

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

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

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OFFICE OF SECRETARY
DOCKETING & SERVICE
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PREFILED TESTIMONY OF
JAMES E. BROWN
AUGUST 15, 1984

PREFILED TESTIMONY OF JAMES E. BROWN, 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

WITNESS: JAMES E. BROWN

Examination by Mr. Watkins

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DEPOSITION EXHIBITS

PAGE

Exhibit Number 1, Blank Labor Control Sheet for Brown & Root employees

6

Exhibit Number 2, Labor Control Sheet for week ending 1/14/84

11

Exhibit Numbers 3 through 7, Labor Control Sheets for week ending 1/14/84

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Exhibit Number 8, Sign-out sheet for Brown & Root employees

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JAMES E. BROWN,

the witness hereinbefore named, being first duly cautioned and sworn to testify the truth, the whole truth and nothing but the truth, testified on his oath as follows:

MR. WATKINS: My name is McNeill Watkins. I'm with the law firm of Bishop, Liberman, Cook, Purcell & Reynolds in Washington, D. C. We are counsel for Applicants in this licensing proceeding. This is the prefiled testimony of Mr. James Brown, a Brown & Root employee at Comanche Peak. He is appearing here voluntarily for this deposition and has not been subpoenaed by any party.

EXAMINATION

BY MR. WATKINS:

Q. Mr. Brown, would you please state your full name.

A. James E. Brown.

Q. By whom are you employed?

A. Brown & Root, Incorporated.

Q. Where are you employed?

A. Comanche Peak Steam Electric Station.

Q. What is your title, Mr. Brown?

A. Chief Timekeeper and Payroll Supervisor.

Q. How long have you held that position?

1 A. A little over five years.

2 Q. Where, physically, is your office located
3 at Comanche Peak?

4 A. In the Time Office.

5 Q. Would you briefly describe your duties?

6 A. I am responsible for documentation of hours
7 worked by Brown & Root employees on the job site.

8 Q. How does the Time Office keep track of the
9 number of hours that each Brown & Root hourly
10 employee works on a given day?

11 A. As the employees come to work, they're
12 issued a brass with an employee identification
13 number on it, and then we go behind them and log the
14 time that they pick their brass up. At the end of
15 the day, whenever they leave for the day, the
16 employees drop their brass off; we log them out.

17 Q. Do Time Office personnel write down the
18 times that Brown & Root employees check in and out?

19 A. In most cases we don't actually write down
20 the time, no. What we do is, when an employee comes
21 in at the beginning of a shift, Time Office
22 personnel put a pencil mark down for that employee.
23 The pencil marks are color-coded to shifts. For
24 example, a blue pencil mark would mean that the
25 employee clocked in on the 5:30 a.m. shift, and a

1 green pencil mark would mean that the employee
2 reported for work on the 7:30 a.m. shift. The
3 reason we use color codes is that on some shifts we
4 have over a thousand people reporting or leaving at
5 the same time. It's not feasible for the Time
6 Office to write down the times.

7 Q. What happens if a shift employee reports
8 for or leaves work at a time other than the normal
9 shift?

10 A. Then we write down the actual time that the
11 employee reports or leaves.

12 Q. Do the Time Office people use a form for
13 recording the times that Brown & Root employees
14 report for and leave work?

15 A. Yes, sir. We use a Brown & Root Labor
16 Control Sheet.

17 Q. Mr. Brown, I'll show you the document
18 that's been marked for identification as Brown
19 Exhibit 1 and ask you if that is a blank copy of the
20 Labor Control Sheet to which you just referred.

21 A. Yes, sir, it is.

22 Q. Mr. Brown, are these Labor Control Sheets
23 filled out daily for each Brown & Root hourly
24 employee that works at Comanche Peak?

25 A. Daily, yes.

1 Q. Does the Time Office retain these Labor
2 Control Sheets after they have been filled out?

3 A. Yes, sir. They are the basis for paying
4 Brown & Root employees.

5 Q. After they are filled out, do they remain
6 in your personal possession and control?

7 A. Yes, sir.

8 Q. Physically where do you keep, and how do
9 you keep, these Labor Control Sheets once they have
10 been filled out for a given week?

11 A. Each week the Labor Control Sheets and
12 other documentation are bound together for each
13 week-ending period.

14 Q. Mr. Brown, do you have all of the Brown &
15 Root hourly Labor Control Sheets for the week ending
16 January the 14th, 1984, here with you at this time?

17 A. Yes, sir. I have before me the binder
18 including all Labor Control Sheets for that week.

19 Q. Are those Labor Control Sheets the
20 originals?

21 A. Yes, sir.

22 Q. Mr. Brown, how do the Labor Control Sheets
23 identify employees?

24 A. By badge number.

25 Q. Is there a list of names and corresponding

1 badge numbers for all Brown & Root employees at
2 Comanche Peak?

3 A. Yes, sir.

4 Q. Would you describe that list, please?

5 A. It's called a timekeeper's listing. It's a
6 computer printout that lists all the employees
7 alphabetically. The list gives their badge number
8 and other information.

