

Name	Title	I.D. No.
Jimmy Martin	Sr. QA Specialist	50647
Period Appraised/Planned	Organizational Unit	
Jan. 1, - Dec. 31, 1991	Quality Program Assurance	

WORK PLAN and PERFORMANCE APPRAISAL
for
A- and M-GRADE EMPLOYEES

Key for "Performance Rating" and "Methods used to Achieve Results"

E - Excellent
VG - Very Good
SP - Satisfactory Plus

S - Satisfactory
M - Marginal
U - Unsatisfactory

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3-93-013

9509250001 950616
PDR FOIA
MARQUAR95-142 PDR

18 A/7

Major Duties/Responsibilities/Projects	Work Results Expected
b) Develop/maintain SME expertise as assigned.	9/91 - Performance-based refresher training. 4/91 - assist in identifying development needs for each assigned SME areas; 6/91 -develop individualized training/maintenance of proficiency plan for SME as assigned; Follow-thru on training plan Participate in JUTA as SME. Document confirmation of audit skills for uncertified auditors on audits where you are ATL.
SPECIAL ASSIGNMENTS	
6. Assess Nuclear Generation performance in SME area as requested by NSRG. (BP 1B5)	Accurate organization assessments developed when requested.
7. Submit ideas to eliminate or reduce QPA activities that are less than optimally productive. <i>HAG, T</i>	Submit at least one idea per quarter, have at least one idea implemented this year.
PERSONAL DEVELOPMENT	
8. Assure quarterly AWP reviews are performed. (BP 3 A3)	AWP quarterly reviews performed no later than 3 weeks past end of quarter.
9. Improve/correct development needs noted in 1990 AWP:	Improvements noted in the following:
a) Making presentations and handling group difficult situations.	Keeping control of audit exit meeting.
b) Request help from Supervisor when needed	Supervisor's input is included when making decisions, when necessary.
c) Identify key information necessary to accurately define a problem and determine cause.	Problems and their causes are accurately defined.

Approved: 3/15/91 (date)

by J. Z. Martin and
Don W. Wells

IV. Quarterly Progress Reviews

Jointly review the progress made in meeting the expected results.

Note project status, problems encountered, changes made, new assignments and accomplishments to date.

Three Month Review

Six Month Review

1. THE CHEMISTRY AND RADIOLOGICAL PROTECTION AUDITS WERE VERY GOOD AUDITS AND WELL RECEIVED BY MANAGEMENT.
2. ALL AUDITS WERE COMPLETED AND ISSUED IN A TIMELY MANNER.
- (a) PROCEDURE SIMPLIFICATIONS WERE MADE AS A RESULT OF THE RADIOLOGICAL PROTECTION AUDIT.
- (b) THIRD PARTY COMMITMENTS WERE VERIFIED DURING AUDITS. AUDIT REPORTS REPORTED ON STATUS AND EFFECTIVENESS OF CORRECTIVE ACTIONS.
3. HAVE ALWAYS DEMONSTRATED OWNERSHIP OF ASSIGNED AUDIT SUBJECT AREAS. PROVIDED INPUT TO AUDIT PREP FILES AND SCHEDULING.
4. VISITED CORRECTIVE ACTIONS AND COMPLETION OF DIRECT OBSERVATIONAL REVIEW AND VERIFICATIONS.
- 5(a) COMPLETED ALL REQUIRED TRAINING ON SCHEDULE.
- (b) ASSISTED IN IDENTIFYING DEVELOPMENT NEEDS SUGGESTED TRAINING CLASSES WITH ANNUAL TRAINING & DOCUMENTED CONFIRMATION OF AUDIT SKILLS FOR B. LEWIS AND D. GARDNER.
6. NONE REQUIRED THIS QUARTER.
7. MADE MANY VERY GOOD SUGGESTIONS IN AUDIT CRITIQUES. MADE SUGGESTIONS FOR APPROACH TO TAKE NEXT FIRE PROTECTION AUDIT. SUGGEST THAT CIA GET OUT OF APPROACH OF SECURITY PROCEDURE CHALLENGES.
8. SUBMITTED THIS REVIEW ON 7/3/91
- 9.(a) ALL AUDIT EXIT MEETINGS WERE VERY WELL PRESENTED. GOOD CONTROL.
- (b) ALWAYS REQUESTED HELP FROM SUPERVISOR - WELL KEPT.
- (c) ALWAYS IDENTIFIED KEY INFORMATION TO DEFINE PROBLEMS AND THEIR CAUSE.

1. ALL AUDITS HAVE BEEN RECOGNIZED AS HELPING TO ACHIEVE THE NUCLEAR GENERATIONS GOAL OF EXCELLENCE.
2. ALL AUDITS CONTINUE TO BE ISSUED IN A TIMELY MANNER. NO AUDITS HAVE BEEN PERFORMED LATE.
- (a) PROCEDURE SIMPLIFICATION RECOMMENDATIONS WERE MADE AS A RESULT OF THE FIRE PROTECTION AND M&E AUDITS
- (b) THIRD PARTY COMMITMENTS WERE VERIFIED DURING AUDITS. AUDIT REPORTS REPORTED ON STATUS AND EFFECTIVENESS OF CORRECTIVE ACTION.
3. CONTINUES TO DEMONSTRATE OWNERSHIP OF ASSIGNED SUBJECT AREA. PROVIDED INPUT TO AUDIT PREP FILES AND SCHEDULING.
4. ALWAYS PERFORMS VERY GOOD AND TIMELY FOLLOW-UP ON CORRECTIVE ACTIONS.
- 5.(a) ALWAYS COMPLETED REQUIRED TRAINING ON SCHEDULE.
- (b) ASSISTED IN IDENTIFICATION OF DEVELOPMENT NEEDS. DOCUMENTED CONFIRMATION OF AUDIT SKILLS FOR R. GUMMARAJU.
6. NONE REQUIRED THIS QUARTER.
7. SUGGESTED THAT WE DO NOT USE A UTILITY FIRE PROTECTION ENGINEER FOR THE 1991 FIRE PROTECTION AUDIT. WE SHOULD USE A CONSULTANT (INDEPENDENT).
8. SUBMITTED THIS REVIEW 7/16/91.
- 9.(a) ALL AUDIT EXIT MEETINGS WERE VERY WELL PRESENTED. VERY GOOD CONTROL.
- (b) CONTINUES TO ALWAYS REQUEST HELP FROM SUPERVISOR - IF AND WHEN NEEDED.
- (c) CONTINUES TO IDENTIFY KEY INFORMATION TO DEFINE PROBLEMS AND THEIR CAUSE.

NOTE: SEE ATTACHED COMMENTS TO ITEM 3

Review completed: J. Martin 4/18/91
 (date), by: _____
4/18/91 ell
 and Don Will

Review completed: J. Martin 7/16/91
 (date), by: St. Bugos 7/18/91
 and _____

* This comment has been adequately resolved and it has been concluded by me that Jim took all necessary

Jim's performance for first half of year is satisfactory. His assignments of excellence (Fire Protection)

Key for Performance Rating:
 E-Excellent S-Satisfactory
 VG-Very Good M-Marginal
 SP-Satisfactory Plus U-Unsatisfactory

V. Full Year Review and Evaluation
 Measure the results the employe attained during the year against those expected. Rate the level of performance in the right column.

For full definitions see the Managing Human Resources book, Page 104.

Nine Month Review	12 Month review	Perf. Rat.
<p>1. PERFORMED AUDITS OF M&TE SECURITY AND FIRE PROTECTION. ALL WERE NOTED AS ASSISTING IN ACHIEVING GOALS OF EXCELLENCE.</p> <p>2. ALL AUDITS CONTINUE TO BE PERFORMED AND ISSUED IN A TIMELY MANNER.</p> <p>(a) RECOMMENDATIONS FOR PROCEDURE SIMPLIFICATIONS WERE NOTED AND MADE IN ALL THE AUDITS.</p> <p>(b) AUDIT REPORTS CONTINUE TO DOCUMENT THE STATUS AND EFFECTIVENESS OF OF CORRECTIVE ACTIONS FOR THIRD PARTY FINDINGS.</p> <p>3. ALWAYS DEMONSTRATED SME OWNERSHIP OF ASSIGNED AUDIT AREAS. REASSIGNED TO THE QA GROUP DURING THIS PERIOD AND HAVE PICKED UP ADDITIONAL ASSIGNMENTS IN THE QUALITY ENGINEERING AREA.</p> <p>CONTINUES TO PERFORM ADEQUATE AND TIMELY FOLLOW-UP ON CORRECTIVE ACTIONS FOR QA OBSERVATIONS AND DER'S.</p> <p>5. HAVE ALWAYS COMPLETED (a) REQUIRED TRAINING ON SCHEDULE.</p> <p>(b) CONTINUES TO ASSIST IN IDENTIFYING AND DEVELOPING SME NEEDS. ATTENDED VOTES TRAINING AND REQUESTED FIRE PROTECTION TRAINING.</p> <p>6. NONE REQUIRED THIS QUARTER</p> <p>7. SUBMITTED SUGGESTIONS FOR PROPERLY DOCUMENTING AUDIT CHECKLIST AND VAULTING.</p> <p>8. SUBMITTED THIS REVIEW 10/9/91.</p> <p>9. ALL AUDIT EXITS WERE VERY WELL (a) CONTROLLED.</p> <p>(b) ALWAYS REQUESTED HELP WHEN NEEDED</p> <p>(c) CONTINUES TO IDENTIFY ALL KEY INFORMATION AND TO DEFINE THE PROBLEM AND THEIR CAUSES.</p>	<p>Jimmy has participated in numerous audits Two audits of special note were 91-0195 & 91-0205. Fire Protection and FFD respectively In both audits several areas of program weakness were identified.</p> <p>His pursuit of resolutions of DERs, although politically unpleasant, has been <u>extremely</u> thorough and correct. He takes personal ownership of problems.</p> <p>He has also done extensive & detailed followups on items that were turned over to him when assigned to QA.</p>	
<p>is a definite asset to NQA. His list of Inspector Certifications identified</p> <p>Review completed: <u>11/27/91</u> (date), by <u>J. March</u></p> <p>and <u>J. March</u></p>	<p>Review completed: _____ (date), by _____</p> <p>and _____</p>	

deficiencies that, if not corrected, could have severely impacted the EF2 QA

Employee Methods Use to Achieve Results

Rate the methods and skills the employee used to accomplish the work. Identify the major skills upon which the ratings are based from the listing in the instruction manual and mark the appropriate rating column. Objectively describe the rating in the space provided.

	Performance Rating
A. 100. Individual Work Results	
Technical Competence	VG
101 - discipline technical knowledge	VG
102 - QA program, procedures, requirements	VG
Organizing	
111 - uses time effectively	S+
114 - prioritizes tasks, assignments and projects	S
Planning and Controlling	
131 - develops action plans for assignments	S+
Problem Solving/ Decision Making	
143 - identifies key information necessary to accurately define a problem and determine cause(s)	VG
Accountability	
150 - when given an assignment, sees it through to an effective conclusion	VG
154 - accepts responsibility for his/her errors or omissions	VG
B. 200. Teamwork Team Support/ Participation	
202 - removes obstacles that interfere with getting the job done	S+
208 - works cooperatively with others in the work group	S+

Communication Effectiveness	
223 - writes effective technical reports	S
C. 300.Customer/Client Relations-internal and external Relations	
N/A	
Development	
N/A	
D. 400.Company and Organizational Unit Goal Achievement Innovation	S
402 - accepts responsibility for carrying out difficult assignments which may involve criticism (or failure)	VG
403 - offers ideas and suggestions to improve organizations effectiveness	VG
Change and Development	
408 - adapts easily to changes in work assignments	S
410 - handles multiple work assignments and completes them	S+
E. 500.Others-list any other methods or skills that have not been identified, but are required for the position	
N/A	

VII. Overall Performance Rating Summary

The overall rating is a summary of the employe's performance in achieving results and using methods.

Excellent
 Satisfactory

Very Good
 Marginal

Satisfactory Plus
 Unsatisfactory

Comments:

VIII Assets:

Based on job performance, identify the employe's skills and abilities which are assets. Use the skills listing in the instruction manual. Place the number of the skill in the box and describe it.

- 1. _____
- 2. _____
- 3. _____

Development Needs:

Based on job performance, identify the employe's three priority development needs. Use the skills listing in the instruction manual. Place the number of the skill in the box and describe it.

- 1. _____
- 2. _____
- 3. _____

IX Employee's Career Interests:

The supervisor and employe should discuss and list future positions of interest based on the employe's current assets and development needs. Place the number of the interest in the box and describe it.

Short-Term Career and Position Interests.

