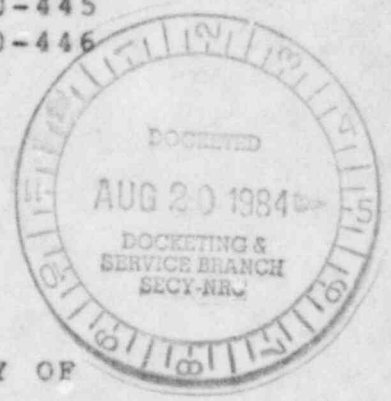


UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY & LICENSING BOARD

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

DOCKET NUMBER 50-445-02-2
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PREFILED TESTIMONY OF
KENNETH LIFORD
JOHN R. JOHNSON
JAMES W. CALICUTT
AUGUST 19, 1984

PREFILED TESTIMONY OF KENNETH LIFORD, JOHN R.
JOHNSON and JAMES W. CALICUTT, taken on the 19th 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:

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BY: Mark L. Davidson, Esq.

APPEARING FOR APPLICANTS

P R O C E E D I N G S

1
2 MR. DAVIDSON: My name is Mark L.
3 Davidson. I am a member of the firm of Bishop,
4 Liberman, Cook, Purcell & Reynolds, counsel for the
5 Applicant in these proceedings. I am accompanied
6 here today by Mr. Ken Liford, Mr. James Calicutt and
7 Mr. John R. Johnson for the purpose of taking these
8 gentlemen's direct testimony and preparing the same
9 for prefiling pursuant to a procedure ordered by the
10 Atomic Safety Licensing Board.

11 Ms. Reporter, would you please swear in
12 these witnesses, who would appear here today as a
13 panel, so we may begin their direct examination by
14 way of this deposition.

15 KENNETH LIFORD,

16 JOHN R. JOHNSON and

17 JAMES W. CALICUTT,

18 the witnesses hereinbefore named, being first duly
19 cautioned and sworn to testify the truth, the whole
20 truth and nothing but the truth, testified on their
21 oaths as follows:

22 MR. DAVIDSON: Mr. Liford, for the
23 record, would you please state your full name,
24 current employer and the capacity in which you are
25 currently employed

1 MR. LIFORD: Kenneth Liford, Brown &
2 Root, assistant general superintendent.

3 MR. DAVIDSON: And would you please
4 describe or relate to us your work history at
5 Comanche Peak and the date you were hired there
6 until the present?

7 MR. LIFORD: I was hired January '78.
8 I was hired in as a piping superintendent. I was
9 the piping superintendent until a year and-a-half,
10 plus or minus. Went to assistant general
11 superintendent then, and am still in that capacity.

12 MR. DAVIDSON: As a piping
13 superintendent, Mr. Liford, what were your
14 responsibilities?

15 MR. LIFORD: Piping, welding, hangers
16 and insulation.

17 MR. DAVIDSON: And as a piping
18 superintendent during the period January '78 until
19 approximately a year and-a-half ago, about how many
20 individuals did you supervise?

21 MR. LIFORD: From 1100 to 1400.

22 MR. DAVIDSON: How many individuals
23 directly reported to you, and what were their titles
24 or capacities?

25 MR. LIFORD: At the peak when we had

1 the most people out there, I had approximately six
2 superintendents reporting to me.

3 MR. DAVIDSON: And after you became
4 assistant general superintendent, how many people
5 reported directly to you?

6 MR. LIFORD: That was when I was
7 referring to.

8 MR. DAVIDSON: I'm sorry. I believe
9 my question was when you were piping superintendent,
10 how many people did you have directly reporting to
11 you and what were their capacities?

12 MR. LIFORD: I had about 1100 people
13 working for me. Out of that, I had one
14 superintendent and several general foremen and
15 foremen reporting to me.

16 MR. DAVIDSON: I believe it's your
17 testimony that subsequently you were promoted to
18 assistant general superintendent and you had six
19 superintendents reporting to you?

20 MR. LIFORD: Approximately, yes.

21 MR. DAVIDSON: And how many people
22 were under your general supervision at that time?

23 MR. LIFORD: Ranged from 1100 to 1400.

24 MR. DAVIDSON: Mr. Calicutt, would you
25 please tell us, for the record, your full name, your

1 current employer, current capacity in which you are
2 so employed.

3 MR. CALICUTT: James Walter Calicutt.
4 Work for Brown & Root as a general mechanical
5 superintendent.

6 MR. DAVIDSON: Mr. Calicutt, would you
7 please relate your work history at Comanche Peak
8 from the date you were hired on to the present,
9 detailing also for us your responsibilities during
10 that period.

11 MR. CALICUTT: I have been over all
12 mechanical activities since I've been there.

13 MR. DAVIDSON: Has your position
14 changed since you were hired at Comanche Peak?

15 MR. CALICUTT: No.

16 MR. DAVIDSON: When was that, sir?

17 MR. CALICUTT: May of 1978.

18 MR. DAVIDSON: And in the capacity as
19 general mechanical superintendent, how many people
20 did you supervise?

21 MR. CALICUTT: I have two assistant --
22 at one time I had two assistant superintendents and
23 one superintendent reporting directly to me.

24 MR. DAVIDSON: And how many people
25 overall were you responsible for?

1 MR. CALICUTT: At the peak, between 14
2 and 15 men.

3 MR. DAVIDSON: Mr. Johnson, would you
4 please state, for the record, your full name,
5 current employer and the capacity in which you are
6 employed currently.

7 MR. JOHNSON: John Ronald Johnson,
8 Brown & Root, and superintendent.

9 MR. DAVIDSON: In what area, sir?

10 MR. JOHNSON: Superintendent of civil
11 and mechanical in Reactor Number 2.

12 MR. DAVIDSON: Mr. Johnson, would you
13 please tell us when you were first hired to work at
14 Comanche Peak, and would you relate thereafter your
15 subsequent work history, including any promotions or
16 changes in responsibilities that you may have had?

17 MR. JOHNSON: June 1975 I hired in as
18 a carpenter. Approximately two weeks later I was
19 sent up to carpenter foreman. Six months later
20 general foreman, Building Department. Approximately
21 six months after that, assistant superintendent
22 Civil Department. Probably six months after that,
23 building superintendent, night shift. About a year
24 and-a-half after that I was put on days as a hanger
25 superintendent; about three years and nine months of

1 that. Then I went to Reactor Number 1 Task Force,
2 craft superintendent, ten months. Now present.

3 MR. DAVIDSON: Mr. Liford, is there a
4 policy in effect at Comanche Peak regarding the
5 manner in which construction personnel are to relate
6 to QC/QA personnel?

7 MR. LIFORD: Yes.

8 MR. DAVIDSON: What is your
9 understanding of the policies, sir?

10 MR. LIFORD: The policy between
11 construction and Quality Control on the project is
12 simple working relationship to where each group does
13 their specific job. There is no harassing,
14 intimidating, threatening from one group to the
15 other.

16 MR. DAVIDSON: When you say there is
17 no harassing, intimidating and threatening between
18 one group and another, do you mean that it is the
19 policy that craft are not to engage in that kind of
20 conduct with QC/QA personnel?

21 MR. LIFORD: Yes.

22 MR. DAVIDSON: Explain to me what you
23 understood the policy in that regard to be.

24 MR. LIFORD: Construction personnel
25 are not allowed to harass, intimidate or threaten

1 Quality Control personnel.

2 MR. DAVIDSON: What happens if they do,
3 sir? What is the policy on that?

4 MR. LIFORD: They are terminated.

5 MR. DAVIDSON: Is there any policy of
6 which you are aware that is in effect at Comanche
7 Peak regarding the manner in which disagreements
8 between craft personnel, QC/QA personnel should be
9 handled?

10 MR. LIFORD: Yes. Any time a
11 disagreement between construction and QC or QA
12 personnel occurs, then it is taken to the next
13 immediate supervisor until it is resolved.

14 MR. DAVIDSON: Now, when did you first
15 become aware of these policies, Mr. Liford?

16 MR. LIFORD: Became aware of the
17 policies prior to coming to Comanche Peak.

18 MR. DAVIDSON: How is that, sir?

19 MR. LIFORD: I worked on a nuclear
20 power station in Wilmington, North Carolina. The
21 policies are the same.

22 MR. DAVIDSON: How do you know the
23 policies are the same?

24 MR. LIFORD: Both projects were Brown
25 & Root construction, and Brown & Root's policies are

1 the same.

2 MR. DAVIDSON: When were you first
3 made aware of these policies, sir?

4 MR. LIFORD: Upon indoctrination into
5 Brunswick Steam Electric Station.

6 MR. DAVIDSON: About what date was
7 that?

8 MR. LIFORD: Approximately '76

9 MR. DAVIDSON: When you were hired in
10 January 1978 as pipe superintendent at Comanche Peak,
11 did anyone reemphasize, remind you of the Brown &
12 Root policies that you have just mentioned?

13 MR. LIFORD: U. D. Douglas, who is
14 project manager, and Doug Frankum, who was assistant
15 project manager, discussed the policies and the
16 problems prior to me going to work.

17 MR. DAVIDSON: When you say they
18 discussed the policies, do you mean the policies of
19 Brown & Root with respect to the manner in which
20 craft people should treat QC/QA personnel and how
21 craft individuals should resolve differences of
22 opinion with QC/QA personnel?

23 MR. LIFORD: Yes. And other policies,
24 job policies.

25 MR. DAVIDSON: Were these discussions

1 that you had with Mr. Douglas and Mr. Frankum part
2 of your indoctrination?

3 MR. LIFORD: Yes.

4 MR. DAVIDSON: How were they
5 administered to you? In other words, under what
6 circumstances did these discussions occur?

