

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

3 IN THE MATTER OF: )  
4 )  
4 TEXAS UTILITIES ELECTRIC )  
COMPANY, ET AL )  
5 )  
6 (COMANCHE PEAK STEAM )  
ELECTRIC STATION, UNITS )  
1 AND 2) )

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OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

8 PREFILED TESTIMONY OF  
9 RICHARD W. SIMPSON  
AUGUST 15, 1984

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14 PREFILED TESTIMONY OF RICHARD W. SIMPSON, taken  
15 on the 15th day of August, 1984, in the above-styled  
16 and numbered cause, at Glen Rose Motor Inn located  
17 at Highway 67 & FM Road 201, in the City of Glen  
18 Rose, County of Somervell and State of Texas, before  
19 Janet E. Schaffer, a Certified Shorthand Reporter in  
20 and for the State of Texas.

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APPEARING FOR APPLICANTS

1 I N D E X

2 WITNESS: RICHARD W. SIMPSON

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1                                   RICHARD W. SIMPSON,  
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 of the law firm of Bishop, Liberman, Cook,  
8     Purcell & Reynolds. We are counsel for Applicants  
9     in this proceeding. This is the deposition of  
10    Richard Simpson. Mr. Simpson is an employee of  
11    Brown & Root at Comanche Peak. He is appearing  
12    voluntarily as a witness in this proceeding and is  
13    not under subpoena by any party.

14                                   EXAMINATION

15    BY MR. WATKINS:

16           Q. Mr. Simpson, would you state your full name  
17    please?

18           A. My name is Richard W. Simpson.

19           Q. By whom are you employed, Mr. Simpson?

20           A. I'm employed by Brown & Root.

21           Q. Where are you employed?

22           A. At Comanche Peak, Glen Rose, Texas.

23           Q. Do you have a badge number, Mr. Simpson?

24           A. Yes, sir. It's 8554.

25           Q. What is your job title?

1 A. I'm a pipe fitter.

2 Q. How long have you been a pipe fitter at  
3 Comanche Peak?

4 A. Approximately four and-a-half years.

5 Q. Would you briefly describe your duties as a  
6 pipe fitter?

7 A. It's basically just prepping and cleaning  
8 pipe to get ready for my welder and for QC  
9 inspection.

10 Q. What kinds of QC inspections are you  
11 referring to?

12 A. Cleanliness and fit-ups.

13 Q. What does QC stands for?

14 A. Quality Control.

15 Q. Who's your foreman?

16 A. Don McIntyre.

17 Q. How long has Mr. McIntyre been your foreman?

18 A. He just recently became my foreman.

19 Q. Who was your foreman prior to that?

20 A. Mr. McBee.

21 Q. Was Mr. McBee your foreman in January 1984?

22 A. Yes, sir.

23 Q. Do you remember working on Field Weld 40C?

24 A. Yes, sir.

25 Q. Would you describe the job that was

1 involved in connection with that weld?

2 A. We were replacing a valve in the Unit 1 AF  
3 system.

4 Q. What does AF refer to?

5 A. Auxiliary feedwater.

6 Q. How many welds were involved in this valve  
7 replacement?

8 A. Three.

9 Q. Could you describe the location of those  
10 welds?

11 A. The welds were on either side of the valve  
12 on the west side and the east side, and they were  
13 about two feet apart. And the third one was about  
14 six inches further to the east.

15 Q. Is there a drawing or a map that shows the  
16 location of these welds?

17 A. Yes, sir.

18 Q. What is that document?

19 A. It's called an isometric drawing.

20 Q. What does an isometric drawing show?

21 A. It shows the elevation location of  
22 components and valves.

23 Q. Mr. Simpson, I show you a document that's  
24 been marked as Simpson Exhibit 1 and ask if you can  
25 identify that document, please.

1           A.    Yes, sir.  It's the ISO we used on the  
2 auxiliary feed system.

3           Q.    Does that ISO show the location of the  
4 valve on which you worked in connection with Field  
5 Weld 40C?

6           A.    Yes, sir, it does.

7           Q.    What is the valve number?

8           A.    It is IAF067.

9           Q.    Does that isometric drawing show the  
10 locations of the three welds you have described that  
11 were connected with this job?

12          A.    Yes, sir, it does.

13          Q.    What were the numbers of those three wells?

14          A.    There was Field Weld 40C, Field Weld 39C  
15 and Weld 34A.

16          Q.    Mr. Simpson, did you work with this  
17 isometric drawing in the field in connection with  
18 your replacement of that valve?

19          A.    Yes, sir, I did.

20          Q.    Who was in the crew that worked on this job?

21          A.    It was myself and a welder, Jackie Ables,  
22 and another welder, Danny Wright.

23          Q.    When did you first start work in connection  
24 with this valve replacement?

25          A.    It was January the 2nd, 1984.

1 Q. What did you do on January the 2nd?

2 A. I went in there and cut the old valve out.

3 After that, I had to square up the ends of the pipe,  
4 prep it, bevel it and just prepare it in general for  
5 my welder and for QC.

6 Q. That was on January the 2nd.

7 Were any QC inspections performed in  
8 connection with the work that you did on January the  
9 2nd?

10 A. Yes, sir, there was. The inspection was  
11 performed on January 3.

12 Q. What QC inspection was performed?

13 A. Cleanliness.

14 Q. And which weld was that inspection  
15 performed with respect to?

16 A. It was Field Weld 40C.

17 Q. Who performed the inspection?

18 A. Laurel Yates.

19 Q. And what was the result of that inspection?

20 A. It was unsat.

21 Q. Do you remember why?

22 A. Yes, sir. We had a minimum wall violation  
23 on the pipe side.

24 Q. What was the effect of the unsatisfactory  
25 inspection?



1           A.    There was an NCR written and there was a  
2 hold tag placed on the weld.

3           Q.    What was the effect, on your work, of that  
4 hold tag?

5           A.    We couldn't do any more work on that weld.

6           Q.    When did you next do any work in connection  
7 with this valve?

8           A.    It was January the 13th, '84.

9           Q.    Do you remember what day of the week that  
10 was?

11          A.    It was a Friday.

12          Q.    And what work did you perform on January  
13 the 13th?

14          A.    Okay. We went in and prepped and cleaned  
15 up the Weld 34A.

16          Q.    In connection with the work that you  
17 perform in preparing and cleaning a weld, is there a  
18 document that outlines your step-by-step procedure?

19          A.    Yes, sir, there is.

20          Q.    What is that document?

21          A.    It's a weld data card.

22          Q.    Mr. Simpson, I show you a document that's  
23 been marked for identification as Simpson Exhibit 2  
24 and ask you if you would identify that, please.

25          A.    Yes, sir. It's the weld data card for Weld

1 34A.