Interests { } { } { } _____
 { } { } { } _____

Positions { } { } { } _____
 { } { } { } _____

Long Term Career and Position Interests

Interests { } { } { } _____
 { } { } { } _____

Positions { } { } { } _____
 { } { } { } _____

Supervisors Signature J. O'Donnell Date 1/21/92

Next Management Level Signature J. Wald
Date _____

I. Employee's Comments

Employe's Signature (your signature does not signify that you agree with the appraisal, but means that the appraisal has been discussed with you).

J. J. Martz Date 1/24/92

Marguast

Rev. 3/5-2-90

QAPS DER VAULTING CHECKLIST

NO 90-0310

DIST. CLERK N/A

REVIEWER N.Y. N/A

REVIEWER J. Martin

REVIEWER SB

REVIEWER Y N

REVIEWER Y N

DIST. CLERK N/A

DIST. CLERK dm

DIST. CLERK dm

DIST. CLERK dm

REVIEWER N/A

FINAL DISTRIBUTION

FORWARD NON VAULTABLE BACKUP TO LICENSING (LICENSING DER'S ONLY)

PACKAGE CONTENT READY TO COPY

CODING SHEET PREPARED
INITIAL CODING SHEET

PLACE DER IN FOLLOW-UP REVIEW FILE (FUR)

OPERABILITY DETERMINATION

1 COPY NSS OPERABILITY BOOK
IF ABOVE IS Y

COPIES MADE

1 COPY OF ENTIRE PACKAGE
(INCLUDING CODING SHEET)

COPY OF PACKAGE RETURNED TO FILE

ORIGINAL PACKAGE PLACED IN TO BE VAULTED FILE

LIST RELATED AND IMPLEMENTING DOCUMENTS BELOW (SEE DESK INSTRUCTION #23)

RELATED DOCUMENTS: _____

IMPLEMENTING DOCUMENTS: _____

DOCUMENT INPUT: COMPLETED BY SB DATE AUG 29 1990

EXHIBIT 11

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93-011

A11

Detroit
Edison

Enrico Fermi 2
Nuclear Services - Information Services

CODING SHEET

Quality Verification, Document preparation and Batching

DTC:

VSDEDR

DSN: (DER NUMBER)

90-0310

REV:

N/A

ISSUE DATE (DER CLOSURE DATE):

8-27-90

FILE NUMBER:

0918

SUBJECT/TITLE

Failure to Issue a DER for
Missed QA Hold Point

QA LEVEL: N/A

ORIGINATOR:

DEF

REFERENCE: DSN

COMP ID:

PIS:

HEAT/LOT:

N/A

WORK REQUESTS:

PURCHASE ORDERS:

PURCHASE REQUISITIONS:

Page Count

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EXHIBIT 11

Part 1 IDENTIFICATION (Originator / Supervisor)

Title FAILURE TO ISSUE A DER FOR MISSED QA HOLD POINT

A) Identification
System No / Name N/A Div No N/A PIS No N/A
Component Name N/A Location (Bldg / Elev) N/A
Discovery (Date / Time) 5/3/90 1400HRS Event (Date / Time) 3/23/90

B) QA Level / ASME
 QA Level I QA Level IM ASME Other

C) Detected During:
 Operational Abnormality Observation Alarm Source Code/Dox Type QA-AR
 CM PM ISI ST Work Request No 0010891004
 Other (Explain) QA AUDIT Special Inspection

D) References (Attach if Available)
 Tech Spec LER No
 Procedure Other SPECIFICATION 3071-364, REV.0

E) Description of Condition, Basis for Determination and Immediate Actions Taken
DURING AN II FINAL REVIEW OF DOCUMENTATION IT WAS NOTED THAT NO QA INSPECTION WAS DOCUMENTED FOR TACK WELDS INCORPORATED INTO FW-EII-F009-1 AS REQUIRED BY ASME SECTION III 1971 EDITION N3 4231.1 AND DECO GENERAL SPECIFICATION 3071-364 REV.0. (CONT ON PAGE 3)

F) Work Request Initiated No NA
G) Originator (Print Name) J.L. MARTIN Date / Time 5/8/90 0900 Copy
H) Supervisor (Signature) T.E. Abramson Date / Time 5/8/90 0912

Part 2 REPORTABILITY (NSS)

A) Plant Condition: (Circle One) 1 2 3 4 5
Rx Power Rx Temp Rx Pressure Rx Level
Core Flow Activity in Progress
B) LCO Entry NA Mode Change Restraint Yes No
C) Reportability Determination
20.402 No Immed 50.72 [] No 1 Hr 4 Hr
20.403 No Immed 24 Hr 50.73 [] No Yes
20.405 No 30 Days 73.71 No 1 Hr 24 Hr
26.73 No 24 Hr 40CFR302 No Immed
LC2.F No 24 Hr MICH No 1 Hr
WRC Notified NA Person Contacted Date / Time Initials
MICH Notified NA Person Contacted Date / Time Initials
National Response Center Notified NA Person Contacted Date / Time Initials
D) NSS Date
E) Operability Determination Required Yes No

Part 3 ACTION ASSIGNMENT (Plant Manager)

A) Responsible Organization POA (BRADISH) Due 6-8-90
B) Preparation of Regulatory Report Due
C) Comments This is a repeat problem. Wayne letter 5-8-90
D) Plant Manager [Signature] Date 5-8-90

Part 4 INVESTIGATION and REMEDIAL CORRECTIVE ACTION (Resp Org / ANII)

Investigation, Problem Description(s), and Proposed Remedial Corrective Action(s)
BASED ON RESEARCH DONE WHEN DEVIATION WAS DISCOVERED AND MEETING WITH ANII; DER WAS NOT DETERMINED TO BE NECESSARY BY PQA SUPERVISORY. SEE ATTACHED LETTER QA-90-3070

B) Evaluator YJH/pt Date 5-25-90
1 Nonconforming Items NA Rework Repair
2 Yes No 10CFR50.59 Review Required
3 Yes No Potential 10CFR21
4 Yes No SCAQ
5 Yes No Reportability Review Required
C) RSH YJH/pt Date 5-25-90

D) ANII NA Arnold/pt Date 5-6-90
E) Remedial Corrective Action(s) Completed (Identify and attach supporting documents)
SEE COPY OF ATTACHED LESSONS LEARNED WHICH HAS BEEN DISTRIBUTED TO ALL INSPECTION PERSONNEL FOR LESSONS LEARNED.

Completed By * YJH/pt Date 6-20-90 RSH Tom Bishah Date
Part 5 ROOT CAUSE and CATPR (Resp Org) [UNA] 5-25-90

A) Description of Root Cause(s) and Proposed Corrective Action to Prevent Recurrence (CATPR)

B) Evaluator _____ Date _____ C) RSH * _____ Date _____
D) CATPR(s) Completed (Identify and attach supporting documents)

Completed By _____ Date _____ RSH _____ Date _____
Part 6 CLOSEOUT (OSRO / PM / QAPS)

A) Closeout Summary
PQA ESTABLISHED A LESSONS LEARNED FOR FAILURE TO ISSUE A DER. THE RESPONSIBLE QC INSPECTOR AND WELDER WERE CONTACTED BY PQA AND IT WAS DETERMINED THAT THE INSPECTION WAS PERFORMED AND FOUND ACCEPTABLE. WELD PAPERS WERE UPDATED TO INDICATE THE INSPECTION. (CONT. PAGE 5)

Director Plant Safety [Signature] Date 8/20/90 B) OSRO Wag 21-90 Date
C) Plant Manager [Signature] Date 8/27/90 EXHIBIT 11

* Forward copies to Plant Safety and Group responsible for written reports - 3B
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DTC VSDER File 0918 19 PAGE(S)

Note section to which additional information applies

PARA. 9.6.3. SEE PAGES 4, 5 AND 6 FOR MEMO'S ADDRESSING THIS CONDITION.

NOTE:

1. THIS APPEARS TO BE A SIGNIFICANT CONDITION ADVERSE TO QUALITY THAT SHOULD BE DOCUMENTED ON A DER, EVALUATED, DISPOSITIONED AND NECESSARY CONCURRENCE OBTAINED, BY ALL RESPONSIBLE ORGANIZATIONS.
2. THE SUBSEQUENT INVESTIGATION AND ACCEPTANCE BY PQA, BASED ON THE WELDERS RECALL, DOES NOT APPEAR TO BE COMPLETE AND COULD RESULT IN SUSPECT INSPECTION FOR THE TACK WELDS. THE ROOT CAUSE DETERMINATION AND CORRECTIVE ACTION TO PREVENT RECURRENCE HAVE NOT BEEN ADDRESSED.

RECOMMENDATIONS:

1. ISSUE A DER FOR RESOLUTION OF THE NOTED CONDITION
2. DETERMINE CAUSE FOR NOT ISSUING A DER AT THE TIME OF DISCOVERY AND PROVIDE CORRECTIVE ACTION TO PREVENT RECURRENCE TO INCLUDE RETRAINING OF APPROPRIATE PERSONNEL AS NECESSARY IN THE REQUIREMENTS FOR DOCUMENTING CONDITIONS ADVERSE TO QUALITY ON DER'S.

Note section to which additional information applies

(CONT. SECT. 4A)

FOR REMEDIAL CORRECTIVE ACTION COMPLETED. IN ADDITION TO LETTER WELDING INSPECTOR RICK HILLARD WAS LOCATED AND STATED THAT TACK WELD WAS INSPECTED DURING THE WELD PROCESS BUT NOT SIGNED OFF BEING NO HOLD POINT WAS ESTABLISHED FOR FIT-UP.

RCA WILL ESTABLISH A LESSONS LEARNED BASED ON DER AND THE DER PROCESS. (DUE DATE JUNE 18, 1990.)

CONT. PART 3C-

THIS SITUATION FOR NOT ISSUING A DER FOR MISSED PROBLEM IS A ISOLATED CASE AND NOT A REPEAT PROBLEM.

ADDRESS OF COMMENTS ON DER REVIEW FORM.

PROCEDURES ARE ADEQUATE, NPP-39.WLD.003 WAS REVISED AFTER THIS SITUATION OCCURRED TO ESTABLISH A HOLD POINT TO BACK-UP WIGS AND WIDE REQUIREMENTS. IN ADDITION NPP-INT-01 IS IN REVISION CYCLE TO INCLUDE INSPECTION FOR FITUP'S FOR ASME WELDS

W.P. 001C891004 HAS BEEN UPDATED ON WIGS TO INCLUDE INSPECTION BY, R. HILLARD.

ROOT CAUSE WAS ESTABLISHED IN PART 4A THE CORRECTIVE ACTION IS NOTED IN LESSONS LEARNED

Note section to which additional information applies

(PART 6 CON'T.)

TO PREVENT RECURRENCE, NPP-39.WLD.003
AND NQP-INI-01 WERE REVISED TO INCLUDE
INSPECTION HOLD POINTS FOR FIT-UP FOR
ASME WELDS.

FIVE (5) DER'S CONCERNING MISSED HOLD POINTS
WERE REVIEWED AND DETERMINED TO BE
FIVE (5) ISOLATED CASES INSTEAD OF ONE (1)
CASE WITH FIVE RECURRENCES.

J. J. Martin 7/25/90

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OFFICE MEMORANDUM

DER NO. 90-0310
PAGE 6 OF 13

TO	B. J. Sheffel ISI/PEP Mgr.	DATE	3-23-90
BY	M. A. Brooks ANIZ		
SUBJECT	Sect II Program 89-044		

During final review of documentation for this program I noted that there is no QC visual inspection noted on WPCS 107469 for tack welds incorporated into FN-E11-FC09-1. This is required by ASME Sect III 1971 Ed., NB 4231.1 and DEC General Weld Spec. 3071-364 Rev. 0 para 9.6.3.

Please distribute this memo as necessary to determine required action.

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memorandum

DATE 3-23 19 90

FQA ORGANIZATION

FROM: ROK HAMBLETON

H LECOMTE / H. CASWELL

LEAD ISI ENGINEER

SR INSPECTORS

SUBJECT: WR # 001C891004

MESSAGE: DURING FINAL REVIEW BY ISI/ANII IT WAS DISCOVERED THAT A DISCREPANCY WAS IDENTIFIED ON WPES #107969. FIT-UP INSPECTION WAS NOT DOCUMENTED CORRECTLY IF INFACT IT WAS PERFORMED. IT IS MY UNDERSTANDING THAT THIS IS CURRENTLY UNDER REVIEW BY YOU. PLEASE PROVIDE JUSTIFICATION FOR ACCEPTANCE OF WELD OR INITIATE A DER IF REQUIRED. (SEE ATTACHED MEMO)

SIGNATURE RMB

REPLY: LEAD ISI ENGINEER

WPES Sign off Pro fit cleanliness, was ESTABLISHED IN THE WRONG LOCATION. PER CONVERSATION WITH WELDER I - DISTINCTLY REMEMBERS BOTH THE WELDING ENDE INSPECTOR STAYING WITH HIM THROUGH THE WHOLE JOB AND THE TACKS WERE INSPECTED AS REQUIRED THIS SHOULD SATISFY ANY QUESTIONS. 4-7-80

DE FORM MS 1 3-71 THE DETROIT EDISON COMPANY SENDER: RECIPIENT: SIGNATURE DATE

REMOVE YELLOW COPY - FORWARD WHITE & PINK RETURN PINK COPY - RETAIN WHITE FOR FILE

DER NO. 90-0310 PAGE 7 OF 13

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0801.10

Date: April 26, 1990
QA 90-3070

To: M. A. Brooks
Authorized Nuclear Inservice Inspector

From: H. T. LeCompte - Quality Specialist *HTL*
Inspections

Subject: Response to ANII Concern on WPCS 107969

Production Quality Assurance has reviewed the WPCS and has made the required corrections based on the following information.