7 MR. LIFORD: When I came on site and
8 was called to a meeting with Mr. Frankum and Mr.
9 Douglas, we sat and discussed policies, procedures
10 and problems in the area that I was to be over.

11 MR. DAVIDSON: When you say problems
12 in the area that you were to supervise, what do you
13 mean?

14 MR. LIFORD: Problems of -- in the
15 manner like engineering problems, QA/QC problems,
16 construction problems; just loose run of all types
17 of problems that they were aware of in the
18 department that I was taking over.

19 MR. DAVIDSON: What QC/QA problems did
20 Mr. Douglas and Mr. Frankum discuss with you?

21 MR. LIFORD: Procedural problems.

22 MR. DAVIDSON: Could you amplify on
23 that for me?

24 MR. LIFORD: There were, when I first
25 came here, several procedural type problems

1 concerning QA/QC procedure and a construction
2 procedure that did not say the same thing. Part of
3 my task was to get a correlation between the
4 construction procedures and the Quality Control
5 procedures so everybody was operating with the same
6 words in each specific procedure.

7 MR. DAVIDSON: Mr. Liford, after you
8 received this indoctrination, did you make any
9 effort to communicate the policies that you had been
10 reminded of by Messrs. Frankum and Douglas to those
11 individuals who were to be your subordinates in the
12 department that you were going to supervise?

13 MR. LIFORD: Yes.

14 MR. DAVIDSON: Would you please
15 describe those efforts.

16 MR. LIFORD: After approximately three
17 weeks on the job site reviewing procedures,
18 reviewing the craft production, number of NCR's that
19 they were getting, the delivery of material,
20 everything, I called a meeting with everyone that
21 worked for me on a supervisory capacity and went
22 over all the aspects of the job, including the
23 policies for the site concerning Quality Control and --
24 QA/QC, engineering and craft.

25 MR. DAVIDSON: And at that meeting you

1 emphasized that the harassment, intimidation or
2 threatening of QA/QC personnel would not be
3 tolerated and disagreements were to be handled in a
4 professional manner, and where they could not be
5 resolved in the field, they should be taken up to
6 supervisors?

7 MR. LIFORD: Yes

8 MR. DAVIDSON: At any time subsequent
9 to that meeting did you undertake to reinforce or
10 reiterate the policies of which you were aware
11 regarding relationship with QC/QA by craft personnel
12 among your subordinates?

13 MR. LIFORD: The answer to your
14 question is yes. I have always dealt with anybody
15 working for me to the point that -- of conveying to
16 them the way the job was to be run and how they were
17 to conduct theirself when dealing with QA/QC.

18 MR. DAVIDSON: Now, when you say that
19 you have always attempted to emphasize these
20 policies and explain them to your subordinates, when
21 you were pipe superintendent you were supervising
22 general foremen and foremen; is that correct?

23 MR. LIFORD: Yes.

24 MR. DAVIDSON: Are you saying that you
25 undertook, at meetings or in discussions, to

1 emphasize to these general foremen and foremen what
2 the policies were for dealing with QA/QC personnel?

3 MR. LIFORD: Yes.

4 MR. DAVIDSON: Did you make any effort
5 to communicate these policies to people below the
6 level of general foreman and foreman?

7 MR. LIFORD: Yes.

8 MR. DAVIDSON: What efforts did you
9 make?

10 MR. LIFORD: Any time that we have a
11 meeting with supervisors, within approximately two
12 days after the meeting I usually go out into the
13 field and talk to the fitters, welders, helpers to
14 find out has the word of the policy been transmitted
15 down to that level.

16 MR. DAVIDSON: Mr. Calicutt, when were
17 you first made aware of any policies regarding the
18 way in which it was expected at Comanche Peak that
19 craft and QC/QA personnel would relate to each other?

20 MR. CALICUTT: When I was hired on.

21 MR. DAVIDSON: And what policies were
22 explained to you at that time?

23 MR. CALICUTT: All Brown & Root
24 policies.

25 MR. DAVIDSON: Were any policies

1 specifically regarding the manner in which craft was
2 to treat QC/QA personnel and deal with disagreements
3 with them discussed with you?

4 MR. CALICUTT: Yes, they were.

5 MR. DAVIDSON: Could you tell us what
6 those policies were?

7 MR. CALICUTT: I was told that dealing
8 with QA/QC would be handled in a professional manner.
9 If they had disagreements, it would be brought up to
10 the letter until it was solved.

11 MR. DAVIDSON: Was any mention made as
12 to whether or not it was appropriate to fight or
13 argue with QC/QA, or otherwise harass, intimidate or
14 threaten such individuals?

15 MR. CALICUTT: That was a no-no.
16 There was to be none of that.

17 MR. DAVIDSON: When you say that was a
18 no-no and there was to be none of that, what do you
19 mean?

20 MR. CALICUTT: I mean that you would
21 be terminated.

22 MR. DAVIDSON: And that was made clear
23 to you, sir?

24 MR. CALICUTT: Yes, it was.

25 MR. DAVIDSON: And who made these

1 policies clear to you, and explained them to you,
2 when you hired on at the Peak?

3 MR. CALICUTT: Mr. U. D. Douglas and
4 Doug Frankum.

5 MR. DAVIDSON: In what cases or
6 circumstances did they explain that?

7 MR. CALICUTT: As I was being informed
8 of my duties when I got to Comanche Peak.

9 MR. DAVIDSON: At that time they took
10 the occasion to explain these policies to you?

11 MR. CALICUTT: Yes, they did.

12 MR. DAVIDSON: Subsequent to your
13 meeting with Messrs. Douglas and Frankum at which
14 they explained the policies that were in force
15 regarding the manner in which craft would deal with
16 QC/QA personnel, did you personally make any effort
17 to see to it that those policies, as you understood
18 them, were communicated to your subordinates?

19 MR. CALICUTT: Yes, I did.

20 MR. DAVIDSON: What efforts did you
21 make, sir, to communicate the policies on dealing
22 with QA/QC personnel?

23 MR. CALICUTT: I had meetings with
24 superintendents under me.

25 MR. DAVIDSON: Sir, when you say

1 "meetings," did you mean that you had more than one
2 such meeting with the individuals who were
3 subordinate to you?

4 MR. CALICUTT: Yes.

5 MR. DAVIDSON: How often or how
6 frequently did you hold such meetings?

7 MR. CALICUTT: About once a month.

8 MR. DAVIDSON: Were these meetings
9 solely to discuss the proper relationship between
10 craft and QA/QC personnel, or were other subjects
11 discussed?

12 MR. CALICUTT: Other subjects would be
13 discussed.

14 MR. DAVIDSON: Did you also include in
15 those discussions, however, mention of the policies
16 regarding the relationship between craft personnel
17 and QC/QA?

18 MR. CALICUTT: Quite frequently.

19 MR. DAVIDSON: Other than having
20 meetings with the superintendants who reported to
21 you at which you communicated the policies regarding
22 the way in which craft would deal with QC/QA
23 personnel, did you make any effort to see to it that
24 those individuals communicated that policy down to
25 the craft personnel they supervised?

1 MR. CALICUTT: Yes. When I was in the
2 field, I would ask foremen, general foremen, crafts
3 people if they had been made aware of that.

4 MR. DAVIDSON: You would specifically
5 ask them that question?

6 MR. CALICUTT: Yes.

7 MR. DAVIDSON: And were you convinced,
8 based on these discussion and question sessions that
9 you had with various craft personnel, that the
10 message was being communicated?

11 MR. CALICUTT: Yes.

12 MR. DAVIDSON: Do you know whether, as
13 part of the indoctrination program at the Peak for
14 all new employees, any discussions are had or
15 mention made of policies that are in force regarding
16 the proper relationship between craft personnel and
17 QA/QC?

18 MR. CALICUTT: I believe it's in the
19 indoctrination.

20 MR. DAVIDSON: So therefore, all
21 employees receive this information when they're
22 employed and then receive it again through
23 communication by their superiors?

24 MR. CALICUTT: That's correct.

25 MR. DAVIDSON: Both at the time they

1 are hired and subsequently, just as you did with
2 your subordinates?

3 MR. CALICUTT: Yes.

4 MR. DAVIDSON: Mr. Johnson, when you
5 were hired on at the Peak, were you made aware of
6 the existence of any policies with regard to the
7 manner in which craft were to relate to QC/QA
8 personnel?

9 MR. JOHNSON: No.

10 MR. DAVIDSON: Were you ever made
11 aware of such policies?

12 MR. JOHNSON: Yes, sir.

13 MR. DAVIDSON: When were you first
14 made aware of them?

15 MR. JOHNSON: It would be the latter
16 part of 1979, around November.

17 MR. DAVIDSON: How is it that you were
18 first made aware of these policies when you were
19 first hired on, sir?

20 MR. JOHNSON: Concerning the QC
21 programs and stuff, I was involved with non-Q
22 buildings and temporary sites and things like that.
23 And then whenever it came time for me to be moved
24 down to hole, that's when I was indoctrinated on
25 policies with QC.

1 MR. DAVIDSON: If I understand you
2 correctly, Mr. Johnson, what you're saying is that
3 your initial employment at the Peak did not involve
4 what is known as Q-related equipment or jobs, and
5 that the work you did was not subject to inspection
6 by QC/QA personnel?

7 MR. JOHNSON: That's right.

8 MR. DAVIDSON: And therefore, you were
9 not indoctrinated to craft QC personnel because it
10 was not related to your job function?