2 Q. Now, on the 13th, did you ask for a QC  
3 inspection in connection with your work on Weld 34A?

4 A. Yes, sir, I did.

5 Q. What inspection did you ask for?

6 A. Cleanliness.

7 Q. Who performed the inspection?

8 A. Jack Stanford.

9 Q. Does Mr. Stanford's name appear on the QC  
10 hold point on the weld data card?

11 A. Yes, sir, it does.

12 Q. And what is the date of his inspection?

13 A. 13th of January, 1984.

14 Q. What was the result of his inspection?

15 A. It was sat.

16 Q. Does "sat" refer to satisfactory?

17 A. Yes, sir, it does.

18 Q. What additional work did you perform in  
19 connection with Weld 34A on the 13th?

20 A. We went ahead and fit the pipe up.

21 Q. Was there a QC inspection on that item?

22 A. Yes, sir, there was.

23 Q. Who performed that inspection?

24 A. Laurel Yates.

25 Q. And does her name appear next to the fit-up

1 hold point on that weld data card?

2 A. Yes, sir, it does.

3 Q. What was the result of her inspection?

4 A. It was satisfactory.

5 Q. Did she perform any further inspections at  
6 that time?

7 A. Yes, sir. She checked preheat.

8 Q. Did you do any welding on Weld 34A on the  
9 13th?

10 A. Yes, sir, we did.

11 Q. What welding did you do?

12 A. We put approximately 35 percent in the weld.

13 Q. Mr. Simpson, is there a document that would  
14 reflect that welding was done on Field Weld 34A on  
15 Friday the 13th?

16 A. Yes, sir.

17 Q. What document is that?

18 A. It's a weld filler material log.

19 Q. I show you a document that's been marked  
20 for identification as Simpson Exhibit 3 and ask if  
21 you will identify that, please.

22 A. It's the WFML for Weld 34A.

23 Q. Now, with reference to Simpson Exhibit 3,  
24 would you please explain how it reflects that you  
25 did a partial weld on Friday the 13th?

1           A.    Okay.  Under the column where there's a  
2           date, it has the 13th of January '84, and there's  
3           two different size rods that have been drawn on that  
4           date, and there had been rods issued and a lesser  
5           amount returned.

6           Q.    Under welder's symbol appear the initials  
7           AHS.  What does that symbol mean?

8           A.    That's the symbol that Brown & Root gives  
9           all their welders when they're qualified to weld,  
10          and AHS is the symbol for Jackie Ables.

11          Q.    Does that indicate that Mr. Ables performed  
12          the welding on Weld 34A on Friday the 13th?

13          A.    Yes, sir, he did.

14          Q.    Did you or your crew perform any work on  
15          Field Welds 39C or 40C on January the 13th?

16          A.    No, sir.

17          Q.    During this period in January of 1984 was  
18          Saturday a normal workday for you?

19          A.    No, sir, it sure wasn't.

20          Q.    On Friday the 13th were you instructed to  
21          report to work on Saturday the 14th?

22          A.    Yes, sir, I was.

23          Q.    What did you understand was the purpose of  
24          your work on Saturday the 14th?

25          A.    On the 14th we had to come in because it

1 was a rush job. STE was really pushing us to finish  
2 the job, and we had to stay until we were through  
3 with that job.

4 Q. What does STE stand for?

5 A. It stands for Startup Test Engineer.

6 Q. Did you report for work on Saturday?

7 A. Yes, sir, I did.

8 Q. What time did you clock in?

9 A. Seven o'clock.

10 Q. What welds did you begin working on on  
11 Saturday morning?

12 A. On Saturday morning, whenever we came in, I  
13 cleaned up the pipe and the valve, and we were  
14 getting ready to start work on Field Weld 40C and  
15 Field Weld 39C.

16 Q. And as you testified earlier, those are the  
17 two welds that are on either side of the valve?

18 A. Correct.

19 Q. Do Field welds 39C and 40C have weld data  
20 cards associated with them?

21 A. Yes, sir, they do.

22 Q. Mr. Simpson, I ask you to identify a  
23 document that's been marked as Simpson Exhibit 4.

24 A. It's the weld data card for Field Weld 39C.

25 Q. And, Mr. Simpson, I'll ask you to identify

1 a document that's been marked as Simpson Exhibit 5.

2 A. It's the weld data card for Field Weld 40C.

3 Q. What work did you perform on these welds  
4 starting Saturday morning?

5 A. On Saturday morning after I had cleaned up  
6 the pipe and the valve, we had to have cleanliness  
7 bought off, and that was our first step.

8 Q. Did you call for a cleanliness QC  
9 inspection?

10 A. Yes, sir, I did.

11 Q. Did you do so for both welds at the same  
12 time?

13 A. Yes, sir, I did.

14 Q. Why did you do that?

15 A. Well, what it was, it was a valve that's  
16 only about two feet long, and we'd have to have both  
17 sides bought off at the same time because QC has to  
18 come down and mic the pipe, and in order to get the  
19 micrometer on the pipe, we had to do both sides,  
20 because if the valve was in place, QC wouldn't be  
21 able to mic it.

22 Q. Who performed the QC cleanliness  
23 inspections?

24 A. Jack Stanford performed both inspections.

25 Q. Referring to Simpson Exhibit 4, what is the

1 cleanliness hold point for Field Weld 39C?

2 A. It's step two.

3 Q. And referring to Simpson Exhibit 5, what is  
4 the cleanliness hold point for Field Weld 40C?

5 A. It's step 2-A.

6 Q. Did Mr. Stanford sign the weld data cards  
7 for both welds, recording his inspection?

8 A. Yes, sir.

9 Q. Did he have to sign the cleanliness hold  
10 points at that time for you to do any further work?

11 A. Yes, sir. He had to, because if he didn't  
12 sign it, we couldn't perform any work on it until  
13 his signature was on the card.

14 Q. What was the result of Mr. Stanford's  
15 cleanliness inspections?

16 A. They were both satisfactory.

17 Q. What work did you do next in connection  
18 with these welds?

19 A. After Mr. Stanford had checked the  
20 cleanliness, we put the valve back in place and we  
21 started to fit the valve up. And my welder, after  
22 we got the valve fitted up, he tacked up the valve  
23 to the pipe, which means he just placed four tacks,  
24 small tacks, around the pipe of the valve to hold it  
25 in place.

