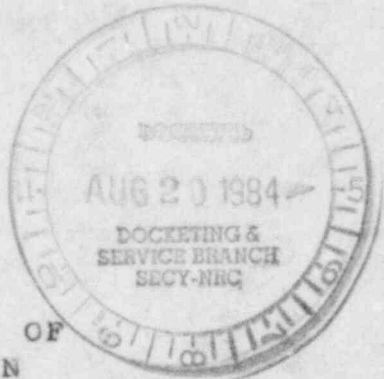


UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY & LICENSING BOARD

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

PROD. NO. 50-445-0L-2
50-446-0L-2

DOCKET NOS.
50-445
50-446



PREFILED TESTIMONY OF
GREGORY BENNETZEN
AUGUST 16 & 18, 1984

PREFILED TESTIMONY OF GREGORY BENNETZEN, taken
on the 16th and 18th days 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 Marigay Black, 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

P R O C E E D I N G S

1
2 MR. WATKINS: This is a prefiled
3 direct testimony of Greg Benitson. Mr. Bennetzen is
4 a Brown & Root employee at Comanche Peak. He is
5 appearing as a witness in this proceeding
6 voluntarily and has not been subpoenaed by any party.

7 My name is McNeill Watkins with the law
8 firm of Bishop, Liberman, Cook, Purcell & Reynolds.
9 We represent the Applicants in this licensing
10 proceeding.

11 GREGORY BENNETZEN,

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

EXAMINATION

16
17 BY MR. WATKINS:

18 Q. Mr. Bennetzen, would you state your full
19 name, please.

20 A. Gregory M. Bennetzen.

21 Q. By whom are you employed, Mr. Bennetzen?

22 A. Brown & Root, Incorporated.

23 Q. Where are you employed?

24 A. At the Comanche Peak project.

25 Q. What is your job title?

1 A. I am the ASME QA/QC N-5 supervisor.

2 Q. Would you briefly describe your duties as
3 the QA/QC N-5 supervisor?

4 A. As N-5 supervisor, I'm responsible for
5 supervising the N-5 reviewers and coordinating the
6 final ASME documentation review and preparation of
7 the N-5 Code Data Reports for Unit 1 and systems
8 common to both units.

9 Q. How many employees do you supervise?

10 A. Ten presently.

11 Q. Is the N-5 group also sometimes referred to
12 as the document review group?

13 A. Yes, sir.

14 Q. How long have you held the title QA/QC N-5
15 supervisor?

16 A. Since late February of this year.

17 Q. Do your document reviewers do any field
18 work?

19 A. No, sir. Their work is office work.

20 Q. Would you describe the work that the
21 document reviewers subject to your supervision
22 perform?

23 A. Let me answer that by describing what steps
24 are taken before documents come into my group for
25 review.

1 Design and engineering comes out with an
2 isometric drawing which shows a piping system and
3 all components and processes relating to
4 installation of that system. The drawing is used by
5 construction to fabricate and install the piping
6 that is part of the system. Pursuant to the ASME
7 Code, QC verifies and inspects -- including NDE
8 tests -- the piping. QC inspectors record their
9 inspections on control documents.

10 When installation is complete, the
11 documents come to my review group for Brown & Root
12 QA final review. My group reviews packages of
13 documents -- travel packages, for example -- to make
14 sure that all hold points have been signed and to
15 make sure that all required documents are included
16 in the package.

17 Q. When your group reads and approves a
18 package, what do they do with the package?

19 A. After satisfactory review by my group, the
20 packages go to ANI, Authorized Nuclear Inspection
21 Agency. If they review and approve a package, it's
22 transferred back to my group, and then it's
23 transmitted to the permanent plant records vault.

24 Q. What does N-5 review involve?

25 A. My group statuses and prepares an N-5 Code

1 Data Report. The Code Data Report covers an entire
2 system shown on an ISO. Prior to preparing the
3 report, the reviewers do quite a bit of work.

4 For example, the reviewer checks for any
5 NCR's against the isometric, make sure the latest
6 flange travelers are reviewed by Brown & Root QA and
7 the ANI. He makes sure that all hydrostatic testing
8 documentation is in the package.