9 Q. How often is the list updated?

10 A. Once a week.

11 Q. Do you have a current list with you at this
12 time?

13 A. Yes, sir.

14 Q. Mr. Brown, is Ronald McBee a Brown & Root
15 employee at Comanche Peak?

16 A. Yes, sir.

17 Q. What is his badge number?

18 A. 3164.

19 Q. Is Richard Simpson a Brown & Root employee
20 at Comanche Peak?

21 A. Yes, sir.

22 Q. What is Mr. Simpson's badge number?

23 A. 8554.

24 Q. Is Alan Justice a Brown & Root employee at
25 Comanche Peak?

1 A. Yes, sir.

2 Q. What is Mr. Justice's badge number?

3 A. 2371.

4 Q. Is Danny Wright an employee of Brown & Root
5 at Comanche Peak?

6 A. Yes, sir.

7 Q. What is Mr. Wright's badge number?

8 A. 5823.

9 Q. Mr. Brown, have you established each of the
10 badge numbers for those individuals by reference to
11 the computer printout that you have before you as
12 you testify today?

13 A. Yes, sir, I have.

14 Q. Mr. Brown, if a badge number includes the
15 prefix HQ, what does that indicate?

16 A. QC inspectors at Comanche Peak are carried
17 on the Brown & Root Houston payroll completely
18 separate from the site Craft personnel. An "HQ"
19 badge number indicates that the employee is on the
20 Houston payroll.

21 Q. Are employees with "HQ" badge numbers
22 listed on your timekeeper's list?

23 A. No, they are not.

24 Q. Is there a separate list of Comanche Peak
25 employees carried on the Houston payroll?

1 A. Yes.

2 Q. Do you have a current copy of that list
3 before you at this time?

4 A. Yes, sir, I do.

5 Q. Is Jack Stanford included on that list?

6 A. Yes, sir, he is.

7 Q. What is Mr. Stanford's badge number?

8 A. HQ-10.

9 Q. Is Mr. Stanford currently a Brown & Root
10 employee at Comanche Peak?

11 A. Yes, sir.

12 Q. Mr. Brown, is Jackie Ables currently a
13 Brown & Root employee at Comanche Peak?

14 A. No, sir, he is not.

15 Q. Has Mr. Ables ever been a Brown & Root
16 employee at Comanche Peak?

17 A. Yes, sir, he has.

18 Q. When did he terminate his employment?

19 A. May 24, 1984.

20 Q. Was Mr. Ables employed by Brown & Root at
21 Comanche Peak in January of 1984?

22 A. Yes, sir.

23 Q. What was his badge number?

24 A. 7794.

25 Q. Mr. Brown, I show you a document that has

1 been marked for identification as Brown Exhibit 2.
2 Can you identify it?

3 A. This is a copy of the Labor Control Sheet
4 for certain Comanche Peak employees with "HQ" badge
5 numbers for the week ending January 14, 1984.

6 Q. Earlier you testified that Jack Stanford's
7 badge number is HQ-10. Does Brown Exhibit 2 show
8 that Jack Stanford worked on Saturday, January the
9 14th?

10 A. Yes, sir, it does.

11 Q. When did he clock in that day?

12 A. 7 o'clock a.m.

13 Q. When did he leave on that day?

14 A. 3:30 p.m.

15 Q. Mr. Brown, I show you five additional
16 documents which have been marked for identification
17 as Brown Exhibits 3, 4, 5, 6 and 7, and ask you to
18 identify them.

19 A. These are copies of Labor Control Sheets
20 for Brown & Root Comanche Peak employees for the
21 week ending January 14, 1984.

22 Q. Have you compared those exhibits with the
23 originals in the binder that is in your possession?

24 A. Yes, sir.

25 Q. And that binder is for the week ending

1 January the 14th, 1984; is that correct?

2 A. Yes, sir.

3 Q. Earlier you testified that Ronald McBee's
4 badge number was 3164. Referring to Brown Exhibits
5 4 through 7, can you state whether Mr. McBee worked
6 on Saturday, January the 14th?

7 A. Yes, sir, he did.

8 Q. To which exhibit are you referring?

9 A. Brown Exhibit 4.

10 Q. What hours did Mr. McBee work on January
11 the 14th?

12 A. From 7 o'clock a.m. till 1:30 Sunday
13 morning.

14 Q. Is there an actual notation as to the time
15 he checked out on the 14th?

16 A. Yes, sir, there is.

17 Q. What is that notation?

18 A. 0130.

19 Q. Does that mean he left work at 1:30 a.m. on
20 Sunday morning, January the 15th?

21 A. Yes, sir.

22 Q. Earlier you gave Richard Simpson's badge
23 number as 8554. Referring to Brown Exhibits 4
24 through 7, can you tell me whether Mr. Simpson
25 worked on January the 14th?

1 A. Yes, sir, he did.

2 Q. To which exhibit are you referring?

3 A. Brown Exhibit 7.

4 Q. When did Mr. Simpson check in that day?

5 A. 7 o'clock a.m.

6 Q. When did he leave work?

7 A. 1:30 Sunday morning.

8 Q. And that would be Sunday, January the 15th?

9 A. Yes, sir.

10 Q. Mr. Brown, earlier you gave Danny Wright's
11 badge number as 5823. By referring to Brown
12 Exhibits 4 through 7, can you state whether Mr.
13 Wright worked on January the 14th, 1984?

