

ORIGINAL

UNITED STATES
NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF:

DOCKET NO: 50-445-OL2
50-446-OL2

TEXAS UTILITIES GENERATING COMPANY,
et al.

(Comanche Peak Steam Electric
Station, Units 1 and 2)

LOCATION: BETHESDA, MARYLAND

PAGES: 20775 - 21091

DATE: TUESDAY, NOVEMBER 27, 1984

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

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In the Matter of: :
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TEXAS UTILITIES GENERATING COMPANY, : Docket Nos. 50-445-OL2
6 et al. : 50-446-OL2
:
7 (Comanche Peak Steam Electric :
Station, Units 1 and 2) :
:
8 -----X

Nuclear Regulatory Commission
Fifth Floor Hearing Room
4350 East-West Highway
Bethesda, Maryland

Tuesday, November 27, 1984

The hearing in the above-entitled matter was reconvened
pursuant to adjournment at 8:40 a.m.

BEFORE:

JUDGE PETER BLOCH, Chairman
Atomic Safety and Licnesing Board

JUDGE HERBERT GROSSMAN, Member
Atomic Safety and Licensing Board

JUDGE WALTER JORDAN, Member
Atomic Safety and Licensing Board

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C O N T E N T S

<u>WITNESS</u>	<u>DIRECT</u>	<u>CROSS</u>	<u>REDIRECT</u>	<u>RE CROSS</u>	<u>BOARD</u>
3 C. Thomas Brandt(Resumed)					
4 by Mr. Roisman (Resumed)		20779			
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6 by Mr. Roisman(Continued)		20821			
7 by Judge Bloch					20826
8 by Mr. Roisman(Continued)		20827			
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14 by Mr. Roisman(Continued)		20978			
15 by Mr. Bachmann		21015			
16 by Judge Bloch					21026
17 by Mr. Bachmann		21039			
18 by Mr. Watkins			21045		
19 by Mr. Roisman(Further)		21056			
20 RECESSES:					
21 A.M. - 20830					
22 A.M. - 20898					
23 NOON - 20947					
24 LAY-IN - TRAVELER PACKAGE NO. 988, PAGES 20781 - 20783.					
25 LAY-IN - FULL PACKAGE FOR WELD NO. 35, PAGES 20799 - 20814.					
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P R O C E E D I N G S

JUDGE BLOCH: Good morning. The hearing will come to order. Mr. Brandt, I'm sure you could remind me that you continue to be sworn.

Whereupon,

C. THOMAS BRANDT

resumed the stand, having been previously duly sworn, was examined and testified further as follows:

JUDGE BLOCH: Mr. Roisman?

CROSS-EXAMINATION (Resumed)

BY MR. ROISMAN:

Q Mr. Brandt, I'm going to show you what was attached to CASE's supplemental filing as Exhibit 2, which is for a weld numbered 988, for the N. Trans. canal, stainless steel liner, angle to plate. Mr. Brandt, would you take a look at the document that's there, I believe it's three pages, and tell me whether or not in your review of the stainless steel liners you had occasion to look at that particular document?

A You are talking about this traveler for this particular one?

Q Yes, that's correct.

A Not to my recollection, Mr. Roisman.

Q Okay. And the reason for that is because that's for something other than the reactor cavity number 2?

1 A Right. It's inside the fuel building.

2 Q And does that document represent a document
3 produced in the ordinary course of the business of the
4 constructing of the stainless steel liner plates for the
5 north transfer canal?

6 A Is that -- is your question: Was this traveler
7 ordinarily used? I don't understand what you mean by the
8 word "produced," Mr. Roisman.

9 Q No. Is it a regular document produced in the
10 ordinary course of the business of building the stainless
11 steel liners for the north transfer canal?

12 A This was a document that was used for the
13 majority of the welds. I won't say the majority.

14 I have, since October 1st, looked at some of the N. 1
15 travelers. I'm talking about anything in the fuel
16 building, which is a common building, or the unit 1
17 reactor building.

18 I'm not sure I'm willing to say a majority, but a
19 number of these travelers were used in that instance; yes,
20 sir.

21 Q And when you are referring to that traveler, are
22 you referring in particular to page 2 of 3, of the
23 document that's in front of you?

24 A Yes, I am.

25 Q And that form, that's shown on page 2 of 3 of

1 the traveler package 988, is the form that was required by
2 procedures in 1978 to be used for doing inspections on
3 stainless steel liner plates; isn't that correct?

4 A It was the form used -- it was the form
5 contained in the QC procedure, the QC instruction, 211.11;
6 yes, sir.

7 Q And it's that form that didn't get used,
8 apparently, in the reactor cavity unit number 2 stainless
9 steel liners that has been at least a source of part of
10 the problems that we have been looking at; isn't that
11 correct?

12 A Yes, sir.

13 MR. ROISMAN: Mr. Chairman, I would like to have
14 this three-page document received in evidence and either
15 bound in the record at this point or marked as an exhibit.
16 Whichever you prefer.

17 JUDGE BLOCH: It may be received into evidence
18 and bound into the record.

19 (The document follows:)

20

21

22

23

24

25

Brown & Root, Inc.

20781

FOR INFORMATION ONLY

988

WELD NO.

B&R Stainless Steel Liner Inspection Traveler

PROJECT: CPSES JOB NO: 35-1195 UNIT 2 PAGE 1 OF 3

UJF00831 N. TRANS. CANAL STAINLESS STEEL 7/16" Angle to R A41
 Drawing No. Pool Metal Type Mtl. Thk. PC. to PC.
 Plate to Plate Insert to Plate Angle to Plate Other _____

Weider Symbol	W/FIL No.	Weld Proced.	Hold Point
AEO	D-080	88023	5
BAG	D-251	88023	5
BAF	D-255	88023	7
BAF	D-282	88023	7
BAG	D-717	88023	7
BAG	D-1378	88023	7
B	D-1438	88023	7
BROWN & ROOT RECEIVED			
MAR 10 1980			
FILES NOTED			
QUALITY ASSURANCE			
PERM. PLT. RECORD			
RTN	L	FILE LOC	17-198-7
SUBFILE LOC	988		

- Fit up and Cleanliness of Above:
NA NA NA
 Results Inspector Signature Date
- V.T. of Backing Strip Tack/Fillet Welds:
NA NA NA
 Results Inspector Signature Date
- Cleanliness of Channel, Liner, and B. Strip:
NA NA NA
 Results Inspector Signature Date
- Final V.T. of Channel Fillet Weld:
NA NA NA
 Results Inspector Signature Date
- Inside Fit Up and Cleanliness:
Sat. Whitebrook 8-27-79
 Results Inspector Signature Date
- V.T. of Fillet Prior to Grinding:
NA NA NA
 Results Inspector Signature Date
- Final V.T. of Inside Weld:
Sat. Robert J. Kanney 2-26-80
 Results Inspector Signature Date
- Completion of Weld Inspection: (NDE P200)
Sat. James W. Cole 3-6-80
 Results Inspector Signature Date

QUALITY ASSURANCE DEPARTMENT
STAINLESS STEEL LINER INSPECTION TRAWLER/NDE REPORT

20782

JWC
3.3.80
2 3
7 7

PROJECT: CPSES

JOB NO.: 35-1185

UNIT 2

PAGE 7

OF 7

WELDING <u>WFB00931</u>	POOL <u>Equal Bldg canal</u>	North MTL TYPE <u>SIS</u>	MTL. THICKNESS <u>3116"</u>				
WELD/ITEM NO. <u>988</u>	PC. TO PC. <u>ANGLE TO R A41</u>		<input type="checkbox"/> Plate to Plate <input type="checkbox"/> Insert to Plate <input checked="" type="checkbox"/> Angle to Plate				
WELDER NO.	<u>42903</u>	<u>42903</u>	<u>54066</u>	<u>54018</u>	<u>54029</u>	<u>61660</u>	<u>61672</u>
WELD PROCEDURE	<u>88023</u>	<u>88023</u>	<u>88023</u>	<u>88023</u>	<u>88023</u>	<u>88023</u>	<u>88023</u>
WELDER SYMBOL	<u>A1H</u>	<u>A1H</u>	<u>AEP</u>	<u>A1H</u>	<u>AEP</u>	<u>AET</u>	<u>AEP</u>
STAGE OF MANUFACTURE	<u>FIT-UP</u>	<u>TACK B.S.</u>	<u>TACK B.S.</u>	<u>Final</u>	<u>channel</u>	<u>Step 600</u>	<u>DS.00</u>

DESCRIPTION(s) and INSPECTION REMARK(s)	RESULTS	SIGNATURE	DATE
1. Fit up of Liner <u>plate</u> to plate, <u>angle</u> insert. Cleanliness of liner and backing	<u>SAT</u>	<u>Jampel</u>	<u>5-2-78</u>
2. V.T. of backing strip <u>50</u> filler welds.	<u>SAT</u>	<u>Jampel</u>	<u>5-2-78</u>
3. Cleanliness of channel, liner and backing strip.	<u>SAT</u>	<u>Jampel</u>	<u>5-2-78</u>
4. Final V.T. on Channel Welds.	<u>SAT</u>	<u>Jampel</u>	<u>5-2-78</u>
5. Liner Fit-up verification. Cleanliness	<u>X</u>	<u>X</u>	<u>X</u>
Final V.T.	<u>X</u>	<u>X</u>	<u>X</u>

Approved by: 10-01-78

Dwell Time

5b. Penetrant Mfg. Magnaflex-Spotcheck-Batch _____

Developer Mfg. Magnaflex-Spotcheck-Batch _____

Developing Time

Developer Mfg. Magnaflex-Spotcheck-Batch _____

NDE Procedure Surface
300-ND-5850 Attach. 63 As Welded _____ Ground _____ Other _____

Final P.T. _____

5c. Vacuum Box _____ Gasket Type _____ Solution Type _____

Pre-test Cleaning _____ Pressure _____ Temperature _____ NDE Procedure 600

Solution Application Method _____ Post Test Cleaning _____

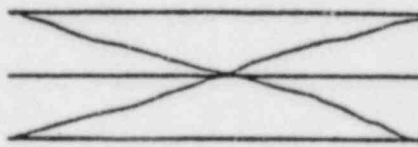
Serial Number _____ Pressure Differential Maintained for _____ Sec. _____ Min

Final V.T. _____

W/A - Not Applicable
Satisfactory _____ Unsatisfactory _____ Inspector _____ DATE _____ CERT. LEVEL _____

PAGE 3 OF 3988

Weld No.

Acceptance Std.
Gibbs & Hill 2323-SS-185b. Penetrant Mfg. Magnaflux-Spotcheck
Cleaner Mfg. Magnaflux-Spotcheck
Developer Mfg. Magnaflux-SpotcheckNDE Procedure
300-N8-5350 Attach. 63

Final P.T. Level II

SAT.
RESULTSRobert F. Karney
INSPECTOR SIGN.2-26-80
DATE

5c. Vacuum Box GASKET TYPE SOLUTION TYPE
24" by 5" rubber SNOOP
 Pretest Cleaning Sat. Pressure 2-5 Temperature 740° NDE Procedure 600
 Solution Application Method Squeeze B. Post Test Cleaning Sat.
 Gauge Serial Number 898 Pressure Differential
 Maintained for 20 Sec. 0 Min.

Final V.B.

James W. Cole

N/A - Not Applicable

Satisfactory Unsatisfactory

Level II

Inspector JWC Date 3-5-80

1 MR. ROISMAN: I do want to point out one thing.
2 The copy I am handing the reporter has in the upper right-hand
3 corner "Exhibit 2," which is added by CASE. Other than
4 that, it is as we received it.

5 JUDGE BLOCH: We'll receive it as it is now.

6 MR. WATKINS: Your Honor, since Mr. Roisman has
7 brought the document up, this will be a good time to move
8 to strike several passages in CASE'S further evidence of
9 the quality control breakdown, dated November 15, 1985.

10 On page 3, last paragraph of the upper portion,
11 Intervenors allege that Mr. Brandt either didn't know what
12 was happening with the construction, inspection, and
13 installation of liner plates, or that he knows what
14 happened and was misleading the board and the Commission.
15 And under the conclusion the Intervenors make the same
16 challenge to the Applicants, that they are either ignorant
17 or knowingly deceptive.

18 They base those allegations exclusively on the traveler
19 that Mr. Roisman has had Mr. Brandt identify.

20 It is abundantly clear from Mr. Brandt's testimony in
21 this proceeding, that all of his testimony -- and that
22 includes testimony specifically about the five-line
23 traveler form versus the eight-line traveler form -- has
24 been with respect to the reactor refueling cavity for unit
25 2. I'll refer the board to transcripts pages 15,924; 15,921

1 through - 923; 15,927, in which he and Ms. Garde went back
2 and forth on this very subject.

3 This, as Mr. Brandt has just identified it, is a
4 traveler for the north transfer canal liner plate.
5 Mr. Brandt has never testified about the north transfer
6 canal, and, for the Intervenors erroneously to make these
7 charges on that basis is impertinent and scandalous, and
8 the language should be stricken.

9 I repeat, the words "Applicant may be ignorant or
10 knowingly deceptive that certain irregularities in
11 stainless steel liner plate --" are based specifically on
12 this traveler that Mr. Brandt has not testified to in this
13 proceeding, nor has he this morning.

14 JUDGE BLOCH: The inference is that this was
15 used in another part of the liner construction -- was
16 required by procedure. I would reserve acting on your
17 motion to strike until there is some explanation given how
18 it was that the liner was used in one part of the plant
19 but not the other.

20 MR. WATKINS: No one has ever asked Mr. Brandt
21 about that.

22 JUDGE BLOCH: I say I'll reserve decision on
23 this until we really know that there is no connection
24 between unit 2 and unit 1, because it's possible that
25 Mr. Roisman's explanation is correct at this point. It

1 was just a wild guess, but his wild guess was that the
2 documentation once existed for both plants.

3 MR. WATKINS: Mr. Chairman, the statement was
4 made on November 15, that accuses Applicants and
5 Mr. Brandt of being either ignorant or knowingly deceptive.
6 That is not the case as of this moment.

7 JUDGE GROSSMAN: Mr. Watkins, what are you
8 moving to strike? There's no evidence in there that has
9 to be stricken.

10 MR. WATKINS: No, the statements, Judge Grossman,
11 the judgments in these first three pages of "CASE's
12 Further Evidence."

13 JUDGE GROSSMAN: Well, it was supplied in the
14 way of briefing, of memoranda prefatory to the hearing.
15 What you are raising now really has no place in the
16 hearing.

17 If you want to file a motion, file a motion. But we
18 can do without interruptions of the hearing.

19 MR. WATKINS: Judge Grossman, our point is this
20 language has no point in this hearing. With all respect.
21 I will make this motion and I'll make it in writing.

22 JUDGE BLOCH: Let's proceed.

23 BY MR. ROISMAN:

24 Q Mr. Brandt, before we started the session this
25 morning I gave you a short list of liner plate inspection

1 travelers that we were going to talk about. Have you had
2 an opportunity to pull those out of your file?

3 A Yes, I have.

4 Q Good. The first one I wanted to look at was the
5 one, weld number 35. And, also looking at page 5 of your
6 prefiled testimony of November 21st.

7 Now, weld number 35 is one of the welds which CASE had
8 identified on page 3 of Exhibit 1 of its supplemental
9 filing under the paragraph 2: "The following welds also
10 lacked QC verification for step 1."

11 Do you see that on the listing there?

12 A Yes, I do.

13 Q And I believe your answer 9, on page 5 of your
14 testimony in reference -- I'm sorry, excuse me. Your
15 answer 11 on page 5.

16 JUDGE BLOCH: Also transcript page 20578.

17 Continue.

18 MR. ROISMAN: That's the transcript of yesterday?

19 JUDGE BLOCH: Yes.

20 BY MR. ROISMAN:

21 Q Your answer 11 on page 5 indicates that there
22 was a chit and/or traveler substantiating the QC
23 inspection of the fit-up and cleanliness of the concrete
24 side of these welds for all except weld number 32. I
25 wonder if you would take a look at the weld 35 package,

1 and show me in there the documentation that you rely upon
2 with respect to that weld for substantiating the QC
3 inspection of fit-up and cleanliness of the concrete side
4 of the weld.

5 A Actually, there's two documents, Mr. Roisman.

6 Q Okay.

7 A There's a chit signed by Don Vogt, on 9/13/78,
8 which says, "first fit-up of top angle to plate."

9 Q All right.

10 A And there's also an inspection report that
11 indicates the top angle was removed and the backing strip
12 replaced. Cleanliness of plate to angle was checked again
13 on this, according to hold points on travelers, dated 7/24/79.
14 Also signed by Mr. Vogt.

15 Q The second one that you referred to was following
16 the issuance of the NCR number 1'84-200017; is that correct?

17 A No, sir.

18 Q On which side of the issuing of that NCR did the
19 second inspection occur?

20 A Prior to issuance.

21 Q Prior to issuance of the NCR; okay.

22 A 1979. Yes, sir.

23 Q I would like you to take a look, if you would,
24 at the first documentation, the one signed by Don R. Vogt
25 on 9/13/78. Does your docket have two chits signed by Don

1 R. Vogt, for the period 9/13/78?

2 A One is a copy of the other; yes, sir.

3 Q One is a copy of the other?

4 A It certainly appears that way to me. Look at
5 the word "below" next to "welder."

6 Q Can you explain to me why it is that one of
7 those apparently doesn't have anything written in the
8 comments section, where the other one has written in "first
9 fit-up of top angle to plate"?

10 A No, sir, I can't.

11 Q I take it by "copy," you mean a carbon copy,
12 don't you? And then a Xerox of the carbon copy?

13 A These weren't done with carbons, Mr. Roisman.
14 It's -- it looks to me to be a Xerox copy. One or the
15 other. But that's impossible due to the writing on it. I
16 don't -- I can't explain it, but these were not done --
17 these were not multiple copy forms.

18 JUDGE BLOCH: The second form also appears to be
19 darker than the first, which would be hard -- darker and
20 clearer, which would be hard by Xerox.

21 It would be hard to Xerox -- the first one could have
22 been from the second, but then the writing put on later.

23 THE WITNESS: I don't know, it's tough to tell.

24 BY MR. ROISMAN:

25 Q Well, let's just take a look for a second, just

1 at the question of whether one is a Xerox of the other?

2 A That's what I'm trying to determine now.

3 Q Look at the line where "except" is written down
4 at the bottom; I'm sorry -- where "except" is printed down
5 at bottom of the two forms?

6 A Yes.

7 Q And notice the placement of the check on the
8 forms that has the "first fit-up of top angle to plate"
9 written in on it. And notice the placement of the same
10 check on the form that has no comment.

11 A It looks like it is lower on one.

12 Q Now, if it was Xeroxed, as far as you know, that
13 wouldn't happen, would it?

14 A That's true.

15 Q So it does appear, at least to our untrained
16 eyes, that these in some way or another are two -- are
17 copies of two different pieces of paper?

18 A Yes, sir.

19 Q Now, can you describe to me your understanding
20 of the process that was in place in September of 1978 for
21 the use of these chit forms? First of all, what did the
22 form look like? Was it just one form, freestanding, or
23 was it on a pad of forms, or whatever? And take me
24 through how it gets out to a man like Mr. Vogt and what he
25 does with it when he's out in the field?

1 A The ones I have seen, Mr. Roisman, look just
2 exactly like what you are looking at. They are a piece of
3 white paper that's either printed or Xeroxed as a
4 standard-type form. Construction fills them out and sends
5 them to QC-inspection.

6 Q Do you know what the actual procedure was for
7 how the form was processed? What was the proper procedure
8 for how it was processed?

9 A I don't understand what you mean by "proper
10 procedure."

11 Q Well, for instance, who was supposed to write on
12 there the name of the welder and the drawing; and who was
13 supposed to put the checks in, if any checks were made on
14 the inspection request line; and who was to write in the
15 W.M.R.; and who was to write in comments; that kind of
16 procedure?

17 A It was a form for request of inspection. I
18 don't know that it got that detailed, in any procedural
19 description of how to fill out the form. The form was
20 filled out, typically, by either the welder himself or the
21 foreman, and delivered to QC at the request of an
22 inspector. In some forms they were -- he they checked
23 both cleanliness and fit-up. Some forms appear to have
24 been checked by the inspector, due to the fact that the
25 craft did not check either box, and some forms are as this

1 one is, and that is blank.

2 Q How would the inspector know if he received the
3 form and there was no check in the inspection request line,
4 and there was nothing under the comments, what it was that
5 the inspector was supposed to be doing when they got to
6 the field with this form?

7 A It's rather obvious if it's for a fit-up
8 inspection when you get there.

9 Q You mean you could tell it by looking? Or there
10 would be someone there who would say --

11 A No, you could tell by looking at the joint
12 configuration. There won't be any welding done.

13 Q If they had pretacked on the backing strip in
14 order to help hold the fit-up in place, as you indicated
15 was a possibility yesterday, how would the inspector know
16 when he got there whether he was inspecting for the
17 tacking of the backing strip or the cleanliness and fit-up
18 of the stainless steel liner plates?

19 A The traveler would indicate that it was for
20 cleanliness and fit-up.

21 Q If he had the traveler with him; right?

22 A If the traveler was in the area. Yes, sir.

23 Q Now if he only had the chit with him, how would
24 he know?

25 A The inspections were procedurally described to

1 be concurrent; fit-up and cleanliness inspection were to
2 be done as one.

3 If the tack welding operation, which I think is line 2
4 in the traveler --

5 Q That's correct.

6 A -- were to be done, the backing strip would be
7 tacked and that chit would be for that.

8 Q But I thought yesterday when we talked about
9 this, we indicated, or you indicated that at least one
10 possibility was that in order to help hold the plates
11 together, and to keep them from moving after the fit-up
12 was done, the welders might make a tack or two onto the
13 backing strip; and that in your judgment that would be
14 irrelevant for the cleanliness inspection because nothing
15 of relevance would have been covered by the tacking strip.

16 And my question to you is --

17 JUDGE BLOCH: First, is that a fair --

18 THE WITNESS: No, it's not.

19 JUDGE BLOCH: Would you explain?

20 THE WITNESS: I believe it was my statement,
21 Mr. Roisman, that I agreed with you that the procedure
22 clearly required a cleanliness and fit-up inspection first
23 but as a practical matter, and in a discussion with the
24 Chairman, I discussed that you could not clean the
25 surfaces of two liner plates in selected areas such that

1 tacks could be placed over dirty areas and the rest of the
2 liner plate appear clean.

3 JUDGE BLOCH: Before we continue, I wonder also
4 how you can tell about the outside fit-up if the backing
5 strip is tacked in place already. Can you tell the
6 separation?

7 THE WITNESS: You walk around to the other side.

8 JUDGE BLOCH: So you have to do it on the inside
9 even though you are certifying the outside?

10 THE WITNESS: There's only one fit-up. The
11 fit-up is, on the drawing, the gap between two plates.

12 JUDGE BLOCH: And when you check fit-up you
13 check that it's uniform from front to back?

14 THE WITNESS: I don't know how it could vary.

15 MR. WATKINS: Your Honor, you might be reminded
16 of the witness' testimony. These plates are only 3/16 of
17 an inch thick.

18 JUDGE BLOCH: Mr. Roisman, please continue.

19 BY MR. ROISMAN:

20 Q Let me follow up on the line the Chairman asked
21 and we'll come back to this other in a second. With
22 respect to the checking of the fit-up from the water side
23 of the stainless steel liner, are these liners
24 freestanding in the millwright shop when they are worked
25 on?

1 A No, they were attached to a temporary support
2 structure.

3 Q How would you see the other side?

4 A You walk around the liner.

5 Q It is standing out in the middle of the room?
6 The structure is not up against the wall?

7 A No, sir. It was fabricated in a freestanding-type
8 position where you had access to both sides.

9 Q Let's go back to the chit for a moment. Is it
10 your testimony that there was never any kind of a carbon
11 or copy made of the chit upon its initial creation by the --
12 either the foreman or the welder, when the inspection
13 request was filled out?

14 JUDGE BLOCH: First, do you know?

15 THE WITNESS: I think I can answer that question
16 two different ways, Mr. Chairman. Answer both of your
17 questions.

18 Number 1, I don't know the answer to that question.
19 From what I have personally seen, and I have seen a bunch
20 of originals, they are all in original handwriting.
21 However, in answer to your question, Mr. Roisman, on some
22 occasions the chit was misplaced temporarily and then
23 later found, because you'll see two chits that are
24 definitely not either a carbon copy or a Xerox copy and
25 you'll see the word "copy" written on them. And when it's

1 done, as the inspector apparently had given a chit to
2 construction, construction momentarily or temporarily
3 misplaced it and asked for another copy of the chit and
4 the inspector would fill out another one and write "copy"
5 on the chit. I have seen examples of that, both in
6 original handwriting.

7 BY MR. ROISMAN:

8 Q But this is your surmise as to what the
9 explanation for that event is, as opposed to the result of
10 an investigation on your part?

11 A The only person I saw that did that is no longer
12 around.

13 Q Let me ask a question again. It's not the
14 result of an investigation on your part, it's an effort on
15 your part to come up with what you perceive to be a
16 plausible explanation for the existence of two chits for
17 the same inspection?

18 A I offered it in a way of explanation. It's not
19 a concern to me if an inspector signs two chits that are
20 absolutely identical on the same day.

21 Q Is it a concern to you when the inspector signs
22 two chits which are not absolutely identical on the same
23 day, such as we have here on weld number 35?

24 A I would not -- I would say it's a concern only
25 to the extent of why the difference in the chits; and if

1 they -- you could tell by looking at the originals of this,
2 whether this is indeed a copy or if it's in original ink.

3 Q So it's possible, in effect, to have these two
4 originals of which we have only Xerox copies now, to try
5 to discern what we have; isn't that correct?

6 A It would be easier. We are looking, probably,
7 at least -- yours at best is third generation copy. Mine
8 at best is second generation copy.

9 JUDGE BLOCH: Do you want that produced,
10 Mr. Roisman?

11 MR. ROISMAN: I think we should, Mr. Chairman,
12 since as you remember in Ms. Neumeyer's testimony, she was
13 asked that the chits that she was asked to sign had
14 nothing written in that indicated whether they were for
15 first fit-up and cleanliness or anything else. And that
16 was one of the problems that she had had when she saw the
17 chits, was that she couldn't match them up to the
18 particular inspection line that she was being asked to
19 sign.

20 JUDGE BLOCH: Well, in addition, we have no
21 explanation for why there are two copies, one of which has
22 the writing and one doesn't. Mr. Watkins, do you have any
23 objection to producing the originals?

24 MR. WATKINS: The original chits?

25 JUDGE BLOCH: For these particular welds.

1 MR. WATKINS: May I consult with Mr. Brandt?
2 JUDGE BLOCH: Sure.
3 (Discussion off the record.)
4 MR. WATKINS: That's not a problem, Mr. Chairman.
5 JUDGE BLOCH: When would be a good time to have
6 a target for production of that?
7 MR. WATKINS: Mr. Brandt, when would be a good
8 time to produce those?
9 THE WITNESS: They can probably be --
10 MR. WATKINS: Friday?
11 THE WITNESS: Probably Friday will be a good
12 shot.
13 JUDGE BLOCH: Why don't we do that. If there's
14 a problem you can ask for an extension for cause.
15 MR. ROISMAN: Mr. Chairman, I would like to have
16 the full package for weld number 35 bound in the record at
17 this point, since we have been discussing it, following
18 yesterday's procedure.
19 JUDGE BLOCH: That may be done.
20 (The document follows:)
21
22
23
24
25

FIGURE 3

35

WELD NO.

B&R STAINLESS STEEL LINER INSPECTION TRAVELER

PROJECT: CPSES JOB NO.: 35-1195 UNIT #2 PAGE 2 OF 3

Drawing No. 2401A Reactor liner #2 Pool Stainless steel 3/16 A:1G2 to angle MTL. THK. 60PC. to PC.

PLATE TO PLATE [] INSERT TO PLATE [] ANGLE TO PLATE [x] OTHER []

Table with columns: WELDER SYMBOL, WMR NO., WELD PROCED., HOLD POINT. Rows include welder symbols AAR, ARD, ATR and their corresponding WMR numbers and hold points.