1. Per the welding inspector who initiated the WPCS, the QC hold point was inadvertently marked pre fit-up cleanliness instead of fit-up inspection.
2. When the welder was questioned, he remembered distinctly which welding inspector and NDE Tech. was working the job, and both stayed with him through completion of weld. The weld inspector did do a fit-up inspection prior to root pass.
3. The welder who performed the weld has completed both Level I and II (VT) Inspection courses and has previously been certified as a Level II VT Inspector.

Based on the items listed above, the weld was in fact inspected by two (2) qualified individuals both in process and final inspection/NDE was acceptable.

HTL/vkf

cc: T. G. Bradish

111 108-102
E. G. ...
WAS CANCELLED

Date: June 20, 1990

To: PQA Personnel

From: H.T. LeCompte, Inspection Coordinator *HTL*
Production Quality Assurance

Subject: Lessons Learned per DER 90-0310

This letter is to remind each inspector the requirements stipulated in FIP-CAL-01. The following are two requirements listed in the FIP-CAL-01:

- To prescribe the method for processing Deviation Event Reports (DER's) for identification, documentation, notification, evaluation, evaluation corrections, and reporting of event or nonconformance conditions that have the potential for affecting the safe and reliable operation of Fermi 2.

- The procedure applies to the identification, documentation, notification, evaluation and/or nonconforming conditions that may impact Fermi 2 structures, systems and components, and to activities that affect those structures, systems and components, as identified by FMD CAL.

Based on the above requirements it is each individual's duty to initiate a DER in the event that any of the above mentioned requirements exists. Whether it is a missed hold point, inadequate package review, or a failed component - a DER must be issued, and reviewed

shall 12.6.2490
by Detroit Edison Management to determine its applicability.

FITZ.....

F. E. ABRAMSON
JUN 27 1990

DER 90-0310
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0801.10

Date: June 25, 1990
QA-90-3110

To: F. E. Abramson, Supervisor
Quality Program Assurance

From: T. G. Bradish, Supervisor ^{17R} FOR
Production Quality Assurance

Subject: Response to Observation No. 1
Identified in Audit Report 90-0125

Production Quality Assurance (PQA) reviewed Observation Number 1 identified in Audit Report 90-125.

The (5) DERs identified (89-1091, 1295, 1323, 1361 and 1381) were reviewed and the following conclusions obtained.

- o 89-1091 Hold Point was not established for fit-up inspection on ASME welding. Inspector inadvertently did not establish a hold point. Lessons learned conducted.
- o 89-1295 Established hold point for verification of shaft and impeller replacement was by-passed. By-passed hold point established in Work Request.
- o 89-1323 PQA hold point to verify fit-up of the base plate to embedded plate, per EDP-10894, was not completed. Hold points established per EDP-10894, by-passed by craft during modification.
- o 89-1381 Deviation from inspection verification program based on heat number verification not performed. Work request written up in general terms to remove relief valve, test, rework if required and reinstall. General hold point established in work request has been implemented due to this situation.

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F. E. Abramson
QA-90-3110
June 25, 1990
Page 2

- o 89-1361 Weld inspection was not performed by ANSI N45.2.6 inspection.

Package was routed to PQA to review on night shift. Inspection coordinator on shift was unaware of letter QA-89-2265 which stated Henze inspectors were not certified to DECo's QA Program. This letter had been routed to all of DECo's welding inspectors. Based on DECo weld inspectors not being present in office when package was revised, a contractor performed the review. Hold point was not established by contractor inspector based on Henze Q.C. had their own hold point established.

Based on review of noted DERs, it is determined though they are similar in nature, all five (5) are different situations. They appear to be five (5) isolated cases instead of one (1) case with five (5) reoccurrences.

Hold points being by-passed by craft will be reduced in the future based on the following:

- o QCIC's will be eliminated from Work Request.
- o Hold points will be established in controlling Work Request.
- o Inspections required by Nuclear Engineering will be specified in both the EDP's and Work Request.

The above referenced condition will reduce the possibility of missed hold points by consolidating their location.

All DERs will remain in RF-02 file and be discussed as lessons learned with both DECo and contract inspectors.

HTL/vlh

cc: R. B. Stafford

File 0801.10

Date: July 17, 1990
QA-90-0157

To: T. G. Bradish, Supervisor
Production Quality Assurance

From: ^{F.E.A.} F. E. Abramson, Supervisor
Quality Program Assurance

Subject: Response to Observation No. 1 of Audit 90-0125,
Evaluation and Corrective Action

Ref: QA-90-3110 dated June 25, 1990

Quality Program Assurance has reviewed and accepted your response to the subject audit observation. No further response is required at this time and the observation is considered closed.

Your response to the missed PQA witness/hold point causes appear appropriate. QPA will follow-up on this observation during the next audit of Evaluation and Corrective Action. Further evaluation of the actions taken will be made at that time.

If you have any questions, please contact R. Fitzsimmons of my staff at extension 6-1406.

FEA/RWF/wjt

cc: D. Delk
W. Miller
Audit 90-0125 File

DER CLOSURE CHECKLIST

DER 910 - 1031101
Page 13 of 13

Yes NA

PART 1

- 1. Title accurately describes the condition specified in Part 1E (change title if necessary).
- 2. Part 1, Items A - E, are complete and accurate and any applicable WRs are listed in Part 1F.

PART 2

- 1. If Part 2 is not applicable, "NA" block is checked.
- 2. If Part 2 is applicable, Items A - E have been completed.

PART 4

- 1. Trend data sheet has been initiated.
- 2. Proposed remedial action is adequate and all actions are complete.
- 3. Items dispositioned "use-as-is" or "repair" have:
 - a. Necessary justification
 - b. Necessary design change document for deviations from design requirement
- 4. If ASME block in Part 1B is checked, ANII review has been obtained.
- 5. Part 4, Items A - E, have been completed.
- 6. Operability concerns are resolved.

PART 5

- 1. If root cause and CATPR are not required, Part 5 "NA" block is checked.
- 2. Root cause is adequate.
- 3. CATPR addresses root cause and all actions are complete.
- 4. Part 5, Items A - D, have been completed or properly transferred.

PART 6

- 1. If DER addresses licensing issues, Nuclear Licensing concurrence was obtained and is documented in Part 6A.
- 2. If SOER, ISEG concurrence has been obtained.
- 3. Part 6A provides a brief summary of actions taken to resolve the condition. Part 6A signed and dated.
- 4. Indicate OSRO review is requested for violations of Technical Specifications, reportable event, SOER, selected industry issuances, or unplanned release of radioactive material.
- 5. Necessary supporting documentation is attached or referenced
- 6. Trend data is revised, if necessary, to reflect final evaluation
- 7. Additional follow-up investigation of effectiveness of corrective action is required (SCAQ only).
- 8. Hardware/software reviewed for closure LESSONS LEARNED, WR001891004, NPP-39.WLD.003 REV 2, NRP-1N1-01, REV. 2.
- 9. All implementing documents are identified on vaulting checklist.

CLOSURE

- 1. Prepare package for vaulting, separating "vaultable" material from "non-vaultable" material.
- 2. Number "vaultable" material pages both front and back, if necessary.
- 3. Include this checklist and number it as the last page in the DER package.
- 4. Vaulting checklist and coding sheet are included with package submitted for closure.

Reviewed by J. J. Martin

Date 7/25/90

CKI FIP-CAT-01 ATT 2 P1/1 042590

DTC VSDEDR File 0918

EXHIBIT 11

PAGE 15 OF 19 PAGE(S)

J. L. MARTIN
PREPARER'S NAME

NUMBER (NO) DER 90-0310 A1

PLT. MGR. APPVL. DATE (ADT) 5/8/90

REVISED DATA
(Y)es (N)o

If yes circle items revised:

(NO) (SRC) (TY) (REP)
(RPT_ID) (ADT) (RDT) (SYS)
(IDT) (TD) (REM) (CD)

SOURCE (SRC) QA DOC. TYPE (TY) _____ (SRC & TY AS THEY APPEAR ON THE DER)

REPORTABLE (REP) (Y)es (N)o

REPORT ID (RPT_ID) _____

SYSTEM (SYS) E11

REPORT DATE (RDT) _____

ITEM DATE (IDT) 3/23/90
(In order of availability from DER Part 1 ..
Event, Discovery, or Supervisor Date)

TREND DATE (TD) 7/25/90
(Today's date)

INFO KEYWORDS EVENT (EVNT) _____

KEYWORD 1 (KY1) _____

KEYWORD 2 (KY2) _____

REMARKS (REM) FAILURE TO ISSUE A DER FOR
MISSED QA HOLD POINT

TREND CODES (CD):

Program element violated (PE)	<u>1</u>	<u>6</u>
Org. involved in CAQ (PO).....		<u>7</u>
Activity at the time CAQ occurred (PA).....	<u>9</u>	<u>H</u>
Org. responsible for cause (SO).....		<u>7</u>
Activity incorrectly performed (SA).....	<u>Z</u>	<u>D</u>
Hardware component involved (HC).....	<u>3</u>	<u>B</u>
Cause for CAQ (DC).....	<u>1</u>	<u>G</u>
Document type and action (ST).....	<u>A</u>	<u>3</u>

Date Input to Data Base 7/11/90

Verified by: CB

EXHIBIT 11

DATE 7/8/90 PAGE(S) 48

ROUTE THE COMPLETED FORM TO THE DER COORDINATOR LOCATED AT 230 AIB

J. L. MARTIN
PREPARER'S NAME

NUMBER (NO) DER 90-0310 B1

PLT. MGR. APPVL. DATE (ADT) 5/8/90

REVISED DATA
(Y)es (N)o

If yes circle items revised:

- (NO) (SRC) (TY) (REP)
- (RPT_ID) (ADT) (RDT) (SYS)
- (IDT) (TD) (REM) (CD)

SOURCE (SRC) QA DOC. TYPE (TY) AR (SRC & TY AS THEY APPEAR ON THE DER)

REPORTABLE (REP) (Y)es (N)o

REPORT ID (RPT_ID) _____

SYSTEM (SYS) E11

REPORT DATE (RDT) _____

ITEM DATE (IDT) 3/23/90
(In order of availability from DER Part 1 -
Event, Discovery, or Supervisor Date)

TREND DATE (TD) 7/25/90
(Today's date)

INFO KEYWORDS EVENT (EVNT) _____

KEYWORD 1 (KY1) _____

KEYWORD 2 (KY2) _____

REMARKS (REM) MISSSED QA HOLD POINT

TREND CODES (CD):

Program element violated (PE) 10

Org. involved in CAQ (PO)..... I

Activity at the time CAQ occurred (PA)..... GC

Org. responsible for cause (SO)..... I

Activity incorrectly performed (SA)..... ZS

Hardware component involved (HC)..... 3B

Cause for CAQ (DC)..... 1G

Document type and action (ST)..... EA3

JUL 26 1990

Date Input to Data Base JUL 30 1990

Verified by: S3

PAGE 17 OF 19 PAGE(S) -
Date: 5-3-90

ROUTE THE COMPLETED FORM TO THE DER COORDINATOR LOCATED AT 230 AIB

TREND DATA SHEET
Revised 01-26-90

J.L. MARTIN
PREPARER'S NAME

NUMBER (NO) DER 90-0310 ~~AA~~ ^{BI} _{JLM 6/13/90} PLT. MGR. APPVL. DATE (ADT) 5/8/90

REVISED DATA (Y)es (N)o (N)o If yes circle items revised:
(NO) (SRC) (TY) (REP)
(RPT_ID) (ADT) (RDT) (SYS)
(:IDT) (TD) (REM) (CD)

SOURCE (SRC) QA DOC. TYPE (TY) AR (SRC & TY AS THEY APPEAR ON THE DER)

REPORTABLE (REP) (Y)es (N)o (N)o REPORT ID (RPT_ID) _____

SYSTEM (SYS) E11 REPORT DATE (RDT) _____

ITEM DATE (IDT) 3/23/90 TREND DATE (TD) 6/4/90
(In order of availability from DER Part 1 - (Today's date)
Event, Discovery, or Supervisor Date)