14 A. Yes, sir, I can. He did work.

15 Q. To which exhibit are you referring?

16 A. Brown Exhibit 5.

17 Q. When did Mr. Wright commence work that day?

18 A. 7 o'clock a.m.

19 Q. And when did he leave work that day?

20 A. 1:30 Sunday morning.

21 Q. So he would have left at 1:30 a.m., Sunday,
22 January the 15th; is that correct?

23 A. Yes, sir.

24 Q. Earlier you gave Alan Justice's badge
25 number as 2371. Referring to Brown Exhibits 4

1 through 7, can you state whether Mr. Justice worked
2 on January the 14th, 1984?

3 A. Yes, sir, he did.

4 Q. To which exhibit are you referring?

5 A. Brown Exhibit 3.

6 Q. What time did Mr. Justice commence work?

7 A. 7 o'clock a.m.

8 Q. And when did Mr. Justice leave work on the
9 14th?

10 A. 2:30 Sunday morning.

11 Q. So he left work on January the 15th at 2:30
12 a.m.; is that correct?

13 A. Correct.

14 Q. Earlier you gave Jackie Ables' badge number
15 as 7794. Referring to the exhibits before you, can
16 you state whether Mr. Ables worked on January the
17 14th, 1984?

18 A. Yes, sir, he did.

19 Q. To which exhibit are you referring?

20 A. Brown Exhibit 6.

21 Q. What time did Mr. Ables commence work on
22 January the 14th?

23 A. Seven o'clock a.m.

24 Q. And when did he leave?

25 A. 2:30 a.m. Sunday morning.

1 Q. And that would be January the 15th; is that
2 correct?

3 A. Correct.

4 Q. Mr. Brown, for each of the individuals that
5 we have just identified and discussed, the time that
6 they began work that morning is not actually
7 recorded by number, is it?

8 A. No, sir, it's not.

9 Q. Are they referred to by color code on the
10 original Labor Control Sheets?

11 A. Yes, sir, they are.

12 Q. Have you compared the markings on the
13 copies of the Labor Control Sheets that have been
14 marked as Brown Exhibits 4 through 7 in this
15 proceeding with the original color codes in the
16 binder that is in your possession?

17 A. Yes, sir, I have.

18 Q. And on that basis your testimony is that
19 each of these individuals commenced work at seven
20 a.m. on January the 14th; is that correct?

21 A. Yes, sir, that's correct.

22 Q. Mr. Brown, is there any independent means
23 of verifying when an employee leaves work at
24 Comanche Peak other than the Labor Control Sheets?

25 A. Yes, sir. Oftentimes they will sign out in

1 my office, when my people are not available to
2 actually log them out at that time when they leave.

3 Q. And when they sign out, is there a form
4 used for that purpose?

5 A. Yes, sir.

6 Q. Are these forms retained in your possession,
7 supervision and control in the Time Office?

8 A. Yes, sir.

9 Q. Mr. Brown, I'll show you a document that's
10 been marked as Brown Exhibit 8. Would you identify
11 that document, please.

12 A. This is a copy of the sign-out sheet for
13 Brown & Root employees who leave other than their
14 regular scheduled time, for January 14, 1984.

15 Q. Does it record the names of any of the
16 gentlemen that you have discussed in your testimony?

17 A. Yes, sir.

18 Q. Who are those?

19 A. Jackie Ables and Alan Justice.

20 Q. What time does it show that they signed out?

21 A. At 2:30 a.m.

22 Q. Now, the sign-out sheet is for January the
23 14th. Earlier you testified that these gentlemen
24 left work at 2:30 a.m. on the 15th. Could you
25 explain that?

1 A. The first person on the top of this page, I
2 know personally, comes in at 11 o'clock p.m. every
3 night. And so that's p.m. The sign-ins and
4 sign-outs on this sheet start on January 14, but
5 spills over into the early morning hours of January
6 15.

7 Q. Does that conclude your testimony?

8 A. Yes, it does.

9 MR. WATKINS: Thank you, Mr. Brown.

10 THE WITNESS: Okay.

11 MR. WATKINS: For the record, Mr.

12 Brown has with him at this deposition the computer
13 printout that he described in his testimony. The
14 computer printout is quite bulky, and it would be
15 difficult to introduce individual pages from the
16 printout. Mr. Brown also has the original Labor
17 Control Sheets showing the color codes for the week
18 ending January the 14th, 1984. The color coded
19 sheets must remain in Mr. Brown's possession and
20 control at the Time Office at Comanche Peak, so we
21 will not attempt to introduce the originals of these
22 documents into evidence.

23 Applicants move the admission of Brown Exhibits
24 1 through 8 into evidence. Anticipating a possible
25 hearsay objection to Exhibits 2 through 8,

1 Applicants invoke the business records exception to
2 the rule. Federal Rule of Evidence 803(6) provides
3 that business records are not excluded by the rule
4 against hearsay if such records are shown by the
5 custodian of such records that they are kept in the
6 course of a regularly conducted business activity,
7 and if such records were kept as part of regular
8 practice.

9 Mr. Brown has testified that he is the
10 custodian of the Labor Control Sheets, and that they
11 are made out and kept in the regular course of
12 business, all within the meaning of the Rule 803(6).