1. Fit up and cleanliness of above:

Sat. James W. Cole 4.3.80 RESULTS INSPECTOR SIGNATURE DATE

2. V.T. of backing strip tack/fillet welds:

Sat. S.M. McCoy 9.15.78 RESULTS INSPECTOR SIGNATURE DATE

3. Cleanliness of channel, liner, and backing strip:

N/A N/A N/A RESULTS INSPECTOR SIGNATURE DATE

4. Final V.T. of channel fillet weld:

N/A N/A N/A RESULTS INSPECTOR SIGNATURE DATE

5. Final V.T. of inside weld:

RESULTS INSPECTOR SIGNATURE DATE

NO INFORMATION ONLY

Completion of weld inspection:

RESULTS INSPECTOR SIGNATURE DATE



INSPECTION REPORT

PLANT CODE	SYSTEM CODE	COMPONENT CODE
14	5-10	11-16

TAG/SPIN/IDENT NO						DRAWING/SPECIFICATION NO		SERIAL NO
A	B	C	D	E	F	G (Units)		H (Units)
						17 55		J (Units)

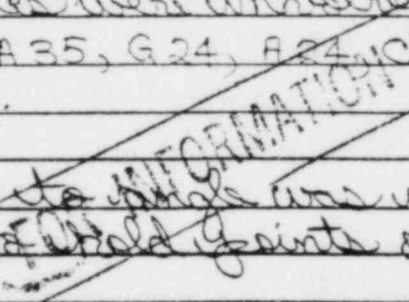
PURCHASE ORDER NUMBER	VEND CODE
53-69	70-73

MRR NUMBER	RIR NUMBER	VENDOR'S HEAT/LOT/BATCH NO.	COUNT QUANTITY	UNITS	PURCH'S OR NO.	RLS/HOLD NO. CODE STATUS	INPUT DATE
74-79	80-85	86-95	96-105		106-111	112-121	122-127

PURPOSE AND TYPE OF INSPECTION/SURVEILLANCE: *The purpose of this report is to verify that the top angle was removed in order to cut the top plates down to required elevation and that cleanliness and fit up was checked again on this*

RESULTS OF INSPECTION/SURVEILLANCE: *The top angle of the liner on BR 2401A (Reactor 2) was removed to facilitate cutting the plates to meet required elevation. The top angle was then stacked to the plates. The following plates were involved: A 22, G 21, A 21, H 20, A 20, C 35, A 35, G 24, A 24, C 23, G 34, A 34, A 30, A 29, and C 29.*

Cleanliness of plate to angle was checked again on this according to Weld Joints on travel.



NCR NO. *N/A*

Donald R. Vogt
QC ENGINEER/INSPECTOR

DATE *7/24/79*

35

WELD NO.

B&R Stainless Steel Liner Inspection Traveler

PROJECT: CPSES JOB NO: 35-1195 UNIT 2 PAGE 1 OF 3

BB2401A React. Liner #2 Stainless Steel 3/16" Top angle to R AZ1
 Drawing No. Pool Metal Type Mtl. Thk. PC. to PC.
 Plate to Plate Insert to Plate Angle to Plate Other

Welder Symbol	W.M.R. No.	Weld Proced.	Hold Point
BEN	A162855	88023	1
BDA	A162881	88023	2
BDA	A162928	88023	2
BCC	D-021 (WFML)	88027	2
BEN	D-027	88023	1
BDA	N-009	88023	1
BDA	N-020	88023	57
BCC	D-043	88023	57
BEN	D-065	88023	57
CCG	B-219	88025	57
CCG	B-229	88025	7
CCG	B241	88025	7

1. Fit up and Cleanliness of Above:

* SAT Don R. Uvalde 7-12-79
 Results Inspector Signature Date

2. V.T. of Backing Strip Tack/Fillet Welds:

SAT Don R. Uvalde 7-24-79
 Results Inspector Signature Date

3. Cleanliness of Channel, Liner, and B. Strip:

NA NA NA
 Results Inspector Signature Date

4. Final V.T. of Channel Fillet Weld:

NA NA NA
 Results Inspector Signature Date

5. Inside Fit Up and Cleanliness:

NA NA NA
 Results Inspector Signature Date

6. V.T. of Fillet Prior to Grinding:

NA NA NA
 Results Inspector Signature Date

7. Final V.T. of Inside Weld:

SAT
 Results Inspector Signature Date

* Cleanliness reverified JWC
 4.3.80

8. Completion of Weld Inspection: (NDE P200)

 Results Inspector Signature Date

35

WELD NO.

B&R Stainless Steel Liner Inspection Traveler

Weld Inspection Sheet

Page ___ of ___

Acceptance Std.
Gibbs & Hill 2323-SS-18

7a. Penetrant Mfg. Magnaflux-Spotcheck _____
 Cleaner Mfg. Magnaflux-Spotcheck _____
 Developer Mfg. Magnaflux-Spotcheck _____

NDE Procedure

Final P.T. Level II

RESULTS	INSPECTOR SIGN.	DATE
---------	-----------------	------

7b. Vacuum Box _____ GASKET TYPE _____ SOLUTION TYPE _____

_____ by _____

Pretest Cleaning _____ Pressure _____ Temperature _____ NDE Procedure _____

Solution Application Method _____ Post Test Cleaning _____

Gauge Serial Number _____ Pressure Differential _____
Maintained for _____ Sec. _____ Min.

Final V.B. _____

N/A - Not Applicable

Satisfactory _____ Unsatisfactory _____
Level II Inspector _____ Date _____

FOR INFORMATION ONLY

WELD NO. 55

B&R Stainless Steel Liner Inspection Traveler

PROJECT: CPSES JOB NO: 35-1195 UNIT 2 PAGE OF

BB-2401-A Drawing No. Reactor Liner #2 Pool STAINLESS STEEL Metal Type 1/4" TO 3/16" Mtl. Thck. TOP ANGLE TO PLATE PC. TO PC.

Plate to Plate Insert to Plate Angle to Plate Other L TO A21

Table with 4 columns: Welder Symbol, WFML No., Weld Proced., Hold Point. The table contains 12 empty rows.

1. Fit up and Cleanliness of Above

Results Inspector Signature Date

2. V.T. of Backing Strip Tack/Fillet Welds:

Results Inspector Signature Date

3. Cleanliness of Channel, Liner, and B. Strip:

Results Inspector Signature Date

4. Final V.T. of Channel Fillet Weld:

Results Inspector Signature Date

5. Seam Weld Fit Up and Cleanliness:

* Sat [Signature] 8/16/84 Results Inspector Signature Date

6. Final V.T. of Welds for Surface Preps.

Results Inspector Signature Date

7. Final P.T. and Vacuum Box of Seams (See Weld Inspection Sheet)

Results Inspector Signature Date

8. Completion of Weld Inspection: QI-QP-11.14-6

Inspector Signature Date

* NCFM 84-2007 only

FOR INTERNAL USE

BOP OS M

Fluor 35

MILLWRIGHT DEPT.

AC Serial No. N/A

Drawing No. BB2401A

~~FRS~~ B-229

USE FILE MATERIAL USE Date No. N/A

INSTR. NO.	DATE	SIZE/CLASS	VALVE SYMBOL	WPS/LOT #	HEAT/TREAT # OF CODE #	QTY. ISS.	QTY. RET'D.	ISSUANCE APPROVAL
35	1/5/82	3/32 ER308	CC6	88025	463516	40	7	[Signature] R-696
35	7/12/84	3/32 ER308	B20	88025	463516	10	10	[Signature] R-036
35	8/1/84	3/32 ER308	CDP	88025	463516	15	4	[Signature] R-038
35	8/10/84	3/32 ER308	CDP	88025	463516	10	0	[Signature] R-003
35	8/14/84	3/32 ER308	C.DP	88025	463516	15	10	[Signature] R-016
35	8/16/84	3/32 ER308	ABF	88025	463516	68	1	[Signature] R-024
35	8/21/84	3/32 ER308	ABF	88025	463516	20	4	[Signature] R-044
35	8/21/84	3/32 ER308	ABF	88025	463516	5	3	[Signature] R-044

Jett
84-84

FOR INFORMATION ONLY

DOMANCHE PEAK STEAM ELECTRIC STATION

INSPECTION REPORT

SHEET 2 OF 2
NO. 2-0021078

ITEM DESCRIPTION IDENTIFICATION NO. SYSTEM / STRUCTURE DESIGNATION

SPEC. NO. REV. REF. D.C. NO. & REV. & CHANGE NO. MEASURE OR TEST EQUIP. IDENT. NO.

- IN-PROCESS INSPECTION
- PRE-INSTALLATION VERIFICATION
- INSTALLATION INSPECTION
- FINAL INSPECTION
- PRE-TEST INSPECTION

INSPECTION RESULTS

- INSPECTION COMPLETED, ALL APPLICABLE ITEMS SATISFACTORY
 - INSPECTION COMPLETED, UNSATISFACTORY ITEMS LISTED BELOW
- QC INSPECTOR [Signature] DATE 8/14/84

ITEM NO.	INSPECTION ATTRIBUTES	SAT	UNSAT	DATE	QC SIGNATURE
	Area around and backing strip was located at the proper location				
	(1) Hold Tag removed			8/14/84	[Signature]

FOR INFORMATION ONLY

REMARKS (DWGS, SPECS, ETC.)

RELATED NCR NO. 15 M-84-200017 I.R. CLOSED DATE _____ SIGNATURE _____ QC INSPECTOR 16

M2420017
 TEXAS UTILITIES SERVICES INC
 COMANCHE PEAK S E S
 Agent For
 DALLAS POWER & LIGHT COMPANY
 TEXAS ELECTRIC SERVICE COMPANY
 TEXAS POWER & LIGHT COMPANY

DISPOSITION [CONT'D]

REWORK PROCEDURE

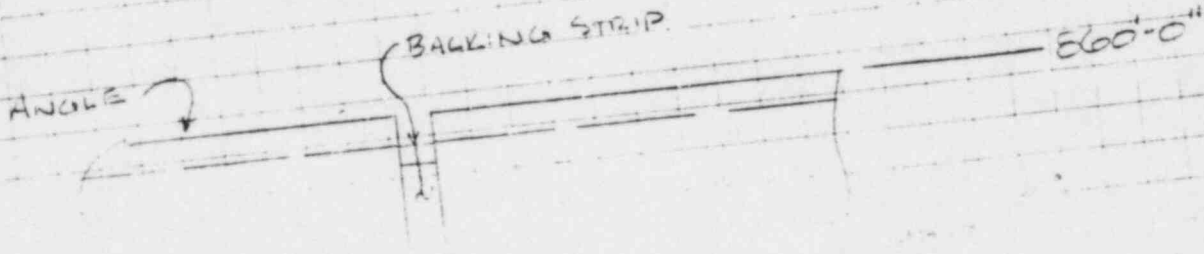
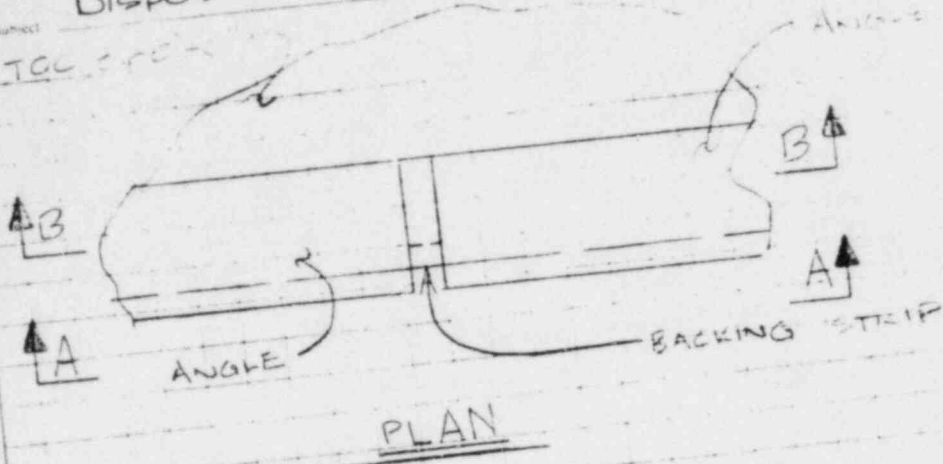
1. THIS PROCEDURE IS TO DESCRIBE THE ACTIONS NECESSARY TO REPLACE THE BACKING STRIP WHICH WAS REMOVED BY GRINDING.
2. THE BACKING STRIP(S) INSTALLED PER THIS PROCEDURE MAY BUTT UP AGAINST EXISTING BACKING STRIP(S) THAT THE G.C. INSPECTOR HAS DEEMED ACCEPTABLE. IT IS NOT NECESSARY TO WELD THE 2 SECTIONS OF BACKING STRIP TOGETHER, HOWEVER CRAFT MAY TACKWELD THE 2 SECTIONS TOGETHER TO EXPEDITE INSTALLATION.
3. REPLACEMENT BACKING BAR INSTALLED PER THIS PROCEDURE IS TO BE 1/8" MIN. THICKNESS X LENGTH REQ'D. IT IS TO BE STAINLESS STEEL.
4. IN THE AREAS DOCUMENTED BY PG. 1 OF THIS PROCEDURE WHERE A BACKING BAR, THE CRAFT MAY REMOVE THE EXISTING BAR AND WELD FILLER METAL TO THE NEW BAR. THE DRILLING AREAS FOR THE REMOVAL OF REMOVING EXISTING COGS AND WELD FILLER METAL.
5. THE FINAL CONFIGURATION OF BACKING BAR RELATIVE TO THE ANGLE ARE TO BE AS SHOWN ON PG 2. VOIDS DEEPER THAN 1/16" ARE NOT PERMITTED UNDER THE BACKING BAR.
6. PG. 2 SHOWS ONLY THE CONFIGURATION OF NEW BACKING BAR. SUITABLE EXISTING BACKING BARS EXISTS IN SOME AREAS AND WILL NOT BE AS PICTURED ON PAGE 2. THIS IS ACCEPTABLE.
7. NEW BACKING STRIPS MAY BE TACKWELDED TO THE ANGLE TO EXPEDITE CONSTRUCTION.

ME4200017
TEXAS UTILITIES SERVICES INC
COMAN THE PEAKS ETS
DALLAS POWER & LIGHT COMPANY
TEXAS ELECTRIC SERVICE COMPANY
TEXAS POWER & LIGHT COMPANY

Chk'd Apprd By

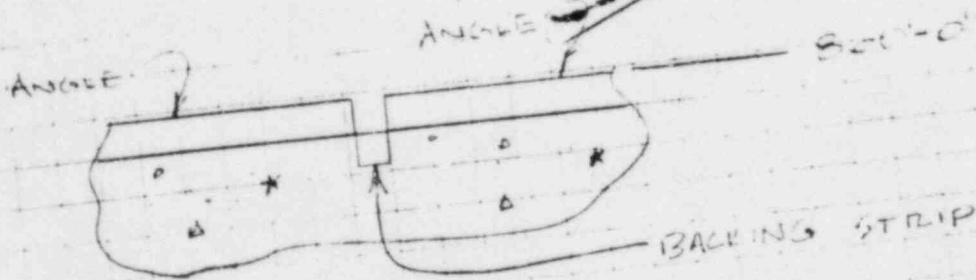
Subject
TOL 5-10-58

DISPOSITION [CONT'D]



SECT A-A

FOR INFORMATION ONLY



SECT B-B

TEXAS UTILITIES
GENERATING CO

COMANCHE PEAK STEAM ELECTRIC STATION
NONCONFORMANCE REPORT (NCR)

NCR No. 11517

Page 1/3

UNIT	STRUCTURE/SYSTEM	ITEM/COMPONENT	TAG/ID NUMBER	LOCATION OR ELEVATION	RIR NO.
2	S.S. Liner	weld #35	Reactor Coar	Exc 112 ft	

REPORTING PERSONNEL

NONCONFORMING CONDITION
The Backing Strip is Removed By Grinding, EXPOSING the Concrete rebar
APPROX. 1" Long on weld #35.

1) Hold TAG Applied

REFERENCE DOCUMENT: DT-OP 11.14-6 REV 6 PARA 3.1.4.5

REPORTED BY: L. TESSIER / Jimmie Duncan / Bill Cooper DATE: 7/18/84

QE REVIEW/APPROVAL: D.T. Oxt DATE: 7/19/84

ACTION ADDRESSEE: Bill WRIGHT - Heaton / TRIESTE DEPARTMENT: Engineering

DISPOSITION: REWORK REPAIR USE AS IS SCRAP

Install new backing strip in the affected area per sketches and procedure given on attached sheets.

FOR INFORMATION ONLY

Roy Valdez 8-2-84 DATE: 8/2/84

ENG. REVIEW/APPROVAL: James Mathews DATE: 8/13/84

QE REVIEW APPROVAL: Michael D. Warner DATE: 1/1

DISPOSITION VERIFICATION & CLOSURE:

COMMENTS:

UNIT	STRUCTURE SYSTEM	ITEM COMPONENT	TAG ID NUMBER	LOCATION OR ELEVATION	R/P NO
2	Reactor Cavity	weld 35	S.S. Liner	E60'RB2 A/19	N/A

NONCONFORMING CONDITION

The Backing Strip is Removed By grinding, Exposing Concrete For 1" on W#35

1 Hold TAG APPLIED

REPORTING PERSONNEL

REFERENCE DOCUMENT: QEQP 11.14-6 REV 6 PARA 3.1.4.5

REPORTED BY: L TESSIER DATE: 8.14.84

QE REVIEW/APPROVAL: [Signature] DATE: 8.14.84
ACTION ADDRESSEE DEPARTMENT

QE

DISPOSITION: REWORK _____ REPAIR _____ USE AS IS SCRAP _____

NOT A NONCONFORMING CONDITION

CLEANING OF WELD GROOVE AREA BY CHIPPING AND BRUSHING. BACKING STRIP WAS FOUND TO BE IN PLACE AS REQUIRED.

NOTE: THE EXPOSED CONCRETE AS REFERENCED ABOVE WAS IN THE GROOVE ON TOP OF THE BRUSHING STRIP.

[Signature] Michael D. Nanner 8/14/84
FOR MITCHELL

ENG. REVIEW/APPROVAL DATE: 1 1

QE REVIEW APPROVAL: "VOID" Michael D. Nanner DATE: 8.14.84

QE

DISPOSITION VERIFICATION & CLOSURE DATE: 1 1

COMMENTS

RI ISSUED TO VOID NCR. SEE ATTACHED I.R. #20021078
8/15/84

INTERIM RECORDS VAULT

DOCUMENTATION PACKAGE INVENTORY CARD

ROOM # _____

PACKAGE I.D.# FW 35

BB 2401A

PACKAGE TYPE MFP

THIS PACKAGE CONTAINS THE FOLLOWING:

QUANTITY	DOCUMENT DESCRIPTION	UNIQUE I.D., REMARKS, ETC.
1	WFML	(#35)
1	TRAVELER	4 pages (#35)
2	IR	(#35)
2	B ^{PH 6/20/54} NDIR NDIR (1 copy)	^{KC 7-19-54} M-84-01969 M-84-200017
1	AICR _{original copy}	
1	BB-2401-A SET E3	
1	IR	2-0021078

FOR INFORMATION ONLY

NON DESTRUCTIVE TEST
INSPECTION REQUEST

FOREMAN _____

TIME _____ DATE _____

WELDER: See Below

DRAWING # 2401A BB R#2

INSP. REQ.

CLEAN
VISUAL
FINAL

FIT-UP
L.F.

FIELD WELD JT. # _____
V.B. _____

COMMENTS:

FOR ACCEPTANCE

AN 7210 RD

INSPECTOR: J. R. V...

ACCEPT:

DATE: 9-13-

NON DESTRUCTIVE TEST
INSPECTION REQUEST

FOREMAN _____

TIME _____
DATE _____

WELDER: See Below

DRAWING # 2401A BB R#2

INSP. REQ.	CLEAN <input type="checkbox"/>	FIT-UP <input type="checkbox"/>	FIELD WELD JT. # <u>35</u>
	VISUAL <input type="checkbox"/>	L.P. <input type="checkbox"/>	V.B. _____
	FINAL <input type="checkbox"/>		

COMMENTS:

*First fit up of
top angle to plate*

WWR: AOI-71 82 AAK

FOR INTERFERE
AOI 7210 ARD

INSPECTOR: Don R. Vag

ACCEPT:

DATE: 9-13-78

NON DESTRUCTIVE TEST
INSPECTION REQ. T

FOREMAN
Toules

TIME/DATE
1-5-82

WELDOR: *K/A*

DRAWING # *BB 2401A*

INSP. REQ.	CLEAN	<input checked="" type="checkbox"/>	FIT-UP	FIELD WELD #
	VISUAL		L.P.	V.B.
	FINAL			

COMMENTS:
*# 35 clear from C of test
 well next to C of embedded
 plate # 36*

INSPECTOR: *O. Sturges*

ACCEPT:

DATE: *1-5-82*

WFML: [unclear] ONLY



Brown & Root, Inc.

INSPECTION REPORT

20814

PAGE 1 OF 1

PLANT CODE	SYSTEM CODE	COMPONENT CODE
1-4	5-10	11-16

TAG/SPIN/IDENT NO						DRAWING SPECIFICATION NO			SERIAL NO	
A	B	C	D	E	F	G (UNITS)	H (UNITS)	I (UNITS)		J (UNITS)
						17-55				

PURCHASE ORDER NUMBER	VEND CODE
56-69	70-73

MRR NUMBER	RIR NUMBER	VENDOR'S HEAT/LOT/BATCH NO.	COUNT QUANTITY	UNITS	PURCH'S OR NO.	RLS/HOLD NO. STATUS	CODE	INPUT DATE
74-79	80-85	86-95	96-105		106-111	112-121		122-127

PURPOSE AND TYPE OF INSPECTION/SURVEILLANCE: TO VERIFY WFMLs issued to field weld #35 (BB2401A)

RESULTS OF INSPECTION / SURVEILLANCE: After replacement of top angle, backing strip was welded out completely to prevent concrete from getting into seam. The following WFMLs were used:

WMA	A162999	AKK	✓
WFML	D-027	BEN	✓
	N-009	BDA	✓
	N-020	BDA	✓
	D-043	BCC	✓
	D-065	BEN	✓
	D-021	BCC	✓

FOR INFORMATION ONLY

NCR NO. N/A

Robert F. Kanney
QC ENGINEER/INSPECTOR

DATE 7/30/79 ^{RFK} 6-24-80

1 JUDGE BLOCH: Mr. Roisman, you haven't specified
2 whether you want it in evidence or not, does that matter
3 to you?

4 MR. ROISMAN: Yes, I do.

5 JUDGE BLOCH: It is also admitted into evidence.

6 MR. ROISMAN: I would like to invite the
7 Applicants to please check their copy of weld 35 against
8 ours. It's a fairly large package. Mr. Brandt testified
9 there's an NCR written on it. The copy I have, the staple
10 is out of it and so I'm concerned about losing any pages.
11 It doesn't have to be done at any second.

12 BY MR. ROISMAN:

13 Q Now, Mr. Brandt, on pages 6 and 7 of your
14 prefiled testimony of November 21st --

15 JUDGE BLOCH: Transcript 20579 and -80.

16 BY MR. ROISMAN:

17 Q -- you discuss the role of the backing strip in
18 the production of the stainless steel liners. And I
19 wonder if you can tell me: What is the source of your
20 opinions that are expressed there regarding the role of
21 the backing strip, and what its importance is, and what
22 its importance is not?

23 JUDGE BLOCH: Could you tell us which Q starts
24 the relevant passage?

25 MR. ROISMAN: Yes. I'm sorry, Mr. Chairman.

1 Well, the Q starts on -- Q 14 on page 6. But the
2 pertinent portions of the answer, really, appear at the
3 top of page 7, the first full sentence in which Mr. Brandt
4 begins,

5 "The only purpose of verifying the cleanliness" and
6 goes on from there. And then the second sentence, "The
7 sole purpose for the inspection is to ensure that the
8 backing strip remains in place until the time of the
9 inside fit-up."

10 THE WITNESS: Mr. Roisman, I think I explained
11 that yesterday. I'll try again.

12 I --

13 JUDGE BLOCH: The question was the source of the
14 information.

15 THE WITNESS: The source of the information -- I
16 guess I don't understand the question. I know what the spec
17 requires. I know of a way of achieving that.

18 JUDGE BLOCH: So it's your own opinion based on
19 your knowledge of the plant and welding; is that right?

20 THE WITNESS: Right.

21 BY MR. ROISMAN:

22 Q Is there a specification that says that once the
23 welding is completed on the front, that the tacking strip --
24 I'm sorry -- that the backing strip does not need to
25 remain in place? Does that appear in the specification?

1 A No, sir. The specification, as I attempted to
2 state, just simply says it has to be welded by welders
3 qualified to section 9.

4 Q But here you are giving us a statement, in
5 particular the second sentence -- well, both the first and
6 the second sentence up say, in one case, "the only purpose
7 of verifying" and then in the next sentence "the sole
8 purpose for the inspection," and I want to know what the
9 basis of that opinion is? Is that your opinion? Or is
10 that set out in a document that specifies the purpose for
11 the cleanliness inspection and the purpose for having the
12 backing strip?

13 A The backing strip's purpose is outlined in
14 section 9: "Deletion of backing for gas tungsten arc
15 welding is an essential qualification for welding function.
16 Thus the presence or absence of backing strip determines
17 what qualification requirements exist for the welder, not
18 for the joint itself.

19 If the welder was qualified to weld an open butt weld,
20 as I discussed yesterday, the backing strips are
21 absolutely -- serve absolutely no purpose.

22 Q None whatsoever?

23 A None.

24 JUDGE BLOCH: Except the drawings didn't allow
25 open butt welds; did they?

1 THE WITNESS: I'm not sure that's a true
2 statement.

3 JUDGE BLOCH: You mean it was a drawing that
4 said make either an open butt weld --

5 THE WITNESS: No, the drawing showed a weld
6 symbol for a groove weld. If you weld an open butt you
7 have to have a welder that's qualified to weld an open
8 butt.

9 JUDGE BLOCH: So the drawing specified a weld?

10 THE WITNESS: Right.

11 JUDGE BLOCH: So the only weld that could be put
12 on pursuant to the drawing is a groove weld?

13 THE WITNESS: I agree. But it could be done
14 with either backing or without.

15 JUDGE BLOCH: I thought you called it an open
16 butt weld when it was done without backing.

17 THE WITNESS: It's a U groove, just like the
18 drawing shows. Excuse me, it's a square butt. There is
19 no groove. It's two plates welded, butted up together
20 between 3/16 and 3/8 of an inch apart and welded.

21 JUDGE BLOCH: And for design purposes on the
22 weld, is there no difference in strength between whether
23 or not the backing --

24 THE WITNESS: The weld is not structural,
25 Mr. Chairman.

1 JUDGE BLOCH: So there was no calculation of the
2 strength of the weld in the design?

3 THE WITNESS: No, sir. It's a liner.

4 BY MR. ROISMAN:

5 Q Mr. Brandt, does every single plate-to-plate
6 weld have behind it not only a backing strip but a channel?

7 A No.

8 Q On the ones that didn't have a channel, didn't
9 the backing strip also serve to prevent the concrete that
10 was poured against the liner plate from coming into the
11 weld area?

12 A In most cases; yes, sir.

13 Q So that's a second reason, separate from any
14 reason you gave us on page 7 of your testimony, for why
15 the backing strip had to be on there; isn't that true?

16 A It could have been done with other items.

17 Q According to specifications it was supposed to
18 be done with the backing strip; wasn't it?

19 A Specifications; no. The specification does not
20 address backing strips.

21 EXAMINATION

22 BY JUDGE BLOCH:

23 Q Drawings?

24 A I don't believe so either.

25 Q Do you know whether or not, when there was no

1 leak chase channel, there was a requirement for a
2 continuous weld on the backing strip?

3 A No, there was not. As a matter of explanation,
4 in many cases they did do a continuous fillet weld to keep
5 it from seeping through. As the traveler in 35 indicates,
6 as I discussed, when they remove the angle and leak chase --
7 excuse me -- angle and backing strip, the purpose in
8 removing it was to realign it and to make it continuous
9 fillet weld on the back to prevent concrete from seeping
10 through.

11 Q But to be clear, you are confident that there
12 was never a drawing that specified a continuous weld on
13 the backing strip?

14 A I didn't say that, Mr. Chairman. I said I
15 didn't believe that the drawing required a continuous
16 fillet weld.

17 Q Did you examine the drawings?

18 A I don't have the drawing.

19 Q Did you examine the drawings for the backing,
20 the areas where there were backing strips and no leak
21 chase channel?

22 A Have I looked at drawings where that's the case?
23 Yes, sir.

24 Q Did you examine those for seeing whether there's
25 was a specification of a continuous weld?

1 A I don't recall any weld symbol or any
2 specification -- any specifying requirement on a drawing,
3 stating how the backing strip was to be attached to the
4 liner plate.

5 Q But sometimes when we look at documents we have
6 a lot of things in mind. I'm asking specifically whether
7 you are looking for it.