11 MR. JOHNSON: That's correct.

12 MR. DAVIDSON: Now, subsequent to that
13 time you were hired as a carpenter, you were
14 transferred to areas that you would be employed in
15 work on safety-related equipment, that was Q
16 equipment, and that you would thereafter have to
17 relate to QA/QC personnel?

18 MR. JOHNSON: I think I understand
19 your question. Yes, that's it.

20 MR. DAVIDSON: And at the time that
21 you were assigned to the power block in a Q area,
22 that is the time that you were given indoctrination
23 into the policies of Brown & Root with respect to
24 the manner in which craft personnel were to relate
25 to QC/QA personnel?

1 MR. JOHNSON: That's right.

2 MR. DAVIDSON: What indoctrination
3 were you given?

4 MR. JOHNSON: Mr. Raymond Hebert was
5 my general foreman at the time. He had a meeting
6 with me and told me how the QC program worked and
7 how we were supposed to deal with those people.

8 MR. DAVIDSON: What did he tell you
9 specifically about the way in which you were to deal
10 with QC/QA people?

11 MR. JOHNSON: That if we had a problem
12 arise that could not be handled between myself and
13 the QC inspector, that I was then to inform him of
14 the problem and to handle my part of it with
15 professionalism, not to get boisterous or no cursing,
16 so forth like that, and that he would take it up
17 with the QC lead inspectors.

18 MR. DAVIDSON: Did he tell you whether
19 there was any policy regarding the harassment,
20 intimidation or threatening of QC/QA personnel by
21 craft?

22 MR. JOHNSON: Yes, sir.

23 MR. DAVIDSON: What did he tell you,
24 sir?

25 MR. JOHNSON: He told me at the time

1 there would be no harassment of QC, because if it
2 was, it would be subject to termination.

3 MR. DAVIDSON: At any time subsequent
4 to your conversation with Mr. Hebert regarding these
5 policies, were you reminded or told once again about
6 the existence of these policies at Comanche Peak?

7 MR. JOHNSON: Yes.

8 MR. DAVIDSON: Could you relate to us
9 what those times or occasions were when that policy
10 was reemphasized to you?

11 MR. JOHNSON: I cannot relate no
12 special time as far as work with Raymond was
13 concerned, except that during the time installing
14 anchor bolts, hilti bolts, things like that, that
15 the procedures, qualitywise and QC-wise, would be
16 some differences of opinion. And we would discuss
17 what went on in the field, and again he would tell
18 me make sure that you don't mistreat or harass the
19 QC people.

20 MR. DAVIDSON: When you say "he," do
21 you mean Mr. Hebert?

22 MR. JOHNSON: Right.

23 MR. DAVIDSON: Did any of your other
24 supervisors remind you or reemphasize this policy?

25 MR. JOHNSON: Yes, sir.

1 MR. DAVIDSON: Who were they, sir?

2 MR. JOHNSON: James Calicutt, Hal
3 Goodson, Hal Lawford, Doug Frankum.

4 MR. DAVIDSON: Subsequent to the time
5 you began working for Mr. Hebert, at one time or
6 another did they remind you of the policies
7 regarding QC personnel?

8 MR. JOHNSON: Prior to working with
9 Hebert?

10 MR. DAVIDSON: Subsequent.

11 MR. JOHNSON: Yes.

12 MR. DAVIDSON: Do you remember on
13 which occasions these individuals reminded you or
14 reemphasized the policies in effect regarding the
15 policies of QA/QC personnel?

16 MR. JOHNSON: The only special times I
17 remember would be the time I was called in to Mr.
18 Frankum's office about the intimidation charge
19 against Eddie Niedecken and Charles Reeves and Mike
20 Hundly.

21 MR. DAVIDSON: So these were incidents
22 in which allegations were made that you might have
23 violated the policies of which you were aware, and
24 Mr. Frankum was discussing those incidents with you
25 and reminded you of the policies and asked you for

1 your response with respect to the claims that were
2 made against you?

3 MR. JOHNSON: That's right.

4 MR. DAVIDSON: Did Mr. Calicutt ever
5 reemphasize or reiterate to you any of the policies
6 on how to deal with QA/QC personnel and how to
7 resolve differences with them?

8 MR. JOHNSON: Yes.

9 MR. DAVIDSON: On what occasion did
10 Mr. Calicutt do that?

11 MR. JOHNSON: Whenever we had
12 superintendents' meeting up there, he would call us
13 together and talk to us about job problems and so
14 forth, and during the course of the conversation,
15 we'd be reminded of how we was supposed to carry on
16 our business.

17 MR. DAVIDSON: Mr. Johnson, did you
18 ever communicate or make any effort to communicate
19 these policies regarding the treatment of QA/QC
20 personnel, as you understood them, to your
21 subordinates and the craft people you supervised?

22 MR. JOHNSON: Yes, sir.

23 MR. DAVIDSON: What efforts, sir, did
24 you make?

25 MR. JOHNSON: We would have meetings

1 in my office with the general foreman; sometimes
2 general foremen and foremen. And then after that
3 was done, to make a followup, talk to the people in
4 the fields and see if they had the word.

5 MR. DAVIDSON: Mr. Liford, did you
6 have any occasion to implement the policies about
7 which you've testified here today?

8 MR. LIFORD: Yes.

9 MR. DAVIDSON: Did you have any
10 occasion to implement or give effect to the policy
11 you have described in which it is a termination
12 offense to harass, intimidate or threaten a QC/QA
13 person?

14 MR. LIFORD: Yes.

15 MR. DAVIDSON: Would you please
16 describe those incidents or those occasions on which
17 you gave implementation to that policy?

18 MR. LIFORD: From the time I come on
19 site until now, I have had to terminate three
20 employees for threatening QC inspectors.

21 MR. DAVIDSON: When you say three
22 employees, you mean three craft employees?

23 MR. LIFORD: Yes.

24 MR. DAVIDSON: Who were under your
25 supervision?

1 MR. LIFORD: Yes.

2 MR. DAVIDSON: Could you tell us about
3 each of those incidents where you were required to
4 terminate craft personnel for harassing,
5 intimidating or otherwise threatening a QC inspector?

6 MR. LIFORD: As far as giving specific
7 background on each one, no. The last one --

8 MR. DAVIDSON: First, how many such
9 occasions were there, sir?

10 MR. LIFORD: Three. The last occasion
11 was strictly a threat by construction hand against
12 bodily harm of a Quality Control inspector. The
13 other two were similar, but I can't remember the
14 details of them.

15 MR. DAVIDSON: When you say you can't
16 remember the details, are you saying that you cannot
17 remember the names of the craft individuals whom you
18 terminated for violation of the policies?

19 MR. LIFORD: I don't. No, I can't.

20 MR. DAVIDSON: Do you remember the
21 name of the QC inspector or QC representative who
22 was involved?

23 MR. LIFORD: No.

24 MR. DAVIDSON: Can you remember who
25 the superintendent of the craft employee that you

1 told me about, was?

2 MR. LIFORD: Vaguely, yes. Two of
3 them worked for Gary Cox who was the superintendent
4 for me at the time.

5 MR. DAVIDSON: In what discipline, sir?

6 MR. LIFORD: In piping. The last one
7 I believe was Gene Everson.

8 MR. DAVIDSON: Was he a superintendent
9 also, sir?

10 MR. LIFORD: He was also a piping
11 superintendent.

12 MR. DAVIDSON: When, if you recollect,
13 did Mr. Everson come to you regarding the problem
14 that you ultimately resolved by terminating a craft
15 person?

16 MR. LIFORD: Mr. Everson did not have
17 the opportunity to come to me first.

18 MR. DAVIDSON: In other words, you
19 became aware of the incident not through Mr. Everson
20 who reported to you, but through some other means?

21 MR. LIFORD: The superintendent over
22 the Quality Control inspector came to me.

23 MR. DAVIDSON: Do you remember who
24 that was, sir?

25 MR. LIFORD: I'm guessing, but I think

1 it was Bob Siever.

2 MR. DAVIDSON: And what did Mr. Siever
3 tell you?

4 MR. LIFORD: He explained what had
5 happened per his inspector's view of the situation.

6 MR. DAVIDSON: When you say "what had
7 happened," do you remember what it was he told you?

8 MR. LIFORD: Yes. There was a
9 disagreement over over the interpretation of a
10 procedure. Construction hand got irate and
11 threatened to whoop the QC inspector's ass.

12 MR. DAVIDSON: So from what Mr. Siever
13 told you, had there been a violation of two policies;
14 first, the way in which to resolve an agreement with
15 QC person, which was to take it to a supervisor
16 rather than to dispute it with the QC inspector, and
17 the second one was that he lost his temper and made
18 a threat?

19 MR. LIFORD: Yes.

20 MR. DAVIDSON: What did you do after
21 Mr. Siever told you that this individual, whose name
22 at this time you can't remember, had apparently
23 violated these two policies?

24 MR. LIFORD: As a normal run of events
25 on any instance concerning any disagreements, both

1 parties were called in, in this particular case, to
 2 my office with both myself and the Quality Control
 3 superintendent and the two individuals involved. We
 4 interviewed both of them separately, both of them
 5 together, dismissed both of them back to the field,
 6 then made a determination as to what had to happen,
 7 who was wrong and who was right.

8 MR. DAVIDSON: Did you consult with or
 9 have Mr. Everson present, who was the immediate
 10 superior of the craft person involved, as you now
 11 remember?

12 MR. LIFORD: Yes. I did consult with
 13 Mr. Everson on the situation.

14 MR. DAVIDSON: Was he present at any
 15 of these interviews that you had with the craft
 16 person involved and with the QC inspector?

17 MR. LIFORD: No, he was not.

18 MR. DAVIDSON: After you concluded the
 19 interviews that you and Mr. Siever held jointly with
 20 these individuals, is that when you consulted Mr.
 21 Everson?