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I, JAMES E. BROWN, have read the foregoing deposition and hereby affix my signature that same is true and correct, except as noted herein.

JAMES E. BROWN

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: JAMES E. BROWN, who was by me duly
10 sworn to testify the truth and nothing but the
11 truth of his knowledge touching and concerning the
12 matters in controversy in this cause; and that he
13 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

BROWN & ROOT, INC.
"LABOR CONTROL SHEET"

WEEK ENDING: _____ JOB NO.: 35-1195

BADGE NUMBER	SUNDAY			MONDAY			TUESDAY			WEDNESDAY			THURSDAY			FRIDAY			SATURDAY			BATCH #	TOTAL HRS	REMARKS
	IN	OUT	HRS	IN	OUT	HRS	IN	OUT	HRS	IN	OUT	HRS	IN	OUT	HRS	IN	OUT	HRS	IN	OUT	HRS			
HQ01				630			630	180		A		A			A							18	9/22	
HQ02				/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	40		
HQ03				/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	40		
HQ04				/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	40		
HQ05				/	/	/	/	/	/	/	/	/	/	/	/	/	/	1300	/	/	/	40		
HQ06				/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	40		
HQ08				630			630	180		630			630			630			1200	/	/	40	* See memo	
HQ09		1200		/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	1300	/	/	40		
HQ10				/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	40		
HQ11				/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	40		
HQ12		800		/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	1600	/	40		
HQ13				/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	40		
HQ14				/	/	/	/	/	/	/	/	/	800		630	1400			1130	/	/	40		
HQ15				/	/	/	/	/	/	/	1550		/	/	/	1530			/	/	/	32	9/3	
HQ16		1000		630			/	/	/	1800			1800		/	/	/	/	/	/	/	40		
HQ17				/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	30		
HQ18				/	/	/	/	1800		/	1800		/	1800	630	1800			830	/	/	40		
HQ19				/	1200		/	/	/	/	/	/	800		/	/	/	/	/	/	/	40		
HQ20				/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	32		
HQ21				/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	40		
HQ22				630			630			630			630			630			/	/	/	40		
HQ23				630			630			630			630			630			630	1130	/	40		
HQ24				630	800		630	700		630	1800		630	1800		630	1800		630	1230	/	40		
HQ25		1000		630	1800		630	1800		630	1800		630	1800		630	1800		/	/	/	40		
HQ26				/	/	/	/	/	/	/	/	/	/	/	/	/	/	800	1800	/	/	40		
HQ27				/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	40		
HQ28				/	/	/	630			630			630			630			/	/	/	40	* See memo	
HQ29				/	/	/	/	/	/	/	/	/	1230		/	/	/	/	/	/	/	35		
HQ30				/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	40		
HQ31				/	/	/	/	/	/	/	1800		/	/	/	/	/	/	/	/	/	40		
HQ32				/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	40		
HQ33				/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	40		
HQ34				/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	40		
HQ35		800		1800			/	/	/	1800			1800		/	/	/	/	/	/	/	40		
HQ36				/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	1200	/	/	40		
HQ37				/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	1100	/	40		
HQ38		1000		/	/	/	/	/	/	/	/	/	800		/	/	/	/	/	/	/	40		
HQ39				/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	40		
HQ40				630			/	/	/	/	/	/	/	/	630			/	/	/	/	40		

TOTALS:

1-14-84

DEPOSITION
EXHIBIT
Brown 2

BROWN & ROOT, INC.
"LABOR CONTROL SHEET"