8 A I understand what you are asking and I think I
9 answered it. I don't recall seeing that requirement and I
10 couldn't state the requirement doesn't exist. You asked
11 if I looked at those drawings. My answer is "yes." If I
12 looked at those drawings with particular attention to
13 whether or not it required a continuous fillet weld, until
14 yesterday I had -- the issue never even came to mind.

15 Q So the answer is, then, you did not have that
16 specifically in mind?

17 A When I looked at those drawings; yes, sir.

18 CROSS-EXAMINATION (Continued)

19 BY MR. ROISMAN:

20 Q Mr. Brandt, you said just a moment ago -- and of
21 course you said it on many other occasions -- that there
22 is no structural role that these welds play. That is,
23 it's not for their strength, it's for their
24 watertightness, I believe. Is that a fair summary of what
25 you said?

1 A Yes, sir.

2 Q Is it your testimony that the stainless steel
3 liner plates in the reactor cavity are not required to be
4 seismic 1 qualified?

5 JUDGE BLOCH: I couldn't hear the last couple of
6 words --

7 MR. ROISMAN: Seismic 1 qualified. I'm sorry,
8 Mr. Chairman.

9 THE WITNESS: The plates themselves, Mr. Roisman,
10 are fixed. The structure itself is seismic 1. The plates
11 are not free to move. The plates have studs on the back
12 of them and are embedded in concrete.

13 BY MR. ROISMAN:

14 Q But the thing that's holding the plates to the
15 concrete, as well as what's holding the plates one to the
16 other, is welds, is it not?

17 A No, sir.

18 Q What's holding it there?

19 A Studs.

20 Q What's holding the plates to each other?

21 A The welds.

22 Q And is it your -- you are saying that the plate
23 and the study have to be seismicly qualified but the weld
24 does not?

25 A That's my understanding, yes, sir.

1 Q And the source of that understanding?

2 A Is discussions with engineering.

3 Q Who did you talk to about that particular point?

4 A At the moment I don't recall. I believe it was
5 Dick Kissinger.

6 JUDGE BLOCH: Was that relevant to the
7 disposition of any of the NCRs on the pool?

8 THE WITNESS: In my opinion, no.

9 JUDGE BLOCH: That whether or not the liner had
10 to be seismicly qualified was not relevant to the
11 disposition of any of the NCRs on the pool?

12 THE WITNESS: If the welds are not seismic,
13 Judge Bloch, all the NCRs that I'm aware of, with one
14 exception which required scrapping a plate, involved
15 welding. If the welds are not seismic it wouldn't be an
16 engineering consideration.

17 JUDGE BLOCH: But knowing they are not seismic
18 would be relevant to dispositioning the NCR; wouldn't it?

19 THE WITNESS: That's right. There's also DCAs
20 which state the welds are not structural.

21 BY MR. ROISMAN:

22 Q Are the studs attached to the plates by welds?

23 A Most of them are stud welding, which is a fusion
24 welding process, it's not a manual welding process.

25 Q But it's a weld, isn't it?

1 A It's not a weld like we are talking about here;
2 no.

3 Q But it has to be seismic -- that weld has to be
4 seismicly qualified; doesn't it?

5 A Yes, sir.

6 Q Mr. Brandt, I would like to direct your
7 attention to page 9 of your testimony, and to --

8 CHAIRMAN BLOCH: Transcript 20582.

9 BY MR. ROISMAN:

10 Q And to weld number 12. Now, on page 9 of your
11 testimony you say, about in the middle of the page,
12 "Second, CASE is correct with respect to a small group of
13 eight-line travelers." And then there's a parentheses and
14 you have listed a number of welds, the first one of which
15 is 12.

16 Is 12 an eight-line traveler?

17 A Mr. Roisman, this is an example of my lack of
18 understanding what you are even talking about. In order
19 to answer your filing, for lack of a better term, I looked
20 at it with the least favorable light on our part. I
21 assumed that would be a conservative position.

22 You tend to talk about --

23 JUDGE BLOCH: Mr. Brandt, if you want to
24 continue you may. But the question was much simpler.

25 THE WITNESS: No, I understand. I'm getting

1 there.

2 If you look at the top of page 5, where weld 12 is
3 listed by you, it says, "inspection travelers for the
4 following --"

5 JUDGE BLOCH: This is page 5 of?

6 THE WITNESS: CASE's November 15 filing -- page
7 5 of Exhibit 1, excuse me.

8 BY MR. ROISMAN:

9 Q Isn't it page 6?

10 A I'm sorry, page 6.

11 Q Go ahead.

12 A The only way the allegation, or your point even
13 makes sense, is to assume that you are talking about
14 eight-line travelers.

15 If you are talking about five-line travelers, your
16 allegation is "lacked QC verification for step 5." If
17 that's the case, you are not even talking about a fit-up
18 inspection.

19 I assume you are talking about eight-line travelers.
20 That's the way I answered the allegation. And -- in that
21 sense I'm just playing back in my answer what you alleged
22 in your allegation. Whether it's a five-line traveler or
23 eight-line traveler is somewhat irrelevant. What we are
24 talking about here is weld 12. There's nothing to
25 indicate that the inside fit-up and cleanliness inspection

1 was performed. It is on a nonconformance report.

2 EXAMINATION

3 BY JUDGE BLOCH:

4 Q So, is the testimony correct that you just
5 delete "eight-line"?

6 A No, sir. The testimony matches the allegation.

7 Q But the allegation --

8 A Is nebulous. If it's talking about five-line
9 traveler in the allegation, the allegation doesn't make
10 sense.

11 Q On 20582, what do you want to do to modify it?
12 Strike out "12" or take out "eight-line"?

13 A I don't want to do anything. I want Mr. Roisman
14 to qualify, and I think as part of our interrogatories,
15 what are they talking about with five-line or eight-line
16 travelers on the top of page 6. It appears to me the
17 allegation is addressing eight-line travelers.

18 Q We are not talking about his allegation. We are
19 talking about --

20 A I understand that, Judge Bloch. I have
21 responded to his allegation in the same language to match
22 his allegation.

23 Q We we are just talking about your answer and
24 whether you want to change it.

25 A No, sir. I don't want to change it.

1 Q You want to leave it "eight-line travelers (lines
2 12-8)"?

3 A This is an eight-line traveler in line 12. Line
4 5 is not signed off.

5 CROSS-EXAMINATION (Continued)

6 BY MR. ROISMAN:

7 Q The signature on line 1 of the five-line
8 traveler should only have been there if both the inside
9 and outside fit-up and cleanliness had been done; is that
10 correct?

11 A Yes, sir.

12 Q So that even with the asterisk, as done by
13 Ms. Neumeyer, what she did there you are saying was
14 contrary to what the procedure was done that should have
15 been followed when the five-line traveler was used; is
16 that correct?

17 A Yes, sir.

18 Q Now, if I understand the information that's
19 contained on number 12, weld number 12, this weld has not
20 been completed yet; has it?

21 A No, sir.

22 MR. WATKINS: Does that mean it has or has not?

23 BY MR. ROISMAN:

24 Q Has this weld been completed yet?

25 A No, it hasn't.

1 MR. ROISMAN: Thank you, Mr. Watkins.

2 BY MR. ROISMAN:

3 Q Given that an eight-line traveler form has been
4 attached to it, and that there's a notation at step 5, the
5 final V.T. of the inside weld directing anyone to go to
6 the fifth line, which is, incidentally if you are
7 interested, Mr. Brandt, what the line 5 reference is to in
8 the allegation -- to the fifth line of the eight-line
9 traveler, which is page 1 of this document, why is an NCR
10 written on this?

11 A From the handwriting, Mr. Roisman, this looks
12 like this also was entered by Ms. Neumeyer. Because it
13 seems to match the rest of her handwriting. That's an
14 assumption I'm making.

15 In either case, that notation itself is an error,
16 because the final V.T. of the inside weld should have
17 properly referenced "see step 6, page 1." Step 5 on page
18 1 is the inside fit-up and cleanliness inspection which is
19 lacking.

20 Q But nothing actually has happened here, has it?
21 As far as these documents tell us, this weld, the inside
22 weld has not yet been made and there's an eight-line
23 traveler on the front that has on it a line which would
24 allow you to do a -- a fit-up and cleanliness inspection
25 before you do that final weld; isn't that true?

1 A No, sir.

2 Q All right. You explain it to me then, please.

3 A If you look at the five-line traveler, the last
4 two entries, D1502 and D1549 --

5 Q Okay.

6 A And WFMLs were attached. Welding was done on
7 the inside weld in 1980.

8 Q All right.

9 A In one case -- in both cases.

10 Q Explain to me how you can tell that from the WFML?

11 A After the V.T. of the channel fillet weld, 1978 --

12 Q Excuse me. Let me just interrupt you. There
13 are two WFMLs here.

14 When you explain this, will you tell us which of the
15 two you are looking at?

16 A It's a matter of understanding the sequence,
17 Mr. Roisman. The channel weld was done in 1978. You
18 could show from concrete pour cards that the pour was
19 probably made prior to 1980. Even if you couldn't, it's
20 irrelevant.

21 The panel was made, consequently -- the channel weld
22 was made, consequently the weld which would have been
23 welded in 1980 is the inside weld. Consequently there has
24 been a hold point bypassed. You also could tell by
25 physically going to the field and verifying that weld 12

1 has been at least started.

2 Q And you can't tell from these documents there
3 the weld has been completed -- that is, the welding work
4 has been completed?

5 A No, sir, you can't.

6 Q The volume of rods used does not give us a clue
7 in that respect?

8 A No, sir.

9 Q All right. Mr. Brandt, I would like --

10 PRESIDING JUDGE: Why don't we take our seven-minute
11 break here.

12 (Recess.)

13 JUDGE BLOCH: The hearing will come to order.

14 MR. ROISMAN: Mr. Chairman, just before the
15 break I realized I had not asked to have inserted in the
16 record at this point the traveler for weld number 12,
17 which we had just been discussing. And I'm now handing a
18 copy of that to the reporter.

19 (The document follows:)

20

21

22

23

24

25

FOR INFORMATION ONLY

20831

12

B&R Stainless Steel Liner Inspection Traveler

QI-QP-11.14-6 REV.

PROJECT: CPSES JOB NO: 35-1195 UNIT 2 PAGE 1 OF 4

BB-2401-A Reactor Liner#2 Stainless Steel 3/16" B23 To B26
Drawing No. Pool Metal Type Mtl. Thck. PC. to PC.

Plate to Plate Insert to Plate Angle to Plate Other _____

Welder Symbol	WFML No.	Weld Proced.	Hold Point

- 1. Fit up and Cleanliness of Above
Results Inspector Signature Date
- 2. V.T. of Backing Strip Tack/Fillet Welds:
Results Inspector Signature Date
- 3. Cleanliness of Channel, Liner, and B. Strip:
Results Inspector Signature Date
- 4. Final V.T. of Channel Fillet Weld:
Results Inspector Signature Date
- 5. Seam Weld Fit Up and Cleanliness:
Results Inspector Signature Date
- 6. Final V.T. of Welds for Surface Preps.
Results Inspector Signature Date
- 7. Final P.T. and Vacuum Box of Seams
 (See Weld Inspection Sheet)
Results Inspector Signature Date
- 8. Completion of Weld Inspection: QI-QP-11.14-6
Inspector Signature Date

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WELD NO. _____

B&R Stainless Steel Liner Inspection Traveler

Weld Inspection Sheet

Page 2 of 4

Acceptance Std.
Gibbs & Hill 2323-SS-18

7a. Penetrant Mfg. Magnaflux-Spotcheck _____
 Cleaner Mfg. Magnaflux-Spotcheck _____
 Developer Mfg. Magnaflux-Spotcheck _____

NDE Procedure

Final P.T. Level II RESULTS INSPECTOR SIGN. DATE

7b. Vacuum Box GASKET TYPE SOLUTION TYPE
 _____ by _____

Pretest Cleaning _____ Pressure _____ Temperature _____ NDE Procedure _____

Solution Application Method _____ Post Test Cleaning _____

Gaug. Serial Number _____ Pressure Differential
 Maintained for _____ Sec. _____ Min.

Final V.B. _____

N/A - Not Applicable

Satisfactory _____ Unsatisfactory _____ Level II
 Inspector _____ Date _____

FIGURE

FOR INFORMATION ONLY

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B&R STAINLESS STEEL LINER INSPECTION TRAVELER

PROJECT: CPSES JOB NO.: 35-1195 UNIT 2 PAGE 23 OF 284

BB 2401A React Line # 2 Stainless Steel 3/16" R B23 to R B26
 Drawing No. POOL METAL TYPE MTL. THK. PC. to PC.

PLATE TO PLATE INSERT TO PLATE ANGLE TO PLATE OTHER

WELDER	WBR NO.	WELD PROC.	FOLD POINT
4EO	A008144	88023	FF
9BT	A017009	88023	FF
9BT	A017009	88023	2,3
4RT	A017038	88023	4
4RT	A017219	88023	4
3RN	A017252	88023	4
7HE	A017300	88023	4
3	D-1502	88023	1, 5
3CO	D-1549	88023	1, 5

- Fit up and cleanliness of above:
 ⊕ SAT RESULTS AG Munn INSPECTOR SIGNATURE 3/13/83 DATE
- V.T. of backing strip tack/fillet welds:
 SAT RESULTS J.M. McCoy INSPECTOR SIGNATURE 9-8-78 DATE
- Cleanliness of channel, liner, and backing strip:
 SAT RESULTS J.M. McCoy INSPECTOR SIGNATURE 9-8-78 DATE
- Final V.T. of channel fillet weld:
 Sat. RESULTS Jain Wilson INSPECTOR SIGNATURE 10-19-78 DATE
- Final V.T. of inside weld:
 SAT RESULTS SEE STEP 5 D91 INSPECTOR SIGNATURE _____ DATE _____

Completion of weld inspection:

RESULTS SEE STEP 8 OF INSPECTOR SIGNATURE _____ DATE _____
 ⊕ LATE ENTRY PER CP-QCI 2.11-11 985
 SEE NOTE: REF. NDI CHIT ATTACHED DOCUMENTATION
 AG Munn 3/13/83

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NON DESTRUCTIVE TEST INSPECTION REQUEST		TIME	DATE
FOREMAN _____			9-7-78
WELDER: <u>SEE BELOW</u>		40F4	
DRAWING #	<u>BB 2401A</u>	FIELD WELD JT. # <u>12</u>	
<u>5/8 LINER #2</u>		V.B. _____	
INSP. REQ.	CLEAN <input type="checkbox"/>	FIT-UP <input type="checkbox"/>	WMR: <u>A008144 AEO</u> <u>A017009 ABT</u>
	VISUAL <input type="checkbox"/>	L.P. <input type="checkbox"/>	
	FINAL <input type="checkbox"/>		
COMMENTS: <u>First fit up and</u> <u>cleanliness of Plate to</u> <u>Plate</u>			
INSPECTOR: <u>J.M. McCoy</u>		ACCEPT: <input checked="" type="checkbox"/>	DATE: <u>9-7-78</u>

FOR INFORMATION ONLY

20835

MILLWRIGHT DEPT.

Drawing No. _____

D-1502

WELD FILLER MATERIAL LOG Weld No. _____

WELD NO.	DATE	SIZE/CLASS	WELDER SYMBOL	WPS/ICN #	HEAT/LOT # or CODE #	AMT. ISS.	AMT. RT'D.	ISSUANCE APPROVAL
12	1/4/20	3/32 ER708	ACC	8/1	1163638	40	8	Sample used
688	↓	↓	↓	↓	↓	↓	↓	Sample used
13	↓	↓	↓	↓	↓	↓	↓	Sample used
15	↓	↓	↓	↓	↓	↓	↓	Sample used
17	↓	↓	↓	↓	↓	↓	↓	Sample used

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1 JUDGE BLOCH: Now, Mr. Brandt, would you please
2 take a look at --

3 I think I have to -- it may be admitted into evidence
4 and bound into the transcript.

5 MR. WATKINS: No objection.

6 MR. ROISMAN: I'm making the assumption that
7 they are produced by the Applicant in the ordinary course,
8 but I will go through it each time.

9 BY MR. ROISMAN:

10 Q I would like to direct your attention to weld
11 308. And this is one of the welds listed on CASE's
12 supplemental filing 6 under the first grouping of weld
13 numbers, and that you respond to in your answers on page
14 number 9 of your November 21st prefiled testimony. And I
15 believe that this is one of the welds which you found CASE
16 was factually wrong, because the inside fit-up and
17 cleanliness inspections were performed and documented.

18 MR. WATKINS: What part of page 9?

19 MR. ROISMAN: That's near the last third of the
20 page, where he begins, still under answer 16: "Finally,
21 my examination of all the remaining eight-line --" et
22 cetera. Do you see that?

23 MR. WATKINS: Thank you.

24 BY MR. ROISMAN:

25 Q Mr. Brandt, first my question to you is:

1 Looking now at number 308 and at the eight-line traveler
2 which appears on the front, where is the indication that
3 the inside fit-up and cleanliness inspections were
4 performed and documented, shown on that eight-line
5 traveler?

6 A It's a chit dated February 3, 1982, which
7 indicates the cleanliness and fit-up inspection on fillet
8 weld 308.

9 Q What does the "NA" on line 5 of the eight-line
10 traveler with the signature of Mr. Duncan on 4/25/83
11 signify?

12 A Procedurally it means that it is either
13 nonapplicable or it had previously been inspected on
14 another traveler.

15 Q But I thought with regards to steps 1, 2, 3, and
16 4, all of which had been previously verified on another
17 traveler, the procedure that was used by Mr. Duncan was to
18 refer the reader to the particular step and the particular
19 page of this traveler package. Isn't that true?

20 A Yes, sir.

21 Q So, why would Mr. Duncan have done it
22 differently here?

23 A I asked myself that same question when I was
24 reviewing these, Mr. Roisman. And, if you'll give me a
25 second I'll find the answer that I made to myself.

1 If you look -- and maybe this is in the record and
2 maybe it's not -- They have been produced. -- QI-QP-11.14-6 --

3 Q Can you just stop there one second while I get
4 that in front of me. QI QP 11.14-6?

5 A Right.

6 Q Rev --

7 A Just a second. Rev 3 was in effect when
8 Mr. Duncan did this.

9 Q Okay.

10 A Paragraph 3.4.1 --

11 Q Okay.

12 A The last paragraph in that major heading 3.4.1
13 states, "If any of the hold points do not apply because of
14 work previously accomplished, et cetera, then the QC
15 inspector shall 'NA' the inspection hold point on the
16 inspection traveler, attachment 1."

17 Q Can you explain why Mr. Duncan didn't do that,
18 then, for steps 1, 2, 3, and 4, on the first -- on the
19 eight-line traveler?

20 A No. But I think it's clear what Mr. Duncan was
21 doing. My concern, Mr. Roisman, when I reviewed them, was
22 that Mr. Duncan had "NA'd" the inside fit-up and
23 cleanliness inspection. After determining that I
24 determined there was a chit to verify that the inside
25 cleanliness and fit inspection was performed, and then I

IMAGE EVALUATION
TEST TARGET (MT-3)

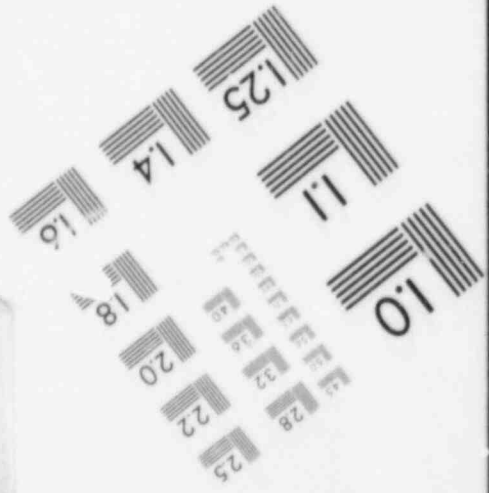
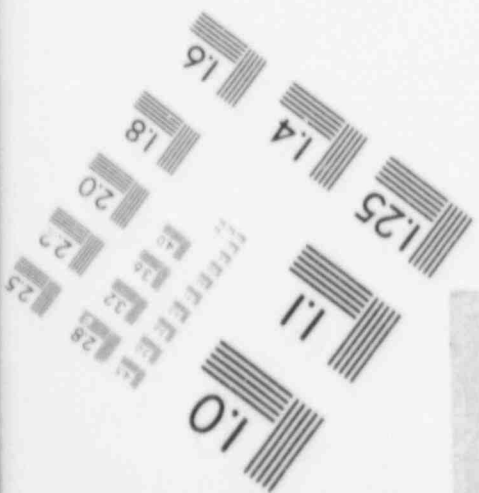
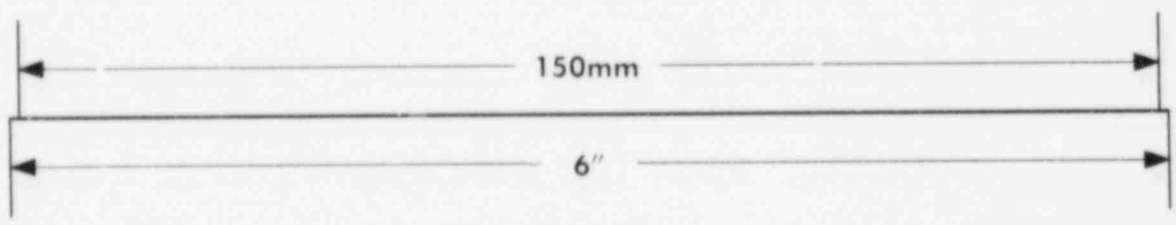
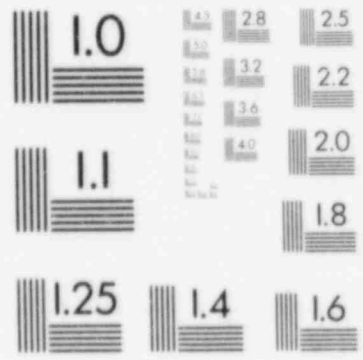
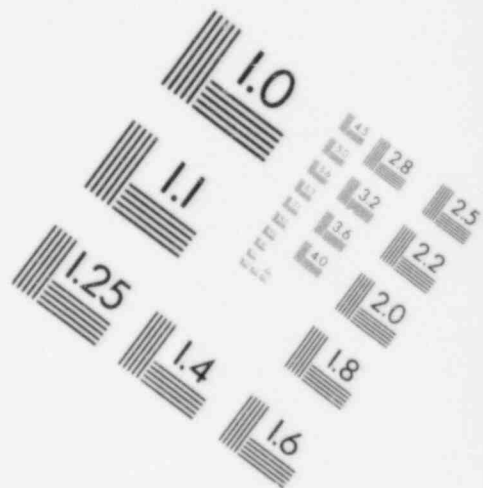
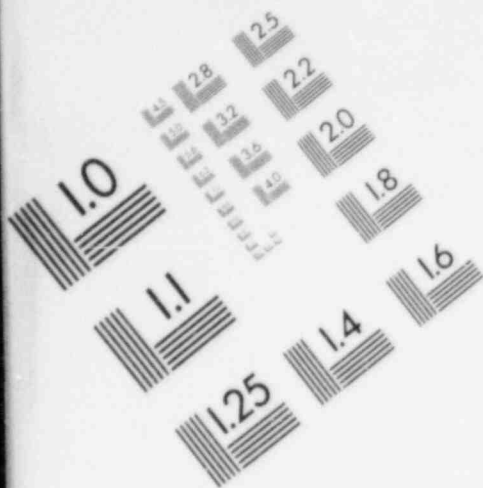
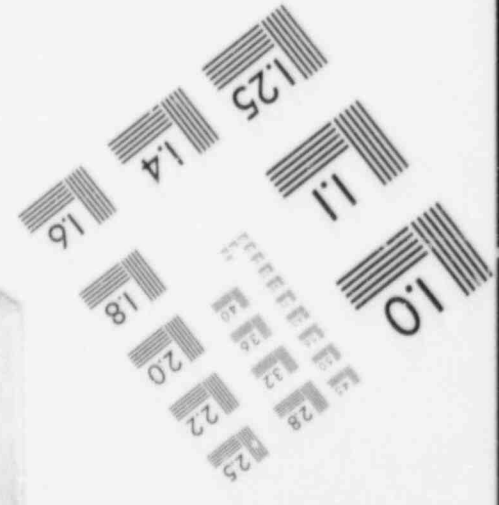
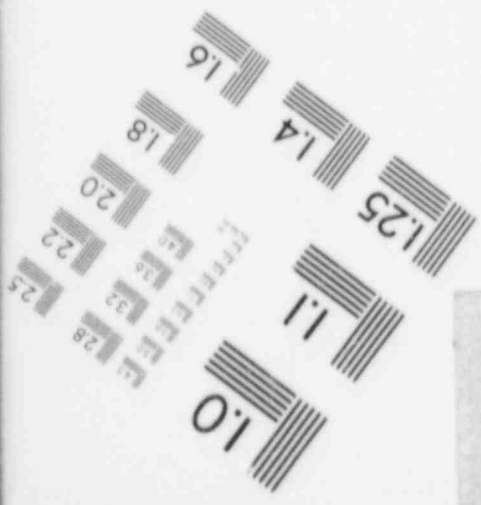
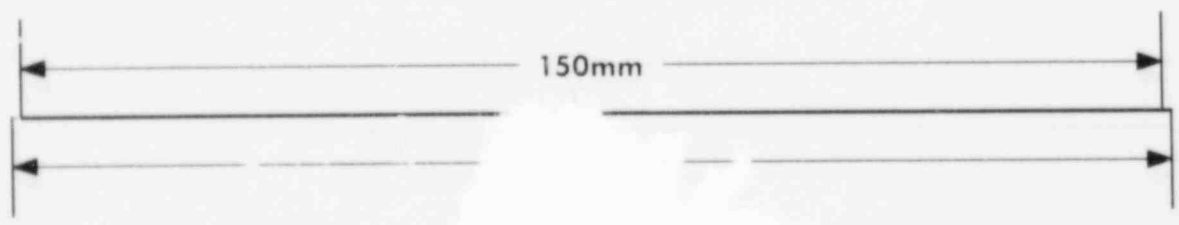
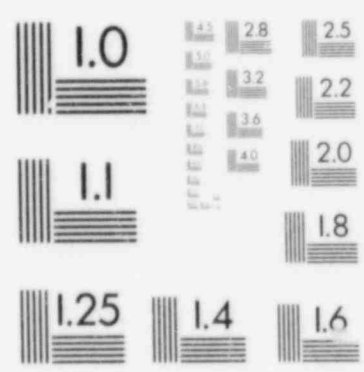
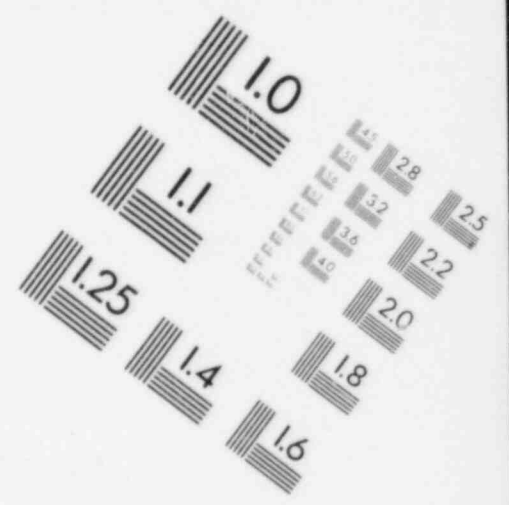
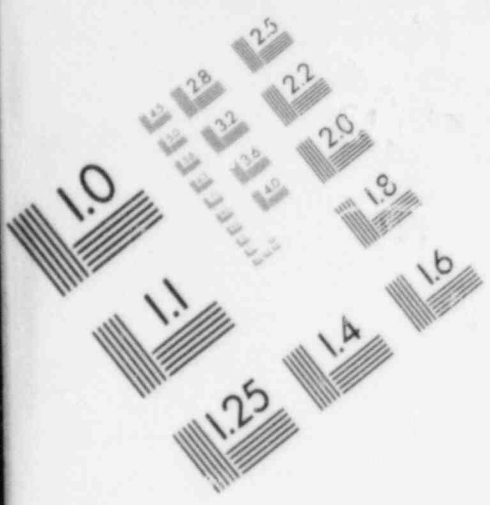


IMAGE EVALUATION
TEST TARGET (MT-3)



1 went back to the procedure that was in effect at the time,
2 which clearly indicated they should NA the inspection hold
3 point on the eight-line traveler which was attachment 1 to
4 this procedure.