1 Q. Is tacking part of the fit-up process?

2 A. Yes, it is.

3 Q. Did you tack both welds as part of the same  
4 operation?

5 A. Yes, sir, we did.

6 Q. Who is the welder who performed the welding?

7 A. Jackie Ables.

8 Q. Did you call for a QC inspection of the  
9 fit-up?

10 A. Yes, I did.

11 Q. Who performed that inspection?

12 A. Jack Stanford.

13 Q. Did Mr. Stanford sign the weld data card  
14 hold points for fit-up for both welds?

15 A. Yes, sir.

16 Q. Did he, at that time, perform any further  
17 inspections?

18 A. Yes, sir. He signed the preheat off on  
19 both cards, too.

20 Q. What were the results of his inspections  
21 for fit-up and preheat on both welds?

22 A. They were both satisfactory.

23 Q. Did Mr. Stanford sign both cards at the  
24 same time?

25 A. Yes, sir, he did.



1 Q. Were you the individual who called for the  
2 inspections on these welds on Saturday the 14th?

3 A. Yes, sir, I did.

4 Q. How did you request them?

5 A. Well, Jack was called in specifically just  
6 to work with us on Saturday. And he was standing  
7 around close to us part of the time; and if he  
8 wasn't, there was a telephone close to us.

9 Q. Following Mr. Stanford's approval of the  
10 fit-up and preheat, what work did you commence next  
11 with respect to those welds?

12 A. After fit-up, my job was basically done.  
13 It was up to the welder to start his weld-out.

14 Q. And did he begin welding?

15 A. Yes, sir, he did.

16 Q. Who was the welder?

17 A. Jackie Ables.

18 Q. Do you remember the time of day that he  
19 commenced welding?

20 A. It was sometime around lunch.

21 Q. How long did it take Mr. Ables to complete  
22 these two welds?

23 A. Approximately 13 hours.

24 Q. You testified that you believe his welding  
25 commenced at around lunchtime. Does that mean that

1 he was there for the rest of Saturday?

2 A. Yes, sir. We didn't leave -- or Jackie  
3 didn't leave until Saturday morning at 2:30.

4 Q. Did you remain on the job for the remainder  
5 of the day?

6 A. Yes, sir, I did.

7 Q. What were you doing during that time?

8 A. I was basically just helping the welders  
9 out in any way I could.

10 Q. Did any other welder work on this job?

11 A. Yes, sir. Sometimes in the afternoon Danny  
12 Wright started helping Jackie.

13 Q. And were they welding together?

14 A. Yes, sir. They were what you call  
15 brother-in-lawing the weld. It was a term we use at  
16 Brown & Root for two welders welding on the same  
17 pipe.

18 Q. Were Field Welds 39C and 40C the only welds  
19 on which they were working that day?

20 A. No, sir.

21 Q. What other weld or welds did they work on?

22 A. They worked on weld 34A.

23 Q. And as you testified earlier, 34A was the  
24 third weld that was connected with this valve  
25 operation; is that correct?

1 A. Correct.

2 Q. Did Field Welds 39C and 40C also have weld  
3 filler material logs?

4 A. Yes, sir, they did.

5 Q. Mr. Simpson, I'll show you this document  
6 that's been marked as Simpson Exhibit 6 and ask if  
7 you can identify that, please.

8 A. Yes, sir. It's the WFML for Field Weld 39C.

9 Q. And, Mr. Simpson, I'll show you the  
10 document that's been marked for identification as  
11 Simpson Exhibit 7 and ask if you'll identify that,  
12 please.

13 A. Yes, sir. It's the WFML for Field Weld 40C.

14 Q. Now, referring to Simpson Exhibit 6, can  
15 you explain how that document reflects that welding  
16 was done on Field Weld 39C on the 14th of January?

17 A. Yes, sir. On the column where the date is  
18 there's a 14th of January written in, and then out  
19 beside that there's two different size rods that  
20 have been issued. And under the amount issued  
21 there's ten rods that's issued under both sizes, and  
22 there's a lesser amount that's been returned.

23 Q. Could you explain in a little more detail  
24 the number of rods that were issued and the number  
25 of rods that were returned on the 14th?

1           A.    Yes, sir. Under the one-eighth rods, there  
2 were ten rods that were issued and four returned.  
3 And under the 3/32, there was ten rods issued and  
4 eight returned. And that is under the heliarc  
5 procedure.

6           Q.    Were any other rods issued on that same day?

7           A.    Yes, sir, there was. On the same day there  
8 was a stick procedure that covered the weld, and  
9 there were 3/32, and there was 40 each that had been  
10 issued and none returned.

11          Q.    Does Exhibit 6, therefore, reflect that a  
12 total of 80 of that category of rods were issued and  
13 none returned?

14          A.    Yes, sir.

15          Q.    Does that mean they were used in the  
16 welding process?

17          A.    Yes, they were.

18          Q.    Earlier you testified that under welding  
19 symbol the initials AHS refers to Mr. Ables; is that  
20 correct?

21          A.    That's correct.

22          Q.    It appears on Exhibit 6 that AFK, another  
23 set of initials, appears. Whose initials are those?

24          A.    Those are Danny Wright's.

25          Q.    And as you testified earlier, Mr. Wright

1 commenced helping on this weld operation sometime on  
2 Saturday; is that correct?

3 A. Yes.

4 Q. Now, referring to Simpson Exhibit 7, would  
5 you explain, please, how that document reflects that  
6 welding on Weld 40C was performed on January 14?

7 A. Okay. Now, under the date there's also the  
8 14th of January. And then out beside Jackie's  
9 symbols there are, in the heliarc procedure, ten  
10 rods that have been issued and seven returned under  
11 the 3/32 size. Then under the one-eighth size  
12 there's also been ten issued and five returned.

13 And under the stick procedure, Danny Wright  
14 also received 3/32 rods, and he received 40 of them  
15 and there was none returned. And Jackie received 40  
16 of the 3/32, and there weren't any returned.

17 Q. Does Exhibit 7, which refers to Field Weld  
18 40C, show that further welding was performed on that  
19 weld after January the 14th?

20 A. Yes, sir.

21 Q. Do you know what welding was performed and  
22 why?

23 A. Yes, sir. It was for a repair.

24 Q. Was your crew continuously engaged in  
25 working on Field Welds 39C and 40C and Weld 34A on

1 Saturday, January the 14th?

2 A. Yes, sir, we were. We had a deadline to  
3 meet, and we wanted to go home sometime, so we had  
4 to work pretty hard to get through.

5 Q. Those three welds the only welds on which  
6 your crew worked on the 14th?

7 A. Yes, sir, they were.

8 Q. What time did you leave work that day?

9 A. I left at 1:30 Sunday morning.

10 Q. Did any other members of your crew remain  
11 on the job at that time?

12 A. Yes, sir. When I left, Jackie Ables and Al  
13 Justice were still there.

14 Q. Who is Mr. Justice?

15 A. He's my general foreman.

16 Q. What were Mr. Justice and Mr. Ables doing  
17 at the time you left?

18 A. They were prepping the weld.

19 Q. Would you describe the prepping process?

20 A. Yes, sir. What it is is really a smoothing  
21 out the weld so it looks uniform, and it takes out  
22 all the porosity; it takes out the creases. And  
23 according to procedure, that's basically what we  
24 have to do in order for it to pass QC inspections.