WEEK ENDING: _____ JOB NO: 35-1195

BADGE NUMBER	SUNDAY		MONDAY		TUESDAY		WEDNESDAY		THURSDAY		FRIDAY		SATURDAY		BATCH #	TOTAL HRS	REMARKS
	IN	OUT	HRS	IN	OUT	HRS	IN	OUT	HRS	IN	OUT	HRS	IN	OUT			
1959			6:30	10:00	6:30	10:00	6:30	10:00	6:30	10:00	6:30	10:00				52 1/2	
1962			/	/	8	/	8	/	8	/	8	/	8			40	
2029			/	/	10	/	10	/	10	/	10	/	10			50	
2052			/	/	10	/	8	/	10	/	10	/	10			48	
2061			/	/	10	/	10	/	10	/	10	/	10			50	
2071			/	/	10	/	10	/	10	/	10	/	10	8		58	
2127			/	/	10	/	10	/	10	/	10	/	10	8		58	
2149			/	/	10	/	10	/	10	/	10	/	10			50	
2210			/	/	10	/	10	/	10	/	10	/	10	8 1/2	8 1/2	58 1/2	
2212			/	/	10	/	10	/	10	/	10	/	10			50	
2237			/	/	10	/	10	/	10	/	10	/	10			50	
2336			/	/	9	/	10	/	10	/	10	/	10			49	
2371			/	/	10	/	10	/	10	/	10	12	19			71	
2373	10				A	/	/	8	/	8	/	8	/	10		44	
2375			/	/	10	/	10	/	10	/	10	/	10			50	
2420			/	/	10	/	10	/	10	/	10	/	10			40	
2440			/	/	10	/	10	/	10	/	10	/	10			50	
2446			/	/	10	/	10	/	10	/	10A	/				40	
2469			6:30	10:00	6:30	10:00	6:30	10:00	6:30	10:00	6:30	10:00				47 1/2	
2472			/	/	8	/	8	/	8	/	8	/	8			42 1/2	
2506			/	/	8	/	8	/	8	/	8	/	8			40	
2512			/	/	8	/	8	/	8	/	8	/	8			40	
2520			5:00	11:00	5:00	11:00	5:00	11:00	5:00	11:00	5:00	11:00				54 1/2	
2524			/	/	10	/	10	/	10	/	10	/	10	10		60	
2531			/	/	10	/	10	/	10	/	10	/	10			51	
2546			/	/	10	/	10	/	10	/	10	/	10	7 1/2	10	57 1/2	
2571			/	/	10	/	10	/	10	/	10	/	10			50	
2581			/	/	10	/	10	/	10	/	10A	/				40	
2608			/	/	8	/	8	/	8	/	8	/	8			32	
2627			/	/	8	/	8	/	8	/	8	/	8			40	
2647			/	/	10	10 1/2	5 1/2	/	/	/	A	/				15 1/2	
2651			/	/	8	/	8	/	8	/	8	/	8			40	
2664			/	/	8	/	8	/	8	/	8	/	8	8		48	
2683			6:00	11	10	/	10	/	10	/	8	/	10			49	
2695			/	/	10	/	10	/	10	/	10	/	10			50	
2735			/	/	10	/	10	/	10	/	10	/	10			50	
2824			/	/	10	/	10	/	10	/	10	/	10			50	
2858	10		/	/	10	/	10	/	10	/	10	/	10			60	
2914	10	12	/	/	8	/	8	/	8	/	10	/	10	12		68 1/2	
TOTALS:	32		21 1/2		35 1/2		35 1/2		35 1/2		33 1/2		93 1/2	-			

DEPOSITION
 EXHIBIT
 BROWN 3

BROWN & ROOT, INC.
"LABOR CONTROL SHEET"

WEEK ENDING _____ JOB NO. 35-1195

BADGE NUMBER	SUNDAY		MONDAY		TUESDAY		WEDNESDAY		THURSDAY		FRIDAY		SATURDAY		BATCH #	TOTAL HRS.	REMARKS
	IN	OUT	HRS	IN	OUT	HRS	IN	OUT	HRS	IN	OUT	HRS	IN	OUT			
2918	/	/	/	10	/	10	/	10	/	10	/	10	/	/		50	
2939	/	/	/	10	/	10	/	10	/	10	/	10	/	/		50	
2982	/	/	/	10	/	10	/	10	/	10	/	10	/	/		59 1/2	
3031	/	/	/	10	/	10	/	10	/	10	/	10	/	/		50	
3039	/	/	/	10	/	10	/	10	/	10	/	10	/	/		50	
3060	/	/	/	10	/	10	/	10	/	10	/	10	/	/		40	
3062	/	/	/	10	/	10	/	10	/	10	/	10	/	/		50	
3103	/	/	/	F	/	A	/	A	/	A	/	A	/	/		-	JAC
3117	/	/	/	10	/	10	/	10	/	10	/	10	/	/		50	
3164	/	/	/	10	/	10 1/2	/	10 1/2	/	10 1/2	/	8 1/2	/	10 1/2		67 1/2	Supp 1/2
3174	/	/	/	8	/	8	/	8	/	8	/	8	/	/		40	
3206	/	/	/	10	/	10	/	10	/	10	/	10	/	/		50	
3230	/	/	/	10	/	10	/	10	/	10	/	7	/	/		47	
3246	/	/	/	8	/	8	/	8	/	8	/	8	/	/		40	
3274	/	/	/	8	/	8	/	8	/	8	/	8	/	/		40	
3275	/	/	/	10	/	10	/	10	/	10	/	10	/	/		50	
3284	/	/	/	10	/	10	/	10	/	10	/	10	/	10		60	
3293	/	/	/	10	/	10	/	10	/	10	/	10	/	/		50	
3302	/	/	1700	10 1/2	/	10 1/2	/	10 1/2	/	10 1/2	/	10 1/2	/	/	5	47	
3314	/	/	/	8	/	8	/	8	/	8	/	8	/	/		40	
3319	/	/	/	10	/	10	/	10	/	10 A	/	9 1/2	/	/		49 1/2	
3320	/	/	/	10	/	10	/	8	/	8	/	8	/	/		44	
3352	/	/	/	8	/	8	/	8	/	8	/	8	/	/		40	
3372	/	/	/	10	/	10	/	10	/	10	/	10	/	/		50	
3381	/	/	/	8	/	8	/	8	/	8	/	8	/	/		40	
3386	/	/	/	10	/	10	/	10	/	10	/	10	/	/		50	
3399	/	/	/	10	/	10	/	10	/	10	/	10	/	/		50	
3416	/	/	/	10	/	10	/	10	/	10	/	10	/	/		50	
3478	/	/	/	8	/	8	/	8	/	8	/	8	/	8		48	
3527	/	/	/	10	/	10	/	10	/	10	/	10	/	/		50	
3530	/	/	/	8	/	8	/	8	/	8	/	8	/	/		40	
3621	/	/	/	8	/	8	/	8	/	8	/	8	/	/		40 1/2	
3639	/	/	/	10	/	10	/	10	/	10	/	10	/	/		50	
3668	/	/	/	10	/	10	/	10	/	10	/	10	/	/		50	
3709	/	/	/	9 1/2	/	10 1/2	/	10	/	10	/	10	/	/		51	
3732	/	/	/	8	/	8	/	10	/	10 A	/	/	/	/		36	
3794	/	/	630	9 1/2	/	8 1/2	/	8 1/2	/	8 1/2	/	8 1/2	/	11		53 1/2	
3810	/	/	/	8	/	8	/	8 1/2	/	8	/	8	/	/		40 1/2	
3833	/	/	/	10	/	10	/	10	/	10	/	10	/	/		50 1/2	
TOTALS:	/	/	/	217 1/2	/	344	/	347	/	337	/	335	/	57	5		
	-	-	-	10 1/2	-	10 1/2	-	10 1/2	-	10 1/2	-	-	-	-			