22 MR. LIFORD: That is right.

23 MR. DAVIDSON: And what did you say to
 24 Mr. Everson?

25 MR. LIFORD: We went over the

1 interview with both parties with Mr. Everson and
2 told him what my decision was as to the outcome.

3 MR. DAVIDSON: And what was your
4 decision, Mr. Liford?

5 MR. LIFORD: To terminate my employee.

6 MR. DAVIDSON: The craft person?

7 MR. LIFORD: The craft person.

8 MR. DAVIDSON: Because he had violated
9 the established policies?

10 MR. LIFORD: Yes.

11 MR. DAVIDSON: Did you communicate
12 this to the craft person?

13 MR. LIFORD: Yes.

14 MR. DAVIDSON: How did you do that,
15 sir?

16 MR. LIFORD: When the decision was
17 made, I called the superintendent and the craft
18 person into my office, told the craft individual
19 what was going to happen and why it was going to
20 happen.

21 MR. DAVIDSON: When you say why it was
22 going to happen, what did you tell him?

23 MR. LIFORD: He was wrong. That was
24 the main thing I wanted to convey to him, was the
25 fact that he was wrong. I wanted him to understand

1 that he was wrong and why he was wrong.

2 MR. DAVIDSON: Well, why was he wrong,
3 Mr. Liford, in your view?

4 MR. LIFORD: He violated the
5 procedures, the policies, and he let his temper rule
6 when he should not have.

7 MR. DAVIDSON: How long after the
8 incident with the QC inspector occurred -- that is,
9 after this craft person apparently made a threat to
10 the QC inspector -- how long after that did the
11 interviews that you had with him occur?

12 MR. LIFORD: That day.

13 MR. DAVIDSON: And how long after the
14 interviews that you and Mr. Siever conducted with
15 the craft and QC inspector involved did you make
16 your determination to terminate that employee?

17 MR. LIFORD: Same day.

18 MR. DAVIDSON: And how long after you
19 made that decision was that employee terminated?

20 MR. LIFORD: The same day.

21 MR. DAVIDSON: Now, Mr. Liford, going
22 back to the other incident or incidents that you
23 recall, that is the two employees that you recollect
24 worked for Mr. Gary Cox, can you give us similar
25 background information, as you have now, with

1 respect to how those matters were handled?

2 MR. LIFORD: I cannot give you any
3 details because of the time span from when it
4 happened to now.

5 MR. DAVIDSON: How long ago did the
6 incidents with Cox's employees occur?

7 MR. LIFORD: Somewhere between three
8 and five years.

9 MR. DAVIDSON: Somewhere between three
10 and five years ago?

11 MR. LIFORD: Yes.

12 MR. DAVIDSON: What about the
13 incidents involving Mr. Everson's employee; how long
14 ago did that happen?

15 MR. LIFORD: Approximately two years.

16 MR. DAVIDSON: About two years ago.
17 Other than these three incidents in which you gave
18 implementation to the policy for dealing with QC/QA
19 personnel, were you involved or aware of any other
20 incidents where that policy was given implementation?
21 And I mean specifically the policy against harassing,
22 intimidating and threatening QA/QC personnel.

23 MR. LIFORD: Yes. The policy -- well,
24 let me back up a step. During the course of events
25 since I have been on site, we have had an ongoing

1 training program training craft personnel into their
2 procedures and any revisions thereto. During almost
3 all training sessions, this subject is brought up
4 when it comes to the section in the procedure that
5 is appropriate for this.

6 MR. DAVIDSON: When you you say "this
7 subject," do you mean the policy that disagreements
8 with QC/QA personnel are to be dealt with in a
9 professional manner, and if they cannot be dealt
10 with in the field, they should go up in the chain of
11 command and the fact that there will be no
12 toleration of harassment, intimidation and
13 threatening of QA/QC personnel?

14 MR. LIFORD: Yes.

15 MR. DAVIDSON: I think, however, my
16 question was directed at something else. What I was
17 asking about, Mr. Liford, was, were you involved in
18 or aware of any other incidents where the policy
19 against harassing, intimidating and threatening
20 QA/QC personnel was implemented by termination of
21 the craft person accused of doing that or otherwise?

22 MR. LIFORD: The only other instance
23 that I can think of right now is the one concerning
24 Mr. Johnson and the allegation against him of
25 harassing or trying to intimidate QC.

1 MR. DAVIDSON: All right. You were
2 not involved in the resolution of that issue, were
3 you?

4 MR. LIFORD: Yes.

5 MR. DAVIDSON: Yes, you were or you
6 were not?

7 MR. LIFORD: Yes, I was.

8 MR. DAVIDSON: Well, after Mr. Johnson
9 has had an opportunity to tell us about it, perhaps
10 we can have you supply some additional detail.

11 With respect to the policy for the
12 resolution of disagreements between craft and QA/QC
13 personnel, were you involved in the implementation
14 of that policy? In other words, did anyone at any
15 time, any subordinate of yours, bring to your
16 attention a disagreement between craft and QA/QC
17 personnel that had proceeded up the chain of command
18 and brought to you for resolution in accordance with
19 that policy?

20 MR. LIFORD: Talking in terms of other
21 than the three that I have discussed? Reask the
22 question shorter.

23 MR. DAVIDSON: Well, Mr. Liford, what
24 I'm getting at is, you told us how you gave
25 implementation to the policy that prohibits the

1 harassment, intimidation and threatening of QC/QA
2 personnel. When it was brought to your attention
3 that some three individuals had engaged in that
4 prohibited conduct, you made inquiry, you dealt with
5 the matter and you terminated them.

6 MR. LIFORD: Yes.

7 MR. DAVIDSON: So therefore, you
8 understood the policy; they understood the policy.
9 You gave effect to the policy; you implemented the
10 policy.

11 Now, you also told us in your testimony
12 here today that in addition to the policy that
13 prohibits harassment, intimidation and threatening
14 of QA/QC personnel, there is also a policy or
15 procedure for dealing with disagreements between
16 craft and QA/QC personnel. You've told us that
17 where craft cannot resolve a difference of opinion
18 with QC or QA personnel in the field, that instead
19 of arguing with QC/QA personnel, they are to take
20 the matter up with their superior, their supervisor,
21 who would attempt to resolve it, and this matter
22 proceeds up the chain of command until resolved.

23 My question to you, sir, was, were you ever
24 involved in any situation where such a problem was
25 brought up the chain of command to you and you were

1 required to resolve the dispute and, therefore, you
2 were giving implementation, you were giving effect,
3 to the policy you spoke of?

4 MR. LIFORD: Yes.

5 MR. DAVIDSON: Would you please
6 describe those incidents, as best you recollect them,
7 in which you gave effect to the policy we've just
8 discussed.

9 MR. LIFORD: On almost any major
10 revision of a procedure, and effectively on minor
11 revisions to procedures, there is an agreement on
12 the interpretation of that procedure. When these
13 disagreements on the interpretation of a procedure --
14 or when my people run into those disagreements, they
15 bring them to me.

16 MR. DAVIDSON: They always bring them
17 to you? They don't resolve those differences
18 themselves?

19 MR. LIFORD: In most cases where there
20 is a disagreement over an interpretation and it cannot
21 be solved or agreed upon by QC or the craft
22 personnel, the combination of the two, it has to be
23 brought up to the quality engineers, the Quality
24 Control supervisors and the craft supervisors to sit
25 down and discuss the words written into the

1 procedures so everybody can interpret the procedure
2 the same way.

3 MR. DAVIDSON: And is it your
4 experience, based on what you've just related, that
5 most craft personnel understand the manner in which
6 they are to deal with QC/QA and how they are to
7 resolve differences or report differences to their
8 superiors?

9 MR. LIFORD: Yes.

10 MR. DAVIDSON: Do your subordinates
11 also give implementation to this policy?

12 MR. LIFORD: Yes, they do.

13 MR. DAVIDSON: Mr. Calicutt, you have
14 testified here to the existence of two policies with
15 regard to the relationship between craft and QC/QA
16 personnel, the first being that harassment,
17 intimidation or threatening of QC/QA personnel by
18 craft will not be tolerated, that it is a
19 termination offense; the second policy being that
20 craft personnel are to behave professionally in
21 dealing with QC/QA, and should they have a
22 disagreement with QC/QA personnel, they are not to
23 fight with personnel about it, but to take it up to
24 their supervisors and it rises up the chain of
25 command until it is properly resolved; is that

1 correct?

2 MR. CALICUTT: Yes.

3 MR. DAVIDSON: With regard to that
4 first policy, the one involving the problem of
5 harassment, intimidation and threatening, have you
6 ever been involved in the implementation of that
7 policy; that is, carrying it out and giving it
8 effect?

9 MR. CALICUTT: That directly involved,
10 no. But I knew of the three cases that it happened.

11 MR. DAVIDSON: When you say the three
12 cases that had happened, to what do you refer, Mr.
13 Calicutt?

14 MR. CALICUTT: The three cases Mr.
15 Liford talked about.

16 MR. DAVIDSON: Did Mr. Liford report
17 his action, with respect to the three individuals
18 reported here, to you as a responsibility of your
19 subordinate?