INFO KEYWORDS EVENT (EVNT) _____
KEYWORD 1 (KY1) _____
KEYWORD 2 (KY2) _____

REMARKS (REM) FAILURE TO ISSUE A DER JLM 6/10/90
FOR MISSED QA HOLD POINT

TREND CODES (CD):
Program element violated (PE) 10
Org. involved in CAQ (PO)..... T
Activity at the time CAQ occurred (PA)..... GL
Org. responsible for cause (SO)..... T
Activity incorrectly performed (SA)..... ZS
Hardware component involved (HC)..... 3B
Cause for CAQ (DC)..... LX
Document type and action (ST)..... 3

JUN 15 1990

Date Input to Data Base JUN 18 1990 Verified by: [Signature] PAGE: 18/25/19 PAGE(S) _____

NOOPY THE COMPLETED FORM TO THE DER COORDINATOR LOCATED AT 230 AIB

TREND DATA SHEET
Revised 01-26-90

J.L. MARTIN
PREPARER'S NAME

NUMBER (NO) DER 90-0310 A1

PLT. MGR. APPVL. DATE (ADT) 5/8/90

REVISED DATA
(Y)es (N)o

If yes circle items revised:

(NO) (SRC) (TY) (REP)
(RPT_ID) (ADT) (RDT) (SYS)
(IDT) (TD) (REM) (CD)

SOURCE (SRC) QA DOC. TYPE (TY) AR (SRC & TY AS THEY APPEAR ON THE DER)

REPORTABLE (REP) (Y)es (N)o

REPORT ID (RPT_ID) _____

SYSTEM (SYS) E11

REPORT DATE (RDT) _____

ITEM DATE (IDT) 3/23/90
(In order of availability from DER Part 1 -
Event, Discovery, or Supervisor Date)

TREND DATE (TD) 6/4/90
(Today's date)

INPO KEYWORDS EVENT (EVNT) _____
KEYWORD 1 (KY1) _____
KEYWORD 2 (KY2) _____

REMARKS (REM) FAILURE TO ISSUE A DER FOR
MBSER QA HOLD POINT

TREND CODES (CD):

Program element violated (PE)	<u>1</u>	<u>G</u>
Org. involved in CAQ (PO)		<u>T</u>
Activity at the time CAQ occurred (PA)	<u>G</u>	<u>H</u>
Org. responsible for cause (SO)		<u>T</u>
Activity incorrectly performed (SA)	<u>Z</u>	<u>D</u>
Hardware component involved (BC)	<u>3</u>	<u>B</u>
Cause for CAQ (DC)		<u>X</u>
Document type and action (ST)	<u>1</u>	<u>A</u>
		<u>3</u>	

JUN 15 1990

Date Input to Data Base JUN 18 1990

Verified by: _____

PAGE 19 OF 19 PAGE(S)
Date: 6/20/90

ROUTE THE COMPLETED FORM TO THE DER COORDINATOR LOCATED AT 230 AIB

1 APPEARANCES:

2

3 On behalf of the Nuclear Regulatory Commission:

4 RICHARD T. ANDERSON, Investigator

5 U.S. Nuclear Regulatory Commission

6 Office of Investigations, Region III

7 799 Roosevelt Road

8 Glen Ellyn, Illinois

9

10 On behalf of Detroit Edison and the Interviewee:

11 JOHN H. FLYNN, ESQ.

12 PETER A. MARQUARDT, ESQ.

13 Detroit Edison

14 2000 Second Avenue

15 Detroit, Michigan 48226

16

17

18

19

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21

22

23

24

25

P R O C E E D I N G S

[1:25 p.m.]

MR. ANDERSON: The time is approximately 1:25 p.m., February 2, 1994. For the record, this is an interview of Mr. Thomas Bradish, spelled B-r-a-d-i-s-h, who is employed by Detroit Edison. The location of this interview is the Fermi II Nuclear Power Station.

Present at this interview are Mr. Flynn and Mr. Marquardt, attorneys representing Mr. Bradish and Detroit Edison.

As agreed, this interview is being electronically recorded by court reporter Gretchen Schultz, and the subject matter of this interview concerns an alleged employment discrimination.

Mr. Bradish, would you please stand and raise your right hand, sir?

Whereupon,

THOMAS BRADISH

was called for examination and, having been first duly sworn, was examined and testified as follows:

EXAMINATION

BY MR. ANDERSON:

Q Mr. Bradish, would you please state what your title is and what your responsibilities and duties are?

A My title is Supervisor, Nuclear Quality Assurance.

1 I am in charge of running the audit program in accordance
2 with our license and NRC requirements.

3 Q Sir, approximately how long have you been in that
4 position?

5 A Approximately, I would say 30 months.

6 Q Approximately two-and-a-half years?

7 A Yes, sir.

8 Q And that, of course, precedes the time of the
9 transitional plan that came into effect?

10 A That's correct.

11 Q And what were you doing prior to coming into the
12 Quality Assurance Program?

13 A The Quality Assurance Audit Program, I was
14 Supervisor of a Production Quality Assurance portion of the
15 QA Program for the Detroit Edison Fermi plant.

16 Q So you had been in the Quality Assurance Program
17 for --

18 A Yes, sir.

19 Q Approximately how long total?

20 A I would say that was about a year-and-a-half also.

21 Q So we are talking five years, approximately?

22 A I have been in the QA organization probably four-
23 and-a-half years. The first six months I was in the Plant
24 Safety, and that was reviewing corrective actions,
25 evaluating corrective actions, implementation of corrective

1 actions as a result of previously identified problems.

2 Q And then from there you then went to?

3 A Supervisor of the Production Quality Assurance
4 organization.

5 Q And then eventually to the Quality Production?

6 A Audits.

7 Q Audits, okay.

8 And during this period of time, your position is
9 to review the work and to assign the work of various
10 auditors; is that correct?

11 A Yes, sir, I make the schedules out.

12 Q The last position that you had that you have been
13 in for approximately two-and-a-half years, approximately
14 how many people were in your group?

15 A It has varied from as few as seven to as many as
16 13.

17 Q And why has there been a variance there?

18 A The variance, through attrition, employee
19 requests, a couple of people -- like I said, attrition, a
20 couple of people went back to seminary school or whatever to
21 go into other fields of employment that they have chosen.

22 Q I guess my question thought, Mr. Bradish, is, were
23 you authorized up to 13 individuals?

24 A I guess our complement, our budget complement
25 varied. Prior to staffing transition I think it was 11. I

1 am not sure on that number, but I think it was 11, so we
2 were approximately four short at one time minimum.

3 Q And approximately how long would an auditor be
4 assigned to your group, would they rotate through various
5 other organizations prior to coming into and then even after
6 being in quality assurance then would they rotate out?

7 A Typically not. Some utilities, if you describe
8 their audit program are set up that way, but ours are really
9 not. It is a permanent position. We do have opportunities
10 to go into other organizations, it is called job advancement
11 or job placement, a bidding process, if you will.

12 I mean they are free to -- if they are an auditor
13 and there is another position that comes up in another
14 department, they are free to bid on that job to see if they
15 have the qualifications to fill it. It is not that you are
16 an auditor and you always will be an auditor type of
17 approach. So there is some turnover due to that mechanism.

18 Q Were you here when Mr. Miller, I believe, was
19 Director of Quality Nuclear Assurance?

20 A Do you want the whole story on me and Mr. Miller
21 here?

22 Q You bet.

23 A Okay. I had taken over -- the history here is
24 that I had taken over the Production Quality Assurance which
25 is now called the INS Group, Inspection and Surveillance

1 Group, that is what it is termed now, so I will refer to
2 that as the INS Group from now on, if that is all right.

3 Q Okay.

4 A I was in charge of that group. Bing Miller or Bob
5 Stafford was the Director of Nuclear Quality Assurance at
6 that time who promoted me into that position. From there,
7 Bing Miller then accepted the job as Director of Quality
8 Assurance and Bob Stafford then became the manager of
9 Nuclear Assurance as a title. So Bing then reported to
10 Stafford.

11 There was a transition period there, I would say,
12 approximately eight or nine months where I was the
13 Supervisor for Production or INS Group, and he requested
14 that I go over and be the supervisor of the audit groups,
15 and subsequently I accepted that position and that is how I
16 became supervisor of the audit groups.

17 Q I understand.

18 Now as a supervisor of a particular group,
19 especially not a group -- during this period of time, we
20 have had described that there were basically four groups
21 within the Quality Assurance Program?

22 A That is correct.

23 Q Would there be occasion to utilize an inspector or
24 an auditor from one of the other three groups within your
25 particular group?

1 A Yes, we would have -- it is always good to have a
2 technical specialist on an audit. It gives a lot of
3 credibility to the audit team if they have somebody
4 technically qualified that knows the nuts and the bolts of
5 the subject that they are auditing. So we will utilize
6 expertise within the QA organization, and it is not only
7 limited to the QA organization, we use expertise from other
8 utilities as well and we use expertise from other
9 departments as well.

10 Q Excuse me, when you said "other utilities," you
11 are talking outside of Detroit Edison?

12 A That's correct. That is how we try to assemble
13 the make-up and the chemistry of our audit teams with
14 technical specialists.

15 Q So if you were doing something very, very highly
16 technical in auditing a particular thing, you could call
17 upon, say, Davis-Besse or how would you work that?

18 A We have an exchange process really utilizing -- we
19 use a joint utility technical assistance where there is
20 approximately eight utilities that we share technical
21 expertise with, and we will typically share three to four
22 audits, audit topics, a year where we will send four
23 technical specialists to various utilities a year and they
24 will -- we will import four technical specialists, and we
25 decide what areas they will be in. There is an agenda made

1 up and there is a buy-in by the QA Managers of the different
2 utilities. So we use technical expertise that way.

3 We are involved with the JUMA Technical Assistance
4 where the QA organization goes in and audits other
5 utilities' QA organizations.

6 Q Is that the Joint Utility Management Assessment
7 Team?

8 A That's correct.

9 Q I understand. Okay.

10 A So we use different techniques to get the
11 technical expertise to give the credibility to the audit
12 teams.

13 Q Mr. Bradish, an individual who would be selected
14 for that -- I think you pronounced it JUMA?

15 A Yes.

16 Q Would people, would auditors rotate through that
17 or would you select them because of certain expertise?

18 A There is some criteria there that the other
19 utilities like to see. They like to see people certified as
20 a lead auditor, ANSI Standard 4523 gives the standards by
21 which we certify our auditors to. It is based on
22 experience, technical competence, years in the QA program
23 and education, and things of this nature, to certify a
24 person as a lead auditor.

25 Typically, we have to lead one of the three audits

1 that we described a year in the JUMA process. So we would
2 have to send a certified lead auditor on that team.

3 Q Okay.

4 A The other make-up is that if we were going to
5 send -- we like to send people to other utilities that have
6 done them before. So if you are sending a person that is
7 more or less virgin to the JUMA process, you would send
8 another person along with them at least that they have some
9 experience doing one because they are not typically the same
10 way that we would do an audit internally here at Detroit
11 Edison.

12 Q I understand.

13 A So there is different mechanisms that you use for
14 that.

15 Q In your audits here at this particular plant,
16 would you also utilize companies such as Bechtel?

17 A In the past they have, but we have grown and got
18 the expertise that we really are not using contract auditors
19 or contract technical specialists from Bechtel and other
20 large insuring firms that supply those type of people.

21 We do have a fire protection requirement that
22 rotates on a three-year basis, and every three years you
23 have to have someone that has got this nuclear insurers'
24 fire license certification and other outside independents.
25 We have been able to fill that with other utilities

1 technical expertise that have those fire protection
2 certifications. So really we have not been -- I guess the
3 answer is no, we have not been utilizing contract auditors.

4 Q Because of the maturity of your own program?

5 A And the agreement with other utilities to utilize
6 their personnel independent, too.

7 Q During this period of time that you have been as a
8 supervisor within the program, did you on occasion have the
9 ability to work -- or the opportunity, excuse me, to work
10 with a Mr. Jimmy Martin?

11 A Yes.

12 Q And in what capacity was he assigned to your
13 group?

14 A Well, he was -- when I took over the audit group
15 for a short period of time, and I want to say it was two to
16 three months, I don't have the exact dates, after I assumed
17 the supervisors job and he was in the audit program, I would
18 say it was probably two to three months. I was his
19 supervisor.

20 Q You were his supervisor?

21 A I was his supervisor for two to three months, yes.

22 MR. ANDERSON: Wait a minute. Let me, just for my
23 own clarification, I want to show you some handwritten, I
24 guess I will have to call this Exhibit 7 at this point, but
25 this handwritten out. We received this from Ms. Goodman, at

1 least from her recollection.

2 [Exhibit No. 7 was marked for
3 identification.]