DEPOSITION
EXHIBIT
Brown 4

BROWN & ROOT, INC.
"LABOR CONTROL SHEET"

WEEK ENDING: _____ JOB NO.: 35-1195

BADGE NUMBER	SUNDAY			MONDAY			TUESDAY			WEDNESDAY			THURSDAY			FRIDAY			SATURDAY			BATCH #	TOTAL HRS.	REMARKS
	IN	OUT	HRS	IN	OUT	HRS	IN	OUT	HRS	IN	OUT	HRS	IN	OUT	HRS	IN	OUT	HRS	IN	OUT	HRS			
4859				/	/	8	/	/	8	/	/	8	/	/	10	/	/	8				42		
4870				/	/	10	/	/	10	/	/	10	/	/	10	/	/	10				50		
4885				/	/	10	/	/	10	/	/	10	/	/	10	/	/	10				50		
4901				/	/	8	/	/	8	/	/	8	/	/	8	/	/	8				40		
4914				A ¹⁰ 7:30	12:22	9:20	9:15	2:20	3:00	9:12	2:20	3:00	9:12	2:20	3:00	9:12				7 1/2		57 1/2		
4961				/	/	8	/	/	8	/	/	8	/	/	8	/	/	8				40		
5003				/	/	10 1/2	/	/	10 1/2	/	/	10	/	/	10	/	/	10				51		
5080				/	/	10	/	/	10	/	/	10	/	/	10	/	/	10				50		
5104						7:00	10:15	1:00	10:15	1:00	10:15	1:00	10:15	1:00	10:15	1:00	10:15	10:15			7 1/2	60		
5132				/	/	8	/	/	8	/	/	8	/	/	8	/	/	8				40		
5134				/	/	10A	/	/	10	/	/	10	/	/	10	/	/	10				40		
5196				/	/	10	/	/	10	/	/	10	/	/	10	/	/	10				60		
5201				/	/	8	/	/	8	/	/	8	/	/	8	/	/	8				40		
5222				/	/	10	/	/	10	/	/	10	/	/	10	/	/	10				50		
5247				/	/	8	/	/	8	/	/	8	/	/	8	/	/	8				40		
5291				/	/	10	/	/	10	/	/	10	/	/	10	/	/	10				50		
5311				/	/	10	/	/	10	/	/	10	/	/	10	/	/	10				50		
5338				/	/	10	/	/	10	/	/	10	/	/	10	/	/	10				50		
5350				/	/	10	/	/	10	/	/	10	/	/	10	/	/	10			5	45		
5552				/	/	10	/	/	10	/	/	10	/	/	10	/	/	10				50		
5563				/	/	8	/	/	8	/	/	8	/	/	8	/	/	8				40		
5610				/	/	10	/	/	10	/	/	10	/	/	10	/	/	10			10	60		
5612				/	/	8	/	/	8	/	/	8	/	/	8	/	/	8				40		
5686				/	/	10	/	/	10	/	/	10	/	/	10	/	/	10			10	60		
5698				/	/	10	/	/	10	/	/	10	/	/	10	/	/	10				50		
5738				/	/	7 1/2	/	/	8	/	/	8	/	/	8	/	/	8				39 1/2		
5785				6:30	10:15	6:30	8:15	6:30	8:15	6:30	8:15	6:30	8:15	6:30	8:15	6:30	8:15	8:15				44 1/2		
5786				7:45	10:15	7:45	10:15	7:45	10:15	7:45	10:15	7:45	10:15	7:45	10:15	7:45	10:15	7:45				61 1/2		
5787				/	/	10	/	/	10	/	/	10	/	/	10	/	/	10				50		
5823				/	/	10	/	/	10	/	/	10	/	/	10	/	/	10				70 1/2		
5829				6:30	8:15	6:30	8:15	6:30	8:15	6:30	8:15	6:30	8:15	6:30	8:15	6:30	8:15	8:15				42 1/2		
5840				/	/	10	/	/	10	/	/	10	/	/	7	/	/	10				47		
5959				/	/	10	/	/	10	/	/	10	/	/	10	/	/	10				50		
5985				/	/	10	/	/	10	/	/	10	/	/	10	/	/	10			10	60		
6023				/	/	10	/	/	10	/	/	10	/	/	10	/	/	10				50		
6158				/	/	10	/	/	10	/	/	10	/	/	10	/	/	10			10	60		
6178				/	/	10	/	/	10	/	/	10	/	/	10	/	/	10			10	60		
6218				/	/	10	/	/	10	/	/	10	/	/	10	/	/	10			5	45		
6244				/	/	8	/	/	8	/	/	8	/	/	8	/	/	8				40		
TOTALS:				17		219 1/2			318			326 1/2			325 1/2			328 1/2			83 1/2	25		
				12		30			40			40			40			20 1/2						