5 Q Taking a look at the chits for this inside --

6 JUDGE BLOCH: I'm sorry, Mr. Roisman, I don't
7 understand. Was it a violation of procedure to use the
8 entries on the first four lines there or not?

9 THE WITNESS: I don't think that's what
10 Mr. Roisman's point was, Mr. Chairman.

11 EXAMINATION

12 BY JUDGE BLOCH:

13 Q No. But it was done inconsistently, so I want
14 to know whether one of the ways was wrong?

15 A The way that's wrong is clearer than the way
16 that's right. I know that doesn't make much sense, but
17 his entries on line 1, 2, 3, and 4 are clear to even a
18 casual observer, I think, what he's talking about.

19 When I looked it, I was concerned that he had NA'd step
20 5. There are a number of these that's talking about.
21 That's why these came to my attention. As a matter of
22 fact I can dig through my notes and show you a list of all
23 of these that he did that I thought at the time he made an
24 error, but before I made that determination I went back
25 and looked at the inspection function in effect at that

1 time, and indeed it should have been marked "NA."

2 Q I guess what we don't know is what he meant by
3 the difference between the reference on line 1 to 4, and
4 the NA on line 5. Do we know that --

5 A I don't know that. I haven't discovered that.
6 I haven't discovered that since last Wednesday -- I
7 haven't talked to Mr. Duncan.

8 Q If he meant it's exactly the same as the four
9 lines there's nothing wrong with the form but if he meant
10 something else there could be something wrong; is that
11 right?

12 A There's nothing wrong with the inspection of
13 this weld. I'll stipulate to the fact that it's different
14 from what he did in steps 1 to 4. But, NA typically means
15 "not applicable." When I reviewed the travelers I
16 originally thought Mr. Duncan had erred in function in
17 determining that the inside fit-up wasn't applicable.
18 However, the procedure which Mr. Duncan was working to, in
19 April 1983, indicated that he should mark that blank "NA"
20 so no violation exists.

21 Q Providing that all he was doing was indicating
22 the things on lines 1 to 4. If he really meant it was not
23 applicable, then there could be a problem.

24 A What's the problem? I certainly can't tell you
25 what he meant. I haven't talked to him.

1 All I'm saying, as a reviewer of paper, which
2 essentially was what I was doing last week when I was
3 looking through these things, my concern was the NA.

4 Q Maybe my problem -- is there a document there
5 that documents step 5?

6 A Yes.

7 JUDGE BLOCH: Okay. Let's continue.

8 CROSS-EXAMINATION (Continued)

9 BY MR. ROISMAN:

10 Q Mr. Brandt, looking at the procedure that was
11 used here, is it your understanding that at the time that
12 Mr. Duncan was making those signatures, that he would look
13 and see the cleanliness and fit-up inspection chits that
14 appear in the back, and use those to verify that the
15 cleanliness and fit-up had in fact occurred for the water
16 side of the weld?

17 A I'd say there's two possibilities, Mr. Roisman.
18 Once again, I'm not Mr. Duncan.

19 He could have seen the line signed off on line 1 of the
20 five-line traveler by Ms. Neumeyer, which says, "late
21 entry, see NDT chit attached," which there are chits for
22 both the inside and the outside fit-up. Or Mr. Duncan
23 could have looked at the chits for the inside and outside
24 fit-up.

25 Q All right. Looking at the chits for what you

1 state is the water side weld, here again, I see we have
2 two chits signed by Mr. Cole on 2/3/82.

3 A That's true. There's two copies in this package.

4 Q If you look at it, it's fairly clear, isn't it,
5 that one is not the copy of the other? Just look at the WFML
6 line on the two forms, and see the space between it and
7 the line that's directly above it. That couldn't have
8 been done by a Xerox, could it?

9 A I think you are correct.

10 Q Do you have any explanation as to why we have
11 those two?

12 A No, I don't, Mr. Roisman. But it's fairly
13 apparent to me that when Charles Reeves was reviewing it
14 on March 4, 1983, that the second copy wasn't there.

15 JUDGE BLOCH: Do we know which copy is the
16 second copy?

17 THE WITNESS: One copy is listed. Part of this
18 review, that was in March of 1983, Mr. Chairman, was a
19 paper clean up operation, if you will.

20 If you look at the five-line -- well, you don't have it
21 in front of you, I'm sorry. The five-line traveler, they
22 have changed from page 1 of 2, to page 3 of 5. It's
23 initialed by Charles Reeves, on March 4, 1983. The next
24 page is marked -- which is a chit dated October 2, '78,
25 which is marked page 4 of 5.

1 The next chit, which is one of the two chits for the
2 inside fit-up, is numbered page 5 of 5. And the next
3 page is not numbered at all.

4 I think it's reasonable to draw the conclusion that on
5 March 4, 1983, there was only five pages to this traveler.

6 JUDGE BLOCH: Well, why? When do you think that
7 the new chit was added?

8 THE WITNESS: I have no idea. It serves no
9 purpose. Maybe it was an extra copy that was --

10 JUDGE BLOCH: Why would you conclude it was
11 after any particular date rather than before that date?

12 THE WITNESS: That it was added to the package?

13 JUDGE BLOCH: Yes.

14 THE WITNESS: Because when they were reviewing
15 the package they were putting page numbers on all the
16 package. It's clear if this is part of the package it's
17 page 6 of 5.

18 BY MR. ROISMAN:

19 Q I take it that is also -- if that explanation is
20 correct, that is also true for the weld filler material
21 log, which is the last page of the package that I have
22 here?

23 A It was probably not contained within the package
24 on that date; no, sir. It appears that it was still in
25 the craft's possession on -- also fairly clear that it's

1 for two different welds. The original -- I don't know if
2 this is a copy of the original or if the original was in
3 package 306 or 313.

4 It is clear to me that when Charles Reeves was
5 reviewing the package on March 4, 1983, there was only
6 five pages to the package.

7 Q On the assumption that he numbered all the pages?

8 A He numbered all the pages; yes, sir.

9 Q If he did number all the pages, then that is
10 correct?

11 A That's true.

12 Q You said that there was a paper cleanup. What
13 were you referring to?

14 A The same -- at the same time that they were
15 reviewing these packages for what we termed yesterday "lack
16 of signature on line 1" -- as, you'll see, this was one of
17 those travelers -- now they are trying to number pages to
18 make sure that the paper was clean, or that the paper
19 errors have been corrected and rectified before the
20 traveler was once again sent to the field to work again.

21 Q And is that done as a result of any particular
22 event? Or is this just a routine cleanup process?

23 A There was a review, Mr. Roisman, of the
24 travelers that we have discussed, six or seven times now,
25 that did not have signature of line 1 on the five-line

1 .traveler signed off. As part of that review they were
2 correcting any other errors they noted at the time.

3 Q So that is only, then, with reference to the
4 group of travelers that were missing the line 1 on the
5 five-line traveler being signed, and not a larger group,
6 that this document review was taking place?

7 A The initial -- my initial involvement -- and as
8 a matter of fact my only involvement, in March of '83,
9 with this issue -- was to see that the problem of line 1 --
10 excuse me; that the five-line travelers that did not have
11 line 1 signed off, were reconciled; that all required
12 inspections could be documented or substantiated, that
13 they were performed; and where they couldn't be performed,
14 that those instances be properly identified.

15 This review continued on all that paper for -- excuse
16 me. By "this review," I'm probably misleading you.

17 For a period of a couple of months, QC inspectors
18 worked on correcting page number deficiencies and things
19 like that on all the travelers.

20 EXAMINATION

21 BY JUDGE BLOCH:

22 Q Mr. Brandt, how did you decide that the scope of
23 the review should be more than just inquiring into line 1?

24 A I didn't, your Honor.

25 Q Who did?

1 A I guess this is one of the disadvantages of
2 dragging this discussion on liner plates, now, over two or
3 three months.

4 The way this originally came up was the millwright
5 group was getting ready to start working on these
6 travelers again. Timeframe was now late February 1983.

7 One of my QC supervisors came in and said: "Tom, these
8 travelers are a mess. There are some lines that should
9 have been signed off that apparently the whole point has
10 been bypassed. Unless we can substantiate the inspections
11 were performed, we've got a problem." I directed him to
12 straighten that out.

13 As the millwrights were getting ready to work --

14 Q Before you directed him to straighten it out, I
15 take it you said, "We'll write an NCR on that."

16 A No, I did not say we'll write an NCR.

17 Q Didn't you just say there were all kinds of
18 problems in the documents?

19 MR. WATKINS: Your Honor, this is pretty fully
20 described in Mr. Brandt's testimony filed on August 14,
21 and subsequently elaborated on.

22 The testimony was that the travelers were missing hold
23 points, withhold points that were unsigned.

24 There was also a lot of other documentation which was
25 either in a box or boxes that apparently related to those

1 hold points. And those were in the NDE chits.

2 JUDGE BLOCH: And the testimony was --

3 THE WITNESS: I directed my Staff to resolve the
4 problem.

5 BY JUDGE BLOCH:

6 Q And no deficiency paper was created at that time?

7 A Deficiency paper was created at that time.

8 JUDGE BLOCH: Okay. Mr. Roisman, Mr. Brandt may
9 have been in the middle of answering a question. I don't
10 want to cut him off.

11 THE WITNESS: All I wanted to do was take you
12 back through the sequence of events that occurred;
13 Mr. Roisman or both of you.

14 JUDGE BLOCH: Mr. Watkins reminded me to visit
15 your testimony so you don't have to.

16 MR. WATKINS: Your question was who made the
17 decision to continue the review process to cover all the
18 travelers.

19 THE WITNESS: That was made by my Staff. It was
20 not -- as I stated, my only personal involve was was
21 identifying those cases where adequate documentation
22 didn't exist to substantiate the performance of the
23 inspections.

24 CROSS-EXAMINATION (Continued)

25 BY MR. ROISMAN:

1 Q But when did the scope of your examination
2 extend beyond the review that was taking place as a result
3 of that first visit into your office by your staff people
4 in March of '83 or February of '83?

5 A The scope increased to what, Mr. Roisman?

6 Q When?

7 A No. I don't understand your question.

8 JUDGE BLOCH: He wants to know from what to what?

9 THE WITNESS: From what to what, are you talking
10 about scope?

11 BY MR. ROISMAN:

12 Q The scope of the review, looking at a larger
13 range of travelers than merely those with the top line of
14 the five-line traveler not signed?

15 A From a look at the documents, it was continued
16 in the months of March and April.

17 Q Of '83?

18 A Of '83.

19 Q What I'm not clear about, is it your testimony
20 that by the end of April of '83, your staff had reviewed
21 all 1300 travelers for the reactor unit number 2, and in
22 their judgment identified whatever problems existed with
23 those travelers and written NCRs where appropriate, and
24 cleaned up the documentation as necessary, and that they
25 were done at the end of April of '83?

1 A No, Mr. Roisman, that's not my testimony.

2 That's your testimony.

3 JUDGE BLOCH: Okay. I think the problem is that
4 if you expanded the scope beyond just the line 1 problem --

5 THE WITNESS: No, sir, that's not my testimony
6 either. I didn't expand any scope.

7 JUDGE BLOCH: The people working for you. The
8 company.

9 THE WITNESS: The group of people which I was
10 responsible for supervising, attached eight-line travelers
11 to every five-line traveler. When they did that they
12 corrected the page numbers.

13 No review past that point that I'm aware of ever took
14 place.

15 JUDGE BLOCH: Just correcting the page numbers?

16 THE WITNESS: At the point, if we could go to
17 late February, once again, 1983, all that exists of this
18 package were unnumbered -- numbered pages, but after you
19 add the eight-line traveler, they become incorrect page
20 numbers. All that existed was the five-line traveler and
21 the associated chits.

22 JUDGE BLOCH: So what you referred to as
23 cleaning up paper was just putting on the eight-line
24 traveler?

25 THE WITNESS: Putting on the eight-line traveler

1 at correcting the page numbers.

2 JUDGE BLOCH: Nothing else?

3 THE WITNESS: To my knowledge, other than
4 looking for the discrepancy on line 1, that's all that
5 occurred.

6 JUDGE BLOCH: And you call that cleaning up the
7 paper? It just gives you a chance. If you want to say
8 there was something else --

9 THE WITNESS: No. That's what I referred to by
10 "cleaning up the paper." If I misspoke or you
11 misunderstood me, I'm sorry.

12 BY MR. ROISMAN:

13 Q And when was it after that that you began any
14 more intensive review of the adequacy of the documentation
15 for the liner plates for the reactor 2 cavity?

16 A When did I personally, Mr. Roisman?

17 Q Mr. Brandt, you supervise a number of people?

18 A I am just trying to make the question clear.

19 Q When I ask the question "when did you," I mean
20 when did you or the people reporting to you. I'm trying
21 to have this hearing move along at some pace. If you are
22 going to split hairs with me, we are going to be here for
23 the rest of our lives.

24 MR. WATKINS: Please don't address those kinds
25 of comments to the witnesses.

1 MR. ROISMAN: Mr. Chairman, he has addressed
2 quite a few of these to me, and I have been very patient.
3 I will say to you I am sick and tired of a smart witness.
4 I'm going to get answers to obvious questions. I want
5 straight answers. When I say "you" and he supervised a
6 whole group of people, I think he and I know what I'm
7 talking about, but he is trying to see how many games he
8 could play, and I think it's disruptive of the hearing
9 record and disruptive of the truth.

10 JUDGE BLOCH: The next time it happens, I'll
11 make an appropriate ruling.

12 MR. WATKINS: I think it's a mischaracterization
13 of what Mr. Brandt is doing. Mr. Brandt has made it clear
14 that he wasn't responsible for the original decision about
15 the five-line travelers in the first place. He's here to
16 explain what the company did, despite the fact that he
17 doesn't feel personally responsible for it. The
18 distinction between Mr. Brandt and other people at the
19 plant is an important one to him and he's entitled to it.

20 JUDGE BLOCH: Okay. But I think that for speed
21 it would be helpful if when Mr. Roisman says "you," you
22 interpret that to mean you and the people working for you.

23 THE WITNESS: Mr. Chairman, I'm trying to move
24 this along as much as anybody here including you. This is
25 the fourth or fifth time of explaining this same story. I

1 am getting tired of it personally. I understand it's a
2 necessary evil or necessary process -- excuse the term "evil,"
3 but Mr. Roisman for two days now has asked questions in
4 the double negative. I know Mr. Roisman and I are
5 definitely adversarial, and I'm just trying to make sure I
6 understand his question and I can answer his question to
7 the best of my ability. I'm not trying to get smart or
8 with flippant answers.

9 JUDGE BLOCH: In terms of redundancy, you can
10 suggest that and your counsel can argue in support of that
11 position if he wants to argue that a line shouldn't be
12 asked. In this instance there was a new piece of
13 information, it seemed. It had to do with the words you
14 used.

15 THE WITNESS: I understand that. All I'm saying
16 is, for two days we have asked "you" or any of my people.
17 That's an important distinction to me, because after
18 November 1983 I did not supervise QC people at Comanche
19 Peak. My activities have been completely separate from
20 what the Commission's quality engineering group and
21 quality control group has done at Comanche Peak, and
22 that's the only distinction I'm trying to make.

23 JUDGE BLOCH: Okay. But Mr. Roisman is hoping
24 that he can get information from you about the company.
25 If you want to make the distinction in answering -- he

1 says: "Did you do something?" You may say, "Well, up to
2 such and such a date I was supervising, and after that the
3 company went on and did something else." Just for ease of
4 expression. And no one is criticizing you. At this point,
5 the board is not criticizing you for the way you
6 interpreted that. It would just be helpful to answer in
7 that vein. So answer fully, when he uses the word "you,"
8 about the company; and if you want to specify some of it
9 was you and some were people working for you and some
10 after you were done, that's fine. Let's understand "you"
11 could mean the company.

12 MR. ROISMAN: Mr. Chairman, it seems in light of
13 Mr. Brandt's last statement and in light of some of the
14 things that he said over the last couple of days it seems
15 there's some serious question whether Mr. Brandt is the
16 right witness to address this. We are not asking for
17 hearsay here. You have already ruled it is not admissible.
18 And Mr. Brandt tells us unequivocally that work subsequent
19 to November 1983 was neither done personally by him or
20 under his supervision and control, but was done by other
21 people. And on a number of occasions when we asked him
22 how did you know this and how did you know that, most of
23 it has been: "Well, it's sort of how I think it ought to
24 be. I didn't talk to this man. That was engineering.
25 And I had a conversation, but I don't remember exactly

1 what they told me."

2 We weren't getting very good firsthand knowledge here,
3 and I'm beginning to be concerned that if we are really
4 trying to get to the bottom of the issue related to the
5 unanswered questions about the liner plates and what was
6 wrong with them, when were they looked at, why were they
7 looked at then, why didn't this problem get identified
8 earlier, that Mr. Brandt is put into a position which is
9 intolerable for him and unacceptable for us. He's having
10 to pass on to us hearsay information.

11 JUDGE BLOCH: Mr. Watkins, the question is
12 whether we need someone else for after November of '83.

13 MR. WATKINS: Mr. Brandt's testimony in this
14 proceeding has been based on his personal review of the
15 travelers, procedures, and program at the site.

16 JUDGE BLOCH: I take it his responsibility for
17 the company is to know about the whole program even if he
18 wasn't supervising it?

19 MR. WATKINS: For purposes of this hearing
20 that's correct, your Honor. It has been apparent to
21 Mr. Roisman, since July the 7th of this year, exactly what
22 Mr. Brandt's job responsibilities are and have been.

23 MR. ROISMAN: I think what was not apparent
24 until really these two days is the extent to which
25 Mr. Brandt was not relying on his own personal knowledge.

1 I mean, for instance, you'll remember yesterday when we
2 got into the question of, you know, why didn't you see
3 this and why didn't you see that? He told us, "Well, I
4 was really rushed and I only had a few days to do it and
5 thus didn't have time to get into it."

6 If that's the situation, if the real foundation for the
7 answers is not his review but somebody else's review, then
8 I think we are in a different state.

9 For instance, I believe that we were told during the
10 break that the reason we weren't coming back from the
11 break was Mr. Brandt was calling back to the plant.

12 MR. WATKINS: We arranged to have the chits that
13 you requested produced and delivered to Washington.

14 MR. ROISMAN: My point is the information that
15 we are seeking here is not necessarily coming firsthand
16 from Mr. Brandt. He's reporting on a plant review. He's
17 not a reviewer.

18 JUDGE BLOCH: It seems to me the comment you are
19 making goes mostly to the weight of the evidence, and not
20 as to anything that is necessary to be remedied at this
21 point

22 MR. ROISMAN: In all candor, the weight of the
23 evidence cuts against our position. Most of what
24 Mr. Brandt has said supports what CASE is saying. I'm
25 concerned about the weight of the evidence; that is, his

1 evidence is less reliable and it will hurt my client for
2 Mr. Brandt to be the sole source of that information,
3 rather than that I can -- that he's saying something
4 that's damaging that I want to discount.

5 I mean, in a sense what I'm saying is, I don't think we
6 are getting a good record.

7 JUDGE GROSSMAN: Mr. Roisman, you are just going
8 to have to pinpoint on the record where there are
9 insufficiencies.

10 JUDGE BLOCH: What you are saying is strange.
11 Because what you are saying is that the unrebutted
12 testimony on the record supports your position and somehow
13 that hurts you?

14 MR. ROISMAN: No. I didn't say it hurts me. I
15 said it hurts the record overall.

16 JUDGE BLOCH: If this is the best the company
17 puts forward, it seems fair to me that we consider it
18 representing the company. I don't understand your point
19 at all.

20 I'm not making any conclusion that you are right that
21 the testimony supports your position.

22 MR. ROISMAN: I understand that. I wasn't
23 asking you to. I was simply explaining my motivation was,
24 as it has been throughout the hearing, that I have a dual
25 duty. One is to my client and the other is to the record

1 and property process. I'm just not sure that this is
2 doing it.

3 JUDGE BLOCH: I think on that point, the
4 Applicants reached the same conclusion that you did: They
5 have a problem, and they will address the board. But if
6 they don't, I think we can go forward.

7 MR. ROISMAN: But I take it this is the point of
8 no return for them? That they are not going to be able to
9 come back here in December and say: "We have got another
10 liner plate witness who was in weld engineering and he's
11 now going to tell you about some of these problems that
12 Mr. Brandt wasn't -- didn't explain," or didn't explain in
13 the right way or whatever it may be.

14 JUDGE BLOCH: On legal principles you may be
15 right, but I'm not going to rule on something that hasn't
16 even been proposed yet.

17 MR. ROISMAN: I don't want to raise it in
18 December. I want to raise it now.

19 JUDGE BLOCH: We don't make rulings on things
20 that haven't been proposed. Mr. Watkins?

21 MR. WATKINS: A brief statement responding to
22 Mr. Roisman's point about hearsay. The board's ruling was
23 that hearsay could not be introduced to prove out actual
24 incidents of harassment and intimidation. This liner
25 plate material is technical. This doesn't involve

1 harassment and intimidation except minimally. Mr. Brandt
2 is testifying as an expert; necessarily expert opinions
3 are based on documents and conversations and material
4 gathered. Necessarily it's hearsay. It doesn't make his
5 opinion any less valuable, any less credible, any less
6 important for resolving the issues in this case.

7 JUDGE BLOCH: Let's continue with the matter at
8 hand. Mr. Roisman, back to work.

9 BY MR. ROISMAN:

10 Q Mr. Brandt, on the copy of weld number 308
11 packet that you have, is there a cover sheet on that that
12 says "interim records vault"?

13 A On 308, Mr. Grossman?

14 Q Yes, sir.

15 A No, there's not.

16 Q I'm going to show you a copy of 308 that we have,
17 that has that sheet on it. Can you -- there are four
18 entries, I believe, on the sheet below the line for the
19 generic inform -- where the generic information appears.
20 Can you just tell us what each of those entries connotes?
21 I take it, it's like an index to the packet; is that right?

22 A Yes, sir. This is, as I said yesterday, these
23 packages are currently contained in the interim records
24 vault, which is a construction organization.

25 Q What's the first line?

1 A "Traveler."

2 Q And why is it that that line includes first a 5,
3 and then a 3? Is there something that was done in the
4 interim records vault to change the packet?

5 A It also look like the ND inspection requests,
6 what we are calling chits, on the second line has been --
7 originally it appears to me from the copy I'm looking at,
8 that the traveler originally said five pages and NDER
9 originally said one page, for a total of six pages, which
10 there is. It's now been changed to "traveler," which is
11 three pages, and "NDIR," which is three pages, which is
12 also correct.

13 Q Is that in your judgment a totally clerical
14 change or does it reflect a totally different way of
15 viewing what the NDE chits are?

16 A It's a clerical change. There's only clerical
17 personnel that work in this organization. And it's
18 probably due to the fact that the name of the first three
19 documents is legitimately a traveler. The first page says
20 "Brown & Root Stainless Steel Liner Inspection Traveler,"
21 the second, "Stainless Steel Liner Inspection Traveler
22 Weld Inspection Sheet"; and the third sheet says "Brown &
23 Root Stainless Steel Liner Inspection Traveler." The next
24 three pages clearly state "Nondestructive Inspection Test
25 Request." In my opinion it's clearly a clerical change,

1 solely a clerical change.

2 Q Can I have that back, please.

3 MR. ROISMAN: Mr. Chairman, I would like to have
4 bound in and received in evidence at this point the
5 traveler for weld 308 including the interim records vault
6 cover sheet.

7 MR. WATKINS: Is that a document we produced?

8 MR. ROISMAN: As far as I know. That's the only
9 plates we could have gotten it from.

10 MR. WATKINS: No objection.

11 JUDGE BLOCH: It is admitted into evidence and
12 may be bound into the record.

13 (The document follows:)

14

15

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308

WELD NO.

20863

B&R Stainless Steel Liner Inspection Traveler

QI-QP-11.14-6 REV. 6

PROJECT: CPSES JOB NO: 35-1195 UNIT 2 PAGE 1 OF 5

BB-2401-A Reactor Liner #2
Drawing No. Pool

Stainless Steel Metal Type 3/16" Mtl. Thck. 29 to 29 PC. to PC.

Plate to Plate Insert to Plate Angle to Plate Other _____

Welder Symbol	WFML No.	Weld Proced.	Hold Point
Refer to Page 3 for Info.			

1. Fit up and Cleanliness of Above
 Results Refer to Step 1 Page 3 Inspector Signature Jimca Date 4/25/83
2. V.T. of Backing Strip Tack/Fillet Welds:
 Results Refer to Step 2 Page 3 Inspector Signature Jimca Date 4/25/83
3. Cleanliness of Channel, Liner, and B. Strip:
 Results Refer to Step 3 Page 3 Inspector Signature Jimca Date 4/25/83
4. Final V.T. of Channel Fillet Weld:
 Results Refer to Step 4 Page 3 Inspector Signature Jimca Date 4/25/83
5. Seam Weld Fit Up and Cleanliness:
 Results NA Inspector Signature Jimca Date 4/25/83
6. Final V.T. of Welds for Surface Preps.
 Results SAT Inspector Signature Jimca Date 4/25/83
7. Final P.T. and Vacuum Box of Seams (See Weld Inspection Sheet)
 Results SAT Inspector Signature Bill Chudwick Date 6/3/83
8. Completion of Weld Inspection: QI-QP-11.14-6
 Inspector Signature Jimca Date 2/2/84

308

SSR Stainless Steel Liner Inspection Traveler

Weld Inspection Sheet

Page 2 of 5

Acceptance Std.
Gibbs & Hill 2323-SS-19

- 7a. Penetrant Mfg. Magnaflux-Spotcheck
- Cleaner Mfg. Magnaflux-Spotcheck
- Developer Mfg. Magnaflux-Spotcheck

82B035
83C015
82E041

NDE Procedure
~~QI-QAP-10.02-01~~

QI-QP11.18-1A 1C
Final P.T. Level II

Sat L... 4-26-83
 RESULTS INSPECTOR SIGN. DATE

- 7b. Vacuum Box

GASKET TYPE SOLUTION TYPE

#3 by 9x9" Rubber Snoop

Pretest Cleaning SAT Pressure 0-5/2 Temperature 70° NDE Procedure
QI-QAP-10.02-06

Solution Application Method CONTINUOUS Post Test Cleaning SAT Due Date

Gauge Serial Number MATE 3162 Pressure Differential
Maintained for 12 Sec. — Min. 31 Aug 83

Final V.B. Bill Chadwick

N/A - Not Applicable

Satisfactory SAT Unsatisfactory — Level II Inspector II Date 6/3/83

FIGURE 3

20865

308

WELD NO.

B&R STAINLESS STEEL LINER INSPECTION TRAVELER

PROJECT: CPSES JOB NO.: 35-1195 UNIT 2

PAGE 13 OF 25

BB 2401A

React. Liner 2

Stainless Steel

3/16"

R529 to R529

Welding No.

POOL

METAL TYPE

MTL. THK.

PC. to PC.

PLATE TO PLATE INSERT TO PLATE ANGLE TO PLATE OTHER

Table with columns: WELDER SYMBOL, WAR NO., WELD PROCED., HOLD POINT. Rows include entries like ARY A023324, AEO A023384, AHS A023403, etc.

1. Fit up and cleanliness of above:

SAT RESULTS SA Rummy 3/3/83 INSPECTOR SIGNATURE DATE

2. V.T. of backing strip tack/fillet welds:

SAT RESULTS Sam Wilburn 10-4-78 INSPECTOR SIGNATURE DATE

3. Cleanliness of channel, liner, and backing strip:

SAT RESULTS Sam Wilburn 10-4-78 INSPECTOR SIGNATURE DATE

4. Final V.T. of channel fillet weld:

SAT RESULTS Don R. Wood 11-1-78 INSPECTOR SIGNATURE DATE

5. Final V.T. of inside weld:

SAT RESULTS SEE STEP 6 pg 1 INSPECTOR SIGNATURE DATE

Completion of weld inspection:

RESULTS SEE STEP 8 pg 1 INSPECTOR SIGNATURE DATE

LATE ENTRY PER CP-QCI 2.11-11 PAR 9.5 SEE NOTE, REFER. NDT CHIT ATTACHED DOCUMENTATION

SA Rummy 3/3/83



NAME: _____ TIME: _____ DATE: 7-27-72
 ADDRESS: _____
 PHONE: _____

NAME: Langhorne, Mr.
 ADDRESS: 10240A

TYPE: _____
 QTY: _____
 PRICE: _____
 TOTAL: _____

COMMENTS: Box 1324 Mr.
And let out photo
copies of photo
to photo
10/24/72

[Redacted]

DESTRUCTIVE TEST
PERFORMANCE

FOREMAN

TIME DATE

Job No. _____

Job Description _____

10/10/52

NO.	TEST	RESULT	REMARKS	TESTER	DATE
1	FINAL				

COMMENTS

Accepted by _____

[Redacted]

FW #308

BCP QS M

ACC Serial No. N/A

MILLWRIGHT DEPT.

