. What did Mr. Stanford say to you?

10 A. Well, he was trying -- he was trying to get  
11 me to help him jog his memory on it.

12 Q. How long after the 17th did this  
13 conversation take place?

14 A. It seems like a couple of weeks.

15 Q. Why did Mr. Stanford appear to need his  
16 memory jogged?

17 A. He was being questioned about conflicting  
18 dates or something on the weld data card.

19 Q. Did he appear to remember, at that time,  
20 the inspection that you have just described?

21 A. No, sir.

22 Q. Did he, after talking with you, remember  
23 the inspection that you have described?

24 A. No, sir.

25 Q. What did he do to further investigate?

1           A.    He went and talked to the crafts that did  
2 the work.

3           Q.    Do you know who he spoke with?

4           A.    I think he spoke with Ron McBee and Richard  
5 Simpson.

6           Q.    Did he come back to you after speaking with  
7 them?

8           A.    Yes, sir.

9           Q.    And what did he say?

10          A.    Well, after speaking to Ron and Richard, he  
11 remembered. He remembered the inspection. And upon  
12 talking to me about it, I remembered it.

13          Q.    Did you remember Mr. Stanford's having  
14 written down the wrong date on the weld data card?

15          A.    Just exactly like it happened, yes, sir.  
16 It just came back to me.

17          Q.    Did Mr. Stanford ask you to speak to anyone  
18 regarding that inspection?

19          A.    Yes, sir.

20          Q.    Who did he ask you to speak to?

21          A.    Bob Siever.

22          Q.    Did you do so?

23          A.    Yes, sir, I did.

24          Q.    And did you explain your recollection of  
25 the inspection to Mr. Siever?

1 A. Yes, sir.

2 Q. Did he appear satisfied?

3 A. Yes, sir, he did.

4 Q. Mr. Duncan, when a QC inspector makes an  
5 error on a reporting document, what is the proper  
6 procedure for correcting that error?

7 A. The proper procedure is to cross out the  
8 error, enter the correct information, initial and  
9 date.

10 Q. Does that conclude your testimony?

11 A. Yes, it does.

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I, ROBERT MARSHALL DUNCAN, have read the foregoing deposition and hereby affix my signature that same is true and correct, except as noted herein.

\_\_\_\_\_  
ROBERT MARSHALL DUNCAN

SUBSCRIBED AND SWORN to before me this the \_\_\_\_\_ day of \_\_\_\_\_, 1984.

\_\_\_\_\_  
NOTARY PUBLIC IN AND FOR THE STATE OF TEXAS

My commission expires: \_\_\_\_\_

1 STATE OF TEXAS )

2 COUNTY OF DALLAS )

3  
4 I, Janet E. Schaffer, RPR, Certified  
5 Shorthand Reporter in and for the State of Texas,  
6 do hereby certify that there came before me on the  
7 15th day of August, A. D., 1984, at the Glen Rose  
8 Motor Inn, Glen Rose, Texas, the following named  
9 person, to-wit: ROBERT MARSHALL DUNCAN, who was by  
10 me duly sworn to testify the truth and nothing but  
11 the truth of his knowledge touching and concerning  
12 the matters in controversy in this cause; and that  
13 he was thereupon examined upon his oath and his  
14 examination reduced to writing; same to be sworn  
15 to and subscribed by said witness before any  
16 Notary Public.

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

25



1           In witness whereof, I have hereunto set my  
2 hand and affixed my seal this 15th day of August,  
3 A.D., 1984.

4  
5 License Expires:

6 December 31, 1985  
7 CSR No. 1453

---

8 JANET E. SCHAPPER, RPR, CSR  
9 IN AND FOR THE STATE OF TEXAS  
10 1226 Commerce, Suite 411  
11 Dallas, Texas 75202  
12 (214) 742-3035

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

Standard-Single Weld  
 BROWN & ROOT, INC.  
 OFFICE JOB # 24-1124

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

WELD DATA CARD

WDC Serial No. **41013**  
 Drawing No. **AF-1-58-007R-16**  
 Weld No. **34A**

LINE #	10-AF-1-036-2002-3	703	WPS #	REV# / DATE	FABRICATION CODE & CLASS. ACC. CO.
			11020	2 / 10	ACME ICC
			11031	5 / 8	CPM 6.9
			11010	5 / 8	3