DEPOSITION
EXHIBIT
Brown 5

BROWN & ROOT, INC.
"LABOR CONTROL SHEET"

WEEK ENDING: _____ JOB NO.: 35-1195

BADGE NUMBER	SUNDAY		MONDAY		TUESDAY		WEDNESDAY		THURSDAY		FRIDAY		SATURDAY		BATCH #	TOTAL HRS.	REMARKS
	IN	OUT	HRS	IN	OUT	HRS	IN	OUT	HRS	IN	OUT	HRS	IN	OUT			
7076	/	/	10	/	/	10	/	/	10	/	/	10	/	/		50	
7088	/	/	10	/	/	10	/	/	10	/	/	10	/	/		50	
7091	/	/	8	/	/	8	/	/	8	/	/	8	/	/		40	
7143	/	/	10	/	/	10	/	/	10 1/2	/	/	10	/	/	10	60 1/2	
7166	/	/	8	/	/	8	/	/	8	/	/	8	/	/		40	
7229	/	/	8	/	/	8	/	/	8	/	/	8	/	/		40	
7304	/	/	8	/	/	8	/	/	8	/	/	8	/	/		40	
7402	/	/	8	/	/	8	/	/	8	/	/	8	/	/		40	
7477	/	/	8	/	/	8	/	/	8	/	/	8	/	/		40	
7495	/	/	10	/	/	10	/	/	10 1/2	/	/	10	/	/		50 1/2	
7522	/	/	10	/	/	7	/	/	10	/	/	10	/	/	10	57	
7530	/	/	10	/	/	10	/	/	10	/	/	10	/	/	10	60	
7557	/	/	10	/	/	10	/	/	10	/	/	10	/	/	10	60	
7603	/	/	8	/	/	10	/	/	10	/	/	8	/	/		46	
7619	/	/	8	/	/	8	/	/	8	/	/	8	/	/		40	
7721	/	/	8	/	/	8	/	/	8	/	/	8	/	/		40	
7734	/	/	10	/	/	10	/	/	10	/	/	8	/	/		48	
7794	/	/	10	/	/	10	/	/	10	/	/	10 1/2	/	/	10 1/2	71 1/2	50 + 1/2
7825	/	/	8	/	/	8	/	/	8	/	/	8	/	/		40	
7835	/	/	10 1/2	/	/	10 1/2	/	/	10 1/2	/	/	10 1/2	/	/		7 1/2	60
7895	/	/	8	/	/	8	/	/	8	/	/	8	/	/		40	
7927	/	/	10	/	/	10	/	/	10 1/2	/	/	10	/	/		56 1/2	
7956	/	/	10	/	/	10	/	/	10	/	/	10	/	/		50	
7964	/	/	10	/	/	10	/	/	10	/	/	10	/	/	10	60	
8055	/	/	10	/	/	10	/	/	10	/	/	10	/	/		50	
8069	/	/	8	/	/	8	/	/	8	/	/	8	/	/		40	
8102	/	/	10	/	/	10	/	/	10	/	/	10	/	/	10	60	
8110	/	/	8	/	/	8	/	/	8	/	/	8	/	/		40	
8156	/	/	10	/	/	10	/	/	10 1/2	/	/	10	/	/	10	60 1/2	
8207	/	/	10	/	/	10	/	/	10	/	/	10	/	/		50	
8228	/	/	10	/	/	10	/	/	10	/	/	10	/	/	8	58	
8278	/	/	10 1/2	/	/	10 1/2	/	/	10 1/2	/	/	10 1/2	/	/		63	
8288	/	/	10	/	/	10	/	/	10	/	/	10 1/2	/	/	10	60 1/2	50
8294	/	/	10	/	/	10	/	/	10	/	/	10	/	/		50	
8304	/	/	10 1/2	/	/	10 1/2	/	/	10	/	/	10	/	/		51	
8315	/	/	10	/	/	10	/	/	10	/	/	10	/	/	10	60	
8326	/	/	8	/	/	8	/	/	8	/	/	8	/	/		40	
8333	/	/	10	/	/	10	/	/	10	/	/	10	/	/	10	60	
8340	/	/	10	/	/	10	/	/	10	/	/	10	/	/		50	
TOTALS:	10 1/2	353	352	355 1/2	352 1/2	362	127 1/2	7 1/2									
	—	10 1/2	10 1/2	10 1/2	10 1/2	10 1/2	—										

DEPOSITION
EXHIBIT
Brown 6

BROWN & ROOT, INC.
"LABOR CONTROL SHEET"