4 BY MR. ANDERSON:

5 Q You would be under the Quality Program Assurance.

6 A That's correct.

7 Q And I believe Mr. Martin was under Mr. Wald, who
8 was the --

9 MR. MARQUARDT: Let me, just so the record is
10 clear, Exhibit 7 is your write-up of Ms. Goodman's
11 description?

12 MR. ANDERSON: That's correct. It is a
13 handwritten --

14 MR. MARQUARDT: It is not something that she wrote
15 up?

16 MR. ANDERSON: Correct, that I wrote up during our
17 discussion.

18 BY MR. ANDERSON:

19 Q Where would Mr. Martin be, if you can relate to
20 this particular organizational chart?

21 A I guess I need to ask, do you want me to go back
22 in history here to clarify this a little bit?

23 MR. MARQUARDT: Please just respond to the
24 questions.

25 BY MR. ANDERSON:

1 Q Here is what I would like, basically, Tom, were
2 you like over in this position, when I say over here where
3 Mr. Wald was the supervisor of the Quality Electrical Group
4 at one time, or was he over here with you?

5 A Yes. When I moved from the INS Group, the
6 Production Quality Assurance, to this group, Mr. Martin was
7 one of the auditors in this group that I was the supervisor
8 of.

9 Q This group is the Quality --

10 A Program Assurance.

11 Q -- Program Assurance. So he was an auditor here?

12 A Yes, sir.

13 Q You then were transferred to the supervisor of
14 this particular one which was about two-and-a-half years ago
15 then; is this correct?

16 A That is correct.

17 Q And then he was there approximately two to three
18 months?

19 A That's correct.

20 Q Then he went to the Quality Engineering Group?

21 A Yes, sir, at his request.

22 Q At his request?

23 A Yes, sir.

24 Q During that period of time, how would you rate Mr.
25 Martin's work performance based upon other auditors that

1 were under your direction?

2 A We tried to -- I guess maybe I am getting a
3 little technical here, too. We try to do what we term
4 performance-based auditing. Performance-based auditing is a
5 concept, if you need some clarification, is a concept that
6 you audit performance and how it affects safety, nuclear
7 safety, and reliability.

8 Compliance auditing is more like an accountant,
9 that you look at numbers and you verify the balance sheets,
10 and the numbers agree with the balance sheets.

11 So we were trying to phase out the compliance
12 auditing. To describe Mr. Martin, Mr. Martin was a very
13 compliance-oriented auditor, he was not a performance-based
14 auditor. So I would rate him at the bottom of the eight
15 people, seven to eight to thirteen people that we have had
16 in the auditing organization because he never really grasped
17 the concept of performance-based auditing.

18 Q When you say that he requested to transfer to
19 another group, was that because he could not accept -- that
20 based upon your observation, was that because you feel that
21 he didn't grasp the direction you wanted to take the
22 program?

23 A That is a fairly accurate statement. Mr. Martin
24 was not very happy about his employment in the organization
25 of auditing, even though when he went to Quality Engineering

1 they still performed some audits.

2 When I took the group over there were -- Mr.
3 Martin came to me and requested if there was any way that I
4 could move him to the Quality Engineering Department he
5 would like that. It was a fairly easy process. I talked to
6 John Wald, John Wald and me. He had a position opened and
7 we agreed on the transfer and got it approved through I
8 believe it was Bing Miller at the time to transfer his
9 reporting requirements to John Wald.

10 Q In that short period of time that you were his
11 supervisor, did you feel that there was a personality
12 conflict as well as a philosophical conflict?

13 A I had no personality conflict with him.
14 Personality really never did enter into any of the decisions
15 that were made. The conflict on his job performance, on the
16 consistency of his findings and trying to explain to the
17 auditee or to the customer what the concerns from the audit
18 group were was a very difficult translation. So we did have
19 performance problems, but nothing in the personality
20 department.

21 Q I am going to tax your memory here, but an
22 allegation has come forth that DER -- which is Deviation
23 Event Report?

24 A I understand.

25 Q -- 90, which I take it would be in year 1990?

1 A That's correct.

2 Q -- 310 states that basically he created this DER
3 90-310 because you refused to create a DER that had to do
4 with a missed QA hold point. I don't know if you are
5 familiar with it. Are you familiar with this?

6 A Yes, sir.

7 Q Could you explain your version of what happened?
8 He claims that you refused to create the DER. Therefore, he
9 created a DER 90-310 that did not deal with the hold point
10 but dealt with your refusal to write the DER.

11 A That's correct.

12 MR. MARQUARDT: Do you want to look at the DER?

13 MR. ANDERSON: I don't have the DER.

14 THE INTERVIEWEE: I am familiar.

15 MR. MARQUARDT: Okay, go ahead.

16 THE INTERVIEWEE: We went over this with the NRC,
17 I guess, and I am familiar with that.

18 What happened in that situation was, I was the
19 Supervisor for the Production Quality Assurance of INS.
20 Could I just refer to it as one or the other?

21 MR. ANDERSON: Absolutely.

22 THE INTERVIEWEE: You can just put INS above that,
23 too.

24 MR. ANDERSON: I am going to put INS above that.

25 THE INTERVIEWEE: That is what it is termed now.

1 BY MR. ANDERSON:

2 Q Would that be the correct location of it?

3 A Yes, sir. I was the Supervisor of the INS Group.
4 This work package, without getting too technical, I guess,
5 unless you want me to? I can go as technical as you would
6 like. Mr. Martin was performing an audit on the inspectors'
7 qualifications of which I was in charge of. There was a
8 work package that dealt with a valve, and what they had done
9 was they cut a leak off line on the valve and welded in a
10 three-quarter inch plug. It was part of the pressure
11 boundary and required a fit up, a tack weld to make sure
12 that the weld was there, and then it required another visual
13 inspection, if you will, as the welder came half way out and
14 then a full penetration weld at the end of the weld. So it
15 required three inspection hold points.

16 If I can for just a minute upon a piece of paper,
17 I would like to show you another thing that may be helpful,
18 not only for me to --

19 MR. ANDERSON: We will call this Exhibit 8, is
20 that okay?

21 MR. MARQUARDT: Yes.

22 [Exhibit No. 8 was marked for
23 identification.]

24 THE INTERVIEWEE: What we have here is, this is
25 termed a WPCS, this is a Weld Process Control Sheet. I

1 think that is the term they use, and it has boxes on it.
2 The different requirements, okay, and this is Requirement A,
3 B, C, D, and so forth, okay. This is what the weld engineer
4 puts on here. He will put a description of what he wants,
5 he wants a tack weld, a heliarch, whatever type of weld he
6 wants.

7 Then, it would be reviewed and he will put a star
8 over here for a QA hold, and then he will say visual, okay?
9 Then he might say, NDE test to PT or something. This is
10 typically the way a sheet will run. What he had done, when
11 he did this particular one, he skipped a line here, and he
12 put the visual down here. So this was omitted, if you will,
13 this was omitted from the weld sheet that the inspector was
14 using on the day of the job.

15 Now the inspector says, I have done this job
16 multiple times in the past and I have always done a fit up
17 on this type of job, and he questions in the field, he says,
18 I had better do a visual anyway even though I don't have to
19 sign for it because it is not asterisked up here for a QA
20 hold point, but I will do it anyway.

21 So he did the fit up weld, and he did the half,
22 and then he did the full out, and then he did the NDE test
23 on it down here. He did all the requireds. He did not sign
24 that he did the fit up.

25 BY MR. ANDERSON:

1 Q Because that would have been in the second column
2 then?

3 A Yes. It was actually --

4 Q It was a mistake because it was a column error?

5 A Exactly. It was a column error made by the weld
6 engineer, and the weld engineer acknowledged it. When we
7 discovered it long before Mr. Martin started his audit
8 process, and it is in the work package this way also, we
9 brought it to the attention, self-identified it, and brought
10 it to the attention of the weld engineer. The weld engineer
11 took a look at the package and the description and discussed
12 the whole point, and the process that the weld inspector
13 used when he was on this job I found and agreed that the
14 weld process was acceptable and signed for it on the weld
15 package.

16 When Mr. Martin was in the process of doing his
17 audit and he went by the -- at the time the guy was the
18 American Nuclear Insurer's representative on-site, and
19 looked at this package, and they said, "Well, they obviously
20 missed the hold point right here and they didn't sign for it
21 so they missed it." So he brought that to my attention at
22 that time.

23 I looked at it and I saw the notations on the
24 sheet that the issue was resolved on the fit up, so I did
25 not classify it as a missed QA hold point but a personal

1 error made by the weld engineer, and I brought that to his
2 attention, and that subsequently to this work being
3 performed and completed that the weld engineer had accepted,
4 and I did not see the need, since it had already previously
5 been addressed and corrective actions been implemented, to
6 write a DER by our procedures.

7 Of course, discussions came up about it, but I
8 would not do anything different today at Mr. Martin's
9 request to write a DER on this situation. First of all, it
10 is each employee's own responsibility that if they find a
11 deficiency to initiate the DER. It is not the person -- in
12 other words, if I identify a deficiency and I go to Mr. X
13 over here and say, "You write the DER," it is my
14 responsibility by the procedure and by FERMI management to
15 initiate the DER because I have the concern. I am the best
16 person to address that concern and describe it in written
17 format to be reviewed.

18 Q Excuse me, he was the auditor reviewing this?

19 A Yes, correct.

20 Q So it is his responsibility then to have written
21 the DER if, in fact, he felt that this was an error that
22 needed to have further correction?

23 A That's correct, and it would furtherly get
24 evaluated by an independent source, by another organization
25 solely responsible to review the corrective action process.

1 Q Why was his insistence that you write the DER?

2 A His insistence by me writing the DER -- another
3 sheet of paper, if you want to call this 8, I don't know if
4 you want me to go back to that or not?

5 Q We will do this because we need to keep this.

6 A It helps me to draw a little bit to address
7 questions, sir. What we do is, initiate a DER. If it is a
8 plant DER, it goes a different route. A plant-initiated DER
9 would go to the plant manager and he signs it. He will
10 assign it to an organization.

11 In other words, we have basically operations,
12 maintenance, engineering, rad protection, ten, eleven,
13 twelve different organizations that the plant manager will
14 assign responsibility to this DER.

15 As the INS Supervisor, if I was to write this DER,
16 it would get over here into the plant DER system versus the
17 QA DER system. What happens here is, when QA initiates a
18 DER, it still goes to the plant manager and he assigns it
19 the same way that he would this other one, but it would go
20 back to QA versus going back to plant safety for review. In
21 other words, Mr. Martin would have been the initiator and
22 the reviewer of corrective action.

23 My impression of why he did this would be that it
24 would put the work load for tracking, trending, reviewing,
25 documenting the DER process into another department's house

1 versus his involvement with the DER.

2 Q Would you put at the top underneath the plant on
3 that side just put in parentheses "Supervisor."

4 So basically what you are saying, if it goes off
5 to this direction that is a supervisory created DER?

6 A Yes. That's correct, to anybody in the plant,
7 floor cleaners to the plant manager to the vice president.

8 Q But the QA auditor himself, it goes this way?

9 A Yes.

10 Q So it creates work for himself?

11 A It creates a lot of work for himself. Not a lot
12 of work, don't get me wrong, but he is now responsible for
13 not only the initiation of it but the review of the
14 corrective actions, the buy-in that the corrective actions
15 are adequate to prevent reoccurrence, and then the follow-
16 up of the investigation for the DER.

17 Q Let me just read you this and I would like your
18 comment. It says: "I issued the DER because the Inspection
19 Group Supervisor would not issue a DER and was trying to
20 resolve the issue by other means outside the corrective
21 program."

22 What you are saying is that you felt that the
23 problem had been identified, self-identified, had already
24 been corrected, there was no purpose in creating a DER
25 which, in effect, would just duplicate what has already been

1 done?

2 A That is correct. Let me add something here. This
3 whole point as it is described here, this whole point was
4 identified in our package review some six to eight months
5 before Mr. Martin ever did his audit and corrective.

6 Q Now I have a question on it.

7 A Here is the thing, when the plant was not in
8 start -- this was a requirement for the plant to get started
9 back up, okay. When we identified that that whole point was
10 missing a signature, we contacted the weld engineer, also we
11 contacted the inspector that was on that job that signed the
12 other six requirements on that work package. We resolved
13 that to get the plant started back up, nine months before
14 Mr. Martin ever saw this package. It would have been easy
15 to fax or mail this WPCS to the weld inspector that did it,
16 have him initial it here, send it back and put it in the
17 work package.

18 Q And correct it and no one would know the
19 difference.

20 A Correct it and dated it here, subsequently, date
21 it. It wouldn't be the same date as the rest of them, but
22 it would have been dated and initialed by him that he did
23 it. But we had a phone conversation and documented the
24 phone conversation with him in front of a witness, and
25 everything else, on a work package that he did, indeed, do

1 the visual inspection.

2 So we intentionally left it blank so that there
3 would be no coerciveness or anything else for a cover up in
4 answering questions later.