25 Q. Is the purpose of the prepping process to

1 prepare the weld for VT or PT or RT inspections?

2 A. Yes, sir, all of them.

3 Q. Now, you testified that you left the job at  
4 1:30 a.m. Sunday morning. That would have been  
5 January the 15th; is that correct?

6 A. Right.

7 Q. Was there a QC inspector or inspectors  
8 standing by to perform a VT or a PT on these welds?

9 A. No, sir, not Sunday morning there wasn't.

10 Q. Where was Mr. Stanford?

11 A. Jack Stanford left sometimes on that  
12 afternoon, the 14th.

13 Q. Mr. Simpson, is there any particular reason  
14 that that Saturday, January the 14th, stands out in  
15 your mind?

16 A. Yes, sir, it does. That's the longest day  
17 that I've ever worked for Brown & Root.

18 Q. How many hours did you work that day?

19 A. I worked 18 and-a-half hours.

20 Q. Did you report back to work on Sunday,  
21 January the 15th?

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

23 Q. But you did not come back to work at any  
24 time on that Sunday?

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

1 Q. Now, referring back to Simpson Exhibit 7,  
2 which is the weld filler material log for Field Weld  
3 40C, you mentioned earlier that there was a repair  
4 performed after January 14th on that weld; is that  
5 correct?

6 A. That's correct.

7 Q. Why was that repair necessary?

8 A. Well, on Field Weld 40C, when we came back  
9 in Monday morning, our RT report came in and there  
10 was a reject on it.

11 Q. Did you perform the repair?

12 A. Yes, sir, Jackie Ables and myself did.

13 Q. When did you perform that welding repair?

14 A. It was Monday afternoon when we started on  
15 it. It was the 16th of January.

16 Q. Had an RT also been done on Field Welds 39C  
17 and Weld 34A?

18 A. Yes, sir, there was.

19 Q. What was the result of those RT's?

20 A. They both came back accepted.

21 Q. Mr. Simpson, what is an RT?

22 A. An RT is basically just an x-ray of the  
23 weld itself.

24 Q. And when did you learn that Field Weld 39C  
25 and Weld 34A had passed their RT examination?



1 A. Monday morning.

2 Q. Were those welds ready for final QC visual  
3 and penetrant examination at that time?

4 A. Yes, sir, they were.

5 Q. Did you call for QC inspection for those  
6 items for those two welds on Monday morning?

7 A. Yes, sir, I did.

8 Q. How did you call for those inspections?

9 A. I used the QC call board.

10 Q. Did you request it in writing?

11 A. Yes, sir, I did.

12 Q. Mr. Simpson, I'll show you a document  
13 that's been marked for identification as Simpson  
14 Exhibit 8 and ask you to identify that document,  
15 please.

16 A. Yes, sir. It's the document that craft  
17 uses for QC whenever they need to sign up for an  
18 inspection.

19 Q. Did you write in any part of that document?

20 A. Yes, sir. On the top line.

21 Q. And what did you write?

22 A. That I needed two PT's on the 16th of  
23 January.

24 Q. What does "two PT's" refer to?

25 A. What I was referring to on that was two

1 liquid penetrant tests for two welds.

2 Q. What time of the day does the document show  
3 that you requested these inspections?

4 A. 8:35 a.m.

5 Q. And were the two penetrant tests related to  
6 two different welds?

7 A. Yes, sir, they are.

8 Q. And what were those welds?

9 A. They were Field Weld 39C and Weld 34A.

10 Q. Who performed the QC inspections on these  
11 two welds?

12 A. Robbie Duncan and Jack Stanford.

13 Q. Now, if you would refer back to Simpson  
14 Exhibit 2, which is the weld data card for Weld 34A,  
15 who signed the QC hold point for the visual test  
16 with respect to that weld?

17 A. Robbie Duncan.

18 Q. And who signed the QC hold point for the  
19 penetrant test?

20 A. Jack Stanford.

21 Q. Do you know why two different inspectors  
22 signed those two hold points?

23 A. Yes, sir. At that time Robbie was just  
24 training, and he could sign off the visual but he  
25 couldn't sign off the PT.

1 Q. What dates did Mr. Duncan and Mr. Stanford  
2 sign their inspections for Weld 34A?

3 A. It was the 16th of January of 1984.

4 Q. And what were the results of their VT and  
5 PT inspections?

6 A. They were both satisfactory.

7 Q. Now, referring to Simpson Exhibit 4, which  
8 is the weld data card for Field Weld 39C, who signed  
9 the final visual QC hold point for that weld?

10 A. Robbie Duncan.

11 Q. And who signed the final PT hold point for  
12 that weld?

13 A. Jack Stanford.

14 Q. What was the date of those inspections?

15 A. The 16th of January, 1984.

16 Q. And what were the results of those  
17 inspections?

18 A. They were both satisfactory.

19 Q. Now, you've testified that later on the  
20 afternoon of Monday, January the 16th, you worked on  
21 a repair on Field Weld 40C. Is there a document  
22 that outlines the steps that you took in connection  
23 with that repair?

24 A. Yes, sir, there is. It's called an RPS.

25 Q. What does RPS stand for?

1 A. Repair process sheet.

2 Q. Mr. Simpson, I'll show you the document  
3 that's been marked for identification as Simpson  
4 Exhibit 9. Can you identify that document?

5 A. Yes, sir. It's the RPS for Field Weld 40C.

6 Q. Is this the RPS with which you worked in  
7 repairing Field Weld 40C on the afternoon of Monday,  
8 the 16th of January?

9 A. Yes, sir, it is.

10 Q. Does that RPS have QC hold points?

11 A. No, sir. There's not any QC hold points on  
12 this RPS.

13 Q. Did there have to be?

14 A. No, sir. It's an in-process repair.

15 Q. What is the last instruction on the RPS?

16 A. Return to step five of weld data card.

17 Q. Referring to Simpson Exhibit 5, which is  
18 the weld data card for Field Weld 40C, what is step  
19 five of that weld data card?

20 A. The step five is final VT.

21 Q. Mr. Simpson, had a final VT been performed  
22 on Field Weld 40C at the time you and your group  
23 repaired the weld on Monday the 16th?

24 A. No, sir, there hadn't been.

25 Q. Had a final PT been performed on that weld

1 prior to the time you repaired the weld?

2 A. No, sir. We were still welding on it, and  
3 there was no way a final PT or VT could be performed  
4 at that time.