Drawing No. WRD 2401-A

B-558 A

DATE FILED 1/2

NO.	DATE	DESCRIPTION	TYPE	QUANTITY	UNIT PRICE	TOTAL	REMARKS
10-3	2/1/52	ER 32	CAT	88025	463514	40	40
308	2/1/52	ER 308	CAT	4-3		20	20
308	2/1/52	ER 308	CAT	88025	463514	40	5
308	3/32	ER 308	KU	88025	463514	3	1

QUALITY ASSURANCE DEPARTMENT
MT/PT REPORT

20869

PROJECT: COMANCHE PEAK JOB NO. 35-1195

UNIT 2 PAGE 1 OF 1

MT PT

WDC Traveler # NA
Class NA

Drawing BB2401A System SS LINER

Weld Item # 308 Location RB2 860

Mfg Stage FINAL NDE Procedure No. OTOP 11.81 Rev. 2

Equip/Mat'l's Mfg. MAGNAFLUX Acceptance Std. IC

Penetrant Batch # 82B035 Cleaner Batch # 83C015 Developer Batch # 82E041

AC Yoke DC Prods NA Model # NA M&TE IRC # NA

Mat'l Type SS Mat'l Thickness 3/16 Diameter
Length

Sketch & Comments ID OD

RS29 to RS29

Inspector <u>[Signature]</u>	Certification Level <u>IB</u>	Date <u>4-26-83</u>	Results Accept <input checked="" type="checkbox"/> Reject <input type="checkbox"/>
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10870

NON DESTRUCTIVE TEST
INSPECTION REQUEST

FOREMAN

TIME/DATE

[Signature]

2/2/02

WELDOR:

W/A

DRAWING #

WAB 2441-A

INSP.	CLEAN	<input checked="" type="checkbox"/>	FIT-UP	<input checked="" type="checkbox"/>	FIELD WELD #	30K
	VISUAL		L.P.		V.B.	
	FINAL					

COMMENTS:

WFML:

W/A

INSPECTOR:

[Signature]

ACCEPT:

DATE:

2-2-02

1 JUDGE GROSSMAN: Excuse me, if you are going on to
2 something else, one quick question here: Can you refresh
3 my recollection on when Mr. Cole left the company?

4 JUDGE BLOCH: It appears October 21, 1982, based
5 on his severance paper.

6 MR. ROISMAN: That's what mine shows also.

7 BY MR. ROISMAN:

8 Q Mr. Brandt, directing your attention now to weld
9 number 260. I notice that this weld contains, or the
10 sheet that I have contains two separate eight-line
11 travelers.

12 A Yes, sir.

13 Q And, first of all, can you tell why is it that
14 there are two separate eight-line travelers used here?

15 A One came out of QI-QAP-, -- excuse me just a
16 second, Mr. Roisman. The one that's numbered page 3 of 3
17 came out of page -- excuse me -- came out of CCP38, ICN
18 number 3, dated 4/18/79. The traveler that is numbered
19 page 1 came out of QI- QP- 11.14-6 revision 6.

20 Q Was the use of the first traveler, the one
21 that's on page 3 of 3, an error? Should that not have
22 been used?

23 A No, sir. That was correct at that time.

24 Q Is it the formal procedure in the plant, when a
25 new form is introduced, to go back to places where the

1 older version of that form was used and replace them?

2 A If the form changed; yes, sir. I think, as I
3 stated in September, that even when the problem was
4 corrected in '79, they did not go back and add an
5 eight-line traveler to the package that only contained the
6 five-line travelers.

7 If they had done that, we probably wouldn't be sitting
8 here today talking about the five-line traveler.

9 Q Well, as I understand it, the form was actually
10 changed several times. Not only from the five-line to the
11 eight-line, but different variations of the eight-line;
12 was it not? Over the period of time from '78 to '82?

13 A I'd have to look at it, Mr. Roisman.

14 Q But your testimony --

15 A The substance -- the change I see, of substance,
16 if that speeds things along, is the change from NDEP200,
17 which was a visual inspection procedure reference on line
18 8 of page 3, to the QI-QAP-11.14-6, which is line 8 on
19 page 1.

20 Also, the steps are different, it looks like.

21 Q Yes. There's the addition of a vacuum box,
22 isn't there, test?

23 A Yes. It's signed off on the front in addition
24 to being on page 2 of the traveler.

25 Q Now, is it your testimony that for proper

1 procedure, the proper thing would be that when a new form
2 was introduced, that what was done here should be done.
3 That is, that the old form's information should be
4 transferred to the new form and the new form should now
5 become the form to be used?

6 A If it's a substantive change; yes, sir.

7 Q And by "substantive," that would mean such as
8 changing the reference to where -- what controls the weld
9 inspection or adding an inspection step?

10 A Yes, sir. Those would be two examples.

11 Q Right. Okay. Now, I notice that on the form
12 here, the eight-line form that is on page 3, the one
13 originally used, was signed on line 1 by Don Vogt on 5/17/79,
14 and marked "sat"; and then Mr. Cole, apparently on April 4,
15 the 82, reverified the "sat." Was that a standard
16 procedure?

17 A No, sir.

18 Q Is there a specific reason why that was done
19 here?

20 A Not that I can tell, other than the fact that
21 Mr. Vogt was documenting his inspection.

22 Q Why would he go back to inspect if it had
23 already been inspected?

24 A It appears that the weld had been originally
25 accepted for fit-up and cleanliness in 1979 and had not

1 been welded on.

2 Q Then was Mr. Cole following the proper procedure,
3 since there was a time gap from when it had originally
4 been approved for fit-up and cleanliness, that he would
5 reverify it before any welding was done in 1982?

6 A There was no procedural requirement that he do
7 such; no.

8 Q Well, did he do a wrong thing by doing it? Or
9 just an unnecessary thing?

10 A He performed an unnecessary inspection.

11 Q Now, I would like to have you take a look at
12 weld number 127.

13 JUDGE BLOCH: Before we move on, do we know when
14 the concrete was poured?

15 THE WITNESS: That's kind of irrelevant,
16 Mr. Chairman; this is the guide --

17 JUDGE BLOCH: Say it.

18 MR. ROISMAN: I'm not hearing it.

19 THE WITNESS: Your question is somewhat
20 irrelevant. This is for a gate guide.

21 JUDGE BLOCH: That would never have been covered
22 by the concrete and there would always have been access to
23 make a cleanliness inspection on April 4 of '82?

24 THE WITNESS: It's welded. It's a corner weld.
25 It's welded essentially from one side. It does not have a

1 leak chase channel behind it.

2 JUDGE BLOCH: So there's continuous access.

3 THE WITNESS: Yes.

4 JUDGE BLOCH: Are we through with 308?

5 MR. ROISMAN: 308 we are. This is 260. But I
6 was going to ask him a question that may compare the two,
7 so I wanted to keep them together for the moment anyway.

8 BY MR. ROISMAN:

9 Q Do you have 127?

10 A Yes, I do, Mr. Roisman.

11 Q Now, 127 involves a signature on line 1 by
12 Mr. Cole, on 4/29 of '80, with "sat" marked by it. What
13 does that denote on that line 1? His signature?

14 A The same thing that it does on all the rest of
15 the five-lines, Mr. Roisman. It verifies that the outside
16 fit-up had been done and that was for the inside.

17 Q And the verification for the outside was the
18 chit signed by Mr. Wilkerson, and dated 9/25/78?

19 A Yes, sir.

20 Q Now, can we tell by looking at this document
21 when the actual welding was done for which Mr. Cole was
22 doing the fit-up and cleanliness test on 4/29/80?

23 A I don't understand your question, Mr. Roisman.
24 When it commenced?

25 Q Yes. That's right?

1 A Not from looking at this document; no, sir.

2 Q Would the WMR numbers that are referenced for
3 step 5 on the front page of the five-line traveler be the
4 ones that would tell us that? In other words, if we had
5 that WMR number it would give us the date that that
6 welding was done?

7 A I would assume so; yes, sir.

8 Q And what is your understanding of the notation
9 "hold point 5" after each of those? What does that mean
10 when the welder writes that on the traveler?

11 A That he's working on the inside weld.

12 Q Does it mean that he is ready for hold point 5
13 to be checked, or that he's doing the work which will
14 ultimately lead to hold point 5?

15 A The latter.

16 Q And it's your testimony that even if the actual
17 welding for the inside weld, the water side weld were
18 being done a couple of years after Mr. Cole did the fit-up
19 and cleanliness inspection, that there would be no need to
20 do a reverification as was done on the 260 weld?

21 A That's --

22 MR. WATKINS: Objection. The witness said he
23 didn't know when the welding was done on this weld.

24 MR. ROISMAN: And I said "if."

25 MR. WATKINS: You said: "I believe it was your

1 testimony that --"; and the answer is "no." That wasn't
2 his testimony.

3 JUDGE BLOCH: He was asking a hypothetical
4 question.

5 MR. ROISMAN: I said is it your testimony that
6 if -- but I'll withdraw it and ask it again.

7 BY MR. ROISMAN:

8 Q Mr. Brandt, if the welding occurred a year after
9 Mr. Cole had signed off on the fit-up and cleanliness for
10 the inside weld, is it unnecessary for there to be a
11 reverification of the fit-up and cleanliness before that
12 welding takes place?

13 A I assume, Mr. Roisman, you are saying
14 reverification by QC?

15 Q Yes.

16 A Yes, it is unnecessary. It is not procedurally
17 required.

18 MR. ROISMAN: Mr. Chairman, I would like to put
19 weld number 127 and weld number 260 into evidence at this
20 point and have them bound in the record.

21 MR. WATKINS: No objection.

22 JUDGE BLOCH: They may be admitted and bound.

23 MR. WATKINS: Are we admitting your copies or
24 ours?

25 MR. ROISMAN: Right now I'm giving him ours.

1 MR. WATKINS: Could I have the witness take a
2 look at them and compare them with what we have?

3 MR. ROISMAN: I'll do it easier. Why don't you
4 just give him yours. I'll rely on that. The only
5 exception is 308, where we have the one that has the
6 travelers sheet on the top of it, and I have asked Mr.
7 Brandt to take a look at 35, which is still sitting there
8 on his desk. The reporter knows about that. It can be
9 done at another break or at the lunch break; whatever.

10 JUDGE BLOCH: I have no objection to doing this.
11 We could also just allow Applicants to correct errors that
12 they find.

13 MR. WATKINS: I just want to make sure we are
14 looking at the same documents, is all.

15 JUDGE BLOCH: Okay. If you want to do it now
16 you can do it now.

17 MR. WATKINS: I prefer to do it now. Give it to
18 the reporter so he can ship it out.

19 (The document follows:)

20

21

22

23

24

25

FOR INFORMATION ONLY

127 20879
WELD NO.

TRAVELER

PROJECT: CPSSES JOB NO.: 35-1195 UNIT 2 PAGE 1 OF 2

BB 2401A 5/8 LINER 2 Stainless Steel 3/4" x 3/16" Embedded to Plate
 Drawing No. POOL METAL TYPE MTL. THK. PC. to PC.
 PLATE TO PLATE INSERT TO PLATE ANGLE TO PLATE OTHER Embedded PG to RC35

WELDER SYMBOL	WNR NO.	WELD PROCED.	HOLD POINT
ARD	A017524	88023	FF
ATR	A07661	88023	F, 2
AAK	A068800	88025	4
AUB	D-4275	88023	5
AUB	D-4283	88023	5

1. Fit up and cleanliness of above:
SAT James W. Cole 4-29-80
 RESULTS INSPECTOR SIGNATURE DATE
2. V.T. of backing strip tack/fillet welds:
SAT James Wilkins 9-25-78
 RESULTS INSPECTOR SIGNATURE DATE
3. Cleanliness of channel, liner, and backing strip:
NA NA NA
 RESULTS INSPECTOR SIGNATURE DATE
4. Final V.T. of ^{Embed} channel fillet weld:
SAT James Wilkins 10-25-78
 RESULTS INSPECTOR SIGNATURE DATE
5. Final V.T. of inside weld:
SAT _____ _____
 RESULTS INSPECTOR SIGNATURE DATE

Completion of weld inspection:

_____ _____ _____
 RESULTS INSPECTOR SIGNATURE DATE

FOR INFORMATION ONLY

20880

127
WELD NO.

B&R Stainless Steel Liner Inspection Traveler

Weld Inspection Sheet

Page ___ of ___

Acceptance Std.
Gibbs & Hill 2323-SS-18

- 7a. Penetrant Mfg. Magnaflux-Spotcheck _____
- Cleaner Mfg. Magnaflux-Spotcheck _____
- Developer Mfg. Magnaflux-Spotcheck _____

NDE Procedure

Final P.T. Level II RESULTS INSPECTOR SIGN. DATE

- 7b. Vacuum Box GASKET TYPE SOLUTION TYPE
- _____ by _____
- Pretest Cleaning _____ Pressure _____ Temperature _____ NDE Procedure _____
- Solution Application Method _____ Post Test Cleaning _____
- Gauge Serial Number _____ Pressure Differential Maintained for _____ Sec. _____ Min.
- Final V.B. _____

N/A - Not Applicable

Satisfactory _____ Unsatisfactory _____ Level II Inspector _____ Date _____

FOR INFORMATION ONLY

WELD NO.

127

20881

B&R Stainless Steel Liner Inspection Traveler

QI-QP-11.14-6 REV.

PROJECT: CPSES JOB NO: 35-1195 UNIT 2 PAGE OF

BB-2401-A Drawing No. Reactor Liner#2 Pool STAINLESS STEEL Metal Type 3/4" to 3/16" Mtl. Thck. EMBED TO PLATE PC. to PC.

Plate to Plate Insert to Plate Angle to Plate Other PG TO C35

Welder Symbol	WFML No.	Weld Proced.	Hold Point

- Fit up and Cleanliness of Above
Results Inspector Signature Date
- V.T. of Backing Strip Tack/Fillet Welds:
Results Inspector Signature Date
- Cleanliness of Channel, Liner, and B. Strip:
Results Inspector Signature Date
- Final V.T. of Channel Fillet Weld:
Results Inspector Signature Date
- Seam Weld Fit Up and Cleanliness:
Results Inspector Signature Date
- Final V.T. of Welds for Surface Preps.
Results Inspector Signature Date
- Final P.T. and Vacuum Box of Seams
 (See Weld Inspection Sheet)
Results Inspector Signature Date
- Completion of Weld Inspection: QI-QP-11.14-6
Inspector Signature Date

NON DESTRUCTIVE TEST
INSPECTION REQUEST

FOREMAN

DATE

TIME

9-25-78

WELDER:

See Below

DRAWING #

BB 2401A

FIELD WELD JT. # *127*

INSP. REQ.

CLEAN FIT-UP L.P. V.B. VISUAL FINAL

COMMENTS:

First fit up & Cleanliness of End of To Plate

WWR: *(ARD) A017524*

(AIR) A017661

INSPECTOR:

Samuel Williams

ACCEPT:

DATE:

9-25-78

1 JUDGE BLOCH: Mr. Roisman, you may continue.

2 MR. ROISMAN: Okay. Thank you, Mr. Chairman.

3 BY MR. ROISMAN:

4 Q Mr. Brandt, on page 11 of your testimony of
5 November 21st, the bottom of the page, the discussion
6 relates to the issue raised by CASE about WFMLs, which are
7 attached to but not referenced on the travelers. And I
8 believe that you state that the information is neither
9 required, does not serve a quality function, and then you
10 say: "The millwrights are procedurally required to enter
11 this information, but they have simply not done so as of
12 this date."

13 Is there a distinction that you are drawing there
14 between what is required by specification and what is
15 required by procedure? And, if so, would you explain it,
16 please?

17 A Yes, sir. Your assumption is correct. It's
18 required only by the construction procedure; and a recent
19 revision to the -- by "recent" I'm saying one is as recent
20 as September -- quality assurance requested that that
21 information be deleted from the traveler as it serves no
22 purpose, and because construction was not filling them out
23 on a timely basis.

24 Construction claimed that they used that information
25 for their own planning and scheduling. They requested it

1 be left on the traveler. And construction was given a
2 directive to update the travelers at that point.

3 The only requirement to fill that side of the traveler
4 out is in the construction procedure, and it states that
5 the millwright shall fill that information out.

6 Q So in your judgment it is irrelevant to the
7 traceability question?

8 A Traceability is not required.

9 Q Of the?

10 A -- filler metal.

11 Q If I understand your testimony elsewhere, it was
12 that there is not a requirement that the WFML be
13 physically attached to the traveler?

14 A That's true.

15 Q And it is also apparently not a requirement that
16 the WFML number be written anywhere on the traveler?

17 A It's a construction procedure requirement for
18 the millwrights on that, yes, sir.

19 Q But not a quality requirement?

20 A No, sir.

21 Q So that if one wanted to find out when the
22 welding had occurred on a particular liner plate, the
23 quality procedures do not require that there be
24 documentation to give us the answer to that question;
25 correct?

1 A That's correct.

2 Q Would there be any way to find that out,
3 assuming that the millwrights did not write anything in on
4 the face of the traveler and the WFML was not attached to
5 the traveler, and if you wanted to find out when was this
6 weld made, how would you be able to do that?

7 A It would be difficult. You'd have to have to
8 look for WFMLs with that weld number on it.

9 Q And basically it would just be a mechanical
10 process, going through them until you spotted the right
11 number?

12 A Yes, sir.

13 Q Am I right in assuming that the reason you say
14 that kind of traceability is irrelevant goes back to your
15 position regarding the safety significance, and ASME
16 significance of the welds that we have been talking about;
17 is that correct?

18 A I'm not sure what you mean by that inference,
19 Mr. Roisman. Any inspection program or quality assurance
20 program is geared to meet the requirements of
21 specifications, national standards and codes, and
22 regulatory requirements. There is no requirement in any
23 document on the nature of a code, a standard, or a
24 specification, that requires filler metal traceability to
25 a particular weld.

1 Q For any welds? Or just for welds related to
2 stainless steel liners?

3 A By population of welds I'm limiting that to
4 these. I'm sorry.

5 JUDGE BLOCH: Is that related to the question
6 that this ASME applies or is it irrelevant?

7 THE WITNESS: If the ASME applied, it would
8 depend on what section of the ASME code you maintained
9 applied to the liner. Therefore, if it was certain
10 sections, filler metal traceability could be required.

11 JUDGE BLOCH: Was anyone able to answer the
12 question on the FSAR?

13 MR. WATKINS: Mr. Brandt?

14 THE WITNESS: I have someone checking it now. I
15 looked myself last night but I was fired and I just didn't
16 spend the time --

17 JUDGE BLOCH: I appreciate it.

18 BY MR. ROISMAN:

19 Q Mr. Brandt, I now want to direct your attention
20 to a weld number that I had not previously given you the
21 number which is number 77.

22 A Okay.

23 Q Now, on the front of that traveler package there
24 is a notation that says: "Note, new front page made due
25 to illegal white-out in connection with hold point number

1 3" and it looks like it's "J.W. Cole, 1/18/82" is the
2 signature on that?

3 A Right.

4 Q Can you tell from this document, was any NCR
5 prepared as a result of that?

6 A As a result of the white-out?

7 Q As a result of the white-out, the -- to use his
8 words -- the "illegal white-out"?

9 A I don't know, Mr. Roisman. I see nothing that
10 leads me to believe otherwise, but I do not know that one
11 does not exist.

12 Q I assume in the practice, if one had been done
13 it should have been attached to this traveler package; is
14 that correct?

15 A Not necessarily.

16 Q The traveler package would have no notation of
17 the existence of an NCR on it, according to proper
18 procedure?

19 A It's good practice that there's not a
20 requirement that it be attached to, which was your
21 question.

22 JUDGE BLOCH: Reference?

23 THE WITNESS: Reference -- it's certainly no
24 requirement. It is certainly good practice.

25 BY MR. ROISMAN:

1 Q Should there have been an NCR done for that
2 error?

3 A Mr. Roisman, to be perfectly honest about it, I
4 can't tell from looking at it what happened. I don't know
5 what was whited out on line 3. If they just whited out
6 something on the preprinted form or whether they whited
7 out a group of NAs -- I can't tell what they whited out.

8 Q Does it appear to you that the first page of
9 this traveler is in fact the form on which the illegal
10 white-out was made?

11 A I can't tell. In either rate, the whole out, on
12 hold point 3 number, and hold point number 3, whether this
13 is the replacement traveler that Mr. Cole is referring to,
14 or a copy of the whited out traveler, is irrelevant.
15 Because hold point number 3 is not applicable. There is
16 no leak chase channel on these embeds.

17 Q I don't know what order your document is in.
18 The document that I have, the first page is actually
19 called page 2 of 3. And the next page is another traveler
20 that's marked 1 of 3. Is that what you have there?

21 A Yes. It appears, I guess using that rationale,
22 Mr. Roisman, that this is probably a copy of what was
23 whited -- the document that we have is noted page 2 of 3,
24 is a copy of what was whited out on line 3.

25 Q Okay.

1 A As I said in either case line 3 is not
2 applicable.

3 JUDGE BLOCH: I'm sorry, it's a copy of what was
4 whited out on line 3?

5 THE WITNESS: There was originally a document.
6 This is the document. Line 3 was whited out. Mr. Cole
7 made a notation on the bottom of this page that says:
8 "Note, new front page made to illegal white-out in
9 connection with hold point number 3."

10 When I first looked at it, it appears, even appeared
11 then, that this was a copy of that whited out document.

12 Using Mr. Roisman's rationale, I think he's trying to
13 agree with me, that that's probably the case.

14 It appears that what Mr. Cole replaced on January 19,
15 1982 now appears at page 1 of 3, which is an eight-point
16 traveler.

17 JUDGE BLOCH: The specific language you used in
18 your answer suggested that we had a copy of what was
19 whited out. That's what you said. You don't know what
20 was whited out, do you?

21 THE WITNESS: No, sir. What I meant was a copy
22 of the whited out page. This is Xerox copy.

23 JUDGE BLOCH: We don't know what, if anything,
24 was whited out?

25 THE WITNESS: Right. All I'm stating at this

1 point is, it is somewhat immaterial, because hold point 3
2 is somewhat immaterial. There is no leak chase channel.

3 BY MR. ROISMAN:

4 Q I'm trying to find out what went on with this
5 document. Let's look back at the first chit, dated 10/18/78,
6 which is the date of the accept signature by inspector
7 McCoy. And that's for the first fit-up and cleanliness
8 the embed to plate?

9 A Yes, sir.

10 Q The five-line traveler, so long as it was being
11 used as it was at the time -- the procedure, given that
12 the five-line traveler should not have been used at all
13 but given that it was the practice that was followed was
14 that no entry was made on line 1. The chit was the
15 evidence of the existence of the inspection; correct?

16 A Yes, sir.

17 Q Then on the same date, inspector McCoy did the
18 V.T. of the backing strip tack/fillet weld. I see that
19 Mr., or Ms. McCoy has put a circle and a star by the "sat".
20 What does that mean? Is that a special signal of
21 something?

22 A I don't agree with you, Mr. Roisman, that that
23 was done by Ms. or Mr. McCoy. It appears to me that
24 Mr. Cole did that when he made out the new page. You look
25 at the page number 1 of 3, line 2, which is the V.T. of

1 backing strip tack fillet wells has the same symbol and it
2 says "see next page."

3 Q And it was his way of referring -- referencing
4 us back to where that line had been signed?

5 A Yes, sir.

6 Q And then looking at line --

7 A He did the same thing on line 4.

8 Q Okay. Line 3 he now did with a "NA," replacing
9 the number 3 line of the original traveler where the
10 white-out had occurred; right?

11 A Yes, sir.

12 Q Okay. And then number 4 he's got, I see, a
13 different kind of star, but a star. And then -- yes -- he
14 puts it on line four of the traveler.

15 Now, there is also a traveler dated 1/18/82, a chit
16 signed by Mr. Cole, which is marked in the inspection
17 request category for clean and fit-up.

18 A Yes, sir.

19 Q What is it that Mr. Cole is recording with that?

20 A The inside fit-up.

21 Q Now, there's a line on the traveler that's on
22 page 1 of 3, for the signature for fit-up and cleanliness;
23 is there not?

24 A Yes, sir.

25 Q Should Mr. Cole have signed that line 5?

1 A Yes, sir.

2 Q Is that a failure that should require some kind
3 of deficiency paper?

4 A In my estimation, no.

5 Q How is it different from the missing signatures
6 on the line 1 of the five-line travelers that occurred in --
7 that is became known to people working for you in February
8 of 1983?

9 A The signature is clearly for the inside fit-up.
10 In my mind it's clearly for the inside fit-up. The back
11 side fit-up was inaccessible at that point.

12 It appears on 1/18/82, Cole signed line 1 of the
13 five-line traveler, which would have indicated, as they
14 did on all others, that a chit existed to substantiate the
15 first fit-up and cleanliness, and that that signature was
16 for the inside fit-up and cleanliness. Apparently
17 Mr. Cole realized that line 3 had been whited out, making
18 it not in accordance with cited procedures. Or he whited
19 out something himself. I can't tell at this point what
20 happened. Made a note, made a new traveler, referenced
21 all the previous inspections and rather than signing line
22 5 he signed line 1. It's an error on Mr. Cole's part.

23 Q But on page 2 of 3 of weld number 77, Mr. Cole
24 crosses, or apparently it is he -- crosses through his own
25 signature on line 1 and writes "error" above it and then

1 his initials, and the date which is the same date as the
2 signature on the line.

3 A Right.

4 Q What error was he recording there?

5 A I think he was just pointing out that he had
6 signed the document that should -- the document itself was
7 improper. His note tends to lead me to believe that
8 because it is also dated the same date, something was
9 wrong with line 3 so he made a new traveler sheet. He was
10 in error in signing line 1 rather than line 5. But now it
11 says, as page 1 of 3, which is the eight-line traveler.

12 JUDGE BLOCH: Does that error reflect in any way
13 on your confidence in Mr. Cole?

14 THE WITNESS: As inspection or ability to fill
15 out paper? I would say it reflects adversely on his
16 ability to fill out documentation properly, which is what
17 he was ultimately terminated for, as I understand it.

18 I don't think you can draw a conclusion one way or the
19 other, as to his competence performing the inspection.

20 JUDGE BLOCH: If he doesn't fill out the paper
21 properly, possibly he could make other mistakes in filling
22 it out that you didn't understand? Because you thought he
23 understood the paper?

24 THE WITNESS: That's something I'd just as soon
25 not speculate on.

1 JUDGE BLOCH: Isn't that why we have deficiency
2 paper when an inspector doesn't follow procedures?

3 THE WITNESS: Mr. Chairman, if we were talking
4 in the timeframe 1982 I could agree with you. At that
5 point some corrective action would be meaningful. At this
6 point it's clear to me Mr. Cole was talking about the
7 inside fit-up and cleanliness. I could just as easily
8 write on line 5 of the traveler "see attached chit" sign
9 and date it myself and substantiate the fact that the
10 fit-up was performed.

11 JUDGE BLOCH: That's if you are only worried
12 about that particular weld. But what if you were worried
13 about whether or not Mr. Cole was incompetent and his work
14 should be looked at generally?

15 THE WITNESS: Mr. Cole's -- I guess I have a
16 real problem, Chairman Bloch, with your term "incompetent."
17 To me that's drawing a conclusion before any investigation
18 is done. That's why we are having a problem, or I'm
19 having a problem answering your question. I'm sorry.

20 JUDGE BLOCH: I don't want to --

21 THE WITNESS: Please let me finish. I have
22 reviewed enough paper that Mr. Cole was been involved with
23 to recommend to the utility that they go out and sample
24 his work to get some idea of his competence.

25 To judge the man is incompetent as you and I sit here

1 today without performing that evaluation, I think that's
2 unfair to Mr. Cole.

3 JUDGE BLOCH: I was only asking whether you
4 shouldn't be creating deficiency papers so that that
5 question would be resolved properly and you are telling me
6 you are resolving it, you just haven't created the paper?

7 THE WITNESS: I created paper on what I consider
8 legitimate hardware deficiencies. The only corrective
9 action we could take on Mr. Cole, by writing a deficiency
10 paper on determining what is causing -- on your
11 determining yesterday what would be the root cause, would
12 be to reindoctrinate Mr. Cole.

13 JUDGE BLOCH: No, it would be to reexamine all
14 his work.

15 MR. WATKINS: That's exactly what he's suggesting.
16 Your question assumed a deficiency paper would be next.
17 Mr. Brandt has indicated this is all water under the
18 bridge for training purposes.