9 When the document reviewer has checked all
10 the attributes, he prepares the N-5 Code Data Report.
11 The report goes through several reviews by my leads
12 and by myself. If the report is acceptable, I have
13 it transmitted to ANI for review and approval.

14 Q. What happens when the N-5 process is
15 complete?

16 A. Then Brown & Root turns the system over to
17 the owner, TUGCO.

18 Q. During your tenure as QA/QC N-5 supervisor,
19 did you supervise Meddie Gregory?

20 A. Yes, sir.

21 Q. Did you, during that time, supervise Linda
22 Barnes?

23 A. Yes, sir.

24 Q. Mr. Bennetzen, have you reviewed Ms.
25 Gregory's testimony regarding your alleged comments

1 in connection with job shoppers?

2 A. Yes, sir.

3 Q. What is a job shopper?

4 A. It's a company that hires or subcontracts
5 personnel to come in and do a specific job for your
6 company.

7 Q. Did you ever state to the document review
8 group that anyone was going to replace those
9 document reviewers with job shoppers?

10 A. No, sir.

11 Q. Did you ever make any remarks to the
12 document review group about the possibility of job
13 shoppers being added to the document review group?

14 A. Yes, sir.

15 Q. On how many occasions did you refer to the
16 possibility of job shoppers being brought into the
17 document review group?

18 A. Once.

19 Q. Where did you make these remarks?

20 A. In a meeting with my N-5 personnel.

21 Q. What was the substance of your remarks?

22 A. I told my personnel that our management had
23 told me that the owner was concerned with the amount
24 of N-5's that we were completing, and asked if we
25 would need additional help such as job shoppers.

1 Q. Mr. Bennetzen, did you think that adding
2 job shoppers to your group was a bad idea?

3 A. Yes, sir.

4 Q. Did you express that opinion to the
5 document reviewers at this meeting?

6 A. Yes, sir.

7 Q. What opinion did you express?

8 A. I told my personnel that we could do the
9 job ourselves. All we needed to do is work as a
10 team. And that as all of them knew, we did not need
11 job shoppers coming in making more money than all of
12 us, and thus having to train them on how to -- how
13 to make up an N-5.

14 Q. Now, you testified that your management has
15 been told by the client about the possibility of
16 bringing in job shoppers. Who in your management
17 conveyed this concept to you?

18 A. My immediate supervisor, Bob Siever, and
19 the QA manager, Gordon Purdy.

20 Q. As he related the idea to you, did it
21 involve replacing your document reviewers with job
22 shoppers?

23 A. No, sir.

24 Q. What was the idea?

25 A. Giving us additional help.

1 Q. Did Mr. Siever or Mr. Purdy ask you for
2 your opinion of the idea of bringing in job shoppers?

3 A. No, sir.

4 Q. Did you express an opinion to them, anyway?

5 A. Yes, sir.

6 Q. What was that opinion?

7 A. I told them that I thought we could handle
8 it on our own and we did not need a bunch of job
9 shoppers in there getting in our way.

10 Q. Mr. Bennetzen, were job shoppers ever
11 brought into the document review group?

12 A. No, sir.

13 Q. Mr. Bennetzen, have you reviewed Ms.
14 Gregory's testimony that, quote, out of the clear
15 blue, close quote, you made a statement regarding
16 loyalty to the company?

17 A. Yes, sir.

18 Q. Mr. Bennetzen, did you make the statement
19 that is quoted on page 54,525 of Ms. Gregory's
20 testimony, and I quote: "Those that are loyal to the
21 company will stay, and those who are not will hit
22 the gate"?

23 A. No, I never said that.

24 Q. Mr. Bennetzen, do you remember making a
25 remark one day about loyalty to the company?

1 A. Yes, sir.

2 Q. Would you relate the occasion for that
3 remark?

4 A. I was pacing through the office one
5 afternoon, and Linda Barnes stopped me and asked me
6 why I put Walter Trautschold in the position of
7 reviewing the documentation involved within a
8 hydrostatic test package.