5 Q. When did your crew complete the repair work  
6 on Field Weld 40C?

7 A. It was approximately 7:30 Monday night,  
8 which was the 16th.

9 Q. Did you call for a QC inspection of the  
10 weld at that time, Monday evening?

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

12 Q. Do you know whether an RT was performed on  
13 Field Weld 40C subsequent to your repair?

14 A. Yes, sir, there was.

15 Q. When did you learn that the RT had been  
16 shot?

17 A. It was Tuesday morning.

18 Q. What was the result of that RT?

19 A. It was an accept.

20 Q. Was Field Weld 40C then ready for its final  
21 visual and penetrant examinations?

22 A. Yes, sir, it was.

23 Q. Did you request such inspections?

24 A. Yes, sir, I did.

25 Q. Did you put your request on the call board?

1 A. Yes, sir.

2 Q. Mr. Simpson, can you identify the document  
3 that's been marked as Simpson Exhibit 10?

4 A. Yes, sir. It's the sheet of paper we use  
5 to call for an inspector.

6 Q. And did you prepare a part of that sheet?

7 A. Yes, sir. I filled out the top line on  
8 this sheet, and I asked for a PT and VT.

9 Q. And what is the date on that sheet?

10 A. It is the 17th of January, 1984.

11 Q. What time of day did you request that this  
12 inspection be performed?

13 A. It was 8:28 in the morning.

14 Q. Which inspector performed the final VT and  
15 PT for Field Weld 40C?

16 A. Jack Stanford.

17 Q. Was he accompanied by anyone?

18 A. Yes, sir. Robbie Duncan came up with him.

19 Q. Mr. Simpson, does the craft keep any  
20 written record of when non-destructive examinations  
21 of welds are performed?

22 A. Yes, sir.

23 Q. What are those records?

24 A. Those are NDE's. We fill those out to show  
25 that there had been progress on the weld and it's a

1       finalled-off weld. When the QC inspector signs them  
2       to let us know that the weld has been accepted, then  
3       we give them to our foreman to use as progress  
4       records.

5             Q.    Are these QA/QC records?

6             A.    No, sir, not to my knowledge.

7             Q.    Mr. Simpson, can you identify this document  
8       which has been marked as Simpson Exhibit 11?

9             A.    Yes, sir. It's the NDE for Weld 34A.

10            Q.    Did you prepare all or a part of this  
11       document?

12            A.    Yes, sir. I filled the top half out, which  
13       is the construction part of it.

14            Q.    What is the date on that document?

15            A.    It's the 16th of January, 1984.

16            Q.    And what weld does it refer to?

17            A.    Weld 34A.

18            Q.    What examinations did you for Weld 34A?

19            A.    The final visual and the final PT.

20            Q.    Can you identify the inspector who signed  
21       this form?

22            A.    Yes, sir. It's Robbie Duncan.

23            Q.    And what is the date next to his signature?

24            A.    The 16th of January, 1984.

25            Q.    Mr. Simpson, I'd like you to identify, if

1 you can, a document that's been marked as Simpson  
2 Exhibit 12.

3 A. Yes, sir. It's the NDE request for Field  
4 Weld 39C.

5 Q. Did you prepare all or a part of that  
6 document?

7 A. Yes, sir. I filled out part of it.

8 Q. What parts did you fill out?

9 A. The construction part.

10 Q. What is the date on that document?

11 A. The 16th of January, 1984.

12 Q. And to which weld does the document relate?

13 A. It's Field Weld 39C.

14 Q. What inspections did you request on Field  
15 Weld 39C?

16 A. The final visual and the final PT.

17 Q. Can you identify the inspector whose  
18 signature appears at the bottom of that form?

19 A. Yes, sir. It's Robbie Duncan.

20 Q. And what is the date?

21 A. The 16th of January, 1984.

22 Q. Mr. Simpson, can you identify the document  
23 that's been marked as Simpson Exhibit 13?

24 A. Yes, sir, I can.

25 Q. Did you prepare all or a part of that



1 document?

2 A. Yes, sir. I filled out the construction  
3 part of it.

4 Q. What is the date on that document?

5 A. The date is the 17th of January, 1984.

6 Q. And to what weld does that document relate?

7 A. Field Weld 40C.

8 Q. What inspections does the document request?

9 A. The final visual and the final PT.

10 Q. Can you identify the inspector's signature  
11 at the bottom of the form?

12 A. Yes, sir. It's Robbie Duncan.

13 Q. And what date did he give next to his  
14 signature?

15 A. 17th of January, 1984.

16 Q. Mr. Simpson, referring to Simpson Exhibits  
17 11, 12 and 13, did you fill out each of these  
18 request forms at the time that you requested the  
19 inspection?

20 A. Yes, sir, I did.

21 Q. To be clear, did you request the final  
22 visual and penetrant inspections on Field Weld 40C  
23 on January the 17th, 1984?

24 A. Yes, sir, I did.

25 Q. Did you request a final VT for Field Weld

1 40C at any time prior to January 17th, 1984?

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

3 Q. Did you request a final PT, penetrant test,  
4 on Field Weld 40C any time prior to January 17th,  
5 1984?

6 A. No, sir. Like I stated before, the weld  
7 wasn't complete. We were still welding on it prior  
8 to the 17th.

9 Q. Mr. Simpson, would it have been possible to  
10 perform a final visual or a penetrant examination of  
11 Field Weld 40C on January the 14th, 1984, that  
12 Saturday?

13 A. On Saturday. No, sir. There's no way. We  
14 weren't even close to being through.

15 Q. Does that conclude your testimony?

16 A. Yes, it does.

17 Q. Thank you, Mr. Simpson.

18 A. You're welcome.

19 MR. WATKINS: For the record, I'd like  
20 to note that many of the documents that have been  
21 identified as exhibits in connection with Mr.  
22 Simpson's testimony are duplicates of documents that  
23 have been included in other depositions. Those  
24 depositions include Sue Ann Neumeyer, Robert Siever,  
25 Dwight Woodyard and Jack Stanford. To the extent

1 that one or more of these exhibits have not already  
2 been moved into evidence, Applicants at this time  
3 move the admissibility of all of Mr. Simpson's  
4 exhibits into evidence.

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I, RICHARD W. SIMPSON, have read the foregoing deposition and hereby affix my signature that same is true and correct, except as noted herein.

\_\_\_\_\_  
RICHARD W. SIMPSON

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: RICHARD W. SIMPSON, who was by me  
10 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.