BASE METAL	WPS #	REV#	DATE	HEATING RATE	VS	TEMP.	VS	OF
WPS #	NA	NA	NA	VS	VS	VS	VS	VS
PC #	32	PCJ	70	VS	VS	VS	VS	VS
P #		P #		VS	VS	VS	VS	VS

QI-CAP/REV	14	3	PT/10.2-1	MT/10.2-2	RT/10.2-3	UT
	1/11/84	1-25				

WELD FILLER MATERIAL REQUIRED	CLASS	ACC. CO.
ROOT	E705-2	
FILL	E705-2	
	E7018	1001-13-84

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

Prepared By: *M.L.*

OPER. NO.	OPERATION	WELD POINTS			CON.	SAT. OF UNIT.	INSPECTION RESULTS		SIGN AND DATE	
		RT	QC	AI			CC	CP	AI	INSPECTION LEVEL
1	Cleanliness	NA	✓	cc						
2	Fits	NA	✓	cc						
3	Preheat	NA	✓	cc						
4	Final IT	NA	✓	cc						
5	Final MT	NA	✓	cc						
Reviewed: <i>G. Macken</i> 1-23-84										8521/1/84

FOR INFORMATION ONLY

*R. K. ...* 1/19/84

INT *R. Byers* 3/28/84

Approval signatures shall be affixed on the line immediately below the last row in each sequence.

DEPOSITION EXHIBIT  
*DUNCAN*

NON-DESTRUCTIVE TEST  
INSPECTION REQUEST

No. 175529

FOREMAN M. Lee

Time \_\_\_\_\_ Date 1-16-84

WELDER: ALLES STAMP AHS LOC. S6#1 ELV. 790-R72  
PIPE DIA. 6" DWG. NO./LINE NO. AF-1-SB-07 JT. NO. W-34A

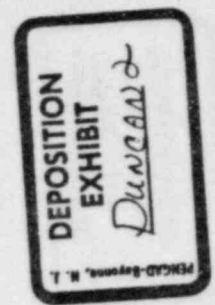
INSP. REQ.  CLEAN  FIT UP  ROOT  INTER  STRESS REL.  FINAL  
 VISUAL  L.P.  R.T.  M.P.  U.T.  HYDRO TEST

COMMENTS:

Q

11010

INSPECTOR: R.M. Duncan ACCEPT: Set DATE: 1-16-84



CLEARANCE REQUIRED

Change of system turn-  
around & root must be  
obtained from the Startup  
Engineer prior to starting  
work.

INSTALLATION TO BE IN  
ACCORDANCE WITH PROCEDURES  
REFERENCED IN -CPM-6.1

40850

WDC Serial No. \_\_\_\_\_

Drawing No. AF-1-007 R-1

Weld No. FW39C

WELD DATA CARD

LINE # <u>10" AF-1-007 R-1-3</u>	WPS # <u>11030</u> <u>11031</u> <u>11010</u>	REV#/ICN# <u>7/0</u> <u>5/0</u> <u>5/0</u>	FABRICATION CODE & CLASS/ACC. STD. ASME III CPM 6.9 <u>3</u>
-------------------------------------	---	---	---

BASE MATERIAL	HT # <u>NA</u> to HT # <u>SA 304-73</u>
PC # <u>703</u> to PC # <u>1AF-007</u>	
P # <u>1</u> to P # <u>1</u>	

POSTWELD HEAT TREATMENT	TIME <u>NA</u> Hrs., TEMP. <u>NA</u> °F
HEATING RATE <u>NA</u> °/Hr.	<u>NA</u>
SPECIFICATION WPS/CPM 6.9D	

QT-QAP/REV	<u>11A</u> VT/II.1-26	<u>13</u> PT/10.2-1	MT/10.2-2	RT/10.2-3	UT
------------	-----------------------	---------------------	-----------	-----------	----

QC VERIF. DATE:	M.S.T.E. <u>1385</u>	CALIB. DUE DATE	QC	WELD FILLER MATERIAL REQUIRED
				ROOT CLASS <u>E705-2</u>
				FILL CLASS <u>E705-2</u>
				CLASS <u>E-7018</u>