9 Q. What was your response to Ms. Barnes?

10 A. I told Ms. Barnes that Walter would take a
11 little while to understand the program, but once he
12 had worked in it for awhile, I believe he would do
13 us a very good job. She stated to me that she
14 didn't believe that Walter could handle the job.

15 Q. And what was your response?

16 A. I told her I believed that she was wrong,
17 and that management had made the decision that he
18 would be the person replacing Kay Gilley, who was
19 the one that was leaving, and that Walter was a very
20 loyal employee; he was here every day, never late,
21 and that in our group we definitely needed more
22 employees like Walter.

23 Q. Mr. Bennetzen, where had you been
24 immediately before this conversation?

25 A. I had been in a meeting with two of my

1 personnel who had turned in their resignations
2 without giving me notice.

3 Q. Was that one reason for your remark about
4 loyalty?

5 A. Yes, sir.

6 Q. How long have you known Walter Trautschold?

7 A. 20 to 22 years.

8 Q. How old were you when you met Mr.
9 Trautschold?

10 A. I was about 12 years old.

11 Q. And how old was Mr. Trautschold?

12 A. Five or six, probably.

13 Q. Where did you first meet Mr. Trautschold?

14 A. In Waco, Texas.

15 Q. Did you grow up in Waco?

16 A. Yes, sir.

17 Q. Were you close to Walter's family?

18 A. Yes, sir. His older brother was my best
19 friend.

20 Q. Is Walter's brother still your best friend?

21 A. No, sir. His brother is deceased.

22 Q. When did he die?

23 A. Roughly 15 to 16 years ago. He was killed.

24 Q. Mr. Bennetzen, earlier in your testimony
25 you stated that Walter may take a while to

1 understand a program. Would you explain that
2 statement?

3 A. Walter received very serious head injuries
4 around five years ago in a motorcycle accident.

5 Q. Is Walter, in your judgment and in the
6 judgment of your supervisors, as far as you know,
7 capable of doing his job?

8 A. Yes, sir. And is certified as such.

9 Q. Mr. Bennetzen, have you reviewed Meddie
10 Gregory's testimony that you pushed document
11 reviewers for, quote, 40 ISO's a week, close quote?

12 A. Yes, sir.

13 Q. To what document do you think Ms. Gregory
14 was actually referring?

15 A. She was referring to preparation of N-5
16 Data Reports.

17 Q. Mr. Bennetzen, during the entire time you
18 supervised Meddie Gregory, did she ever prepare a
19 single N-5 Data Report?

20 A. No, sir.

21 Q. What was her job?

22 A. She was more or less a clerical employee.
23 She was responsible for logging, filing and
24 transmitting documents for the Brown & Root QA group.

25 Q. Mr. Bennetzen, did you ever encourage a

1 group of N-5 document reviewers to prepare 40 N-5
2 Data Reports per week?

3 A. Yes, sir.

4 Q. Would you explain the source for that goal?

5 A. Yes, sir. I had discussed with Mr. Purdy
6 the number of isometric N-5's that we had left to do,
7 and, with our personnel, a reasonable time by which
8 we could finish completing them.

9 Q. How many did you have to prepare?

10 A. Roughly seven hundred. Based on our
11 evaluation of our capabilities, we came up with a
12 goal of 40 ISO N-5's a week.

13 Q. Mr. Bennetzen, was this goal a quota?

14 A. No, sir.

15 Q. How many document reviewers did you have at
16 that time who were qualified to perform N-5 reviews?

17 A. Roughly 20.

18 Q. Therefore, to meet the goal of 40 per week,
19 each reviewer would have to prepare two per week; is
20 that correct?

21 A. Yes, sir.

22 Q. Was that goal reasonably achievable to you?

23 A. Yes, sir.

24 Q. Did you explain this goal to the document
25 reviewers?

1 A. Yes, sir.

2 Q. How did you do that?

3 A. I explained to them that we had calculated
4 a completion date for Unit 1 N-5's and that we have
5 so many ISO's to certify, and that we had come up
6 with a goal to try to meet and that was 40 ISO N-5's
7 a week.