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

License Expires:  
December 31, 1985  
CSR No. 1453

---

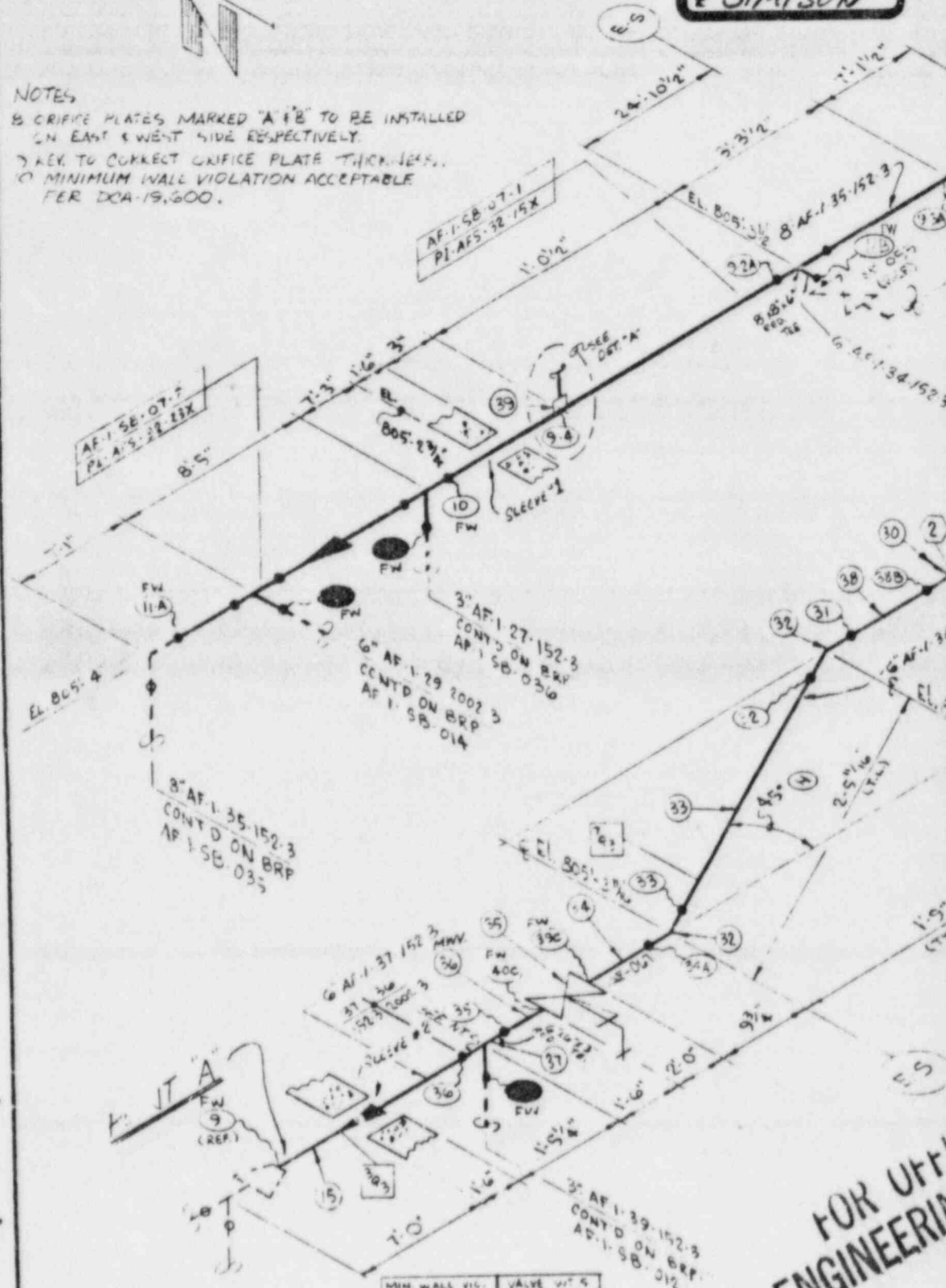
JANET E. SCHAFFER, RPR, CSR  
IN AND FOR THE STATE OF TEXAS  
1226 Commerce, Suite 411  
Dallas, Texas 75202  
(214) 742-3035

N-5 ISSUE

DEPOSITION EXHIBIT  
SIMPSON

NOTES

15 CRIPPLE PLATES MARKED "A+B" TO BE INSTALLED ON EAST & WEST SIDE RESPECTIVELY  
 2 KEY TO CORRECT CRIPPLE PLATE THICKNESS.  
 3 MINIMUM WALL VIOLATION ACCEPTABLE PER DCA-19,600.



17"  
11"  
8.5"  
8.5"  
11"  
17"

MIN. WALL THICKNESS	VALVE WT
1/2"	15.42
3/4"	670

PIPE NO.	IN. / LB.
A AF 1-35-152-3	
B AF 1-29-2002-3	
C AF 1-30-2002-3	
D AF 1-34-152-3	

FOR OFFICE ENGINEERING

1	3
2	1
3	1
4	2
5	2





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

**DEPOSITION EXHIBIT**  
 2  
**SIMPSON**

**41013**

Standard Single Weld  
 BROWN & ROOT, INC.  
 OFFICE JOB # IS-1156

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

WELD DATA CARD

WDC Serial No. \_\_\_\_\_  
 Drawing No. AF-1-SB-007R-16  
 Weld No. 34A

LINE #	10" AF-1-036-2002-3	7Q3	WPS # 11020 11021 11010	REV # / DATE 2 / 10 5 / 8 5 / 8	FABRICATION CODE & CLASS / ACC. STD. ASME III CPM 6.9	3
--------	---------------------	-----	----------------------------------	--	---	---

BASE MATERIAL	MT #	UT #	POST WELD TREATMENT	TEMP.	HEATING RATE	SPECIFICATION
NA	NA	NA	NA	NA	NA	ASME III 6.90

QC-CAP/REV	14	PT/10.2-1	MT/10.2-2	RT/10.2-3	UT
DATE	1-13-84				

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

Prepared By: (Signature)

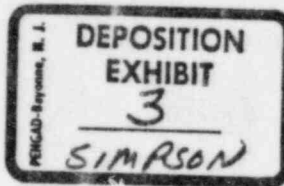
OPER. NO.	OPERATION	WELD POINTS			CON.	SAT. OF WELD	INSPECTION RESULTS			
		RT	QC	AVL			QC	CP	AVL	
1	Cleanliness	NA	✓	cc					Det. Stanford 1/13/84	II
2	Fitup	NA	✓	cc					SAT. Qualifies 1-13-84	II
3	Preheat	NA	✓	cc					SAT. Qualifies 1-13-84	II
4	Final UT	NA	✓	cc					Sat. R. Byers 1-16-84	III
5	Final MT	NA	✓	cc					Det. Stanford 1/14/84	II

Reviewed: (Signature) 1-13-84

**FOR INFORMATION ONLY**

APPROVED: (Signature) 1/18/84

Approval signatures shall be affixed in the order indicated on the last page in each sequence.