20 MR. CALICUTT: Yes, he did.

21 MR. DAVIDSON: Was he required to do
22 so, or secure your approval for his action?

23 MR. CALICUTT: Not for approval.

24 MR. DAVIDSON: But he was
25 appropriately required to inform you?

1 MR. CALICUTT: Correct.

2 MR. DAVIDSON: But he did not require
3 your approval in order to terminate them?

4 MR. CALICUTT: No, he didn't.

5 MR. DAVIDSON: Did you express to him
6 any opinion as to his action?

7 MR. CALICUTT: We talked about it, yes.

8 MR. DAVIDSON: Did you agree with Mr.
9 Liford's action?

10 MR. CALICUTT: Yes, I did.

11 MR. DAVIDSON: Did you think he
12 handled the matter properly?

13 MR. CALICUTT: Yes, I did.

14 MR. DAVIDSON: And in accordance with
15 the procedures and policies at Comanche Peak?

16 MR. CALICUTT: That's correct.

17 MR. DAVIDSON: Other than these three
18 incidents of which Mr. Liford made you aware, were
19 you personally involved in the implementation of
20 that policy?

21 MR. CALICUTT: Not to termination
22 offense, no.

23 MR. DAVIDSON: Were you involved in
24 any matters in which the allegation at hand was
25 craft harassment or intimidation or threatening of

1 QA/QC personnel?

2 MR. CALICUTT: In Mr. Johnson's case.

3 MR. DAVIDSON: You mean in resolving
4 certain allegations made against Mr. Johnson?

5 MR. CALICUTT: Yes.

6 MR. DAVIDSON: Other than that matter
7 on which we may have received some of your testimony
8 after Mr. Johnson has spoken, were you involved in
9 any other such incidents?

10 MR. CALICUTT: There were two
11 incidents that I can recall was brought to my
12 attention. Me, George Tanley and Mr. Bob Siever --

13 MR. DAVIDSON: I'm sorry, sir. I
14 don't think I heard you?

15 MR. CALICUTT: There were two
16 incidents that I can recall was brought to my
17 attention. Me, George Tanley and Bob Siever --

18 MR. DAVIDSON: Were involved in what,
19 sir?

20 MR. CALICUTT: Where it was brought to
21 my level.

22 MR. DAVIDSON: An incident involving
23 alleged harassment, intimidation, or threatening by
24 craft to QA/QC personnel?

25 MR. CALICUTT: Yes.

1 MR. DAVIDSON: Was this merely a
2 disagreement between a craft person --

3 MR. CALICUTT: This was merely a
4 disagreement.

5 MR. DAVIDSON: Let me then ask you
6 questions about that. With respect to the second
7 policy about which you've testified here today,
8 namely the policy that governed the manner in which
9 craft were to deal with disagreements with QA/QC
10 personnel, namely not to attempt to resolve them
11 themselves but to take them forward up the chain of
12 commands, were you ever involved in the resolution
13 of such a disagreement?

14 MR. CALICUTT: Yes.

15 MR. DAVIDSON: Would you please state
16 the circumstances.

17 MR. CALICUTT: Mr. George Tanley came
18 to me when we started installing snubbers and told
19 me he was having problems with QC. I approached Mr.
20 Bob Siever. We met in my office and got the problem
21 resolved.

22 MR. DAVIDSON: Now, who was Mr. George
23 Tanley at the time?

24 MR. CALICUTT: Boilermaker, millwright
25 superintendent.

1 MR. DAVIDSON: And Bob Siever?

2 MR. CALICUTT: QC superintendent.

3 MR. DAVIDSON: And it's your testimony
4 that there was a disagreement between the craft and
5 QC personnel regarding the installation of certain
6 snubbers?

7 MR. CALICUTT: Yes.

8 MR. DAVIDSON: And that craft had
9 reported this to their foreman or superintendent,
10 George Tanley?

11 MR. CALICUTT: Yes.

12 MR. DAVIDSON: And the matter was
13 ultimately brought up to you for resolution?

14 MR. CALICUTT: Yes.

15 MR. DAVIDSON: And how did you go
16 about resolving it?

17 MR. CALICUTT: Had Mr. Siever and
18 Tanley in my office.

19 MR. DAVIDSON: Do you recall what
20 exactly the disagreement was?

21 MR. CALICUTT: Torque and safety bar.

22 MR. DAVIDSON: Can you think of any
23 other occasions in which the matter was brought to
24 your attention which required resolution of the
25 disagreement between craft and QC/QA personnel?

1 MR. CALICUTT: Yes. On a stainless
2 subp. Mr. Tanley brought me a welding problem. Mr.
3 Lawrence, Mr. Tanley and me got that straightened
4 out.

5 MR. DAVIDSON: Let me just backtrack a
6 bit. When did the snubbers incident occur, if you
7 recollect?

8 MR. CALICUTT: Approximately two years
9 ago.

10 MR. DAVIDSON: What about the one
11 involving stainless steel subps?

12 MR. CALICUTT: Between two, two
13 and-a-half years ago.

14 MR. DAVIDSON: All right. Now, Mr.
15 Tanley again brought to your attention a problem
16 where his craft employees were having a difference
17 of opinion or disagreement with QC/QA regarding
18 inspections of welds; is that your testimony?

19 MR. CALICUTT: Yes.

20 MR. DAVIDSON: Do you recollect what
21 the problem was, or disagreement?

22 MR. CALICUTT: Visual inspection of
23 the welds. He thought the QC person was being too
24 tight.

25 MR. DAVIDSON: Now, there was no claim

1 of any harassment, intimidation or threatening by
2 craft of QC personnel, was there?

3 MR. CALICUTT: No, there wasn't.

4 MR. DAVIDSON: And none vice-versa?

5 MR. CALICUTT: No.

6 MR. DAVIDSON: Just a matter of
7 disagreement that the craft had brought up with
8 their supervisor?

9 MR. CALICUTT: That's correct.

10 MR. DAVIDSON: And do you know whether
11 Mr. Tanley took any action to resolve the matter
12 himself?

13 MR. CALICUTT: Yes, I do.

14 MR. DAVIDSON: Do you know what he did?

15 MR. CALICUTT: He had met with some of
16 the QC lead, probably Cappy himself, but they didn't
17 reach an agreement.

18 MR. DAVIDSON: When you say "Cappy
19 himself," do you refer to Cappy Lawrence?

20 MR. CALICUTT: Yes.

21 MR. DAVIDSON: Do you remember what
22 his position was at the time of the occurrence?

23 MR. CALICUTT: No, not specifically I
24 don't.

25 MR. DAVIDSON: What is your best

1 recollection of what position he held at the time in
2 the QC organization?

3 MR. CALICUTT: He was a QC lead
4 inspector, non-ASME inspector.

5 MR. DAVIDSON: That's non-ASME?

6 MR. CALICUTT: Yes.

7 MR. DAVIDSON: Subsequent to Mr.
8 Tanley's effort to resolve the issue, he brought it
9 to you; what did you do?

10 MR. CALICUTT: He sat down, went over
11 the procedures, talked among ourselves.

12 MR. DAVIDSON: When you say you talked
13 among yourselves, you mean you, George Tanley and
14 Mr. Lawrence?

15 MR. CALICUTT: Right.

16 MR. DAVIDSON: Was anyone else
17 involved?

18 MR. CALICUTT: Not right at the
19 present, no.

20 MR. DAVIDSON: You mean not at that
21 time?

22 MR. CALICUTT: No.

23 MR. DAVIDSON: After you had this
24 discussion, did you reach a resolution?

25 MR. CALICUTT: Yes, we did.

1 MR. DAVIDSON: Was anyone else
2 involved?

3 MR. CALICUTT: Mr. Tanley got back
4 with the craft people and Mr. Lawrence got back with
5 the QC personnel, and everything was solved.

6 MR. DAVIDSON: Thank you. Other than
7 the incidents of the snubbers and the stainless
8 steel suhps, were you involved in the implementation
9 of the policy for the resolution of disagreements
10 between craft and QA/QC personnel?

11 MR. CALICUTT: I'm sorry. I didn't
12 understand you.

13 MR. DAVIDSON: I may not have phrased
14 that correctly. Other than these two incidents that
15 you just mentioned, were there any other occasions
16 on which you were required to resolve the
17 disagreement between craft personnel and QC/QA, thus
18 giving implementation to the policy that we have
19 been discussing here?

20 MR. CALICUTT: I'm sure there probably
21 were, but I can't remember a specific instance.

22 MR. DAVIDSON: Mr. Johnson, were you
23 ever involved in an incident concerning the policy
24 that QC/QA personnel not be harassed, intimidated or
25 threatened by craft?

1 MR. JOHNSON: Yes, sir.

2 MR. DAVIDSON: Could you describe that
3 incident or incidents in which you were involved in
4 the implementation or application of that policy?

5 MR. JOHNSON: The first one was with
6 Charles Reeves and Mike Kennedy. They were Class 5
7 non-ASME inspectors. It happened one time we was on
8 night shift with a Task Force group to set up -- to
9 finish the hangers in the Auxiliary Buildings
10 Safeguards, whatever.

11 MR. DAVIDSON: About when was that,
12 sir?

13 MR. JOHNSON: About two years ago,
14 something like that.

15 MR. DAVIDSON: About July or August of
16 1982?

17 MR. JOHNSON: Something like that.
18 About two years ago.

19 And we were having problems selling hangers
20 off on the night shift. I had talked with George
21 Bunt who was over the day shift people and also
22 trying to take care of the hanger people on days.
23 Whenever I come in on night shift in afternoons,
24 George would get with me and tell me what he needed
25 done that afternoon and tell me what kind of

1 problems they had during the daytime, what was sold,
2 what wasn't, so on and so forth.

3 When George would give me his turnover, he
4 would tell me what we had to do on nights. We would
5 go in the field, get lined up and we'd start to work.

6 MR. DAVIDSON: You were, at this time,
7 a hanger superintendent?

8 MR. JOHNSON: Night shift hanger
9 superintendent.

10 MR. DAVIDSON: And you would consult
11 with Mr. Bunt, the Task Force leader, in the
12 Auxiliary Safeguards Building regarding hangers and
13 find out what work would be assigned to you and that
14 would be necessary to be completed during the
15 evening shift?