19 THE WITNESS: If we were to create deficiency
20 paper the only difference between what I have already
21 recommended and writing a deficiency paper would be
22 trending. I recommended we reevaluate his work.

23 If I went on out and said James Cole did this wrong on
24 three travelers and did this on two travelers, all you
25 will do is establish Jim Cole made a lot of mistakes or

1 Jim Cole made a lot of mistakes -- in the way of
2 corrective action what you are going to do is go out and
3 sample his work the same objective.

4 CHAIRMAN BLOCH: If someone decides you don't
5 have to sample the inspector's work, there has to be an
6 explanation, doesn't there?

7 MR. WATKINS: Your question assumes it won't be
8 done.

9 THE WITNESS: Mr. Chairman, I have a great deal
10 of faith that recommendations I'm making will be at least
11 acted on. If they are not acted on, or if they are acted
12 on improperly, I think I owe it to myself to at least make
13 everybody else aware that I made the recommendation and
14 people chose not to act on it. I don't see that writing a
15 deficiency paper on Mr. Cole at this point, on Mr. Cole
16 signing on the wrong line in this case, serves any burden
17 of proof.

18 JUDGE BLOCH: My concern is that you -- it seems
19 you don't think that deficiency papers should be created
20 for personnel deficiencies.

21 THE WITNESS: No, that's not the case. I have
22 written deficiency papers on personnel deficiencies
23 personally.

24 JUDGE BLOCH: Why is Mr. Cole's different?

25 THE WITNESS: I'm not sure it's a personnel

1 deficiency. It could be a lack of training. What you
2 hope to --

3 JUDGE BLOCH: I didn't mean deficiency of the
4 person. I just meant deficiency of his work.

5 THE WITNESS: I know what you are saying. I
6 think the same end will be accomplished, I guess -- it
7 appears to me I'm not going to convince you that the lack
8 of paper is correct and you are not going to direct -- or
9 convince me the paper is necessary. If the inspector was
10 still employed I would see this as a much different case
11 because you would need to stop him from performing further
12 inspections until his adequacy as an inspector could be
13 properly evaluated and I would have done that in other
14 places.

15 JUDGE BLOCH: If he was still employed, it is
16 your opinion that an NCR still is required?

17 THE WITNESS: Yes.

18 JUDGE BLOCH: But because it's not required and
19 you have to go all over his work, you don't think an NCR
20 is required?

21 THE WITNESS: Given what I have already done, I
22 don't think an NCR is required.

23 BY MR. ROISMAN:

24 Q But, Mr. Brandt, isn't the significant
25 difference between doing an NCR and not doing an NCR, is

1 without the NCR the thoroughness of the investigation is
2 left completely in your hands and the hands of the company
3 without any way for outside agencies like NRC
4 investigators to verify it; whereas with an NCR, they then
5 have a paper trail that they can track down and determine
6 whether, in their judgment, the company has done the
7 responsible thing. Isn't that the principle difference?

8 A That is a difference, Mr. Roisman. I guess I
9 would like to think about it before I decided that was the
10 principle difference.

11 MR. ROISMAN: I'm willing to accept a difference.

12 JUDGE BLOCH: Let's take seven minutes.

13 (Recess.)

14 JUDGE BLOCH: The hearing will come to order.

15 BY MR. ROISMAN:

16 Q Mr. Brandt, do I understand that you have
17 recommended, based upon what you have seen, that there be
18 at least a spot, or random recheck of some of the
19 inspections that Mr. Cole performed while he was employed
20 at the Comanche Peak site?

21 A I won't argue over words you use, Mr. Roisman,
22 because I don't honestly remember. I recommended that his
23 inspections be sampled, yes, to determine a confidence
24 level in his proficiency as an inspector.

25 Q And, prior to making that recommendation, did

1 you review the record of Mr. Cole's performance at the
2 plant, to the extent that it was documented on NCRs, and
3 his performance evaluations by supervisors and the like?

4 A I have seen that, Mr. Roisman, but it wasn't an
5 effort -- I mean it wasn't -- if I can go through my
6 sequence of thought processes -- if that helps you any --
7 it wasn't like I had a question, I went to look at the
8 personnel file, and then I made my recommendation. I had
9 seen the personnel file before I ever started -- before I --
10 I'm trying to think when I saw it -- I think I saw it
11 between my October 3rd deposition and the filing that we
12 made last Friday.

13 Q Do you remember seeing an NCR that was written,
14 that recommended that Mr. Cole be retrained in inspection
15 as a result of numerous problems that were being
16 identified in his inspection work?

17 A It doesn't come to memory right away; no.

18 Q Would that be kept in his personnel file, if
19 such an NCR existed?

20 A Probably not.

21 Q Where would that normally be kept? How would
22 that be recorded?

23 A It's in his -- it would be in his -- it would be
24 filed, like any other NCR.

25 Q So it wouldn't be keyed to Mr. Cole,

1 particularly. It would be filed numerically as NCRs are
2 filed?

3 A Yes, sir.

4 JUDGE BLOCH: I think there may be a shortage of
5 communication on my part. Because I asked on the other
6 side of the case for deficiency documentation associated
7 with the termination of Mr. Cole. I understand why there
8 could be some misunderstanding but if there is this
9 earlier NCR on his retraining I think I would like to see
10 that.

11 MR. WATKINS: I'm not sure there is one.

12 JUDGE BLOCH: If there is one. It sounds to me
13 like there was no particular search made for that.

14 MR. WATKINS: But there was no NCR written in
15 connection with his termination. The NCR Mr. Roisman
16 spoke about involved retraining. Retraining was not the
17 solution to --

18 JUDGE BLOCH: But what concerns me if you only
19 look in association with his termination it seems there
20 could have been a whole series of NCRs on Mr. Cole. We
21 wouldn't have gotten them because of the way we worded the
22 request so you actually may have deficiency paper on
23 Mr. Cole.

24 MR. WATKINS: May I review the statement because
25 I want to make sure that I understand what the story is?

1 JUDGE BLOCH: I'm sorry, what statement?

2 MR. WATKINS: Applicant's statement dated
3 November 23rd in the other docket.

4 JUDGE BLOCH: Okay.

5 MR. WATKINS: The statements are that no NCR
6 regarding the hanger documentation errors for which he was
7 terminated was written at that time. Further, that his
8 termination was not related to stainless -- his work on
9 stainless steel liners or travelers.

10 On last Wednesday's hearing, Mr. Chairman, you
11 instructed Applicants to file this document on Friday.
12 The intervening day was Thanksgiving.

13 I called the site. I had asked them to review this
14 matter approximately a week before last Wednesday. They
15 were able to report those facts.

16 JUDGE BLOCH: I was not being at all critical.
17 I want to make that clear. The way I worded it you were
18 fully responsive.

19 MR. WATKINS: For the board's information, I was
20 informed that there may be individual NCRs with respect to
21 hanger documentation.

22 For example, when the document review group was
23 reviewing paper in which he was involved with hangers, if
24 they saw discrepancies they would send the paper back to
25 the lead or supervisor in the field who would try to

1 reconcile the situation.

2 In some cases it may have been that they could not
3 reconcile the situation, at which point the NCR may have
4 been written. But to isolate the particular hangers was
5 an impossible task.

6 JUDGE BLOCH: I guess to look at each NCR
7 written by Mr. Cole would indeed be difficult, but if
8 there were any written that questioned his training, or
9 generally questioned his confidence, could those be found
10 without great difficulty?

11 MR. WATKINS: I don't know the answer to that.

12 JUDGE BLOCH: Mr. Brandt, do you know that?

13 THE WITNESS: If the NCR named Mr. Cole by name
14 it could be identified; yes, Mr. Chairman.

15 JUDGE BLOCH: I guess we would like a search for
16 that, in the other docket.

17 MR. WATKINS: Is this you and Dr. Jordan sitting
18 as a quorum?

19 JUDGE BLOCH: Yes.

20 MR. WATKINS: The point is irrelevant. Here we
21 believe Mr. Brandt has recommended, and we have no reason
22 to believe that the recommendation will not be accepted,
23 that his work on the liner plates will be selectively or
24 on a sampling basis, reinspected.

25 BY MR. ROISMAN:

1 Q Mr. Brandt, your counsel's statement just now, I
2 thought your testimony was that the recommendation was
3 that his work in general be resampled. Is counsel right
4 that it's only that his work with regard to liner plates
5 be resampled? Your recommendation now?

6 A No, my recommendation was as I stated.

7 MR. WATKINS: I misspoke. Liner plate.

8 JUDGE BLOCH: We need a date. Why don't we aim
9 for a week on the documents and if you need more than a
10 week you'll just file for an extension. Let's say -- make
11 it a week from Friday. How about that?

12 MR. WATKINS: Can I understand, again, what we
13 are going to look for?

14 JUDGE BLOCH: You are going to look for any NCRs
15 that name Mr. Cole as having performance problems that
16 either relate to his training or his confidence in
17 performing inspections. Or documenting inspections.
18 Performing or documenting inspections.

19 BY MR. ROISMAN:

20 Q Okay. Mr. Brandt, going back to weld number 77,
21 the page 1 of this weld packet has now been replaced; is
22 that correct? With what appears to be an unnumbered page
23 of a blank inspection traveler as a result of the
24 substantive change in line 8 and line 7?

25 A Yes. There's an additional line, too,

1 Mr. Roisman -- where there was a change.

2 Q Okay. And what is your understanding of the
3 procedure that is to be followed when the new form comes
4 into existence and gets attached to the package? Is the
5 new form to be filled out at that point or is it to await
6 the next inspection? How is that handled?

7 A It normally awaits the next inspection.

8 Q And would the proper procedure be that when the
9 next inspection, which I assume is the step 5 -- no, I'm
10 sorry. That's the one that should have been signed and
11 isn't. -- step 6 is the next one to be done; is that
12 correct?

13 A No, sir. Step 7, on page 1 of 3, which is the
14 one with the signature and the star and the asterisk
15 inside the circle, just to make sure we are talking about
16 the same page --

17 Q Right. Right.

18 A The next step sequentially for this would be
19 step 7.

20 Q The V.T. of the fillet prior to grinding is an
21 NA?

22 A The V.T. of the fillet is for the embed fillet
23 weld which is signed off -- no, I'm sorry, that's for a
24 fillet weld for attachment on the inside. In this case it
25 is an NA.

1 Q So the next step is the final V.T. of the inside
2 weld?

3 A Yes, sir.

4 JUDGE BLOCH: Mr. Brandt, the first question,
5 you talked about replacement of a page. Could you clarify
6 that for me? Does that mean a new page was put in in
7 addition to an earlier one or they took one out and put
8 one in?

9 THE WITNESS: What happened on this traveler was
10 that -- this is the same one we were talking about before
11 with the white-out -- this page was replaced with this one.

12 JUDGE BLOCH: They just added another page?

13 THE WITNESS: Excuse me. Let me finish. -- in
14 1982. If you recall the earlier discussion, when this
15 form changed to the QA QP11.14-6 form, where the substance
16 of line 8, and an addition inspection was added to the
17 form, this page has also now been added.

18 JUDGE BLOCH: I just want to know if any pages
19 were ever taken out.

20 THE WITNESS: No.

21 JUDGE BLOCH: Okay.

22 BY MR. ROISMAN:

23 Q Which is the equivalent o [redacted] page 1
24 of 3 on the newest eight-line traveler?

25 A 6. That's for either one. It's either for the

1 seem weld or a fillet weld in a case in which you have
2 both.

3 Q I see. Okay. Is it your understanding that the
4 proper procedure will be that when that's done the
5 inspector should also sign line 5 and note the existence
6 of the chit to establish that the inside fit-up and
7 cleanliness was done? Or should that line simply never be
8 signed?

9 A This traveler is properly completed. The
10 traveler to which you are referring to is the unnumbered
11 page, which is an eight-line traveler.

12 Q Correct.

13 A The next sequential step would be step 6. That
14 would be signed and dated by the inspector performing the
15 inspections.

16 Steps 1 through 5 would reference, well, actually,
17 properly, it would say "NA," because that's, as we
18 discussed earlier, what the procedure was, as the steps
19 had been performed earlier.

20 Q And -- so that no one will make an entry on this
21 form to note the mistake that Mr. Cole made in not signing
22 the line 5 of page 1 of 3, to verify that the inside
23 fit-up and cleanliness was done?

24 A Mr. Roisman, I think this goes back to my
25 earlier discussion of what would be probably be preferable

1 for an outside, or casual observer looking at the document.

2 It would be easier for an outside observer to look at
3 the document at step -- if step 5 referred you to the chit;
4 step 4 referred you to step 4 of the five-line traveler;
5 step 3 was marked "NA"; step 2 referred you to step 2 of
6 the five-line traveler, and step 1 referred you to the
7 chit dated 10/18/78. That would be most clear to an
8 outside or casual observer.

9 The procedure requirement, or the procedure permits
10 simply marking "NA" in those steps as they have previously
11 been accomplished.

12 Q Is the "NA" for the steps that have previously
13 been accomplished intended to be denoted in some way
14 different for a "NA" for a step that's actually never to
15 be taken? For instance the step number 3 on this page 1
16 of 3?

17 A No, sir.

18 Q And are the "NSs" supposed to have an inspector's
19 signature or initials by them?

20 A "NAs."

21 Q So theoretically, someone could write "NA" in on
22 that, although that would be improper for them to do so?

23 A Yes, sir.

24 Q Now, the white-outing of something on line 3 of
25 the five-line traveler, what is it that is objectionable

1 about the use of white-out on a traveler?

2 A I believe the rationale in developing the ANSI
3 standard was that a single line drawn through any
4 correction and initialed and dated, was to provide a later
5 reviewer, a later observer of the document the opportunity
6 to see what was written there initially and to know who
7 made the change.

8 Whether or not that was in the draft of ANSI 45.2.9, to
9 which Comanche Peak is committed I'm not sure. I believe
10 it was.

11 Q So that if that is in the draft, the use of
12 white-out on any inspection documents would be improper?
13 It wasn't something unique about line 3 here?

14 A No, sir. The thing that, in my estimation, from
15 looking at it as a quality assurance document, line 3 is
16 now and always has been nonapplicable, so there's nothing
17 of substance that could have been lined out on line 3.
18 That's the only point I was attempting to make with the
19 difference between line 3, for example, and line 4.

20 Q But the point is that the use of white-out is
21 inappropriate anywhere on an inspection document, even as
22 here on a line that was irrelevant in any event; is that
23 correct?

24 A To the best of my recollection. As I said, I
25 think, Mr. Roisman, Comanche Peak is committed to draft 11

1 of ANSI 45.2.9, and I believe that draft of the standard
2 required that corrections be made by drawing a single line
3 through the entry, initialing and dating it. So, in
4 answer to your question, if we are committed to that
5 standard -- which I -- excuse me. If the standard to
6 which we are committed does state that, which the current
7 version of ANSI 45.2.9 states, then the answer to your
8 question would be: Yes, that would be improper.

9 Q In that, what I assume you are testifying is the
10 more likely state of events, that it is and was improper,
11 what effort should be made to determine who was using
12 white-out on inspection documents so that that practice
13 can be stopped?

14 A It should have been determined who did it.

15 JUDGE BLOCH: Should any effort have been made
16 to determine what was under the white-out?

17 THE WITNESS: In my estimation, no. It is
18 insignificant.

19 JUDGE BLOCH: It couldn't be evidence of some
20 improper practice?

21 THE WITNESS: I don't know what it would be.
22 It's the inspection -- the line as whited out is clearly
23 not applicable to this weld.

24 JUDGE BLOCH: Could it be someone signing a
25 backdated document?

1 THE WITNESS: What purpose would it serve?

2 JUDGE BLOCH: It doesn't really matter. If
3 someone has backdated the line improperly it would still
4 be important to know about it, wouldn't it?

5 MR. WATKINS: The whole point is completely
6 irrelevant.

7 THE WITNESS: The hold point doesn't need to be
8 on traveler, your Honor.

9 JUDGE BLOCH: Anything that's whited out could
10 have been an improper practice whether it's whited out or
11 not. You just don't know whether someone fraudulently
12 made an improper entry on that line.

13 You do know that it has no physical problem on that
14 particular weld. But you don't know whether it was
15 evidence of an improper practice on that form. The
16 witness doesn't have to answer.

17 Mr. Roisman?

18 MR. ROISMAN: Yes, Mr. Chairman. I would like
19 to have bound into the record at this point and received
20 in evidence, the inspection traveler for weld number 77.
21 I'll give a copy to Mr. Brandt to compare with his copy.

22 (The document follows:)

23

24

25

FIGURE

B&R STAINLESS STEEL LINER INSPECTION TRAVELER

WELD NO.

PROJECT: CPSES JOB NO.: 35-1195 UNIT 2

JWC 1.18.82 JWC 1.18.82 PAGE 72 OF 83

2401A React. Liner # 2 Stainless Steel 1" and 3/16" Embed to Plate PLATE TO PLATE POOL METAL TYPE MTL. THK. PC. to PC. OTHER Embed PC22 to D22

Table with 4 columns: WELDER SYMBOL, WER NO., WELD PROCED., HOLD POINT. Rows include AEU, ATR, AFG, AEO, CAT.

1. Fit up and cleanliness of above: SAT James W. Cole 1-18-82

2. V.T. of backing strip tack/fillet welds: SAT Jim M. Cole 10-18-78

3. Cleanliness of channel, liner, and backing strip: N/A

4. Final V.T. of channel fillet weld: SAT Don R. Voss 10-26-78

5. Final V.T. of inside weld: SAT

note: new front page made due to illegal white-out on correction of hold point #3 JWC 1.18.82

Completion of weld inspection: RESULTS INSPECTOR SIGNATURE DATE

FOR INFORMATION ONLY

Brown & Root Inc.

20912

77

WELD NO.

S&R Stainless Steel Liner Inspection Traveler

PROJECT: CPSES JOB NO: 35-1195 UNIT 2 PAGE 1 OF 23 *JWC 1.18.82*

WRB-10559/BB-2401A REACTOR LINER #2 STAINLESS STEEL 1/2" Fillet EMBED TO PLATE
Drawing No. Pool Metal Type Mtl. Thk. PC. to PC.

Plate to Plate Insert to Plate Angle to Plate Other EMBED TO PLATE

Welder Symbol	WFAL No.	Weld Proced.	Hold Point
AEU	A068849	88025	FF
ATR	A068887	88023	2
AFB	A069141	88023	4
AEO	A069175	88023	4
A	B329A	88025	1

1. Fit up and Cleanliness of Above:
Sat. James W. Cole 1.18.82
Results Inspector Signature Date
2. V.T. of Backing Strip Tack/Fillet Welds:
(S) see next page (S) (S)
Results Inspector Signature Date
3. Cleanliness of Channel, Liner, and B. Strip:
NA NA NA
Results Inspector Signature Date
4. Final V.T. of Channel Fillet Weld:
(S) (S) (S)
Results Inspector Signature Date
5. Inside Fit Up and Cleanliness:
Results Inspector Signature Date
6. V.T. of Fillet Prior to Grinding:
Results Inspector Signature Date
7. Final V.T. of Inside Weld:
Results Inspector Signature Date
8. Completion of Weld Inspection: GI-GAP 10.2-7 REV.
Results Inspector Signature Date

FOR INFORMATION ONLY

77 20913

WELD NO.

B&R Stainless Steel Liner Inspection Traveler

Weld Inspection Sheet

Page ___ of ___

Acceptance Std.
Gibbs & Hill 2323-SS-18

7a. Penetrant Mfg. Magnaflux-Spotcheck _____

Cleaner Mfg. Magnaflux-Spotcheck _____

Developer Mfg. Magnaflux-Spotcheck _____

NDE Procedure

Final P.T. Level II

RESULTS INSPECTOR SIGN. DATE

7b. Vacuum Box

GASKET TYPE

SOLUTION TYPE

_____ by _____

Pretest Cleaning _____ Pressure _____ Temperature _____ NDE Procedure _____

Solution Application Method _____ Post Test Cleaning _____

Gauge Serial Number _____ Pressure Differential Maintained for _____ Sec. _____ Min.

Final V.B. _____

N/A - Not Applicable

Satisfactory _____ Unsatisfactory _____ Level II Inspector _____ Date _____

FOR INFORMATION ONLY

B&R Stainless Steel Liner Inspection Traveler

20914

QI-QP-11.14-6 REV.

PROJECT: CPSES JOB NO: 35-1195 UNIT 2 PAGE OF

BB-2401-A Reactor Liner #2 STAINLESS STEEL 1" TO 3/16" EMBED TO PLATE
Drawing No. Pool Metal Type Mtl. Thck. PC. to PC.

Plate to Plate Insert to Plate Angle to Plate Other PC 22 TO D22

Welder Symbol	WFML No.	Weld Proced.	Hold Point

1. Fit up and Cleanliness of Above
Results Inspector Signature Date
2. V.T. of Backing Strip Tack/Fillet Welds:
Results Inspector Signature Date
3. Cleanliness of Channel, Liner, and B. Strip:
Results Inspector Signature Date
4. Final V.T. of Channel Fillet Weld:
Results Inspector Signature Date
5. Seam Weld Fit Up and Cleanliness:
Results Inspector Signature Date
6. Final V.T. of Welds for Surface Preps.
Results Inspector Signature Date
7. Final P.T. and Vacuum Box of Seams
(See Weld Inspection Sheet)
Results Inspector Signature Date
8. Completion of Weld Inspection: QI-QP-11.14-6
Inspector Signature Date

FOR INFORMATION ONLY

20915

NON DESTRUCTIVE TEST
INSPECTION REQUEST

FOREMAN

TIME

DATE

10-19-77

WELDER:

Justice AEU

DRAWING #

BB 2401A

INSP. REQ.

CLEAN

FIT-UP

FIELD WELD JT. # 77

VISUAL

L.P.

V.B.

FINAL

COMMENTS:

First fit up and

WNR: A068849 AEU

cleanliness of
to plate

INSPECTOR:

S.M. McCoy

ACCEPT:

DATE:

10-19-77

NON DESTRUCTIVE TEST
INSPECTION REPORT

FOREMAN

TIME/DATE

W. Wilson

1:15 PM 1-18-82

WELDOR: *CAT*

DRAWING # *WR32401-A*

INSP. REQ.	CLEAN	<input checked="" type="checkbox"/>	FIT-UP	<input checked="" type="checkbox"/>	FIELD WELD # <i>77</i>
	VISUAL		L.P.		V.B.
	FINAL				

COMMENTS:

WFML: *325-A*

INSPECTOR: *James W. [Signature]*

ACCEPT:

DATE: *1-18-82*

FOR INFORMATION ONLY

20916

FOR INFORMATION ONLY

WELD NO. 260

B&R Stainless Steel Liner Inspection Traveler

20917

QI-QP-11.14-6 REV. 6

PROJECT: CPSES JOB NO: 35-1195 UNIT 2 PAGE 1 OF 3

BB2401A Drawing No. REAC. LINER #2 Pool STAINLESS STEEL Metal Type 3/16" + 3/8" Mtl. Thck. RF34 TO GATE GUIDE ASS. PC. to PC.

Plate to Plate Insert to Plate Angle to Plate Other _____

Welder Symbol	WFML No.	Weld Proced.	Hold Point
<i>Refer Pg 3 of 3</i>			

- Fit up and Cleanliness of Above
Refer Step 1 Pg. 3 of 3
 Results Inspector Signature Date
- V.T. of Backing Strip Tack/Fillet Welds:
NA NA NA
 Results Inspector Signature Date
- Cleanliness of Channel, Liner, and B. Strip:
NA NA NA
 Results Inspector Signature Date
- Final V.T. of Channel Fillet Weld:
NA NA NA
 Results Inspector Signature Date
- Seam Weld Fit Up and Cleanliness:
Refer Step 1 Pg 3 of 3
 Results Inspector Signature Date
- Final V.T. of Welds for Surface Preps.
OK D Brown 4/20/83
 Results Inspector Signature Date
- Final P.T. and Vacuum Box of Seams (See Weld Inspection Sheet)
Sgt Bill Chadwick 6/15/83
 Results Inspector Signature Date
- Completion of Weld Inspection: QI-QP-11.14-6
Roman 2/2/84
 Inspector Signature Date

CP/1/83

FOR INFORMATION ONLY

20918

260

WELD NO.

B&R Stainless Steel Liner Inspection Traveler

Weld Inspection Sheet

Page 2 of 3

Acceptance Std.
Gibbs & Hill 2323-SS-18

7a. Penetrant Mfg. Magnaflux-Spotcheck
Cleaner Mfg. Magnaflux-Spotcheck
Developer Mfg. Magnaflux-Spotcheck

82B097
83C015
82E041

NDE Procedure
ATQP 11.18-1R2

ATTIC

Final P.T.

Level II

SAT [Signature] 4-20-83
RESULTS INSPECTOR SIGN. DATE

7b. Vacuum Box

GASKET TYPE

SOLUTION TYPE

5 by 9x9" Rubber Swoop

Pretest Cleaning SAT Pressure 0.5-1.2 Temperature 75° NDE Procedure
ATQP 10.2-6 Rm 2

Solution Application Method CONTINUOUS Post Test Cleaning SAT

Gauge Serial Number MT4E 2664 Pressure Differential Due DATE
Maintained for 10 Sec. — Min. 31 Aug 83

Final V.B. Bix Chadwick

N/A - Not Applicable

Satisfactory SAT Unsatisfactory N/A Level II
Inspector [Signature] Date 6/13/83

FOR INFORMATION ONLY

260

WELD NO.

B&R Stainless Steel Liner Inspection Traveler

PROJECT: CPSES JOB NO: 35-1195 UNIT: 2 PAGE 34 OF 23 *4/29/83*

BB 2401A Drawing No. React Liner #2 Pool Stainless Steel Metal Type 3/16" x 3/8" Mtl. Thk. RF34 to Kate Knick PC. to PC.

Plate to Plate Insert to Plate Angle to Plate Other

Welder Symbol	W.M.R. No.	Weld Proced.	Hold Point
AXC	A161662	88023	1
CAT	B-939A	88025	1
CAT	B939-A	88025	7

- Fit up and Cleanliness of Above:
 SAT Results Don R. Vack Inspector Signature 5-17-79 Date
- V.T. of Backing Strip Tack/Fillet Welds:
NA Results NA Inspector Signature NA Date
- Cleanliness of Channel, Liner, and B. Strip:
NA Results NA Inspector Signature NA Date
- Final V.T. of Channel Fillet Weld:
NA Results NA Inspector Signature NA Date
- Inside Fit Up and Cleanliness:
NA Results NA Inspector Signature NA Date
- V.T. of Fillet Prior to Grinding:
NA Results NA Inspector Signature NA Date
- Final V.T. of Inside Weld:
SAT Results James W. Cole Inspector Signature 4.4.82 Date
- Completion of Weld Inspection: (NDE P200)
 Results Inspector Signature Date

NON DESTRUCTIVE TEST
INSPECTION REQUEST

DATE 4/15/82

FOREMAN Wendell

WELDER: _____

DRAWING # SB 2401-A

INSP. REQ.

CLEAN FIT-UP APPLIED WELD # 260
 VISUAL L.P. V.S.
 F:UAL

COMMENTS:

*Reverification of fit up
& Cleanliness*

WFML: NA

INSPECTOR: Luob

ACCEPT: DATE: 4/15/82

FOR INFORMATION ONLY

No. T U107

20921

PROJECT: COMANCHE PEAK JOB NO. 35-1195

UNIT 2 PAGE 1 OF 1

MT PT

WDC/Traveler # N/A
Class N/A

Drawing BB 2401A System SS Liner

Fields/Item # FW 260 Location RB# 2 EL. 845'

Fig Stage Final NDE Procedure No. QTOP 11.18-1 Rev. 2

Equip/Mat'ls Mfg. Magnaflex Acceptance Std. ATT-1C

Penetrant Batch # 820097 Cleaner Batch # 830015 Developer Batch # 825041

DC Yoke N/A DC Prods N/A Model # N/A M&TE IRC # N/A

Mat'l Type S.S. Mat'l Thickness 3/16" to 3/8" Diameter Length

Sketch & Comments ID OD

RF 34 TO GATE GUIDE

Inspector <i>V. J. ...</i>	Certification Level <i>II</i>	Date <i>4/20/85</i>	Results Accept <input checked="" type="checkbox"/> Reject <input type="checkbox"/>
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1 BY MR. ROISMAN:

2 Q Mr. B. andt, on page 12 of your testimony of
3 November 21, 1984 --

4 JUDGE BLOCH: 20585 of the transcript.

5 BY MR. ROISMAN:

6 Q In answer to question 22 referencing five NCRs
7 which were on page 21 of Exhibit 1 to the CASE
8 supplemental filing on the liner plates, you indicated
9 that there was nothing significant to the observation that
10 it was an error that was made by the inspector but was
11 properly recorded and dispositioned on an NCR; is that
12 correct?