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

PRODUCTION RELEASE

OPER. NO.	OPERATION	HOLD POINTS			CON	SAT. or UNSAT.	INSPECT ON RESULTS (SIGN AND DATE)		
		WT	QC	ANI			QC or WT	NDE CERT. LEVEL	ANI
1	Verify Cut	X	NA	NC		Sct. JWR 1-13-84			
2	Cleanliness	NA	✓	NC		Sct. Stanford 1-14/84	II		
3	Fitup	NA	✓	NC		Sct. Stanford 1/14/84	II		
4	Preheat	NA	✓	NC		Sct. Stanford 1/14/84	II		
5	Final VT	NA	✓	NC		Sct. R. Duncan 1-16-84	II		
6	Final MT/PT	NA	✓	NC		Sct. R. Duncan 1-16-84	II		

Reviewed: Roy Madson 1-3-84 ✓ JEL 1-3-84

DEPOSITION EXHIBIT  
Duncan 3

FOR INFORMATION ONLY

WE A.K. Madson 1/15/84 OC

ANI R. Byers 3/28/84

Approval signatures shall be affixed on the line immediately below the last step in each sequence.

CNC # 11A

BROWN & ROOT

No. 175530

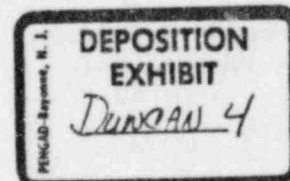
NON-DESTRUCTIVE TEST INSPECTION REQUEST		FOREMAN <u>McRae</u>	Time	Date
				<u>1-16-84</u>
WELDER: <u>ABLES</u>	STAMP <u>AAS</u>	LOC. <u>SL#1</u>	ELV. <u>750-RT</u>	
PIPE DIA. <u>6"</u>	DWG. NO./LINE NO. <u>AF-1-SB-07</u>	JT. NO. <u>FW-39C</u>		
<u>036-3003-3</u>				
INSP. REQ.	<u>CLEAN</u> <u>VISUAL</u>	<u>FIT-UP</u> <u>L.P.</u>	<u>ROOT</u> <u>R.T.</u>	<u>INTER</u> <u>M.P.</u>
			<u>STRESS REL.</u> <u>U.T.</u>	<u>FINAL</u> <u>HYDRO TEST</u>

COMMENTS:

Q

11010

INSPECTOR: Ralph Duncan ACCEPT: Sait DATE: 1-16-84



BROWN & ROOT

No. 175766

NON-DESTRUCTIVE TEST INSPECTION REQUEST		FOREMAN <u>MB Rose</u>	Time	Date
WELDER: <u>AFCS</u>	STAMP <u>A115</u>	LOC. <u>SB#1</u>		<u>1-17-84</u>
PIPE DIA. <u>6"</u>	DWG. NO/LINE NO. <u>AF-1-SB-07</u>	JT. NO. <u>FW-40C</u>		
	<u>36-2000-3</u>			
INSP. REQ.	<u>CLEAN</u>	<u>FIT-UP</u>	<u>ROOT</u>	<u>INTER</u>
	<u>VISUAL</u>	<u>L.P.</u>	<u>R.T.</u>	<u>M.P.</u>
				<u>STRESS REL.</u>
				<u>FINAL</u>
				<u>U.T.</u>
				<u>HYDRO TEST</u>

COMMENTS:

Q

INSPECTOR: RM Duncan ACCEPT: Sut DATE: 1-17-84

DEPOSITION  
EXHIBIT  
Duncan 5

REC-310-Argonne, M. I.



QUALITY ASSURANCE DEPARTMENT  
MT/PT REPORT


PROJECT: COMANCHE PEAK JOB NO. 35-1195

UNIT 1 PAGE 1 OF 1

MT  PT

WDC/Traveler # 40851

Class 3

Drawing AF-1-SB-007 

System A.F.

Welds/Item # F.W. 40C

Location Ele. 805'-3 3/16" S.G.1 Rm. # 72

Mfg Stage FINAL

NDE Procedure No. API 10.2-1 Rev. 3

Equip/Mat'ls Mfg. MAGNAflux

Acceptance Std. ASME Sec. III

Penetrant Batch # 81L071

Cleaner Batch # 83H100

Developer Batch # 82C090

AC Yoke  DC Prods  NA

Model # NA

M&TE IRC # NA

Mat'l Type P-1

Mat'l Thickness 5/120

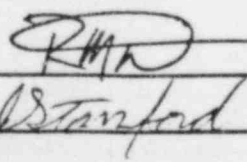
Diameter Length  6"

Sketch & Comments ID  OD

No rejectable indications noted

FOR INFORMATION ONLY

DEPOSITION EXHIBIT  
Duncan 6

Inspector 

Certification Level II

Date 1-17-84

Results Accept  Reject