5 Q Mr. Martin identifies this problem but does not
6 create a DER on this one?

7 A That's correct.

8 Q But instead creates a DER on you because you
9 refused to write a DER. Where would his DER go as far as
10 this program is concerned?

11 A His DER goes over here on the QA program.

12 Q So he is creating -- what corrective action would
13 he have gotten by writing a work deficiency -- I guess that
14 is what it amounts to -- on you rather than on the DER on
15 the problem? Do you see what my question is?

16 A I understand what your question is.

17 Q What is the resolution -- I mean what happened to
18 that DER 310, do you know what happened to it, do you know
19 what became of it?

20 A Without looking at it right now, I don't think I
21 can. I remember the technical issue, and I am not so
22 familia -- this is more of a personnel error type of issue
23 here. What he is saying is procedure compliance for
24 initiating -- requirements for initiating a DER.

25 Q I guess my question is, I understand if he would

1 have written a DER here what corrective actions would have
2 been taken. But to write a DER on you not writing a DER,
3 what corrective actions -- I mean where would that have gone
4 to, to the vice president, or something, --

5 A No.

6 Q -- or what would have been the purpose of that?

7 MR. MARQUARDT: Well, I would let the record show,
8 I guess, that certainly the DER is still in the files and we
9 can look at the disposition noted on the DER for whatever
10 happened to it, especially as Mr. Bradish has indicated he
11 doesn't recall the ultimate disposition.

12 THE INTERVIEWEE: What I recall is, if you would
13 like I could try to go here --

14 MR. ANDERSON: No.

15 BY MR. ANDERSON:

16 Q I will tell you what, what I would like to do,
17 though, is, if I could get a copy of the resolution of that
18 because I am at a loss to understand why he would do that
19 rather than just write this thing up?

20 A I think what you are going to find, it is going to
21 go back to the technical issue of the whole point. This
22 issue also came up with the NRC and that was the resolution
23 of it, it was this -- not depicting the whole point. See,
24 if you look at it, he wanted to write the DER on a missed QA
25 hold point. We subsequently determined it was not a missed

1 QA hold point, that the inspector did the hold point. He
2 did not sign for it because the asterisk was not in that
3 block for him to sign it, but he still did the visual
4 inspection and the requirements as a weld inspector to
5 verify that the fit-up weld was done correctly.

6 Here is the other thing is, if this work package
7 was not done that way, we would have gone in and cut that
8 weld out and redone it, and that was all addressed upfront,
9 should we go do that.

10 Q Previous?

11 A Yes, and it was decided by the engineering group,
12 the welding engineer, the maintenance superintendent, the QA
13 organization, and also with the weld inspector that he did
14 that, and the welder acknowledged that he did the fit-up
15 weld inspection. The welder that was doing the weld called
16 him over and said, "It is not on this WPSC to this, but I
17 think we need to do it. I think we made a mistake here."

18 Q At this time, were you his direct supervisor?

19 A No, I was not.

20 Q Did you have an argument with him and throw a
21 paperclip at him?

22 A I did not have an argument with him and I would
23 not -- what happened was, I flipped it like that. He was
24 sitting in that general direction. I would not term that
25 has throwing at him. I got disgusted with him. The

1 conversation voice levels probably went up a couple of
2 octaves.

3 Q Was this prior to or after he left your group?

4 A This was prior to. This was while I was the INS
5 Supervisor.

6 Q So it safely can be assumed that when you came
7 over, he did not want to remain there because of
8 personalities?

9 A All I can say is that he requested --

10 Q A transfer.

11 A -- to go to work for the Quality Engineering
12 Group, right.

13 Q When did you first learn that there was going to
14 be a transitional plan implemented that involved the QA
15 program?

16 A I guess when everybody else did. I think it was
17 sometime in the January timeframe that the Fermi
18 organization would be going through what they called the
19 staffing transition.

20 Q When did you learn that you were selected to be a
21 Supervisor of a Quality Assurance Group?

22 A I knew about that when the announcement came out
23 for Bob Szkotnicki and myself at the same time. I don't
24 have the exact date for that.

25 Q Approximately April?

1 A I would say April.

2 Q March?

3 A No, it was April. It would have to be April
4 because we finished staffing transition in May, and after
5 Lynn announced her -- first of all, Lynn was announced as
6 the Director of QA when the QA and the Training Group went
7 together. Then she had like a week or so, and I had like
8 two weeks. So it was about the middle of April.

9 Q Subsequent to your placement as the supervisor,
10 you had an occasion to evaluate a number of people for
11 various positions, and in that evaluation you had Mr.
12 Martin. There are two position descriptions, and we have
13 labelled these already as Exhibit 3 and Exhibit 5. They are
14 position summary Quality Assurance Specialist Surveillance
15 and Quality Assurance and Quality Assurance Specialist.

16 I will hand these to you, and if you would take a
17 look at these. When you did this evaluation you had not
18 been Mr. Martin's supervisor for some time by this point, it
19 is almost what two years give or take a couple of months,
20 maybe?

21 A That would be probably right.

22 Q When you did the evaluation, had you had an
23 opportunity of working with Mr. Martin subsequent to his
24 leaving your group that you were able to give the comments
25 on communication -- let's see, flexibility, communication,

1 individual initiative, and decisionmaking?

2 A Yes.

3 Q Did you have any input from anyone else in
4 preparing this evaluation?

5 A I am not sure I understand that.

6 Q Did you talk to Mr. Wald at all who had been his
7 supervisor?

8 A When I did these evaluations?

9 Q Yes, sir.

10 A No, I did not.

11 Q So you did these totally on your own?

12 A Well, there was conversation --

13 MR. MARQUARDT: Just for me to correct things, or
14 to understand things, is the position that you evaluated Mr.
15 Martin for the quality assurance specialist surveillance?

16 THE INTERVIEWEE: No.

17 MR. MARQUARDT: Exhibit 3 which you handed Mr.
18 Bradish is for a position that I don't believe he rated Mr.
19 Martin on. I believe Mr. Szkotnicki rated him on that
20 particular position.

21 MR. ANDERSON: Thank you for clarifying that one.
22 Very well, let me just check it. You are absolutely
23 correct.

24 BY MR. ANDERSON:

25 Q In fact, Mr. Szkotnicki did two of those. Let me

1 hand you which would be Exhibit 5, and if you will take a
2 look at that, and then look on the next page to make sure
3 that that is, in fact, the one that you did?

4 A Yes, that is correct.

5 MR. ANDERSON: Thank you for that correction,
6 Peter.

7 THE INTERVIEWEE: Now, I think you had a question
8 you wanted me to answer. The question was, did I have any
9 involvement in making these --

10 BY MR. ANDERSON:

11 Q First of all, did you talk to anyone else or did
12 you do these on your own? I believe you said that you did
13 these on your own.

14 What was the criteria that you used for, like,
15 team work that you rated him low since you had not been his
16 supervisor for a period of time?

17 A Well, Jimmy did not report directly to me as a
18 supervisor. I still was in charge of the Audit Group. I
19 was in charge of the Audit Group, the Quality Engineering
20 Group assisted and performed audits. The audit reports are
21 initiated with my name on them, and my approvals and Lynn
22 Goodman's approvals, our director's approvals. So the
23 channelling of the information and the communication of the
24 audit results had to go through the Audit Group supervisor,
25 which I was.

1 Mr. Martin was the technical specialist for our
2 fire protection audits, very technical qualified in the
3 arena of the fire protection requirements. When he went to
4 Mr. Wald's group, we had a fire protection audit scheduled.
5 I requested Mr. Martin to lead that audit because it was
6 three or four months before the audit was due. We would not
7 be able to go out and get a technical specialist in that
8 short period of time to fill that technical expertise I felt
9 I needed on the audit team.

10 He agreed at that time during the transfer. When
11 the audit came due and the audit results and the report.
12 Mr. Martin came to me and requested he not be the technical
13 specialist for fire protection any longer and that he not
14 have involvement in the audit team make-up outside of the
15 quality engineering audits, which typically would be their
16 own team.

17 So that to me reflected a team work atmosphere and
18 team work approach that he did not want to work outside of
19 the Quality Engineering Group with the Audit Group or with
20 the INS personnel or other utility people, then there was a
21 lacking of team work.

22 Q But if you will read your narrative there, if you
23 will read it outloud, under team work?

24 A I say: "Jimmy, does not work well on the audit
25 teams I have been involved with."

1 Q Excuse me, I think --

2 A It says "team work," right?

3 Q No, "Jimmy does work well" I believe is correct?

4 It says, "Jimmy does work well on the audit team I have been
5 involved with."

6 A That's correct. That's what it says.

7 Q Then what does the rest of it say?

8 A "He is not very flexible to assume leading jobs."

9 Q I guess my question is, if an individual really
10 doesn't want to take the lead but he works well with the
11 team, would that be reason to give him a 2 on a 5 scale --
12 first of all, let's clarify, is that, in fact, a 5 scale, 1
13 to 5, the rating?

14 A I can't remember. I believe it is, but I can't
15 remember for sure whether it was the 1 to 5 guideline. Let
16 me see and I will tell you what. Yes, I believe it is,
17 because he got a 5 for certifications. They are 1 to 5
18 guidelines.

19 Q A 2 would be below average, and yet you state that
20 he works well with the team. Now leadership I could
21 understand if, in fact, he is below average, but to be a
22 team -- I believe it is team member or team work --

23 A The word "not," "Jimmy does not work well on audit
24 teams I have been involved with should be there." These
25 were handwritten. I do have a tendency to write fast. My

1 thought process there on the 2 was that he does not work
2 well, although it is ont stated here, on audit teams that I
3 had been involved.

4 Q Okay.

5 MR. MARQUARDT: For the record, I believe we did
6 provide copies of the handwritten notes also.

7 MR. ANDERSON: You are absolutely correct. For
8 convenience of getting everything here, I took all of those
9 out saying, I won't need these, and they are back in my
10 house.

11 MR. MARQUARDT: I personally do not know whether
12 on the handwritten notes the "not" is there.

13 THE INTERVIEWEE: The word "not" is not there.

14 MR. MARQUARDT: But he is testifying that it
15 belongs there.

16 THE INTERVIEWEE: Yes, I am testifying that it
17 belongs there, and the also is, when these were taken from
18 my handwritten notes, I read this again and I put the word
19 "not" in there. Then it came back that we want these
20 verbatim, and I said, well, verbatim the word "not" is not
21 on my handwritten submittal. So, therefore, we took it out
22 of here so that it would be identical to the handwritten
23 submittal. But the word "not" is applicable here and was in
24 my thought process when I rated him a 2 in team work.

25 BY MR. ANDERSON:

1 Q I believe the last column that I have or the very
2 last one, is that interfacing down there?

3 A Yes, sir, that is interfacing.

4 Q Would you please read that for us?

5 A "Jimmy does not interface with department heads
6 very well. He has problems accepting the responsibilities
7 to fixing problems the right way which is different than
8 Jim's way."

9 Q Would these be similar or would one be relating to
10 supervisory personnel and the team work in relating to other
11 individuals?

12 A This particular one, department heads, department
13 managers and department heads, Jimmy's personality on the
14 audit teams was more of a dictatorship type of personality,
15 even though he would -- auditors are independent, they don't
16 have any responsibility for the effect of the job that they
17 are doing to anyone, and we report directly to the senior
18 vice president.

19 But on the other hand, we do have to effectively
20 communicate the expectations of what we are seeing in the
21 field to the department heads so that they can make the
22 changes necessary to correct the deficiency.

23 Q Do you feel that Mr. Martin was not at least
24 average as far as team work was concerned, and I have just
25 become aware of this when you were discussing it. But a

1 letter from Ms. Goodman points out that --

2 MR. ANDERSON: And we have listed this as Exhibit
3 1, Peter.

4 BY MR. ANDERSON:

5 Q It states down there that he has been a Detroit
6 Edison representative on a Joint Utility Management
7 Assessment team.

8 I guess my question is, are you aware of the fact
9 that he was on this JUMA team?

10 A I am not sure.

11 Q You are not sure or you are not aware?

12 A Well, I am not sure.

13 Q This is a letter which has been Exhibit 1.

14 A I did not write this letter and I do not recall
15 ever seeing that letter before. I agree with some aspects
16 of that letter but not all of them.

17 Q I am not asking that, Tom. What I am asking is,
18 were you aware that Mr. Martin had been assigned on the
19 Joint Utility Management Assessment Team, were you aware
20 that he had gone out and done audits at other utilities?

21 A Yes, sir.

22 Q Did you have any input into that, the fact that he
23 was on that teams, or would you personally, had you been his
24 supervisor, not allowed him to go on this JUMA program based
25 upon your knowledge of his team work and communications

1 skills?