8 Q. Mr. Bennetzen, in your judgment, how long
9 should it take the average document reviewer to
10 status and prepare an average N-5 Data Report for an
11 average ISO?

12 A. Somewhere between five or six hours.

13 Q. Were you, therefore, in establishing a goal
14 of 40 per week, giving your document reviewers the
15 benefit of the doubt?

16 A. Yes, sir.

17 Q. After you've explained the goal to your
18 document reviewers, what was the maximum number of
19 isometric N-5 Data Reports that your group prepared
20 in a week?

21 A. We had 92 isometric N-5's in one week.

22 Q. Did your group ever fail to produce 40 N-5
23 Data Reports?

24 A. Several weeks.

25 Q. In your review, what was the reason for

1 that?

2 A. It was not the reviewers' fault. It was --
3 they had started statusing and preparing Data
4 Reports and ran into a problem or had
5 deficiencies within the documentation on that
6 isometric N-5 and had written up the deficiencies,
7 QA deficiencies, against them, but had not -- had
8 failed to input those deficiencies into the master
9 data base, which is a computer printout of all work
10 left to do in Unit 1 and common for construction,
11 engineering and the owner to status their remaining
12 work.

13 Q. Was it your view that your document
14 reviewers were not to blame for this problem?

15 A. Yes, sir.

16 Q. Did you communicate your belief to your
17 document reviewers?

18 A. Yes, sir.

19 Q. On more than one occasion?

20 A. Several times in meetings I conveyed that
21 to them.

22 Q. For those weeks in which your document
23 reviewers did not produce 40 N-5 Data Reports per
24 week, did you ever take any action against the group
25 for its failure to do so?

1 A. No, sir.

2 Q. Did you ever take any action against any
3 individual for failure to do so?

4 A. No, sir.

5 Q. Did you review Ms. Gregory's testimony that
6 you placed your group on a schedule of working six
7 12-hour days?

8 A. Yes, sir.

9 Q. Did your group work six 12-hour days, Mr.
10 Bennetzen?

11 A. Yes, sir.

12 Q. For how long?

13 A. Two weeks.

14 Q. Mr. Bennetzen, have you reviewed the
15 testimony of Linda Barnes in this proceeding in
16 which she testified that she went to you one day and
17 expressed a concern about disk numbers on valves
18 that did not match?

19 A. Yes, sir.

20 Q. Mr. Bennetzen, do you remember this
21 conversation?

22 A. No, sir.

23 Q. Do you remember ever having any
24 conversation with Ms. Barnes regarding disk numbers?

25 A. No, sir.

1 Q. Mr. Bennetzen, as a QA supervisor, would
2 the cost of an operation or QC function in any way
3 affect your judgment of what had to be done if that
4 operation or function was required by QA/QC
5 procedures?

6 A. No, sir.

7 Q. If an inspection function is required to be
8 performed, would you ever hesitate to order that
9 function or to perform it yourself because it would
10 be costly?

11 A. No, sir.

12 MR. WATKINS: That will conclude this
13 portion of Mr. Bennetzen's testimony.

14 (There being no further questions,
15 (the deposition of Mr. Bennetzen
16 (was adjourned

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I, Marigay Black, RPR, Certified Shorthand Reporter in and for the State of Texas, do hereby certify that there came before me on the 16th and 18th days of August, A. D., 1984, at the Glen Rose Motor Inn, Glen Rose, Texas, the following named person, to-wit: Gregory Bennetzen, who was by me duly sworn to testify the truth and nothing but the truth of his knowledge touching and concerning the matters in controversy in this cause; and that he was thereupon examined upon his oath and his examination reduced to writing; same to be sworn and subscribed to by said witness before any notary public.

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

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

1 1984.

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MARIGAY BLACK, 351, RPR, CSR
IN AND FOR THE STATE OF TEXAS
1226 Commerce, Suite 411
Dallas, Texas 75202
(214) 742-3035

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7 My commission expires December 31, 1984

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