WEEK ENDING _____ JOB NO.: 35-1195

BADGE NUMBER	SUNDAY		MONDAY		TUESDAY		WEDNESDAY		THURSDAY		FRIDAY		SATURDAY		BATCH #	TOTAL HRS	REMARKS
	IN	OUT HRS	IN	OUT HRS	IN	OUT HRS	IN	OUT HRS	IN	OUT HRS	IN	OUT HRS	IN	OUT HRS			
8368	10:23	8	/	/	10	/	10	/	10	/	10	/	/	/	7 1/2	65 1/2	
8369	/	/	/	/	10	/	10	/	10	/	10	/	/	/		50	
8431	/	/	/	/	10	/	10	/	10	/	10	/	/	/		50	
8432	/	/	/	/	10	/	10	/	8	/	10	/	8	/		46	
8433	/	/	/	/	8	/	8	/	8	/	8	/	8	/		40	
8440	/	/	/	/	8	/	8	/	8	/	8	/	8	/	2 1/2	40	
8458	/	/	/	/	10	/	10	/	10	/	10	/	10	/		50	
8464	/	/	/	/	8	/	8	/	8	/	8	/	8	/		39 1/2	
8519	/	/	/	/	10	/	10	/	10	/	10	/	10	/		50	
8554	/	/	/	/	10	/	10	/	10	/	10	/	8 1/2	10 1/2		70 1/2	sup 1/2
8580	/	/	/	/	8	/	10	/	8	/	8	/	8	/		42	
8593	/	/	/	/	8	/	8	/	8	/	8	/	8	/		40	
8608	/	/	/	/	10	/	10	/	10	/	10	/	10	/		61 1/2	
8700	/	/	/	/	8	/	10	/	10	/	10	/	10	/		58	
8704	/	/	/	/	10	/	10	/	10	/	10	/	10	/		58	
8719	/	/	/	/	/	/	/	/	/	/	/	/	/	/		-	-
8769	/	10	/	/	/	/	/	/	10	/	10	/	10	/		40	
8777	/	/	/	/	10	/	10	/	10	/	10	/	10	/		860	
8900	/	/	/	/	8	/	8	/	8	/	10	/	10	/		52	
8916	/	/	/	/	8	/	8	/	8	/	8	/	8	/		40	
8957	/	/	/	/	8	/	8	/	8	/	8	/	8	/		40	
9035	/	/	/	/	8	/	8	/	8	/	8	/	8	/		52 1/2	
9048	/	/	/	/	8	/	8	/	8	/	8	/	8	/		41 1/2	
9088	/	/	/	/	8	/	8	/	8	/	8	/	8	/		40	
9089	/	/	/	/	8	/	8	/	10	/	10	/	10	/		51	
9113	/	/	/	/	8	/	8	/	8	/	8	/	8	/		40	
9153	/	10	/	/	8	/	8	/	8	/	8	/	8	/		62 1/2	
9224	/	/	/	/	8	/	8	/	8	/	8	/	8	/		40	
9257	/	/	/	/	10	/	10	/	10	/	10	/	10	/		60	
9259	/	/	/	/	8	/	8	/	8	/	10	/	10	/		55 1/2	
9273	/	/	/	/	8	/	8	/	8	/	8	/	8	/		40	
9279	/	/	/	/	8	/	8	/	8	/	8	/	8	/		40	
9322	/	/	/	/	8	/	8	/	8	/	8	/	8	/		40	
9323	/	/	/	/	10	/	10	/	10	/	10	/	10	/		50 1/2	
9335	/	/	/	/	8	/	8	/	8	/	8	/	8	/		40	
9434	/	/	/	/	10	/	10	/	10	/	10	/	10	/		30	
9438	/	/	/	/	10	/	10	/	10	/	10	/	10	/		50	
9447	/	/	/	/	8	/	8	/	8	/	8	/	8	/		40	
9514	/	/	/	/	8	/	8	/	8	/	8	/	8	/	1 1/2	18	
TOTALS:	20	39 1/2	31 1/2	31 1/2	31 1/2	31 1/2	31 1/2	31 1/2	31 1/2	31 1/2	109 1/2	7 1/2					
	8	10	10	10	10	10	10	10	10	10							

DISPOSITION EXHIBIT
 Brown 7



Brown & Root, Inc.

Post Office Box 1001, Glen Rose, Texas 76043

BADGE #		TIME IN		TIME OUT	* NAME *
1162 ✓	I N	11:00	031-150		Lynn Robertson
7927 ✓	I N	12:00	031-150		Larry G. Finkle
9741 ✓	I N		031-150	11:30	Chas. Hauer
S-160 ✓	I N	1:30	031-150		Larry L. Allen
7794 ✓	I N		031-150	2:30	Jackie Alb
2371 ✓	I N		031-150	2:30	Alan Frost
I057 ✓	I N		031-150	3:30	Larry L. Alder
I071 ✓	I N		031-150	3:30	Larry Kelly
4844 ✓	I N	4:00	031-150		R. Tomberly
Q975 ✓	I N	4:00	031-150		T. Do Byers
X191 ✓	I N	4:00	031-150		Don Holey
J335 ✓	I N		031-150	4:00	Larry Law
2915 ✓	I N		031-150	4:00	Tom Faught
	I N		031-150		
	I N		031-150		
	I N		031-150		

Date 1-14-84