16 MR. JOHNSON: Right.

17 MR. DAVIDSON: Would you please
18 continue.

19 MR. JOHNSON: Most of the time, two
20 hours or so after we got to work and trying to sell
21 off hangers, we would have the same problems come up
22 with the two inspectors I just mentioned. They
23 would not buy off what the day shift people bought
24 off because of their interpretation of the
25 procedures.

1 And whenever we would talk to them, there
2 would be no resolving. We would go with Mr. C.C.
3 Randall, which was their boss, when it first started
4 happening, and he would resolve the problems most of
5 the time. Then as the work continued, time went on,
6 these problems continued to happen.

7 Mr. C.C. Randall was not on the job on this
8 particular night, and I went to see if I could find
9 him and ran up with his two inspectors, Kennedy and
10 Reeves. And we talked a few minutes, and there was
11 nothing that could be done, so I told them I had
12 been asked to make a recommendation on paper that
13 would possibly speed up production on night shift.
14 So I told them what I was going to do, have to
15 recommend that the QC personnel be moved days and
16 that we would do the work on nights. And the day
17 shift people would have -- excuse me -- the day
18 shift Quality Control people would have ample
19 supervision and engineering support to give them the
20 answers that they needed to be able to buy or unsat
21 the item.

22 MR. DAVIDSON: When you say "buy or
23 unsat," you mean that your view was that the day
24 shift QC inspectors would be able to either accept
25 or reject the hangers with the support, advice and

1 help of their supervisors who were more readily
2 available during the day, and also because they
3 would have access to engineering, so that any NCR's
4 or unsatisfactory IR's could be evaluated properly?

5 MR. JOHNSON: That's true.

6 MR. DAVIDSON: And who asked you to
7 make the recommendation on how to improve the
8 situation?

9 MR. JOHNSON: Ken Liford.

10 MR. DAVIDSON: Mr. Liford asked you to
11 look into the matter as to why so few hangers were
12 being bought off, and to make a recommendation to
13 whom?

14 MR. JOHNSON: To make a recommendation
15 to him.

16 MR. DAVIDSON: Was that recommendation
17 designed to explain to Mr. Liford what the problem
18 was?

19 MR. JOHNSON: We were always -- as
20 supervisors and managers in this position, we were
21 always looking for more efficient ways to do our job.
22 And that being Mr. Liford's job, he was looking for
23 answers to solve our problems on night shift.

24 MR. DAVIDSON: And did you prepare
25 this recommendation?

1 MR. JOHNSON: No, sir. I never got to
2 the point of doing that.

3 MR. DAVIDSON: Why did you not get to
4 the point of making the recommendation?

5 MR. JOHNSON: Yes, I did make it
6 verbally.

7 MR. DAVIDSON: You never wrote it up?

8 MR. JOHNSON: No.

9 MR. DAVIDSON: I think I interrupted
10 you when you were saying you had a conversation with
11 Mr. Mike Kennedy and Charles Reeves, the two QC's
12 who worked with Mike Randall on the night shift in
13 the Auxiliary Building. And what is it you were
14 discussing with them?

15 MR. JOHNSON: I discussed what I had
16 been asked to do as far as the recommendation was
17 concerned, and I did not want to hit them on the
18 blind side. I was going to make a recommendation
19 that they be sent days.

20 MR. DAVIDSON: You were going to make
21 a recommendation that Mr. Kennedy and Mr. Reeves be
22 transferred from the night staff to the day staff?

23 MR. JOHNSON: Not by name. The QC
24 personnel on nights, non-ASME side, because I think
25 there was three at the time.

1 MR. DAVIDSON: So this wasn't directed
2 to those individuals but, rather, you thought that
3 the QC inspection should be done in the daytime?

4 MR. JOHNSON: That's true.

5 MR. DAVIDSON: But you had no
6 intention of changing the personnel?

7 MR. JOHNSON: No.

8 MR. DAVIDSON: You just wanted them to
9 do it during the daytime when they would have access
10 to engineering and supervision so that there would
11 be some consistency in their evaluation?

12 MR. JOHNSON: That's true. So then I
13 left. The next afternoon I came in to work --

14 MR. DAVIDSON: I'm not through with
15 this incident.

16 You told them about the recommendation; is
17 that correct?

18 MR. JOHNSON: That's true.

19 MR. DAVIDSON: Did they say anything
20 to you when you told them that?

21 MR. JOHNSON: To my recollection, no.

22 MR. DAVIDSON: They said nothing?

23 MR. JOHNSON: Not to my knowledge.

24 MR. DAVIDSON: You walked in the room,
25 they said nothing. You discussed this with them and

1 they said nothing. Did they speak to you at all?

2 MR. JOHNSON: Yes, sir.

3 MR. DAVIDSON: What did they say?

4 MR. JOHNSON: As we first stated, that
5 was two years ago. What I'm fixing to say here
6 would not be per se exactly what they said.

7 MR. DAVIDSON: The best you remember.

8 MR. JOHNSON: The best I remember is
9 we talked a bit, we discussed the fact of what I was
10 saying. They wanted to know my reasoning for it. I
11 told them at the time because we were spending too
12 much time on hangers in the evening on night shift.
13 I have people not doing anything two or three hours,
14 half a day gone, and that I needed to be able to
15 sell the hangers if they were correct. If they
16 weren't, I needed them unsatted.

17 MR. DAVIDSON: Why was there so much
18 dead time for your employees by virtue of the night
19 inspections?

20 MR. JOHNSON: Because they would take
21 time to go to the field to do the inspections.

22 MR. DAVIDSON: When you say "they," QC
23 inspectors?

24 MR. JOHNSON: They would inspect the
25 hangers. QC would unsat the hangers. Then I would

1 let my people come to me and show me the procedures
2 that we had to work with in the construction
3 procedures.

4 Then I would have to go get with them and
5 talk with them about it and see what they had to say
6 and try to figure out what was right and what was
7 wrong. And by the time all this got done, you
8 probably lost anywhere from two hours to half a day.
9 And the time I'm doing this with them I got more
10 inspections ready. So actually, usually lost five
11 or six hangers.

12 MR. DAVIDSON: So it was your idea
13 then to have Mr. Bunt, or whoever was the
14 superintendent in the daytime, spend all this time
15 resolving these problems so that you could just
16 spend your time supervising your employees in
17 producing hangers for inspection?

18 MR. JOHNSON: No, sir, that's not
19 quite right.

20 MR. DAVIDSON: Why did you think that
21 having the inspections then during the daytime would
22 save you time in the evening?

23 MR. JOHNSON: Because the day shift
24 people was buying off items that the night shift
25 personnel would not buy.

1 MR. DAVIDSON: So you thought there
2 was inconsistency in the way in which the procedures
3 were being implemented?

4 MR. JOHNSON: That's true.

5 MR. DAVIDSON: And that you thought if
6 the night inspectors were transferred to the day
7 shift, that they would then become aware of what the
8 proper standards were and, more likely than not,
9 would start buying off more hangers?

10 MR. JOHNSON: That's true.

11 MR. DAVIDSON: Did you tell that to
12 Mr. Kennedy and Mr. Reeves?

13 MR. JOHNSON: That's true.

14 MR. DAVIDSON: What did they say when
15 you said that?

16 MR. JOHNSON: They didn't say anything.

17 MR. DAVIDSON: Did you get angry with
18 them?

19 MR. JOHNSON: No, sir.

20 MR. DAVIDSON: Did they get angry with
21 you?

22 MR. JOHNSON: Evidently, they did.

23 MR. DAVIDSON: I'm not asking for you
24 to speculate. Did they raise their voices?

25 MR. JOHNSON: They did not raise their

1 voices.

2 MR. DAVIDSON: Was there any harsh
3 words exchanged between you and them?

4 MR. JOHNSON: No, sir.

5 MR. DAVIDSON: After you had that
6 conversation, you left?

7 MR. JOHNSON: That's true.

8 MR. DAVIDSON: What happened then?

9 MR. JOHNSON: We continued to finish
10 off that night, come in the next afternoon. I went
11 to see C.C. Randall in the early afternoon, and he
12 was a little bit irritable or that way towards me in
13 the afternoon, and we talked just a few minutes.
14 And he asked me about why I was cussing him and why
15 I had made the position against him I had made. I
16 asked him what he was talking about.

17 MR. DAVIDSON: He said you had been
18 cussing him?

19 MR. JOHNSON: From his QC people.

20 MR. DAVIDSON: Someone had told him
21 you had cursed him out?

22 MR. JOHNSON: Yeah.

23 MR. DAVIDSON: What did you say when
24 he accused you of making these statements?

25 MR. JOHNSON: I asked him how long I

1 had been working with him on nights. I said, "How
2 many times have you heard me curse since I've been
3 on nights?" He said, "Not any." I said, "That
4 should tell you something about the story you're
5 getting."

6 MR. DAVIDSON: What else had he been
7 told, other than that you were supposed to have
8 cursed?

9 MR. JOHNSON: That I had run down his
10 credibility and his knowledge of his job.

11 MR. DAVIDSON: Was this true?

12 MR. JOHNSON: No, sir.

13 MR. DAVIDSON: Who had told Mr.
14 Randall this, so far as you know?

15 MR. JOHNSON: So as far as I know, it
16 would be the two QC personnel we talked about.

17 MR. DAVIDSON: But you don't know that
18 for a fact?

19 MR. JOHNSON: I don't know.

20 MR. DAVIDSON: After you said to Mr.
21 Randall, "Have you ever known me to use profanity?"
22 and he said, "No, never," what then did you discuss?

