

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY & LICENSING BOARD

'84 AGO 20 P5:11

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In the matter of: :  
: :  
TEXAS UTILITIES ELECTRIC :  
COMPANY, et al. :  
: :  
(Comanche Peak Steam Electric :  
Station, Units 1 and 2) :  
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DOCKETED  
OFFICE OF SECRETARY  
REGULATORY & SERVICE  
BRANCH  
Docket Nos. 50-445 OL-2  
50-446 OL-2

Room 46  
Glen Rose Motor Inn  
Glen Rose, Texas

August 1, 1984

Deposition of: HOUSTON FLOYD GUNN  
called for examination by counsel for Applicants,  
taken before Margaret Schneider, Court Reporter,  
beginning at 10:47 a.m., pursuant to agreement.

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## APPEARANCES:

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

McNEILL WATKINS, ESQUIRE  
Bishop, Liberman, Cook, Purcell & Reynolds  
1200 Seventeenth Street, Northwest  
Washington, D. C. 20036

For the Deponent, Houston Floyd Gunn, Personally:

R. JEFFREY COPPOCK, ESQUIRE  
Vinson & Elkins  
First City Tower  
Houston, Texas 77002

\* \* \*

I N D E X

WITNESS:

DIRECT

CROSS

REDIRECT

RECROSS

Houston Floyd Gunn

75,004

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P R O C E E D I N G S

10:47 a.m.

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3 MR. WATKINS: Good morning.

4 My name is McNeill Watkins, counsel for the  
5 Applicants in this proceeding.

6 This is the deposition of Houston Gunn.  
7 Applicants will take Mr. Gunn's deposition as part of an  
8 offer of proof that they will make to the Board in this  
9 proceeding.

10 Because this deposition involves an offer  
11 of proof, his examination will consist solely of questions  
12 asked by the Applicant.

13 Mr. Coppock, would you like to identify  
14 yourself?

15 MR. COPPOCK: Yes.

16 My name is Jeff Coppock. I'm with the law  
17 firm of Vinson & Elkins in Houston. I'm here today  
18 representing Mr. Houston Gunn, who is a Brown & Root employee.

19 For purposes of the record, I'd like to  
20 note that Mr. Gunn is appearing here voluntarily and is  
21 not under subpoena.

22 Whereupon,

23 HOUSTON FLOYD GUNN

24 the deponent, having first been duly sworn, was examined  
25 and testified upon his oath as follows:

## DIRECT EXAMINATION

1  
2 BY MR. WATKINS:

3 Q. Mr. Gunn, would you state your full name,  
4 please?

5 A. Houston Floyd Gunn.

6 Q. By whom are you employed?

7 A. Brown & Root.

8 Q. Where are you employed?

9 A. Comanche Peak Steam Electric.

10 Q. Are you a certified QC inspector?

11 A. Yes.

12 Q. Are you a protective coating inspector?

13 A. Yes.

14 Q. Where do you work as a protective coating  
15 inspector?

16 A. I work at the paint fab shop.

17 Q. How long have you been assigned as a QC  
18 inspector in the paint fab shop?

19 A. Seven years in October.

20 Q. Do you remember Robert Hamilton at the time  
21 that he was employed at Comanche Peak?

22 A. Yes.

23 Q. Do you remember Joe Krolak at the time he  
24 was employed at Comanche Peak?

25 A. Yes.

1 Q. Do you remember Sherman Shelton at the time  
2 that he was employed at Comanche Peak?

3 A. Yes.

4 Q. Do you recall the day on which those three  
5 gentlemen were terminated?

6 A. Yes, sir.

7 Q. What is your understanding of the reason  
8 for which they were terminated?

9 A. For refusing to make an inspection.

10 Q. Do you know where the location of the inspec-  
11 tion was that they refused to perform?

12 A. It was Reactor Building 2, a rotating  
13 platform rail.

14 Q. Mr. Gunn, on that day did any of your super-  
15 visors direct you to perform an inspection in Reactor  
16 Building 2 at or around the rotating access platform rail?