13 A Yes, sir.

14 Q Now, all of the documents with respect to which
15 NCRs were written were already in the permanent plant
16 records vault at the time the NCR was written; is that
17 true? Is that true?

18 A I don't know.

19 Q Well, I'm going to give you a stack that
20 consists of those documents, and ask you to look at them
21 and see if, in fact, or you may look at your own -- if you
22 wish I'll read you off the numbers of them.

23 A It would be easier for me, Mr. Roisman, if you
24 have them in a stack to look at them.

25 MR. ROISMAN: Yes, I do.

1 I'm giving the witness a stack of the documents for
2 weld numbers, and they are traveler packages like the
3 other ones that have been received in the record.

4 JUDGE BLOCH: This could be a five-minute job?

5 MR. ROISMAN: I don't think so. He's just
6 checking the numbers off against the list.

7 (Discussion off the record.)

8 THE WITNESS: No, it is not evident, Mr. Roisman,
9 that they have all been admitted into the vault.

10 BY MR. ROISMAN:

11 Q I'm sorry. I was going to correct that but we
12 weren't on the record. There's a substantial number that
13 are?

14 A Yes.

15 Q But there are a few that have not --

16 A If I can correct that, at one time they were all
17 in the vault.

18 Q But they are now out.

19 Your testimony is that the error was properly recorded.
20 Is it your testimony that it was proper to not find the
21 error until a substantial number of the documents were
22 already in the permanent plant record vault?

23 A No, sir.

24 Q Then in that sense they were not properly
25 reported; is that correct?

1 A As we sit here today, Mr. Roisman, my testimony
2 is, as of today the deficiency has been noted in
3 accordance with the site procedures for reporting
4 deficiencies. The fact that they had made it to the vault
5 and signed off, had been signed off as complete and yet
6 were not complete, is an error. And that error is
7 described in the NCR.

8 Q And what has been done to attempt to determine
9 how these incomplete documents got, not only past the
10 inspector who signed them without having them properly
11 completed, but past the subsequent document reviews?

12 A What subsequent document reviews?

13 MR. WATKINS: Objection. Mr. Brandt stated my
14 objection.

15 JUDGE BLOCH: The document review conducted
16 prior to their being sent to the vault.

17 THE WITNESS: What document review was that?

18 JUDGE BLOCH: Was there no document review prior?

19 THE WITNESS: They don't go through a formal
20 document review; no, sir.

21 BY MR. ROISMAN:

22 Q What's the process? For instance, first looking
23 just at number 1082, the last line of 1082 is signed
24 February 19, 1981, completion of weld inspection.

25 A At that point that was the error that was made,

1 Mr. Roisman.

2 Q I understand. But my question --

3 A That was -- maybe we are mincing words. There
4 is no formal document review like ASME document received,
5 for example. When the inspector signs off that line, he's
6 attesting to the fact that all required inspections have
7 been performed.

8 Q And what's the next thing that's supposed to
9 happen to the document, assuming he did that properly or --

10 A If he had signed off that bottom line properly?

11 Q Right.

12 A They go to the vault.

13 Q Does he personally send them to the vault or
14 does somebody else look at them before they go?

15 A A clerk fills out a transmittal before they go.
16 That's the only step.

17 Q So there's no substantive look at it at all? No
18 one looking to see if, in fact, the document is signed off
19 properly?

20 A There's the certified inspector's signature on
21 the bottom line stating that all required inspections were
22 performed and documented. In this case he was wrong.

23 Q My point is there isn't somebody else who
24 independently looks at that?

25 A No, sir. No, sir; that's true.

1 JUDGE BLOCH: At one point the liner documents
2 were going through an independent review; weren't they?
3 By document checkers?

4 THE WITNESS: No, sir.

5 JUDGE BLOCH: They never were?

6 THE WITNESS: Other than what we've described in
7 this proceeding they were not. Not to my knowledge.

8 BY MR. ROISMAN:

9 Q And who was the author of these documents?

10 A You state in your allegation James Cole.

11 Q Are we right?

12 A I have no reason to believe you aren't right in
13 this instance, Mr. Roisman, but I haven't -- I didn't
14 verify that. I just looked through them quickly just now.
15 I have no reason to think you are not right.

16 Q Can you explain to me, once the documents were
17 in the vault, how did it happen that they were looked at
18 at all?

19 A They were removed from the vault to put in the
20 inner records vault.

21 Q Why was that done?

22 A The establishment of the interim records vault
23 was to have all unit 2 records, more as a package concept.
24 And the packages would be assembled in the field and then
25 resubmitted to the vaults as a package.

1 Q And was a document review done at the time of
2 their removal from the permanent records vault into the
3 interim records vault?

4 A That appears to be the reason for the NCR being
5 written.

6 Q You don't know one way or the other?

7 A The NCR states a review of the documents.

8 Q I'm trying to understand the process. You tell
9 me in order to put a document into the permanent records
10 vault there's no requirement that you do a substantive
11 review of the document if there is an inspector's
12 signature on the line saying that the traveler is complete?

13 A That's correct.

14 Q Now, it seems even more ministerial to take a
15 document already in the vault and move it to another
16 interim vault. And my question to you is, why would a
17 review have been conducted, then, of the documents?

18 A Logically I can't answer your question,
19 Mr. Roisman. I don't know.

20 It appears to me from looking at the documents that are
21 in front of both of us that that's what happened. Mr.
22 Tessier was the author of the NCRs. Mr. Tessier is the
23 inspector that's now covering that particular liner plate --
24 was then and at least as recent as September, was still
25 the inspector on that liner plate.

1 Q On -- by "that liner plate" you mean on the
2 whole liner --

3 A On the reactor unit 2 refuel cavity.

4 Q Refuel cavity -- okay. Yes, sir.

5 JUDGE BLOCH: Sir, this inspection of the
6 documents just took place and you have no idea why?

7 THE WITNESS: I think that's not my testimony
8 Judge Bloch -- well, maybe it is. I don't know the reason
9 for doing it. The review was done by the inspector who is
10 responsible for that activity. Whether he was trained to
11 look at them before they took it -- whether he did it on
12 his own -- I can't answer that question. But speaking
13 from memory, as I said, I believe the author of the NCRs
14 was a gentleman named Tessier. He is the inspector in
15 that cavity right now.

16 JUDGE BLOCH: I guess I think it would be
17 helpful if we knew because it might be that the people who
18 decided to do that have some knowledge about these liner
19 plates that hasn't reached you.

20 MR. ROISMAN: Was that a question, Mr. Chairman?

21 JUDGE BLOCH: Mr. Watkins, how should we handle
22 this problem?

23 MR. WATKINS: Well, the board has indicated that
24 it wants several items of information from Mr. Brandt.
25 I'm open to suggestions. The board wants Mr. Brandt to

1 write NCRs apparently.

2 JUDGE BLOCH: I don't care whether he writes NCRs
3 at this point. I care to know what the company has been
4 doing under its policies.

5 If the company thinks it ought to write NCRs, it ought
6 to; and if it doesn't think it ought to, it shouldn't.

7 MR. WATKINS: Mr. Brandt doesn't believe it was
8 appropriate at this time and he doesn't know and he so
9 testified.

10 JUDGE BLOCH: This particular question has to do
11 with finding out what the plant personnel knew that led to
12 the document review when the documents were moved from
13 permanent plant records vault to the interim vault. It
14 seems to me we ought to know that so the applicants are
15 telling the whole story.

16 THE WITNESS: Is your question, Mr. Chairman --
17 is your question this review that resulted in these five NCRs,
18 why was that review conducted?

19 JUDGE BLOCH: Right. And in particular is there
20 some knowledge that you have about the plates that isn't
21 reflected in your testimony?

22 BY MR. ROISMAN:

23 Q Mr. Brandt, I would like you to look at weld
24 number 111.

25 JUDGE BLOCH: Mr. Roisman, have we forgotten

1 about putting 77 into the record?

2 MR. ROISMAN: That was done. I think that was
3 done. And it is not my intent to put into the record the
4 pile of ones that Mr. Brandt just looked at, which I'm
5 sure will please the reporter no end.

6 MR. WATKINS: Are those the ones identified on
7 page 21, Exhibit 1, of your most recent submittals on this
8 issue?

9 MR. WATKINS: Yes. But Mr. Brandt, I believe --
10 I think Mr. Brandt is correct that the stack that he
11 actually looked at is a subset, although a substantial
12 subset of that whole group, and that there were some that
13 we listed there that are not in the permanent records
14 vault -- were not.

15 MR. WATKINS: You don't care to have those
16 identified?

17 MR. ROISMAN: Well, we can run through the
18 numbers, if you like. I'll just rattle them off from the
19 pile Mr. Brandt looked at. Why don't we do that?

20 Mr. Brandt, did the pile include any that did not have
21 the permanent vault record stamp on them? The pile you
22 looked at?

23 THE WITNESS: Yes.

24 MR. ROISMAN: I will read off the ones that had
25 the permanent vault record stamp on them, while standing

1 at his table, or if you prefer I can have him read them
2 off. Whichever you or he prefer.

3 JUDGE BLOCH: Just so long as Mr. Brandt doesn't
4 leave with his table after the hearing.

5 MR. ROISMAN: What Mr. Brandt will do is he'll
6 read off from the list that's contained on page 21 of
7 Exhibit 1 of our supplemental filing on the liner plates.
8 Any numbers not now read by Mr. Brandt are ones that we
9 are agreeing did have the permanent plant record vault
10 number on them. He's going to read only the ones that did
11 not have it on it.

12 JUDGE BLOCH: Is that okay, Mr. Watkins?

13 MR. WATKINS: That's fine.

14 THE WITNESS: Except that that's not all the
15 travelers that are on page 21.

16 MR. WATKINS: Just read off the ones that you
17 looked at a minute ago.

18 JUDGE BLOCH: I guess I'd prefer that counsel
19 list these and we reach a stipulation instead of doing
20 this on the live record.

21 MR. ROISMAN: Okay. Fair enough.

22 MR. WATKINS: I agree.

23 BY MR. ROISMAN:

24 Q Mr. Brandt, looking at number 111, this is .
25 another one in which Mr. Cole was involved. Looking at

1 page 2 of 3 of the package, there's a signature on line 1
2 with a "sat, James W. Cole, 12/18/81."

3 Now, on pages 45,397 to 45,398, you discuss traveler
4 package 111.

5 JUDGE BLOCH: Okay. He needs the other numbers.
6 I see -- this --

7 MR. ROISMAN: No. No. This is the way -- I'm
8 sorry. Mr. Brandt, this is your earlier, October 3rd
9 testimony I'm now directing your attention to.

10 THE WITNESS: What's the numbers, Mr. Roisman?

11 MR. ROISMAN: 45,397 and -398.

12 BY MR. ROISMAN:

13 Q Now, as I understand your testimony, is it that
14 Mr. Cole signed off on line 1 of the eight-line traveler
15 that's page 2 of this document when he should have signed
16 off on line 5; is that correct?

17 A Yes, sir.

18 Q And, apparently he or someone also wrote in on
19 line 5 that the inside fit-up and cleanliness was NA; is
20 that correct?

21 A It's true that there's an "NA" in that blank. I
22 have no idea who did that.

23 Q Okay. Both of those are in error; isn't that
24 right? Both marking of that as an "NA," and the signature
25 on line 1?

1 A Yes, sir.

2 Q And, am I correct that there is no deficiency
3 paper attached to this document indicating that an NCR was
4 written with regard to this?

5 MR. WATKINS: Objection. The witness has
6 testified that it's not necessary for NCRs to be included
7 in the packets. The question is, therefore, irrelevant.

8 JUDGE BLOCH: Are you going to put the whole
9 package into the record?

10 MR. ROISMAN: I will; yes.

11 JUDGE BLOCH: It's a short package.

12 MR. ROISMAN: Okay.

13 BY MR. ROISMAN:

14 Q Mr. Brandt, what is the process by which this
15 error is, in the normal course of the work that's done on
16 these liner plate documents -- how would this error show
17 up? How would somebody find it?

18 A Prior to the completion of weld inspection,
19 which is line 8 on the traveler, which is now page 3 in my
20 copy, although it's unnumbered, you would have to verify
21 that all required inspections have been performed.

22 Q Mr. Brandt, how can you determine that the
23 signature that's on line 1, by Mr. Cole, is a signature
24 for having conducted the inspection that's called for on
25 line 5, rather than merely a verification of the chit

1 dated 8/31/78, that the inspection called for on line 1
2 was performed?

3 A I think two things lead me to that conclusion,
4 Mr. Roisman, from what's in front of me.

5 There is no chit in the package for the inside -- in
6 the inside -- and the inside fit-up was clear -- excuse me.

7 The outside fit-up was clearly made inaccessible by the
8 attachment of leak chase channel on the 26th of October,
9 1978. It is also clear from the one WFML that is attached,
10 number 5724, that welding commenced on the inside on or
11 slightly before the 19th of February, 1981. Mr. Cole's
12 signature is on the 18th of February, 1981. I think it's
13 reasonable to assume that's the inside fit-up and
14 cleanliness.

15 Q That's based on the assumption that you believe
16 he would have done the inspection in the first place;
17 correct? I mean, you are assuming that he would do the
18 inside fit-up and cleanliness inspection?

19 A Yes, sir. It's also -- if you look at that
20 traveler, the first entry on it is D5715, which is not
21 attached to this, and references hold point 1. It should
22 have correctly referenced hold point 5. That is clearly a
23 WFML reference that could not have been anything used for
24 the inside weld, as WFMLs were not used until 1979. All
25 the outside welding was completed in 1978.

1 JUDGE BLOCH: Are you assuming that Mr. Cole
2 knows what you know? Is it possible he didn't understand
3 the documentation as well as he thought he was signing off
4 on line 1?

5 THE WITNESS: I didn't understand -- combination
6 of didn't understand and didn't hear your question,
7 Mr. Chairman.

8 JUDGE BLOCH: You were just explaining why it
9 couldn't be that Mr. Cole was signing off on line 1. But
10 that was based on your understanding of reading the welds
11 material filler log entries and your figuring out of the
12 chronology. Is it possible that Mr. Cole didn't
13 understand that chronology as well as you did?

14 THE WITNESS: It's possible that Mr. Cole didn't
15 understand the chronology or documentation as well as I do.
16 I think that's it. He signed in the wrong place. It's
17 not possible that that could have been for the back side
18 fit-up and cleanliness, because it was inaccessible.

19 BY MR. ROISMAN:

20 Q But my point is that all he was doing was
21 signing the line as an inspection that there's a chit
22 verifying there was a back side fit-up and cleanliness
23 done and he was signing the line 1 to verify the fact that
24 that had in fact occurred, that he wasn't attempting to
25 say anything about the water side weld.

1 MR. WATKINS: Objection. Mr. Brandt has just
2 explained his full basis for explaining these documents
3 including the fact that there isn't a chit.

4 JUDGE BLOCH: Sustained. It may be that you are
5 correcting me and there may be reason to do that, but
6 let's progress.

7 BY MR. ROISMAN:

8 Q Mr. Brandt, to your knowledge when did this
9 error by Mr. Cole first come to the attention of the
10 company?

11 A To my knowledge it probably came to the
12 attention of the company sometime around the 1st or 2nd of
13 October, 1984.

14 Q One last clarification on this, you've got,
15 looking now at page 2 of 3, you indicated that the first
16 WFML number designates a hold point number 1. And,
17 although we don't have that, you said that that couldn't
18 have occurred with reference to the original inspections;
19 because that WFML was not being used at that time. It was
20 WMR numbers, and the numbers looked different. Is that
21 correct?

22 A That's true.

23 Q Now, I take it, then, that the welder who wrote
24 down hold point number 1, wrote the wrong hold point
25 number down; correct? It should have been hold point

1 number 5?

2 A 5715 was probably used for the inside fit-up,
3 which was ultimately signed off on line 1 on the five-line
4 traveler. It is fairly evident that 5724 was a weld-out
5 type withdrawing of routes, as 40 routes were used. In
6 that respect --

7 JUDGE BLOCH: I think the reporter had trouble
8 hearing. I think you are a little close to your mike.

9 THE WITNESS: 5715 could have been used -- I'm
10 not saying it was, because we don't have it in front of us --
11 for the inside fit-up, or at the time of the inside fit-up
12 which probably would have been -- it would have been most
13 properly recorded as hold point 5. All three of them. I
14 think I'm agreeing with your assumption, Mr. Roisman.

15 BY MR. ROISMAN:

16 Q Look at page 1 of 3, which is the five-line
17 traveler.

18 A Right.

19 Q Line 1 has never been signed on that one except
20 when someone has written in "sat," but other than that
21 there's no signature on line 1; correct?

22 A Yes, sir, that's true.

23 Q So that form has never been signed off, which is --
24 as I understand it, if there were no other form available,
25 the practice would have been: You'd sign that line to

1 verify the existence of both the inside and the outside
2 fit-up and cleanliness.

3 A Yes, sir.

4 Q So in that form, we don't know that an inside
5 fit-up and cleanliness was done?

6 A That's true.

7 Q All right. Number 2, on that form under the WMR
8 numbers, the last three entries are the "D5715," "5724,"
9 and "5730," which appear on page 2 of 3, which is the
10 eight-line traveler; correct?

11 A Yes, sir.

12 Q And, on that first version of this recording, in
13 other words, page 1 of 3, the hold point list listed is
14 all hold point number 1 for 3; correct?

15 A That's true.

16 Q On the second page, where it was apparently
17 relisted the hold point number 1 was listed for the first
18 one and then hold point 7 is listed for the next two; is
19 that correct?

20 A That's also true.

21 Q Now, that listing of 7 is also an error, is it
22 not?

23 A No, sir.

24 Q Shouldn't it have been listed as 5?

25 A No, sir.

1 Q Why is that?

2 A The same reason we discussed earlier. That is
3 far -- what will ultimately result in hold point number 7.
4 The incorrect entry on that page is the first entry, which
5 references hold point number 1.

6 Q Well, then, why shouldn't -- if that explanation
7 is correct, then the proper hold point listing on page 1
8 of 3 for the last two WMR numbers should have been hold
9 point 5 then?

10 A Yes, sir. As I stated, I was trying to agree
11 with you after I thought about it.

12 Q Okay. I wasn't sure that we were talking about
13 the two different places where those hold point numbers
14 were written. But I now see that we are.

15 Mr. Chairman, I would like to have introduced into
16 evidence and bound in the record at this point, the
17 five-line -- the traveler for weld number 111, and I'm
18 passing it to Mr. Brandt to compare with his copy.

19 MR. WATKINS: Assuming they are the same, no
20 objection.

21 JUDGE BLOCH: It is admitted and may be bound.

22 (The document follows:)

23

24

25

FOR INFORMATION ONLY

B&R STAINLESS STEEL LINER INSPECTION TRAVELER

WELD NO. 111

PROJECT: CPSES JOB NO.: 35-1195 UNIT #2 PAGE 1 OF 3

Drawing No. 2401 A Reactor liner #2 Stainless steel MTL. THK. 3/16" PC. to PC. A28-B1
ELM. PLATE TO PLATE INSERT TO PLATE ANGLE TO PLATE OTHER R A28 TO L B1

WELDER SYMBOL	WMR NO.	WELD PROCED.	HOLD POINT
AHS	A008156	88023	Final fit up
AHS	A008156	88023	2+3
ALC	A023355	88023	4
ARY	A068557	88023	4
AEO	A068936	88023	4
ATR	A069432	88023	4
BYZ	D 5715	88025	1
BYE	D 5724	88025	1
BYZ	D 5730	88025	1

1. Fit up and cleanliness of above:

SAT. RESULTS INSPECTOR SIGNATURE DATE

2. V.T. of backing strip tack/fillet welds:

Sat RESULTS INSPECTOR SIGNATURE Phil Davis DATE 8-31-78

3. Cleanliness of channel, liner, and backing strip:

Sat RESULTS INSPECTOR SIGNATURE Phil Davis DATE 8-31-78

4. Final V.T. of channel fillet weld:

Sat RESULTS INSPECTOR SIGNATURE J.M. McEly DATE 10-26-78

5. Final V.T. of inside weld:

SAT. RESULTS INSPECTOR SIGNATURE DATE

Completion of weld inspection:

RESULTS INSPECTOR SIGNATURE DATE

FOR INFORMATION ONLY

20942

BROWN & ROOT INC

111
WELD NO.

B&R Stainless Steel Liner Inspection Traveler

PROJECT: CPSES JCS NO: 35-1195 UNIT 2 PAGE 2 OF 3

WRB-10559/BB-2401A REACTOR LINER #2 STAINLESS STEEL $\frac{3}{16}$ x $\frac{1}{4}$ A-286 B-1
Drawing No. Pool Metal Type Mtl. Thk. PC. to PC.

Plate to Plate Insert to Plate Angle to Plate Other

Welder Symbol	WFL No.	Weld Proced.	Hold Point
BYZ	D-5715	88021	1
BYZ	D-5724	88025	7
BYZ	D-5730	88025	7

- Fit up and Cleanliness of Above:
SAT. James Nicole 2-18-81
Results Inspector Signature Date
- V.T. of Backing Strip Tack/Fillet Welds:
NA NA NA
Results Inspector Signature Date
- Cleanliness of Channel, Liner, and B. Strip:
NA NA NA
Results Inspector Signature Date
- Final V.T. of Channel Fillet Weld:
NA NA NA
Results Inspector Signature Date
- Inside Fit Up and Cleanliness:
NA NA NA
Results Inspector Signature Date
- V.T. of Fillet Prior to Grinding:
NA NA NA
Results Inspector Signature Date
- Final V.T. of Inside Weld:
SAT. James Nicole 2-18-81
Results Inspector Signature Date
- Completion of Weld Inspection: GI-GAP 10.2-7
REV.
Results Inspector Signature Date

FOR INFORMATION ONLY

WELD NO. 111

20943

B&R Stainless Steel Liner Inspection Traveler

QI-QP-11.14-6 REV.

PROJECT: CPSES JOB NO: 35-1195 UNIT 2 PAGE OF

BB-2401-A Drawing No. Reactor Liner #2 Pool STAINLESS STEEL Metal Type 1/4" TO 3/16" Mtl. Thck. BOTTOM ANGLE TO PLATE PC. to PC.

Plate to Plate Insert to Plate Angle to Plate Other B1 TO A2B

Welder Symbol	WFML No.	Weld Proced.	Hold Point

- Fit up and Cleanliness of Above
Results Inspector Signature Date
- V.T. of Backing Strip Tack/Fillet Welds:
Results Inspector Signature Date
- Cleanliness of Channel, Liner, and B. Strip:
Results Inspector Signature Date
- Final V.T. of Channel Fillet Weld:
Results Inspector Signature Date
- Seam Weld Fit Up and Cleanliness:
Results Inspector Signature Date
- Final V.T. of Welds for Surface Preps.
Results Inspector Signature Date
- Final P.T. and Vacuum Box of Seams (See Weld Inspection Sheet)
Results Inspector Signature Date
- Completion of Weld Inspection: QI-QP-11.14-6
Inspector Signature Date

FOR INFORMATION ONLY

20944

WELD NO. 111

B&R Stainless Steel Liner Inspection Traveler

Weld Inspection Sheet

Page of

Acceptance Std.
Gibbs & Hill 2323-SS-18

- 7a. Penetrant Mfg. Magnaflux-Spotcheck _____
- Cleaner Mfg. Magnaflux-Spotcheck _____
- Developer Mfg. Magnaflux-Spotcheck _____

NDE Procedure

Final P.T.	Level II	_____	_____	_____
		RESULTS	INSPECTOR SIGN.	DATE

7b. Vacuum Box GASKET TYPE SOLUTION TYPE

_____ by _____

Pretest Cleaning _____ Pressure _____ Temperature _____ NDE Procedure _____

Solution Application Method _____ Post Test Cleaning _____

Gauge Serial Number _____ Pressure Differential
Maintained for _____ Sec. _____ Min.

Final V.B. _____

N/A - Not Applicable

Satisfactory _____	Unsatisfactory _____	Level II Inspector _____	Date _____
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NON DESTRUCTIVE TEST
INSPECTION REQUEST

FOREMAN _____

TIME _____

DATE

7/31/78

WELDER: Ables ASH

DRAWING # 2401 A BB

R#2

INSP. REQ.	CLEAN <input type="checkbox"/>	FIT-UP <input type="checkbox"/>	FIELD WELD JT.#	<u>111</u>
	VISUAL <input type="checkbox"/>	L.P. <input type="checkbox"/>	V.B.	_____
	FINAL <input type="checkbox"/>	_____		

COMMENTS: first fit up &
Cleanliness of
Plate to Plate

WMR: A008156 ASH

INSPECTOR: Phil Davis ACCEPT: DATE: 8-21-78

20945

FOR INFORMATION ONLY

1 MR. ROISMAN: Mr. Chairman, would this be a good
2 place to break? It would be for me.

3 JUDGE BLOCH: Okay. We'll take a break now.
4 Until 1:00. Is that what you mean?

5 MR. ROISMAN: Yes.

6 JUDGE BLOCH: All right. We'll be back at 1:00.

7 (Whereupon, at 12:10 p.m., the hearing was
8 recessed, to reconvene at 1:00 p.m., this same day.)

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1 are welcome to peruse.

2 BY MR. ROISMAN:

3 Q There's a reference to -- do you know --
4 Yourbough? Well, we'll just assume that. It's a
5 documentation clerk working under Mr. Tanley with the Fuel
6 Pool Travelers Association -- she's worked with the Fuel
7 Pool Travelers for approximately the past three years. Do
8 you know what kind of work would be done with the Fuel
9 Pool Travelers by a documentation person, who is not,
10 apparently, a QC inspector?

11 MR. WATKINS: Mr. Chairman, I'm going to object
12 to the use of the document as representing hearsay. Also
13 I would like to review a copy.

14 JUDGE BLOCH: Why don't you review it. I don't
15 understand he's introducing it for the truth of what he
16 says. He's introducing it to show the source of his
17 information and just request information about it.

18 MR. WATKINS: If that's clear to Mr. Roisman --

19 MR. ROISMAN: It is. Although I am going to
20 introduce it into evidence. It was a document produced in
21 the ordinary course of business of the Applicant. It is a
22 report prepared by them, similar to reports which they
23 have offered into evidence in this proceeding, regarding
24 allegations -- in this case, allegations of Mr. Dillingham.
25 But for the moment what I'm doing is simply referencing

1 the statement that's in there, and asking the witness to
2 discuss it.

3 MR. WATKINS: Mr. Chairman, we believe the
4 witness ought to be asked first whether he has ever seen
5 the document; second, if he knows who the person referred
6 to in the document is.

7 JUDGE BLOCH: At this point, Mr. Roisman, are
8 you trying to introduce the document or just ask a
9 question based on it?

10 MR. ROISMAN: I'm just trying to ask a question
11 based on it.

12 JUDGE BLOCH: I'm not sure why he should be
13 required to ask whether he's ever seen the document.

14 MR. WATKINS: Let's go to the second point.

15 JUDGE BLOCH: Okay. Do you have any knowledge
16 about documentation reviews of the person involved here,
17 Ms. Yourbough?

18 THE WITNESS: I don't believe the term used here
19 was "reviewed," Mr. Chairman. Is that what you said,
20 Mr. Roisman?

21 MR. ROISMAN: No. I didn't.

22 JUDGE BLOCH: Would you restate the question,
23 please?

24 BY MR. ROISMAN:

25 Q The question was, do you know what a person

1 working in documentation would be doing with respect to
2 Fuel Pool Travelers? A position which, according to the
3 statement, at least, she had been doing for approximately
4 three years?

5 A Yes, I do.

6 Q All right. Could you please explain that?

7 A Yes, I believe I've explained previously, these
8 travelers were filled out by the millwrights prior to any
9 inspection being done with these documents. The
10 millwrights filled out the top portion of the traveler,
11 which "says Bostron Bergen drawing 2401-A, for reactor
12 liner number 2; metal type is stainless steel; material
13 thickness is 3/16 of an inch; and piece number to piece
14 number is plate B-23 to plate B-2."

15 Essentially, all information contained on the first
16 inch and a half or two inches of the form is filled out
17 prior to issuance to the field.

18 Q And it's at that phase that a documentation
19 person is involved in it?

20 A The term used in this letter is "documentation
21 clerk."

22 Q Yes.

23 A If you want to call it a documentation clerk,
24 that's fine, I'll accept that. That's a clerical function.
25 It's essentially writing the information on top of the

1 traveler.