WPS #	11020
11010	11021

WOC Serial No. 41013  
 Drawing No. AF-LSB-07R-16  
 Weld No. 34A

WELD FILLER MATERIAL LOG

WELD NO.	DATE	SIZE/CLASS	WELDER SYMBOL	WPS/ICN #	HEAT/LOT # or CODE #	AMT. ISS.	AMT. RT'D.	ISSUANCE APPROVAL
W 34A	1/13/84	<del>3/32</del> E70S-2	AHS	11010 S-0	87401	10	7	<i>[Signature]</i> R-370
W 34A	1/13/84	<del>1/8</del> E70S-2	AHS	11010 S-0	97401	10	6	<i>[Signature]</i> R-350
W 34A	1/13/84	<del>7/8</del> E7018	AHS	11010 S-0	664772 0268227	100	100	<i>[Signature]</i> R-350
34A	1/14/84	<del>3/32</del> E70S-2	AHS	11010 S-0	87401	10	8	<i>[Signature]</i> R-379
34A	1/14/84	<del>1/4</del> E70S-2	AHS	11010 S-0	97401	10	4	<i>[Signature]</i> R-434
34A	1/14/84	<del>3/32</del> E7018	AFK	11010 S-0	664772 0268227	40	0	<i>[Signature]</i>
34A	1/14/84	<del>3/32</del> E7018	AHS	11010 S-0	664772 0268227	40	0	<i>[Signature]</i> R-224
FOR INFORMATION ONLY								

1/22/84

CLEARANCE REQUIRED

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

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

WELD DATA CARD

408-0

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

Drawing No. AF-1-SB-007 R-14

Weld No. FW39C

LINE # 6" AF-1-036-2002-3	WPS # 11020 11021 11010	REV#/ICN# 7/0 5/0 5/0	FABRICATION CODE & CLASS/ACC. STD. ASME III CPM 6.9 3
------------------------------	----------------------------------	--------------------------------	---

BASE MATERIAL HT # NA to HT # SUPSNN-73 PC # 7Q3 to PC # IAF-067 P # 1 to P # 1 561	POSTWELD HEAT TREATMENT TIME NA Hrs., TEMP. NA °F HEATING RATE NA °/Hr. NA SPECIFICATION WPS/CPM 6.9D
---	--

QI-QAP/REV	VT/II.1-26	PT/10.2-1	MT/10.2-2	RT/10.2-3	UT
------------	------------	-----------	-----------	-----------	----

MR#(S)	M.&T.E. 1385	CALIB. DUE DATE 14 DEC 84 / 14 MAR 84 / 18-11/14/84	QC	WELD FILLER MATERIAL REQUIRED ROOT CLASS E705:2 FILL CLASS E705:2 CLASS E-2018 8/2/1-13 CLASS
QC VERIF. DATE:				

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		Sat. JWR 1-13-84			
2	Cleanliness	NA	✓	NC		Sat Stanford 1-14/84	II		
3	Fitup	NA	✓	NC		Sat Stanford 1/14/84	II		
4	Preheat	NA	✓	NC		Sat Stanford 1/14/84	II		
5	Final VT	NA	✓	NC		Sat R. Bryan 1-16-84	II		
6	Final (MT/PT)	NA	✓	NC		Sat Stanford 1/16/84	II		

Reviewed: Ray Madson 1-3-84 JWB 1-3-84

FOR INFORMATION ONLY

DEPOSITION EXHIBIT  
4  
SIMPSON

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

ANI R. Bryan 3/28/84

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

CMC # N/A

CLEARANCE REQUIRED

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

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

WELD DATA CARD

WDC Serial No. 40851

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

Weld No. FU40C

DEPOSITION EXHIBIT 5 SIMPSON

LINE #	WPS #	REV#/ICN#	FABRICATION CODE & CLASS/ACC. STD.
6" AF-1-036-2002-3	11020	7/0	ASME III
	11021	5/0	CPM 6.9
	11010	3/0	3

BASE MATERIAL 1/2" x 1/2"  
 HT # 7/2/84-73 to HT# NA  
 PC # 1AF-057 to PC# 303  
 P # 1 to P # 1

POSTWELD HEAT TREATMENT  
 TYPE NA Hrs., TEMP. NA °F  
 HEATING RATE NA °/Hr. NA  
 SPECIFICATION WPS/CPM 6.9D

QI-QAP/REV	VT/11.1-26	PT/10.2-1	MT/10.2-2	RT/10.2-3	UT
------------	------------	-----------	-----------	-----------	----

MR#(S)	M.&T.E.	CALIB. DUE DATE	QC	WELD FILLER MATERIAL REQUIRED
QC VERIF. DATE:	1385 1/14/84	1410/84	13/10/84	ROOT CLASS E-705-2
				FILL CLASS E-705-2
				CLASS E-7018 Rev 1-13-8
				CLASS

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 'INSAT.	INSPECTION RESULTS (SIGN AND DATE)		
		WT	QC	ANI			QC or WT	NDE CERT. LEVEL	ANI
1	Verify Cut	X	NA	NC		Sat. JWR 1-3-84			
2	Cleanliness	NA	✓	NC		UNSAT (Null) 1-3-84	II		
3	Fitup	NA	✓	(X)		Sat (Stamped) 1/14/84	II		957/1/14/84
4	Preheat	NA	✓	NC		Sat (Stamped) 1/14/84	II		
5	Final VT	NA	✓	NC		Sat (Stamped) 1/17/84	II		
6	Final MPT	NA	✓	NC		Sat (Stamped) 1/17/84	II		
Reviewed: [Signature]						1-3-84			Jh 1-3-84
2A	Cleanliness	NA	✓	NC		*Sat (Stamped) 1/14/84	II		
Reviewed: [Signature]						1-14-84			DW 1/14/84