17 A. No, sir.

18 Q. How can you be so sure?

19 A. Well, the main reason is I have a phobia  
20 of heights, and I found out when I first came to work there  
21 that I couldn't work at extreme height. I went to manage-  
22 ment and told them what the condition was and offered to  
23 resign.

24 Q. How did you discover that you had this fear  
25 of heights?

1           A.       I went up in a spider basket in Reactor  
2 Building 2 and --

3           Q.       When you were first on the job?

4           A.       About the first -- About the second month  
5 I worked there, yes.

6                    And the spider basket malfunctioned. It  
7 dropped, and I was tied off to a safety line with my safety  
8 belt. When it did, well, it kind of hung me up in the  
9 basket and everything. Then they had to take somebody  
10 up on the platform that they had the basket extended from  
11 and pull the cable back up manually to get me loose, to  
12 get me back down, and --

13          Q.       Did you have to be helped down?

14          A.       Well, I was -- I was in an extremely nervous  
15 state, and it was, you know, kind of weak in the knees,  
16 so to say, you know, frightened or whatever, but --

17          Q.       Mr. Gunn, did your superiors accept your  
18 offer to resign at that time?

19          A.       No, sir. The main reason actually I was  
20 hired anyway was to write our QCs, QCIs and our procedures,  
21 and I was certified as an inspector, also. But they told  
22 me that we only had three inspectors on the job. Didn't  
23 have anybody else certified and couldn't find anybody at  
24 the time.

25                    They told me that as long as the fab shop

1 was up there they had to have a full-time employee there,  
2 and they told me that, you know, that I could have that  
3 job, that I didn't have to work in the reactor building  
4 or climb any heights.

5 Q. After you were initially assigned to the  
6 paint fab shop, Mr. Gunn, did you perform any field  
7 inspections?

8 A. No, sir. I did one Saturday work in  
9 Reactor Building 1, 905 elevation, but it was on the floor.  
10 I did not climb or get off the floor at any time.

11 Q. And is that the only field inspection that  
12 you have performed during your period in the paint fab  
13 shop?

14 A. After the first two months, yes, sir.

15 Q. On the day that Mr. Hamilton, Mr. Shelton,  
16 and Mr. Krolak were terminated, how many QC coating  
17 inspectors were there at Comanche Peak?

18 A. Ongoing or backfit?

19 Q. Ongoing inspectors.

20 A. There were six.

21 Q. How many of those six ongoing paint  
22 inspectors worked on the day shift at that time?

23 A. There were four on days and two on nights.

24 Q. Who were the four that worked days?

25 A. Joe Krolak, Bob Hamilton, Sherman Shelton,



1 and Houston Gunn.

2 Q. So you were the only other inspector on  
3 the day shift at that time?

4 A. Yes, sir.

5 Q. Who were the two night shift QC inspectors?

6 A. Joe Fazi and Bill Dunham.

7 MR. WATKINS: Mr. Coppock, do you have any  
8 questions?

9 MR. COPPOCK: No, I do not.

10 MR. WATKINS: That concludes Mr. Gunn's  
11 testimony.

12 Thank you, Mr. Gunn.

13 (Whereupon, at 10:53 a.m., the deposition  
14 was concluded.)

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CERTIFICATE OF PROCEEDINGS

1 This is to certify that the attached proceedings before the  
2 NRC COMMISSION

3 In the matter of: TEXAS UTILITIES ELECTRIC COMPANY, et al

4 (Deponent: Houston Floyd Gunn)

5 Date of Proceeding: August 1, 1984

6 Place of Proceeding: Glen Rose, Texas

7 were held as herein appears, and that this is the original  
8 transcript for the file of the Commission.

9 Margaret K. Schneider

10 Official Reporter - Typed

11  
12 *Margaret K. Schneider*  
13 Official Reporter - Signature