2 A There is a lot of decision and thought process
3 when you send someone out on a JUMA Team. If the JUMA -- if
4 the utility requesting the JUMA audit requests somebody that
5 is fire protection knowledge and wants to look at their
6 compliance issues, I think that Jimmy would have been a good
7 choice to send. If it was operating the controls that
8 manipulate the activity of the reactor, Jimmy is a poor
9 person to send on that team. So there is a lot weight that
10 goes into choosing your JUMA representative from you utility
11 on what technical aspects they are looking for.

12 Q Did you ever have a discussion with Mr. Wald
13 regarding Jimmy Martin's ability to do fire inspection
14 audits?

15 A Specifically, we had discussions on Jimmy Martin's
16 fire protection audits and observations that he had had,
17 yes.

18 Q When you were doing the analysis, did you have any
19 discussion with Ms. Goodman during the evaluation process?

20 A I do not recall.

21 Q Do you recall if she ever had an opportunity of
22 reviewing that and discussing Mr. Martin with you?

23 A There was one occasion I can think of that we had
24 a discussion that dealt with Mr. Walker, Mr. Martin, and Mr.
25 Kilroy who was a fire protection engineer, Ms. Goodman and

1 myself to resolve an issue that Jimmy Martin had opened.

2 Q When the entire new program was implemented and
3 people were selected, Mr. Martin was the only one from the
4 Quality Assurance Program not selected?

5 A That's not correct.

6 Q That is not correct?

7 A No.

8 Q There were others who were not selected?

9 A There were --

10 Q For clarification purposes, wait a minute.

11 MR. MARQUARDT: Let him finish the question, then
12 answer.

13 BY MR. ANDERSON:

14 Q There had been people from Quality Assurance who
15 had been selected for other groups?

16 A That is correct.

17 Q Are you aware of anyone else from Quality
18 Assurance who was not selected by Quality Assurance or
19 another group other than Mr. Martin?

20 A Yes, I am.

21 Q Who would that have been?

22 A Jerry DiSerens, he elected for the staffing
23 transition buy-out.

24 Q With the exception of an individual who accepted
25 the buy-out, was there anyone else who went into the program

1 who was eventually let go by the company and not selected by
2 another group?

3 A I don't believe so, no. I believe Mr. Martin was
4 the only one with that scenario.

5 Q When it was coming down to the final selection of
6 individuals, with Mr. Martin's eight years of quality
7 assurance experience, what criteria did you use for other
8 individuals over Mr. Martin that left Mr. Martin out in the
9 cold?

10 A There was no intent --

11 Q When I say out in the cold, I mean he was not
12 selected by Quality Assurance.

13 MR. MARQUARDT: I think Mr. Bradish has only
14 indicated that he was considering Mr. Martin for a specific
15 position which Mr. Martin was not selected for. I am not
16 sure that he has the knowledge of why he didn't make it for
17 any position in Quality Assurance..

18 MR. ANDERSON: Okay, I understand.

19 BY MR. ANDERSON:

20 Q Was there any other positions besides this
21 particular one that you aware of that Mr. Martin applied
22 for?

23 A No, I am not.

24 MR. MARQUARDT: Wait a minute. In your group or
25 in Quality Assurance or in the Fermi organization does the

1 question relate to?

2 THE INTERVIEWEE: I am not aware of Mr. Martin
3 applying for or being considered for any job outside of the
4 quality assurance organization.

5 BY MR. ANDERSON:

6 Q Let's clarify that even further, if you will flip
7 this page back, you rated him basically for the Quality
8 Assurance specialist; is that correct?

9 A That is correct.

10 Q And that was because that is your group; is that
11 correct?

12 A That is correct.

13 Q And if Mr. Martin had applied for another group
14 within the Quality Assurance, you had no knowledge of
15 whether he applied or whether he was evaluated for that
16 position?

17 A Right. I am not aware of Mr. Martin applying for
18 any position during the staffing transition program, inside
19 of QA or outside of the QA organization.

20 Q So if Mr. Martin was not selected by the group,
21 you had no knowledge of whether he was not selected or
22 whether he even applied for those?

23 A That's correct. Now, I do know that when the last
24 groups went, that was the Training organization, the Quality
25 Assurance organization, were selecting their personnel, also

1 the Independent Safety Review Group positions, we were given
2 direction by the staffing transition organization, Mr.
3 Nolloth to select guidelines, I guess you could call that,
4 for people who met the qualifications for the incumbent
5 jobs. Mr. Martin met the qualifications for this incumbent
6 job, it was the other attributes that he scored less when
7 you looked at the available personnel that met higher
8 categories during my review process.

9 Q For that particular job?

10 A For this particular job, yes, sir.

11 Q No other job that you are aware of?

12 A I --

13 Q You did not have any -- you didn't evaluate him
14 for other positions?

15 A I don't believe so, no.

16 Q Just for this one. You evaluated Mr. Martin
17 strictly for the position summary of Quality Assurance
18 Specialist along with a number of other individuals?

19 A Yes, sir, that is correct.

20 Q And your rating of him was taken into
21 consideration of other individuals who applied for the
22 position who had stronger qualities for the position that
23 would affect his qualification or requirements?

24 A Yes, sir.

25 Q So you are not aware then if Mr. Martin applied

1 for any position under a Mr. Johnson's group and you would
2 not have evaluated him for that position?

3 A No, I would not have evaluated him for that
4 position.

5 Q Of the positions -- by the way, how many people
6 are reporting to you know?

7 A I will have to count them. Twelve.

8 Q Of those twelve positions, would all of them be
9 Quality Assurance Specialists?

10 A No, they are not.

11 Q When the transition period took place, were there
12 other position summaries for the other positions within your
13 group?

14 A Yes, there are.

15 Q Did Mr. Martin apply for any of those?

16 A To my knowledge, Mr. Martin did not apply for any
17 jobs on site.

18 Q He applied for this?

19 A No, he did not apply for this.

20 Q He did not?

21 A No, sir, he did not.

22 Q How did his name come into this?

23 A His name came on to these sheets from a sheet of
24 deselected employees. Lynn Goodman absorbed the Quality
25 Engineering Group, if you will, into the INS Group,

1 Inspection Surveillance Group and into the Program Assurance
2 Group or Audit Group, as it is known now. We had four
3 departments. We had Quality Engineering, Production, Audits
4 and Procurement.

5 Q Prior to?

6 A Prior to. When we were done, after Lynn was
7 selected, she announced her organization. Her organization
8 deselected the five or six personnel that was in the Quality
9 Engineering Group.

10 Q Wait a minute, did they really deselect them or
11 they just weren't selected for the position?

12 A They went into -- my knowledge is that they went
13 into the deselection pool of people.

14 Q This is after everyone had a chance to select
15 them?

16 A Yes, sir. We were the last to go. We were the
17 last departments to make this transition.

18 Q The reason why I am asking for this qualification,
19 Tom, is because an individual was not assured a spot here,
20 and then say there were five of them and then one was
21 deselected out. All of them had to apply for that position,
22 and then what was left over was what you are referring to as
23 the deselected group?

24 A That's correct.

25 Q So this group then are the individuals --

1 MR. MARQUARDT: I think part of the confusion may
2 be in your using the words "applied for the job." I think
3 previous people have said that there was a number of ways
4 that people were considered for it. One, they could have
5 been not selected for other positions; two, they could have
6 expressed an interest; or, three, they could have been an
7 incumbent already without them doing anything else, that
8 would have made up the pool of people to be evaluated if
9 they had minimum qualifications for the position under
10 consideration. Is that correct?

11 THE INTERVIEWEE: That is identical, yes, sir.
12 That is our guidelines.

13 MR. MARQUARDT: So I think you may be confusing
14 him when you say "applied for."

15 MR. ANDERSON: I understand.

16 That is how Mr. Martin's name came into this group
17 because he was, in effect, an incumbent, would that be
18 correct, Peter, or not?

19 THE INTERVIEWEE: He was not an incumbent for this
20 position. Mr. Martin was filling the position of a Quality
21 Engineer.

22 MR. ANDERSON: That's correct, and he was over in
23 this group here?

24 MR. MARQUARDT: I think what he is saying is, this
25 group, the audit.

1 MR. ANDERSON: It was merged, though.

2 THE INTERVIEWEE: It was eventually merged during
3 the one to two weeks.

4 BY MR. ANDERSON:

5 Q But, Tom, how did his name show up on this list?

6 A His name got on this list because when I looked at
7 the deselected list, the personnel that had been deselected,
8 there was some hundred-plus names on this list, my job as a
9 supervisor was to go through that list, review the resumes
10 that were in the package, find out who met the minimum
11 qualifications for this job. Mr. Martin met the minimum
12 qualifications for this job because he had held this job,
13 obviously, so he was evaluated because, going with the STP
14 process, we were, as supervisors, obligated to put him on
15 the evaluation sheets.

16 MR. MARQUARDT: Tom, just for one other
17 clarification here, and it is a terminology question more
18 than anything else. You are once again saying there was a
19 deselection list. Is it more accurate to say that this was
20 a list of people who had not previously been selected for
21 any position in the Fermi organization?

22 THE INTERVIEWEE: Yes, sir.

23 BY MR. ANDERSON:

24 Q So you actually reviewed quite a few resumes or
25 whatever they filled out, whatever you want to call it, more

1 than the --

2 MR. ANDERSON: What did we identify, was this the
3 one where he identified approximately --

4 MR. MARQUARDT: No.

5 MR. ANDERSON: In this particular case 19?

6 MR. MARQUARDT: It looks like 16 through Blair
7 Whitman on Exhibit 5.

8 BY MR. ANDERSON:

9 Q So in this particular one there were 16
10 individuals out of this pool that you reviewed that met the
11 basic qualifications? I am not trying to complicate this.

12 A There is a lot more to this.

13 MR. MARQUARDT: What he is asking for is, you went
14 through a broader list and identified 16 individuals who met
15 the minimum qualification of this particular position
16 questionnaire?

17 THE INTERVIEWEE: That is correct statement, yes.
18 That is what I did.

19 BY MR. ANDERSON:

20 Q And then those 16 you rated either: a) from
21 personal knowledge --

22 A Correct.

23 Q -- or did you talk to maybe supervisors or other
24 individuals to help you come up with the assessment?

25 A Quite a few of them were incumbents, so obviously

1 I knew them from personal experience. One individual on
2 this list I did not know very well. He had submitted a
3 resume and a letter requesting, so I did have to talk to his
4 supervisor on the rating process because I did not know him.

5 Q Was that person eventually selected, do you know?

6 A Not within the QA organization, no. There was
7 another individual that I had to also contact his supervisor
8 for some team work and other attributes that I was looking
9 for, and he was not selected either, and the rest of the
10 individuals I had previous knowledge of some of their work
11 habits and ethics.

12 Q So consequently, do you know, by the way, how many
13 candidates for this particular position description or
14 position summary were actually selected? How many was this
15 for? How many people were you look to fill this?

16 A Was I looking for?

17 Q Yes. Is there any way to review this just to see?

18 A I believe there was -- that number is available.
19 I just don't have it on the top of my head. I don't want to
20 give you a wrong number. Give me just one second. There
21 were seven personnel selected for this position.

22 Q And to the best of your memory all seven of those
23 personnel had been with Quality Assurance prior to?

24 A The selection, no, sir, they had not.

25 Q So there were individuals who hadn't been with

1 Quality Assurance that you selected from this list?

2 A Yes, sir, there was.

3 Q Stop for a second, if this particular list called
4 for seven people do you know approximately how many of those
5 individuals were Quality Assurance prior to?

6 A Can I term those as incumbents?

7 Q Yes, sir.

8 A Three

9 Q Three were incumbents, and were all three of those
10 individuals chosen for this particular position?

11 MR. MARQUARDT: I am confused by that question. I
12 was interpreting of the seven selected three were
13 incumbents, not how many of the seven -- not how many of the
14 16 were incumbents. As I understood the question you were
15 asking, of the seven selected how many were QA incumbents,
16 and I think that answer is three. That is different than
17 how many QA people were among the 16.

18 MR. ANDERSON: Exactly. That would be the next
19 area because what I am trying to get to is that three were
20 other QA people besides Mr. Martin not selected for this
21 position, but that is what I would like to find out.

22 BY MR. ANDERSON:

23 Q So of the 16 how many were QA people or
24 incumbents?

25 A Can we clarify something here?

1 Q Yes, sir.

2 A Can I turn this off just a minute, I guess, I am
3 confused here.

4 MR. ANDERSON: We can go off the record at this
5 point.

6 [Discussion off the record.]

7 MR. ANDERSON: Back on the record.

8 BY MR. ANDERSON:

9 Q Now in reviewing that list, Tom, of the 16 people
10 how many were incumbents, including Mr. Martin?

11 A Seven. No, five. I am sorry, five were QA.

12 Q People?

13 A Exactly.

14 Q And three were selected out of the seven?

15 A That is correct.

16 Q So that means Mr. Martin and one other individual
17 were not selected for this particular position?

18 A That is correct.

19 Q So Mr. Martin was not singled out because another
20 individual was also not selected?

21 A That's correct.

22 Q By the way, just for sake of -- who was that one
23 other individual, if you can identify them?

24 A Kurt Sessions.

25 Q Mr. Bradish, in your evaluation of Mr. Martin, did

1 you evaluate him low because of his previous involvement
2 with NRC, identified problems or going to the NRC with
3 problems, and because of your wanting to prevent him from
4 working here because he was going to the NRC?