FOR INFORMATION ONLY

Dated in error 1/26/84

NCR # 12963

WE A.K. 1/14/84 OC [Signature] 5/23/84 ANI R. Byora 3/28/84

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

REF NCR 12963 (VOID) 6/15/84



40851

WPS #	
11010	11020
	11021

WDC Serial No. \_\_\_\_\_  
 Drawing No. AF-1-SB-07R-14  
 Weld No. FW40C

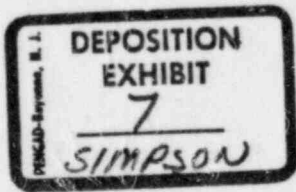
WELD FILLER MATERIAL LOG

WELD NO.	DATE	SIZE/CLASS	WELDER SYMBOL	WPS/ICN #	HEAT/LOT # or CODE #	AMT. ISS.	AMT. RT'D.	ISSUANCE APPROVAL
FW 40C	1/3/84	6" X 3/32 K	A HS	11021				<i>Alan Just</i>
		E705-2		5-0	4250B131	1	1	
FW 40C	1/3/84	3/32	A HS	11021				<i>Alan Just</i> R350
		E705-2		5-0	87401	10	10	
FW 40C	1/3/84	E-705-2	A HS	11010				<i>Alan Just</i> R-389
		3/32		5-0	87401	10	7	
FW 40C	1/3/84	E-705-2	A HS	11010				<i>Alan Just</i> R-434
		1/8		5-0	97401	10	5	
FW 40C	1/4/84	3/32	A AFK	11010	G64772			<i>Alan Just</i>
		E-705-2		5-0	026B227	40	0	
FW 40C	1/4/84	3/32	A HS	11010	G64772			<i>Alan Just</i> R-234
		E7018		5-0	026B227	40	0	
FW 40C	1/4/84	3/32	A HS	11020				<i>Alan Just</i> R250
		E705-2		7-0	87401	10	10	
FW 40C	1/4/84	1/8	A HS	11020				<i>Alan Just</i> R608
		E705-2		7-0	97401	10	10	
FW 40C	1/4/84	E-7018	A HS	11010	G64772			<i>Alan Just</i> R230
		3/32		5-0	026B227	50	5	

1/3/84  
1/3/84

1/4/84  
1/4/84  
RFS

FOR INFORMATION ONLY



NO HANGER S INSULATION SB# / - SWI - UG ASILE PIPING

DATE 11/16/84  
 MON.

TO BE FILLED OUT BY CRATS

TO BE FILLED OUT BY QC

175 1/2  
 28 1/2  
 97

STATION LOCATION  
 832' SB-1

INSPECTION NEEDED BY	UNIT	TIME	LOCATION INSP. NEEDED.	ITEM TO BE INSP.	INSPIR. LINE	TIME OUT	TIME IN	SAT/UNSAT. INSP. RESULTS.	REMARKS
SIMPSON	SGI	9:35	790' Rm 78	2-P.T'S	Loose Leak	9:35	10:00	② Sat	(N.C.B.)
Joltuward	SGI-1	11:00	790' Rm 78 R/E	VALVE	Leak	11:00	11:30	unsat	
James Bond	DGI	11:35	810' E1 WESTING DGI	TRAVELER	Leak	12:35			SECT. 11 GROUP
Whitland	SGI	2:10	790' 4-5	VALVE	Leak	2:11	3:34	Sat	disassembly of valve



CLEARANCE REQUIRED

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

REPAIR PROCESS SHEET

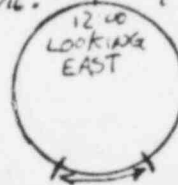
WDC Serial No. 40851  
 Drawing No. AF-1-36-00  
 Weld No. FW-40C

RT REJECT # 3096 ↓

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

↓-6, 6-8 : PRODSITY WITH TAILS  
 E = .531  
 RE-SHOOT ↓-6, 6-8 AFTER REPAIR

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



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

OPER. NO.	OPERATION	HOLD POINTS			CON	"S" OF "U"	INSPECTION RESULTS (SIGN AND DATE)		
		WT	QC	ANL			QC OF WT	NDE CERT LEVEL	ANI
WDC WELD MAJOR REPAIR									
4A	LAYOUT	X	NA	NA		S	RH 1-16-84		
4B	GRIND	X	NA	NA		Sgt.	JWR 1-16-84		
4C	MT/PT CAVITY	X	NA	NA		Sgt.	Pol Deming 1-16-84	PT II	
4D	EVALUATE EXCAVATION	X	NA	NA		Sgt.	Pol Deming 1-16-84		
4E	CLEAN	X	NA	NA		Sgt.	Pol Deming 1-16-84		
4F	PREHEAT	X	NA	NA		Sgt.	Pol Deming 1-16-84		
4G	WELD: <del>11/10/84</del>	NA	NA	NA					
4H	GRIND & BLEND	NA	NA	NA					
4I	FINAL VT	X	NA	NA		Sgt.	JWR 1-17-84		
RETURN TO STEP # 5 OF WDC									
PREP: J. E. ZUMBRUN 1/16/84									
REVIEW: J. E. ZUMBRUN 1-16-84									
FOR INFORMATION ONLY									

WE AH [Signature] 1/18/84      QC      ANI      G&H

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

DEPOSITION EXHIBIT  
9  
 SIMPSON





BROWN & ROOT

NON-DESTRUCTIVE TEST  
INSPECTION REQUEST

No. 175529

FOREMAN Mc 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

036-2002-3

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:

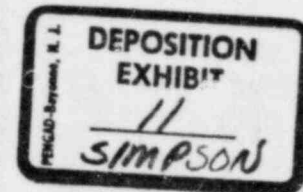
R. Duncan

ACCEPT:

Sat

DATE:

1-16-84



BROWN & ROOT

No. 175530

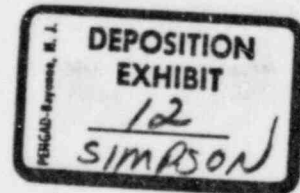
NON-DESTRUCTIVE TEST INSPECTION REQUEST		FOREMAN <u>ME Lee</u>	Time	Date
				<u>1-16-84</u>
WELDER: <u>ABLES</u>	STAMP <u>AAS</u>	LOC. <u>SG#1</u>	ELV <u>750.275</u>	
PIPE DIA. <u>6"</u>	DWG. NO/LINE NO. <u>AF-1-SB-07</u>	JT. NO. <u>FG-39C</u>		
<u>036-3003-3</u>				
INSP. REQ.	<u>CLEAN</u> <u>VISUAL</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>FINAL</u> <u>U.T.</u> <u>HYDRO TEST</u>

COMMENTS:

Q

11010

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



BROWN & ROOT

No. 175766

NON-DESTRUCTIVE TEST INSPECTION REQUEST		FOREMAN <u>W. Lee</u>	Time	Date
				<u>1-17-84</u>
WELDER: <u>APAS</u>	STAMP <u>APB</u>	LOC. <u>SB#1</u>	ELV. <u>790</u>	
PIPE DIA. <u>6"</u>	DWG. NO/LINE NO. <u>AF-1-SB-07</u>	JT. NO. <u>FW-40C</u>		
<u>36-2003-3</u>				
INSP. REQ.	<u>CLEAN</u> <u>VISUAL</u>	<u>FIT-UP</u> <u>L.P.</u>	<u>ROOT</u> R.T.	<u>INTER</u> M.P.
			<u>STRESS REL.</u> U.T.	<u>FINAL</u> HYDRO TEST

COMMENTS:

Q

INSPECTOR: RH Duncan ACCEPT: Sat DATE: 1-17-84