23 MR. JOHNSON: He told me of the
24 accusations made against me, not prior to this day
25 by Mr. Charles Reeves and Mike Tanley.

1 MR. DAVIDSON: What accusations had
2 been made against you?

3 MR. JOHNSON: That I had run down his
4 knowledgeability of his job, his credibility, and
5 that I wanted to try and get his people moved from
6 nights to days. And he said he had a letter there,
7 and I asked him could I see it. He gave it to me.
8 I read the letter and discussed it with him.

9 MR. DAVIDSON: Who was the letter by?

10 MR. JOHNSON: The letter was by Mike
11 Kennedy and Charles Reeves.

12 MR. DAVIDSON: So in other words,
13 these two individuals with whom you had had the
14 discussion the prior evening and prepared a letter
15 or memorandum to Mr. Randall in which they accused
16 you of having said some unkind things about Mr.
17 Randall and also engaging in some kind of conduct
18 that they thought was improper?

19 MR. JOHNSON: That's right.

20 MR. DAVIDSON: Is that correct?

21 MR. JOHNSON: That's correct.

22 MR. DAVIDSON: Did you read the letter?

23 MR. JOHNSON: I read the letter.

24 MR. DAVIDSON: And what, to your
25 recollection, did it say?

1 MR. JOHNSON: The letter said that I
2 had ran down his credibility and knowledge of his
3 job, and that I had got upset with QC inspectors.

4 MR. DAVIDSON: So they accused you of
5 losing your temper?

6 MR. JOHNSON: Yeah, they did.

7 MR. DAVIDSON: Were the fact in that
8 letter or memorandum true?

9 MR. JOHNSON: No, sir.

10 MR. DAVIDSON: Did you tell Mr.
11 Randall whether they were true or not?

12 MR. JOHNSON: I discussed each item
13 that was discussed in the letter with Mr. Randall,
14 the ones that was true and the ones that was not
15 true.

16 MR. DAVIDSON: And was he satisfied
17 with your explanation?

18 MR. JOHNSON: Whenever I left there,
19 he and I was under the general understanding that it
20 was basically blown out of proportion.

21 MR. DAVIDSON: And you had not
22 intended to or in fact harassed, intimidated or
23 threatened either of these two individuals, Mr.
24 Kennedy or Mr. Reeves?

25 MR. JOHNSON: That was my

1 understanding.

2 MR. DAVIDSON: And was that Mr.
3 Randall's understanding, as far as you knew?

4 MR. JOHNSON: As far as I knew.

5 MR. DAVIDSON: Is that the end of the
6 incident?

7 MR. JOHNSON: No, sir.

8 MR. DAVIDSON: What happened after
9 that?

10 MR. JOHNSON: I took a copy of the
11 letter that Mr. Randall let me have, went into my
12 office and wrote a reply or a statement concerning
13 that letter and turned it in to my superiors.

14 MR. DAVIDSON: And to whom did you
15 turn it in?

16 MR. JOHNSON: I gave the copy to Mr.
17 Liford.

18 MR. DAVIDSON: Mr. Ken Liford? Did
19 you give it to anyone else?

20 MR. JOHNSON: Mr. Frankum got a copy
21 of the thing.

22 MR. DAVIDSON: So the only copy that
23 you gave out or distributed was to Mr. Liford?

24 MR. JOHNSON: Yes, sir.

25 MR. DAVIDSON: And did you discuss

1 this letter or memorandum with Mr. Liford, and your
2 response?

3 MR. JOHNSON: He had the opportunity
4 to read it before I ever got back to the job. And
5 then when I got back the next afternoon is when Mr.
6 Frankum wanted to talk with me. And after the fact --
7 after I talked with Frankum, I talked to Mr. Liford
8 again, and he told me that's what I should have done.

9 MR. DAVIDSON: You were asked by Mr.
10 Frankum to meet with him regarding this incident?

11 MR. JOHNSON: Yes.

12 MR. DAVIDSON: Was anyone else present
13 at the meeting that you had with Mr. Frankum?

14 MR. JOHNSON: Mr. James Calicutt.

15 MR. DAVIDSON: Mr. Calicutt was
16 present. And what did Mr. Frankum tell you?

17 MR. JOHNSON: Every word he said I do
18 not remember. But we talked about job policies and
19 how our work relationships with QC would be handled.

20 MR. DAVIDSON: Did you understand him
21 to be reprimanding you?

22 MR. JOHNSON: I understood him, in
23 areas that I may have been vague in, to have been
24 reprimanding. The other areas that I had done like
25 I was supposed to have done.

1 MR. DAVIDSON: When you say, "In the
2 areas I was vague in, I was reprimanded and the
3 other areas I was not," what do you mean? What did
4 you mean?

5 MR. JOHNSON: That maybe I should not
6 have went as far as I did, discussing with two QC
7 persons what my recommendation was going to be until
8 I first talked to their leaders.

9 MR. DAVIDSON: Their supervisors?

10 MR. JOHNSON: Yes.

11 MR. DAVIDSON: Was that the end of the
12 incident, sir?

13 MR. JOHNSON: That was it.

14 MR. DAVIDSON: Were there any other
15 incidents in which you were involved concerning the
16 policy against harassing, intimidating or
17 threatening QA/QC personnel?

18 MR. JOHNSON: Ed Niedecken.

19 MR. DAVIDSON: Could you tell us the
20 circumstances and facts regarding that incident?

21 MR. JOHNSON: The circumstances. I
22 was over the Paint Department in Reactor Number 1,
23 trying to get it painted out. We had a foreman
24 named Danny Ackery in one area in putting in
25 applications with the inspector by the name of Ed

1 Niedecken working with him. Next to Danny Ackery
2 was a foreman named Benny -- that was wrong. Name
3 of Henry, and I don't know what his last name was.
4 And he had approximately 20 hangers that were ready
5 for prime coat application to be put on.

6 And we did not have a QC inspector to
7 inspect the hangers to say if we could or couldn't
8 put it on them. I spoke with Ed Niedecken about it.
9 He said he was busy putting a finished coat
10 application on those. So I went up to the QC to see
11 if I could find QC lead. They were not in the
12 trailer office. Coming out of the office, Ed
13 Niedecken was up there, and I asked him at the time
14 what was he doing, and he told me nothing.

15 And I asked him again about being able to
16 do the inspections for the primeable coat
17 application inspection. He said he was not going to
18 do the primeable coat application inspection. I
19 left him and went to try to find a QC lead. I come
20 back around to where Danny was at, and Eddie was
21 back down there again.

22 So I discussed with Danny Ackery how many
23 people he had busy and he told me he had them all
24 busy painting except for one, maybe two finish coat
25 painters. So then I asked Eddie again was there any

1 way he could possibly inspect those hangers over
2 there, because I could put those painters doing
3 something else and I needed those other things
4 painted.

5 And about that time Jim Ewely, which was
6 his supervisor, came up, heard the conversation and
7 Jimmy told him that's what we would do. And Eddie
8 got hot, shrunked off, used a few cuss words, said
9 he would not do today what he had been doing. And
10 Bob Morey saw all this going on and he asked Eddie
11 Niedecken could we have a word with him, and they
12 had a word or two on whatever.

13 And the next morning is when I found out
14 that I had been written up, along with Bob Morey,
15 for intimidation of QC personnel.

16 MR. DAVIDSON: Did you know why Mr.
17 Niedecken had written you up?

18 MR. JOHNSON: I did not know why at
19 the time, and I still do not know the real reason,
20 other than they were trying to say that I was trying
21 to tell QC where to go.

22 MR. DAVIDSON: And what work to do?

23 MR. JOHNSON: Yes, sir.

24 MR. DAVIDSON: Well, how did you find
25 out that you had been written up by Mr. Niedecken?

1 MR. JOHNSON: Bob Morey told me about
2 it the next morning.

3 MR. DAVIDSON: And did anything occur
4 after that, after you were written up or told that?

5 MR. JOHNSON: Yes, sir.

6 MR. DAVIDSON: What happened?

7 MR. JOHNSON: Mr. Boyce Grier called
8 me to his office and he wanted to know what had
9 happened.

10 MR. DAVIDSON: Who is Mr. Boyce Grier?

11 MR. JOHNSON: I don't know who he is
12 or what his title is. All I know is that I was told
13 he investigates all allegations to which craft and
14 QC have problems.

15 MR. DAVIDSON: And did you speak with
16 Mr. Grier?

17 MR. JOHNSON: Yes.

18 MR. DAVIDSON: And did he tell you
19 anything about the incident?

20 MR. JOHNSON: He asked me about the
21 incident.

22 MR. DAVIDSON: And you've told him as
23 much as you've told us here about what had occurred?

24 MR. JOHNSON: Yes.

25 MR. DAVIDSON: Did he say anything

1 after that?

2 MR. JOHNSON: No, sir.

3 MR. DAVIDSON: Did anything happen
4 after your interview with Mr. Boyce Grier?

5 MR. JOHNSON: Mr. Doug Frankum called
6 me.

7 MR. DAVIDSON: Mr. Frankum?

8 MR. JOHNSON: Yes.

9 MR. DAVIDSON: And what did Mr.
10 Frankum want from you?

11 MR. JOHNSON: Mr. Frankum wanted to go
12 over it one more time on our policies as far as QC
13 is concerned, that we do not tell QC where to go,
14 what to inspect, and that we must or should get
15 ahold of the QC lead to tell him what we needed done.
16 And by that time I told him my side of the story,
17 that the only reason I didn't go to QC lead is
18 because we were all out in other schools that were
19 being trained.