5 A No, sir. I had no knowledge of that at all.

6 Q Did you, in fact, know that he was going to the
7 NRC?

8 A No, sir, I did not.

9 Q The work that you do as auditors in Quality
10 Assurance is that work, in fact, reviewed by the NRC?

11 A Every day, yes, sir.

12 Q So what he was doing was being reviewed by the NRC
13 but what you were doing is being reviewed by the NRC; is
14 that correct?

15 A That is correct.

16 Q So his going to the NRC would not point out
17 anything that wasn't already automatically going to the NRC;
18 would that be correct?

19 A That is correct, sir.

20 Q So your evaluation was based upon his work
21 performance and not because of his involvement with the NRC;
22 is that correct?

23 A Totally his work performance.

24 MR. ANDERSON: I have no further questions.

25 MR. MARQUARDT: Can we go off the record for a

1 second?

2 MR. ANDERSON: Yes.

3 We will be off the record.

4 [Discussion off the record.]

5 MR. ANDERSON: We are now back on the record.

6 Mr. Marquardt, Mr. Flynn, do you have anything
7 that you would like to add?

8 MR. MARQUARDT: I have no questions.

9 BY MR. ANDERSON:

10 Q Mr. Bradish, is there anything that you would like
11 to add for the record that has not been stated?

12 A Make sure that all the questions I have
13 answered -- you know, I have answered them to the best of my
14 ability. Do you need any clarifications on any of the
15 answers I have provided to you?

16 Q I do not, sir.

17 Have I or any other NRC representative at any time
18 threatened you in any manner or offered you any reward in
19 return for the statement you have given today?

20 A No, sir.

21 Q And have you given it freely and voluntarily?

22 A Yes, sir, I have.

23 MR. ANDERSON: We will conclude this interview at
24 approximately 2:40 p.m.

25 [Whereupon, at 2:40 p.m., the above-entitled

1 interview was concluded.]

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REPORTER'S CERTIFICATE

This is to certify that the attached proceedings before the United States Nuclear Regulatory Commission in the matter of:

NAME OF PROCEEDING: Interview of Bradish

DOCKET NUMBER:

PLACE OF PROCEEDING: Newport, MI

were held as herein appears, and that this is the original transcript thereof for the file of the United States Nuclear Regulatory Commission taken by me and thereafter reduced to typewriting by me or under the direction of the court reporting company, and that the transcript is a true and accurate record of the foregoing proceedings.

Arthur Schultz
Official Reporter
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Date: February 14, 1991

To: W. E. Miller, Director
Nuclear Quality Assurance

From: J. L. Martin, QA Specialist *JLM*
Quality Program Assurance

After yesterday's roundtable discussion held at the Monroe Activity Center, I was left with a very uneasy feeling concerning what appears to be your perception of the role of Quality Assurance in a Nuclear Power Plant.

Some of the statements I heard were: "We are going to be more cost effective and beneficial by working with less people, only doing audits that are absolutely required. Assigning auditors to work in other areas of the plant (like maintenance) where they will be more beneficial during the outage. I also understand that it is planned to rotate personnel in and out of the audit group with personnel from other departments in order to gain experience in other areas/departments and that you do not feel that this will create any conflict in independence even when the individual knows he will be returning to the organization he rotated from.

I would like to say that I absolutely support cost effective efforts. I have always completed by assignments on time even when it requires putting in extra unpaid hours. However, your approach to the roundtable discussion gave me the impression that you feel QA is little more than overhead.

As far as the more beneficial issue is concerned we all need to feel that our efforts are beneficial. We need that kind of job satisfaction and it is often so hard to get in auditing. I did not get the impression that you feel QA audits are very beneficial and I will agree that it is often hard to understand how an QA finding on a personnel error or training problem, inadequate procedure or safety issue can benefit the plant when compared to the functions of a doing organization.

If a QA auditor in the space program had found the problem with the "O" ring we may not have lost the space shuttle crew. But, we probably would have never known the full benefit because the accident would not have happened. You may not agree with this analogy but I know of many QA findings that have resulted in prevention of major problems and/or NRC violations. Even QA recommendations to provide training or change procedures may have prevented major problems or accidents which we will never know the full benefit of because the incident never happened.

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I would like to say that I believe in the principals of QA. I feel that QA auditing is not just overhead because it's required by 10CFR50. I believe QA is beneficial and cost effective in many ways that are sometimes hard to see and that the auditors need that kind of feedback, especially from the QA Director. I also believe that we should not reduce our efforts when the plant is going into a refuel outage because this provides an excellent opportunity for early detection of problems and safety concerns before they become major.

W. E. Miller
February 14, 1991
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I would also like to recommend that we utilize the existing training programs used by other departments to keep the subject matter experts (auditors) up to date, instead of rotating with other departments. This would appear cost effective to me and would avoid any conflict of interest/independence or auditors feeling that they are being penalized for doing a good job.

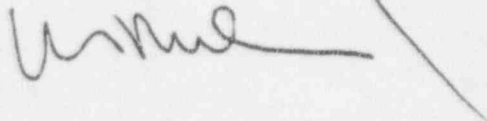
cc: R. Stafford

EXHIBIT 14
PAGE 2 OF 2 PAGE(S)

Date: March 6, 1991

To: J. L. Martin, QA Specialist
Quality Program Assurance

From: W. E. Miller, Jr., Director
Nuclear Quality Assurance



In response to your memo of February 14, 1991, you and I met on February 19 in my office at 3:30 p.m. During this meeting, you acknowledged that your memo was inaccurate.

In your memo, you attribute someone with saying that we are "...only doing audits that are absolutely required." This was not said during that meeting! There was some discussion regarding identifying and reducing or eliminating unproductive audits. We eliminated the Tech Spec line audits because they were unproductive. Similarly, we have reviewed the audit schedule and adjusted it to eliminate other non-productive audits to improve effectiveness. There is a difference between doing only audits that are required and eliminating or reducing non-productive audits. As a final note, if I wanted to only do audits that are required, I would not support our three 1991 unscheduled (and not required) budgeted audits.

You object to my plans for broadening the experience background within NQA. You imply that it will create a conflict of independence and that QA auditors will feel penalized for doing a good job. NQA has, for many years, rotated personnel into and out of the department without any conflict of independence. Most recently, Fred Abramson and Geary Goodman were assigned to Nuclear Training, due to need for SRO personnel within Nuclear Training and an excessive amount of SRO's within the audit group. Rich Fitzsimmons has been assigned, temporarily, to Nuclear Security to improve his experience in this area. John Louwers, from Nuclear Security, replaced Rich. Additionally, Larry Massamore (from Technical Group and previously from Maintenance) and Al Brooks (ANII assigned to the Technical group) were recently hired into the audit group. These personnel moves have led to a significant broadening of NQA's audit group experience base. They were not made to penalize auditors for doing a good job. They were made to strengthen the audit group. I don't view them as creating a conflict of independence.

Our proposal for audit/surveillance personnel rotation really isn't that different from what we have done in the past. I feel that the real benefits will far outweigh the perceived weakness of conflict of independence.

In your memo, you express a concern regarding assigning auditors to do work in other areas of the plant during refueling outages. (During

Jim Martin

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RF02 we will have Larry Massamore working on EDGs, John Wald on MOVs, John O'Donnell on condenser, Dave Gnaedinger on shipping condenser tubes, and Jerry Bussone on Receipt Inspection.) We have learned that performing audits during refueling outages should be carefully evaluated. Organizations we audit during refueling outages sometimes experience difficulty interfacing with us due to the unavailability of their key personnel (busy or on other outage assignments). Also, outages may or may not be the best time to audit performance of select programs. They represent excellent opportunities to assess implementation of design changes and to audit the ISI program. They aren't the best time to audit chemistry or plant operations. The audit schedule is being reviewed and revised to reflect this and also to levelize the audit work load. If this review results in man hours within audit groups being available during refuel outages, they may be used by placing NQA personnel in outage assignments that will reduce dependence on contractors and provide good work experience for the auditor. Conflict of independence, when appropriate, will be a deciding factor in any assignments made both during and after the outage.

In your memo, you state that I feel that QA is little more than overhead. As we discussed at the MAC, we have many efforts underway to maximize return on NQA assignments. These are hardly the actions taken by someone who might feel that their department is little more than overhead. Similarly, they aren't actions taken by someone who feels audits aren't beneficial. They are actions that I am taking to maximize the benefit achievable from audits. These efforts include:

1. Expanding our experience base in the areas of Maintenance, ISI, IST, Special Process, and NDE
2. Raising our standards of acceptance
3. Streamlining the audit reporting process (an average of 30 manhour savings per audit)
4. Eliminate the delinquent QA finding report due to improvements and the report's redundancy to a Plant Safety Report (1 to 1 1/2 man-day/wk savings)
5. Eliminating audits that are not productive; those where we consistently find no safety significant problems (resulting in an estimated 30% manhours available for more productive audits).
6. Encouraging auditors to better develop significant and programmatic deficiencies so that additional related problems are identified and so that the true cause and corrective actions are identified.

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7. Hiring a communications consultant to improve audit communication skills. We want to ensure that the problems we identify are clearly defined and understood, along with the efforts we took to arrive at our recommended corrective actions.
8. Assessing major organizations on site every two months using audit and surveillance results. Results of these assessments are communicated to appropriate management and to the NSRG.
9. Reviewing NQA organization to determine future skills, education, experience, complement, grade and structure needs.
10. Evaluating the audit schedule to even out the audit workload and available manhours. Working to better coordinate audits, surveillances, and other known assessments.

I agree with you that we need to utilize existing training programs to keep our subject matter expertise current. The training needs to be identified, cost effective and budgeted. Subject matter experts, including you, need to ensure this. This action is consistent with actions we planned as a result of the last JUMA audit as were the actions we took to bring experience into NQA where significant background weakness existed. Additionally, I am encouraged by the continuing success of JUTA and with the efforts spearheaded by NQA to share QA auditors amongst Great Lakes utilities. This is an excellent example of cost effective training. It broadens our experiences without incurring additional costs or the usual corresponding loss of resources. It also enables us to compensate for imbalances in our audit schedule by "borrowing resources" when our load is high and "paying back" when our audit load is low. Finally, as I said earlier, I do intend to pursue the proposed audit/surveillance personnel rotation program under review. Training efforts such as these will broaden our background, maintain it, and should enable us to help achieve better Fermi performance.

As I pointed out at the MAC, the electric utility industry is becoming more competitive. I feel that it is prudent to recognize this, understand its effect on us, and to plan and make adjustments in advance of it. These adjustments are better made in an environment that allows for careful thinking and feedback vs waiting, doing nothing, and perhaps later making changes that might lead to errors because they were hastily thought out and implemented.

WEM/vlh

cc: R. B. Stafford

Date: March 27, 1991

To: W.E. Miller, Jr, Director
Nuclear Quality Assurance

From: J.L. Martin, QA Specialist *JLM*
Quality Program Assurance

Reference: (a) Memo from J.L. Martin to W.E. Miller,
dated February 14, 1991
(b) Memo from W.E. Miller to J.L. Martin,
dated March 6, 1991

I have received your memo addressing the concerns that I expressed ^{IN} ~~my~~ written comments to you, after attending the round table discussions of February 13, 1991.

The time and effort you have taken to address my concerns are greatly appreciated. However, it is my understanding that you do not consider my concerns to be valid.

After careful consideration, I have decided to make another effort to further clarify these concerns. During the round table discussions I was concerned when I did not hear any recognition for the benefits of auditing, or for the benefits of early identification of deficiencies before they became major problems. What I did hear was that QA findings recommending procedure changes and/or additional training are not well received, and that we would be more cost effective performing other tasks. I am not alone in feeling uneasy over the round table discussions, most of the auditors have voiced these same concerns to me.

I previously stated that I feel QA audits are beneficial and cost effective. I believe that we should be doing more audits to identify deficiencies early, before they become major problems.

I do not feel that auditors have been properly recognized for their efforts. A case in point, are the Fire Protection Audits for the past four years, that were recently reviewed by the NRC. It is my understanding that the NRC found the audits to be very comprehensive and beneficial. I received on the other hand negative comments, even on my evaluation, concerning the Fire Protection Audits.

There are many other audits that come to mind, for identifying conditions before they become major problems. Some of these audits are in measuring and test equipment, evaluation and corrective action, inspection, and security, just to name a few.

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In conclusion, I would like to say that I also recognize that the electric utility industry is becoming more competitive, but I feel that QA is making a substantial contribution to cost reductions in early detection of deficiencies before they become major problems.