20 We only had one QC lead that day for that
21 period of time, and he was doing something else in
22 the building; I couldn't find him. And I told him
23 from then on, I would be sure to get ahold of the QC
24 leads.

25 MR. DAVIDSON: Anything else happen

1 after that?

2 MR. JOHNSON: No, sir.

3 MR. DAVIDSON: Do you recollect when
4 you had that conversation with Mr. Frankum?

5 MR. JOHNSON: Approximately four or
6 five months ago.

7 MR. DAVIDSON: So in March or April of
8 1984?

9 MR. JOHNSON: Yes.

10 MR. DAVIDSON: Other than these two
11 incidents that you've just mentioned in which you
12 were involved as the subject of an accusation of
13 harassment, intimidation or threatening, were you
14 involved as a supervisor in dealing with any
15 incident involving the craft personnel that you
16 supervised?

17 MR. JOHNSON: No, sir.

18 MR. DAVIDSON: Turning to the other
19 policy that has been discussed here today, namely
20 the policy on how to handle disagreements between
21 craft and QA/QC personnel, were you ever involved in
22 resolving a disagreement or dispute between craft
23 and QC personnel with respect to procedures?

24 MR. JOHNSON: Yes, sir.

25 MR. DAVIDSON: The matter had been

1 brought up to your attention by a subordinate?

2 MR. JOHNSON: Yes, sir.

3 MR. DAVIDSON: Could you describe that
4 incident?

5 MR. JOHNSON: One of them card keys
6 was brought to my attention, I think, by Cleef Buck,
7 which was hanger general foreman. And what the
8 problem was, QC had made accusation that we were
9 using smaller card keys in the pins than we should
10 be using. And we tried to tell them the only ones
11 we was using was the keys that come with the pins.
12 So they were still insisting that those keys were
13 too small.

14 So at that time I discussed the matter with
15 the QC lead and also went to Pat Clark, and the
16 procedures was to change to allow any key to be used
17 as long as the heads would not go through the hole,
18 as long as it was satisfactory.

19 MR. DAVIDSON: Do you know or
20 recollect what Pat Clark's position was at the time
21 of this incident?

22 MR. JOHNSON: My understanding is
23 project engineer.

24 MR. DAVIDSON: Can you think of any
25 other occasion when you were involved in the

1 resolution of a disagreement between QA/QC personnel
2 and craft?

3 MR. JOHNSON: One was with pipe
4 clearances in the R-tunnel on which side they would
5 be on. They had to have a clearance of a sixteenth
6 of an inch, and the drawing would call for just
7 exactly one side and the pipe would be moved from
8 one side to the other, and you could never get it
9 exactly like it was supposed to be there. So we
10 went to QC leads and back through Pat Clark and
11 engineers and resolved that problem.

12 MR. DAVIDSON: Are there any other
13 incidents or occasions that you can recollect now
14 regarding you being involved in the implementation
15 of the policy for resolving disagreements between
16 QC/QA personnel and craft?

17 MR. JOHNSON: Not specific stuff, no,
18 sir.

19 MR. DAVIDSON: Nothing right now?

20 MR. JOHNSON: No, sir.

21 MR. DAVIDSON: Mr. Liford, earlier in
22 the testimony here today, it was mentioned that you
23 had some involvement in one of the incidents in
24 which Mr. Johnson was accused of harassment,
25 intimidation or threatening of QC personnel; is that

1 correct?

2 MR. LIFORD: That's right.

3 MR. DAVIDSON: I believe, in fact, you
4 mentioned that you had some involvement in one of
5 those incidents.

6 Could you tell us what incident it was that
7 you were referring to and what involvement you had?

8 MR. LIFORD: On the night shift
9 turnover sheet that I got from Mr. Johnson, part of
10 that night shift turnover to me on day shift was a
11 copy of the allegations by QC and a copy of the
12 letter that Mr. Johnson sent me explaining the
13 allegations.

14 Early the next morning I picked this up,
15 read it, went to Doug Frankum's office to make sure
16 he was aware that we had an allegation coming down.
17 When I got to Mr. Frankum's office, Ron Tolson was
18 already in his office with a copy of the letter from
19 the Quality Control inspector. We sat, went over
20 both the QC's allegation letter and Mr. Johnson's
21 answer to those allegations. And when I left the
22 office, Ron Tolson, who was QA manager, and Doug
23 Frankum, project manager, were pretty well in
24 agreement.

25 What they had was a misunderstanding more

1 than a harassment and intimidation threatening type
2 situation.

3 MR. DAVIDSON: Mr. Liford, other than
4 Mr. Tolson and Mr. Frankum, was anyone else at that
5 meeting in which this incident was discussed with
6 you?

7 MR. LIFORD: No.

8 MR. DAVIDSON: After that meeting had
9 concluded, at which the three of you had agreed that
10 what was at issue was a misunderstanding rather than
11 an incident in which there had been harassment,
12 intimidation and threatening of a QA/QC person, what
13 happened?

14 MR. LIFORD: When I left, it was
15 agreed that Mr. Tolson was going to call in the QC
16 lead and the two QC inspectors that were involved
17 with the letter, and he was going to talk to them.
18 Mr. Frankum was going to call in Mr. Johnson and
19 discuss the matter with him, and both parties would
20 get together the following day. And if they had
21 anything come out of the meetings other than what we
22 had already discussed, then they would proceed
23 further. Otherwise, end of subject.

24 MR. DAVIDSON: Were you involved or
25 did you participate in any further meetings or

1 discussions of this subject?

2 MR. LIFORD: Only to the point of Mr.
3 Frankum discussing with me later his discussion with
4 Johnson and primarily what come out of his
5 discussion.

6 MR. DAVIDSON: Could you relate to us
7 that conversation that you had with Mr. Frankum?

8 MR. LIFORD: The end result was that,
9 due to the earlier discussions between Johnson and
10 the two QC inspectors concerning problems of getting
11 inspections and the results of inspections, when Mr.
12 Johnson went into the next subject, which was the
13 request for an evaluation and recommendation of the
14 problems on night shift and what to do about them,
15 they interpreted the switch from one subject to
16 another as a threat against them personally more so
17 than a solution to a problem. That's what the
18 misunderstanding was.

19 MR. DAVIDSON: And Mr. Frankum
20 explained this to you?

21 MR. LIFORD: That was in the
22 conversation, yes.

23 MR. DAVIDSON: After you had the
24 conversation, was anything further done or said
25 about the incident?

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MR. LIFORD: Not to my knowledge.

MR. DAVIDSON: Mr. Liford, were you involved in the second incident that Mr. Johnson made mention of here today?

MR. LIFORD: Very slightly. I was aware of the incident. I was aware of some conversations on the subject. Mr. Johnson did not work for me directly at the time, and I chose to stand back and let people that were involved with it take care of that problem, and stay out of it.

MR. DAVIDSON: Mr. Calicutt, you heard Mr. Johnson testify about an incident involving an allegation of harassment, intimidation and threatening lodged by two Quality Control persons. Were you involved or in any way made aware of that incident?

MR. CALICUTT: I was made aware of it by Mr. Liford, and I was present when Mr. Frankum talked to Mr. Johnson.

MR. DAVIDSON: Do you recollect what Mr. Frankum said to Mr. Johnson?

MR. CALICUTT: Basically the same thing Mr. Liford just testified to.

MR. DAVIDSON: What is your recollection of what Mr. Frankum said, since you

1 were present at the meeting and Mr. Liford has
2 testified he was not?

3 MR. CALICUTT: I don't think I could
4 add anything to that.

5 MR. DAVIDSON: Do you have any
6 recollection of what took place at the meeting?

7 MR. CALICUTT: Just said that we would
8 do our business with the QC leads.

9 MR. DAVIDSON: Did you have any
10 involvement or were you aware of the second incident
11 that Mr. Johnson mentioned, the one involving Mr.
12 Eddie Niedecken?

13 MR. CALICUTT: I was aware that it
14 happened. I didn't have any involvement in it.

15 MR. DAVIDSON: That concludes my
16 direct examination of this panel.

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CORRECTIONS AND SIGNATURE

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PAGE/LINE CORRECTION REASON FOR CHANGE

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

KENNETH LIFORD

SUBSCRIBED and sworn to before me this the _____ day of _____, 1984.

NOTARY PUBLIC for the State of Texas

My Commission Expires: _____

1 STATE OF TEXAS)

2
3 I, Janet E. Schaffer, RPR, Certified Shorthand
4 Reporter in and for the State of Texas, do hereby
5 certify that there came before me on the 19th day of
6 August, A. D., 1984, at the Glen Rose Motor Inn,
7 Glen Rose, Texas, the following named persons, to-wit:
8 Kenneth Liford, John R. Johnson and James W.
9 Calicutt, who were by me duly sworn to testify the
10 truth and nothing but the truth of their knowledge
11 touching and concerning the matters in controversy
12 in this cause; and that they were thereupon examined
13 upon their oaths and their examination reduced to
14 writing; same to be sworn and subscribed to by said
15 witnesses before any notary public.

16
17 I further certify that I am neither attorney or
18 counsel for, nor related to or employed by, any of
19 the parties to the action in which this deposition
20 is taken, and further that I am not a relative or
21 employee of any attorney or counsel employed by the
22 parties hereto, or financially interested in the
23 action.

24
25 In witness whereof, I have hereunto set my hand

1 and affixed my seal this _____ day of August , A.D.,
2 1984.

3
4 JANET E. SCHAPFER, 1543, RPR, CSR
5 IN AND FOR THE STATE OF TEXAS
6 1226 Commerce, Suite 411
7 Dallas, Texas 75202
(214) 742-3035

8 my commission expires December 31, 1985
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