2 Q Clerical in the sense that they don't exercise
3 any judgment?

4 A No, sir; no judgment is exercised.

5 Q How do they know what information to put on the
6 top of each traveler? Are they taking that from another
7 document?

8 A It's a drawing take-off.

9 JUDGE BLOCH: Before you continue answering,
10 Mr. Brandt, please read the whole paragraph that's being
11 referred to. Have you read that?

12 THE WITNESS: Yes, I have, if we are talking
13 about this paragraph right here?

14 BY MR. ROISMAN:

15 Q It's the middle paragraph that begins, "we
16 discussed this item with" and it ends with "no other
17 specifics"?

18 A Yes, I read that.

19 JUDGE BLOCH: That seems to imply she was doing
20 more than just filling in the tops of the forms, is the
21 reason I asked.

22 THE WITNESS: Why do you say that?

23 JUDGE BLOCH: It says that Ms. Yourbough cited
24 an instance which appeared to her at the time to involve
25 the improper traveler entry by Mickey Garrett.

1 If there was an improper traveler entry, that suggests
2 it was after it had gone to the field. Doesn't it?

3 THE WITNESS: That's true. But Mr. Roisman's
4 question was what her function was.

5 JUDGE BLOCH: Was what?

6 THE WITNESS: What Ms. Yourbough's function was.

7 JUDGE BLOCH: I see.

8 THE WITNESS: Now you are making an observation
9 that she saw Mickey Garrett, who is a millwright, do
10 something else. That was not her function. It was
11 apparently a casual observation made by her.

12 JUDGE BLOCH: Okay.

13 BY MR. ROISMAN:

14 Q So that her role began and ended before any of
15 the substantive inspection information or WMR number
16 information was placed on the liner plate traveler forms;
17 is that correct?

18 A Mr. Roisman, just so we don't -- I'm not
19 misunderstanding you, nor you me; I don't know
20 Ms. Yourbough. I was answering your question in the
21 hypothetical, at least the way I understood it was: What
22 would some clerk working for Tanley be doing filling out a
23 traveler?

24 My answer was meant to be general, that the top portion
25 of this traveler was filled out by a clerk that worked for

1 the millwrights, prior to its submittal to the field. All
2 of this information, which is on the left side of the
3 traveler which says, "welder symbol WMR welding procedure
4 and hold point" would have been filled out by the
5 craftsman in the field. And the right side of the
6 traveler for hold points 1 through 5 would have been
7 filled out and signed by quality control inspectors.

8 Q I just want to be clear. There was no role --
9 I'm not talking about this woman in particular -- but as
10 far as you know there was no role for anybody working for
11 Mr. Tanley to have occasion to review or look at this
12 document to determine whether any of those entries made by
13 the craft people, or by the inspectors was made properly;
14 is that correct?

15 A I'm assuming, Mr. Roisman, you are asking -- it
16 wasn't her function to pass judgment on the correctness of
17 the information entered below the top inch and a half of
18 the traveler?

19 Q Well -- what I asked was whether there was any
20 review of that by any person working for Mr. Tanley? Did
21 they have occasion to look at the document and do any kind
22 of review after the initial entry of the information on
23 the form by them at the time of the page?

24 A What she did, or what any clerk did in the way --
25 you know -- if you want to call it a review, I don't know.

1 It certainly wasn't required and it certainly wasn't her
2 function or meant to be her function to perform that
3 review.

4 Q Okay. That's what I was trying to get at.
5 There wasn't any function that they were assigned to do.

6 A No, there was not, other than what I've already
7 described.

8 JUDGE BLOCH: Mr. Brandt, I assume that since
9 you answered that you believe you know that. You are not
10 speculating.

11 THE WITNESS: I know how the travelers, were
12 prepared; yes, sir.

13 BY MR. ROISMAN:

14 Q Now, Mr. Brandt, I'm going to show you the front
15 of the document, a memorandum, and ask you have you ever
16 seen that document?

17 A Yes, I have. Just recently. And, by "recently,"
18 I'll say -- it's tough for me to be any more specific,
19 Mr. Roisman, than say the last two or three months. That
20 was the first time I had occasion to see it.

21 Q Just so that I can clarify your situation here,
22 you are an employee of EBASCO, assigned to work for TUGCO;
23 is that correct?

24 A That's true.

25 Q Okay. So you do not either work for nor are you

1 assigned to Brown & Root; is that correct?

2 A That's also correct.

3 Q Do you have any information regarding whether
4 this kind of a memorandum is a standard memorandum
5 prepared by Brown & Root, when they have allegations to
6 investigate?

7 MR. WATKINS: Could counsel clarify the meaning
8 of "standard"?

9 MR. ROISMAN: Regularly done, when an allegation
10 is presented to Brown & Root.

11 THE WITNESS: I do not know.

12 MR. ROISMAN: Don't know anything about it?

13 THE WITNESS: No.

14 MR. ROISMAN: We would like to offer this, and I
15 assume the only way to do it, other than by stipulation,
16 is to have called as a witness, one time when we are in
17 Fort Worth next, or up here, either Mr. Dodd, who is the
18 author of the document, or somebody similar. At this time
19 I'll make a proffer as to why I want it into evidence.

20 JUDGE BLOCH: First, is there going to be an
21 objection, Mr. Watkins?

22 MR. WATKINS: Your Honor, I haven't reviewed the
23 document. I would certainly like that chance before doing
24 so.

25 I suggest, if we can get a copy run, or if I can get

1 one up here I can review it and get together with
2 Mr. Roisman --

3 JUDGE BLOCH: Why don't we try to handle it by
4 stipulation instead of going into it later --

5 MR. ROISMAN: That's fine. We have an extra
6 copy -- I have no further questions for Mr. Brandt about
7 it -- which I'll be happy to give to Mr. Watkins for
8 review. Let me note on the record for his reference that
9 on page 22, the first full paragraph on that page that
10 begins "we," the second sentence thereof is underlined.
11 That's our underlining.

12 And on page 24, the first full paragraph that begins
13 with the word "with" and is in the middle of the page, the
14 third sentence there is underlined. And that is our
15 underlining.

16 Beyond that, all the other marks on the document are
17 the marks that were on the document when we received it.

18 Oh, and on the very front page we have written the
19 words "original copy," which is our notation that this is
20 the original that we received in our office.

21 MR. ROISMAN: We have, as it happens, an unmarked
22 copy of the section I just identified. So what I'm giving
23 to Mr. Watkins now is an unmarked copy. There are no
24 markings that we made on it.

25 MR. WATKINS: Thank you.

1 MR. ROISMAN: By the way, this document was
2 previously referenced and portions of it were attached to
3 both of the filings by CASE related to the liner plate.
4 So it's not a surprise document. The parties are on
5 notice that such a document exists. We have never
6 produced as attached to it, a full copy of the entire
7 document. And there's also an NRC investigation in the
8 same matter. And that NRC investigation has attached to
9 it this document.

10 So, both applicant and Staff have had in their
11 possession, before we did, a copy of the material that we
12 are now going to offer.

13 MR. WATKINS: Agreed.

14 BY MR. ROISMAN:

15 Q Mr. Brandt, I would like to direct your
16 attention to your October 3rd testimony. And, in
17 particular, to pages 45,364 --

18 JUDGE BLOCH: Mr. Roisman, your microphone is on,
19 but you don't seem to be consistently using it.

20 MR. ROISMAN: I'm sorry.

21 BY MR. ROISMAN:

22 Q I direct your attention to pages 45,364 and -365.

23 If I understand the thrust of your testimony, it was to
24 answer a question as to whether or not weld rods had been
25 issued and used prior to the conduct of the first fit-up

1 and cleanliness inspection. And, if I remember correctly
2 your answer is to the effect that that is not likely to
3 have occurred, and that the notations on the document and
4 on the WMR indicate timing such that it doesn't have to be
5 the case that the rods were burned before the inspections
6 were done.

7 Am I correct that that's the essence of what you are
8 saying there?

9 A Maybe I'm confused, Mr. Roisman, but I think
10 what you just stated is the exact opposite of my testimony.

11 Q Okay. Why don't you give it to me then so we
12 don't have that confusion.

13 A Where would you like for me to start? Where we
14 first start discussing weld number 2-A?

15 Q Why don't you start with the answer on line 21.
16 Or, if you want, the question on 19.

17 A On what page?

18 Q On page 45,364.

19 In fact, let me go at it differently and see if we can
20 do it more efficiently.

21 On line 22 of page 45,364, you indicate that "I might
22 explain the front page of the traveler clearly indicates
23 that --"

24 JUDGE BLOCH: One second. Thank you.

25 BY MR. ROISMAN:

1 Q -- WMR was used to issue rod for the initial
2 fit-up and cleanliness." Then you go on through the
3 bottom of that page and the top of the next page, to
4 indicate that there is no reason, looking now on line 2 on
5 page 45,364, " -- for me to believe that this WMR was not
6 issued prior to May 7, 1979, which was the date of the
7 first inspection on this weld."

8 MR. WATKINS: Your Honor, I wonder if the
9 witness could review not only the traveler itself but also
10 the allegation to which it responded. Do you have that,
11 Mr. Brandt?

12 JUDGE BLOCH: There is no objection.

13 THE WITNESS: The allegation is stated on 45,364,
14 beginning on line 13 with a question which states:
15 "Mr. Brandt, are you aware that in the memorandum filed
16 September 27, 1984, CASE alleged a deficiency in this
17 traveler package -- that is, package 2-A, because an
18 inspection was performed before weld rod had been issued?"

19 And the answer is: Yes."

20 To that extent I assume that's the allegation that we
21 are talking about.

22 BY MR. ROISMAN:

23 Q That's correct.

24 A Now what's the existing question, Mr. Roisman?
25 I'm sorry, I forgot.

1 Q That's all right. First, would it have been
2 improper if the inspection was performed before weld rod
3 was issued?

4 A I believe this goes back to a discussion you and
5 I had yesterday, Mr. Roisman, on the three or four -- I
6 suggested three, you added a fourth, I believe -- ways
7 that the fit-up sequence could have been performed.

8 I think first we discussed that the --

9 JUDGE BLOCH: Mr. Brandt, if you want to
10 continue you may. But my recollection is that you never
11 answered the question he just asked you.

12 BY MR. ROISMAN:

13 Q I wasn't planning that we would rehash that. I
14 had remembered the conversation.

15 A I wanted to explain it because I obtained
16 information since our discussion yesterday.

17 Q Okay. Good. That's fine.

18 A That's the reason I was offering this
19 explanation -- the first way of which was that the spacer
20 bar would have been tacked to the existing liner plates,
21 so that the fit-up gap could not have gotten larger. You
22 offered the explanation, you asked me: Could this not be
23 accomplished by the weight of the plate itself?

24 Q That's right.

25 A And I said that normally fit-up is not signed

1 off on any kind of weld until it is held securely in place.

2 From discussions with construction personnel this
3 morning, I learned at least in the majority -- they did
4 not say in all cases because the person that I was talking
5 to was not responsible for all cases -- in the majority of
6 the cases, what happened was the plates were drawn close
7 enough together to make fit-up; the spacer bar inserted;
8 the spacer bar tacked on the front side, or the water side
9 of the liner; and then the cleaning operation performed on
10 the back.

11 Q Okay.

12 A In essence, the rods drawn prior to signature of
13 the fit-up, in the case we were discussing yesterday -- I
14 believe in almost all cases we decided that there was one
15 or two rods used. And normally a day or two before the
16 fit-up was signed off, those fit-ups would have been used
17 to tack the spacer bar to both sides of the liner plate in
18 order to prevent the liner plate from becoming physically
19 separated. Those one or two rods would have been burned
20 prior to fit-up and cleanliness inspections.

21 JUDGE JORDAN: Mr. Brandt, you said it was
22 tacked to both sides of the liner plate. Did you mean
23 both sides of the liner plate or both sides of the bar?

24 THE WITNESS: I understand your question,
25 Dr. Jordan. I guess the confusion is "both sides,"

1 meaning inside and outside, or "both sides" meaning right
2 and left.

3 I meant by "both sides," right and left, not inside and
4 outside. It was tacked to both plates on the inside
5 portion of the weld.

6 JUDGE JORDAN: Thank you.

7 JUDGE BLOCH: Can you now say that was the
8 uniform practice? The tacking plates took place on the
9 water side uniformly?

10 THE WITNESS: I said at least in the majority of
11 the cases, Judge Bloch.

12 JUDGE GROSSMAN: But all of those cases that
13 that person knew about?

14 THE WITNESS: Yes, sir.

15 BY MR. ROISMAN:

16 Q I take it that thus, in that instance, the
17 issuance of the weld rod, or at least some weld rod,
18 should precede the inspection, otherwise there would have
19 been no rods available to do the tacking with; correct?

20 A Yes, sir. Yes, sir.

21 Q And in other instances, such as some of the
22 inspections that are conducted on lower lines, the welding
23 would have to actually be completed before the inspection
24 could take place? That is, you are inspecting a final
25 weld. You can't do that until all the rods that were

1 required for the weld had been burned?

2 A Right. I was only attempting to explain the
3 discrepancy in dates we were discussing yesterday,
4 Mr. Roisman -- on fit-up inspection.

5 Q Okay. Without the existence of WMR numbers,
6 and/or WMR or WFML numbers, and/or the attached WFML or WMR,
7 what other than the inspector's signature do we have on
8 the liner plate traveler to assure that the proper
9 sequencing of inspection and weld rod issuance and use was
10 followed?

11 A If you wish to exclude the items that you listed
12 in your somewhat hypothetical question, I guess,
13 Mr. Roisman, nothing.

14 Q Mr. Brandt, I would like to direct your
15 attention to page 45,373, still in your October 3rd
16 testimony. And, in particular, to the answer on line --
17 beginning at line 7, and ending at line 15.

18 The question was whether you needed to do a
19 reverification of a fit-up and cleanliness, where the
20 original fit-up and cleanliness was done at an earlier
21 date -- in this case an assumed four years -- and the
22 actual welding didn't take place until a later date. And
23 I believe your answer was that the reverification was done
24 by the welder, as opposed to the inspector. Is that a
25 correct summary of what you are saying there?

1 A That's part of my testimony, Mr. Roisman. The
2 question I believe this morning and yesterday: Was there
3 a procedural requirement to reverify it? And I answered,
4 "no."

5 Q I understand that.

6 A With that understanding, the statement you made
7 is correct.

8 Q But I take it that there is -- that having the
9 weld be clean and having the fit-up be proper, that is a
10 procedural requirement?

11 A To be checked once; yes, sir. Once on the
12 inside.

13 Q Twice for fit-up though; correct? The same gap
14 is verified at two different times in the process?

15 A Yes, sir, according to the procedure. Once from
16 the outside and once from the inside.

17 Q Right. Now are you telling me, separate from
18 the procedure, that in your judgment it is irrelevant
19 whether there is a reverification when a period of time
20 has elapsed? Is that your testimony? Of cleanliness and
21 fit-up?

22 A Well, Mr. Roisman, if you'll accept the fact
23 that fit-up was verified on the back side -- which I think
24 you're hypothesizing -- and that fit-up as opposed to
25 fit-up and cleanliness are the -- or the fit-up portion of

1 the inspection was reverified at some point on the inside,
2 the liner plate is not only held together by a leak chase
3 channel on the back side, it's held in concrete, by studs,
4 so the fit-up can not vary.

5 Q No, I was really asking it somewhat differently.
6 I was taking --

7 A I was attempting to answer your question.

8 Q I know you were, and I may not have been clear
9 with it. What I was trying to focus on was the situation
10 in which the cleanliness and fit-up inspection is done,
11 and no work is done. Cleanliness and fit-up inspection is
12 done, no work is done, several years pass, and the workers
13 come back; they look at the documentation, they see three
14 years ago this was verified to be clean and the fit-up was
15 appropriate, and they proceed to reverify on their own --
16 not with an inspector, but on their own -- that it still
17 is clean and that the fit-up is still there, and proceed
18 to weld.

19 Your testimony is, if they did that, that wasn't
20 required by procedure.

21 My next question to you was, then, even if it's not
22 required by procedure, is it irrelevant for any reason for
23 them to do that? Does it not matter whether the weld is
24 actually clean?

25 JUDGE BLOCH: You mean "does it matter"?

1 MR. ROISMAN: Yes.

2 THE WITNESS: That's apparently -- Mr. Roisman,
3 that's what I was trying to differentiate. You keep using
4 the terms "fit-up" and "cleanliness" because that's the
5 sign-out point on the traveler.

6 If fit-up and cleanliness were verified, for example,
7 in 1980, and welding didn't resume until today, I can
8 understand no way for the fit-up which was verified in
9 1980 to have changed today. It is held in place both by
10 the attachment of a backing strip to the leak chase
11 channel, and the fact that there's studs attached to the
12 liner plate which are embedded in concrete. I see no way
13 for that fit-up to change.

14 BY MR. ROISMAN:

15 Q Can I just interrupt you, because I think you
16 are misunderstanding my question. After the original
17 fit-up and cleanliness the remainder of the outside
18 portion of the work was done; and I'm assuming one in
19 which the fit-up and cleanliness in specs was done, but no
20 work was done, no backing strip was tacked on, no leak
21 chase channel was installed, and then after a period of a
22 couple of years somebody came back and said: Now it's
23 time to do the welding on the outside for this piece.

24 A But, Mr. Roisman, the testimony you asked me to
25 look at on 45,373 clearly states that we are talking about

1 cleanliness on the inside part of the weld not being
2 reverified, on lines 5 and 6. It's not at all addressing
3 outside.

4 Q All right. Let's take that example then if
5 that's easier for you to work with. In the example where
6 the inside fit-up and cleanliness is verified 1979 but the
7 welding is not done until 1983, is there any reason to
8 check to see that it is still clean in '83?

9 A That's exactly what I have been trying to
10 explain to you. Cleanliness I can see where it's an issue
11 for us to talk about. The only differentiation I was
12 trying to make is fit-up can't change.

13 Q And I understand when you are talking about the
14 inside weld you say that. Talk to me about cleanliness?

15 A Cleanliness, it was programmatically described
16 the way it was. It is really no different for a fit-up
17 than it is between weld passes, for example, whether it be
18 a day, two days, two weeks or three weeks. It's -- you
19 have got to depend a certain degree on welder training to
20 assure that the weld is clean before he starts it. Even
21 following your philosophical, or your -- not philosophical,
22 but your hypothetical example, if they had welded the
23 first pass in in 1979 and not returned to the welds in
24 1980 or '81 or '84, for that matter, your same concern
25 would be present. For example, if they did it three days

1 ago, your same concern would be today.

2 Q But the first time they did you had a QC
3 inspector who verified it was clean?

4 A That's right.

5 Q It remained important whether the welding is
6 done that moment or two years later, but the next time
7 around we rely solely on the craftsman?

8 A Yes, sir.

9 MR. ROISMAN: Mr. Chairman, I wasn't going to
10 ask him any more questions about that. I was going to go
11 to a slightly different point, so if you have a question --

12 JUDGE BLOCH: Let me ask one. Is it your
13 position that that first cleanliness inspection is not
14 required by any commitments the applicants have taken?

15 THE WITNESS: That's procedurally required.

16 JUDGE BLOCH: You are procedurally required, but
17 is that sort of an extra bonus that's not required by any
18 codes that you are complying with?

19 THE WITNESS: That's a true statement.

20 BY MR. ROISMAN:

21 Q Now, Mr. Brandt, you mentioned that based upon
22 your phone call this morning with people from craft, it is
23 your understanding that in most of the cases, the way in
24 which the fit-up was done is that the spacer bar was
25 placed between the two liner plates, tacked on the water

1 side weld side of it, and then the fit-up and cleanliness
2 inspections were conducted.

3 When was the spacer bar removed?

4 A The tacks were ground off and the spacer bar
5 taken out prior to the commencement of the inside weld.

6 Q Where was there an inspection of the cleanup
7 from the removal of the spacer bar?

8 A The fit-up and cleanliness inspection of the
9 inside welds.

10 Q Includes that inspection as well?

11 A Yes, sir.

12 Q Now, is it your understanding that there is any
13 special cleanliness procedures that are to be followed by
14 craft in the removal and grinding of the places where the
15 tack welds were on the stainless steel liner plate, that
16 held the spacer bar in place?

17 A I don't understand what you mean by --

18 Q Well, did they have to use a special grinding
19 wheel? Did they have to follow a certain procedure? Can
20 they only grind over a certain area? Are there any
21 requirements like that that must be followed before you
22 grind on the stainless steel liner?

23 A There's a site requirement for control of tools
24 that are used on stainless steel. Grinding wheels are
25 color coded so that grinding wheels used on carbon steel

1 aren't inadvertently used on stainless steel.

2 Q Other than that?

3 A The rest of the operation, Mr. Roisman, would be
4 part of the normal cleanup operation prior to welding.

5 Q But who verifies, or does anybody verify that
6 the proper tools were used, or the proper procedure was
7 followed for grinding off the -- I take it what they are
8 grinding off is the weld material that's still clinging to
9 the stainless steel?

10 A It's a very small amount; yes, sir.

11 Q Right. But whatever it is, who verifies that
12 that's -- that the right machinery is used to do that?

13 A It's just more on a surveillance basis by QC;
14 the same as is done for all stainless steel welding.

15 Q But it's a surveillance that doesn't include any
16 kind of a verification?

17 A A single line verification? Is that what you
18 are asking?

19 Are you asking do one of these steps on the traveler
20 include the fact that you verified that they used the
21 proper tools?

22 Q Yes.

23 A I'm not trying to put words in your mouth, but
24 I'm just trying to understand your question.

25 Q No. Okay.

1 A No. It's not.

2 Q And your testimony is that it's subsumed into
3 the general any specs sign-off when you sign off for
4 inspection and cleanliness for the inside weld?

5 A That's right.

6 JUDGE BLOCH: Well, not quite. You didn't
7 expect they'd verify the tools. They'd look at surface.

8 THE WITNESS: The surface. But if, for example,
9 there's a grinding wheel laying inside the stainless steel
10 liner that is not color coded for stainless steel, they
11 would identify it as a problem.

12 JUDGE BLOCH: That's general training. That's
13 not part of the cleanliness step; right?

14 THE WITNESS: Yes, sir. That's what I was
15 trying to say. That particular surveillance or
16 verification, whatever you want to call it, is not covered
17 by any single sign-off on the traveler.

18 BY MR. ROISMAN:

19 Q You then don't mean by "surveillance" that they
20 watch while the grinding is taking place?

21 A No, sir. I don't.

22 Q You mean that they simply observe the obvious
23 signs that may be around?

24 A Yes, sir.

25 Q So that, for instance, if the wrong grinding

1 wheel or wrong brush were used and was not left in the
2 work area, there wouldn't be anything in particular that
3 they could see that would clue them into that; correct?

4 A Are you talking about evidence when they
5 performed the inspection, Mr. Roisman? Evidence on the
6 hardware?

7 Q That's right. When they show up to do the
8 actual cleanliness inspection?

9 A No, at that point there would be nothing.

10 MR. ROISMAN: For the record, Mr. Chairman, in
11 35, 1195, CCP38, reference 3 on page 4 of 18, there is a
12 discussion of the cleaning requirements at paragraph 3.3.3,
13 associated with the stainless steel liner plates. That's
14 just one place where it appears. There are many versions
15 of this same construction procedure.

16 BY MR. ROISMAN:

17 Q Mr. Brandt, would you please turn now to page 45,441 --
18 excuse me, 442 of your October 3rd testimony.

19 A Yes, sir?

20 Q At this point in your testimony you are
21 responding to statements made in a filing by CASE
22 regarding the existence or possible existence of foreign
23 materials that might be in a weld if the cleanliness
24 inspection had not been conducted and the weld had been
25 completed. And I believe that you indicated that you

1 would agree that if there were in fact foreign materials
2 inside the weld, the tests, namely the penetrant test and
3 the vacuum box test, wouldn't detect that, but that it
4 doesn't matter because the purpose of the weld was to make
5 it watertight, not structurally strong; is that a fair
6 summary?

7 A Yes, sir. That's correct.

8 Q Now, is it your testimony that the presence of
9 an impurity beneath the surface of the weld, within the
10 weld itself, cannot affect over time the watertightness of
11 the weld itself?

12 A Mr. Roisman, I'm not sure, either then -- by "then"
13 I mean October 3rd or now -- I mean that what I was
14 attempting to address here was the fact that CASE had
15 alleged that these impurities would "eat their way out."
16 They also implied that the welds might rust. That's
17 simply not the case.

18 The point I was trying to make is that the welds are,
19 simply, a membrane.

20 JUDGE BLOCH: A membrane?

21 THE WITNESS: Yes, to form a continuous membrane,
22 a watertight area.

23 The welds that are important are radiographed. There
24 are welds on the transfer tube that are radiographed, for
25 example.

1 BY MR. ROISMAN:

2 Q And why are they different than the welds in the
3 reactor cavity building?

4 A Because they are structural. Well, they are not
5 structural, they have to be seismicly qualified due to the
6 fact that that's where the transfer canal -- I don't want
7 to get into a battle over terminology -- it's a tube where
8 the fuel building joins the containment building. And the
9 two buildings can move independently of one another.

10 Q And so?

11 A The welds on that tube are radiographed to
12 assure that they are structurally sound. Those welds are
13 seismicly qualified.

14 EXAMINATION

15 BY JUDGE BLOCH:

16 Q Mr. Brandt, back to the question before. What
17 about the impurities inside the weld material? Can that
18 cause, over time, a loss of watertightness?

19 A To talk about no more definitive a term than
20 "impurities," Mr. Chairman, is tough to address.

21 Q Well, qualify it how you want as to what kinds
22 of impurities might do that and what ones wouldn't.

23 A For me to sit here and tell you that all those
24 welds, for 40 years, will not leak, is not going to happen.
25 That's the purpose of the leak chase channel.

1 If that was the intent of the liner to never leak, you
2 wouldn't have the leak chase channel and you'd radiograph
3 the welds.

4 Q I still don't think you've answered it.

5 A I'm getting there. What I believe to be the
6 case is the fact that they are watertight, they've passed
7 a vacuum box test which is a pressure -- it's not a
8 passive test, it's a pressure exerted on the liner. And
9 they passed the hydrostatic test. That gives the designer
10 adequate assurance that his design will meet all
11 regulatory requirements, namely the FSAR commitments in
12 the regulatory guides.

13 Q Now you still have to answer the question.

14 A I think I've told you that that won't happen.
15 I'm not going to -- going to sit here and hypothesize with
16 you what types of impurities could cause a weld to leak
17 and which they couldn't.

18 Q I assume from your answer that the reason that
19 you are doing that is that there are some kinds of
20 impurities that could cause it to leak over time?

21 A I'm not sure I'm ready to answer that question,
22 Judge Bloch. I'm saying there are some, but I'm not
23 willing to specify which ones I think would, because I
24 really haven't thought about it.

25 Q But to the extent that there are some, I take it

1 that the cleanliness inspection has a purpose of trying to
2 make sure that those aren't in the weld?

3 A The cleanliness inspection performed on the
4 inside is to assure that when you get to the surface you
5 are going to have a reasonably smooth surface and you'll
6 have a surface that will pass hydrostatic testing --
7 excuse me, vacuum box testing and liquid penetrant testing.

8 Q That is the --

9 A That is the only acceptance criteria given in
10 the specification for that liner.

11 Q The presence of impurities within the weld
12 material is not of concern?

13 A No, sir.

14 Q Because it will not contribute to a loss of
15 watertightness?

16 A You are drawing that conclusion, your Honor.

17 Q I want to know what your conclusion would be.

18 A My conclusion is the designer determined if it
19 would pass vacuum box, penetrant testing and hydrostatic
20 test, that it was sufficient to perform its function.

21 Q You are also an expert in welding.

22 A I understand that.

23 Q I want to know whether there are materials in
24 the weld material that will cause a loss of
25 watertightness over time? Do you know or don't know? If

1 you don't know, don't say.

2 A Hypothetically, yes. I could imagine this could
3 be. But you are not giving me anything other than -- if
4 the pool just sits there for 40 years, who knows?

5 Q So you are not concerned with the possibility
6 that you lose watertightness more quickly because there
7 might be impurities, just so long as you've got the leak
8 chase channel?

9 A The leak chase channel will determine, from a
10 safety standpoint, that you are losing water. The leak
11 can be isolated and repaired, without impugning the
12 functioning of the pool in the first place.

13 This is not a continuous pool. These pools are
14 separated by gates.

15 Q I understand that. But it is therefore your
16 conclusion the fact --

17 A The fact that the possibility exists that you
18 could lose water is not important.

19 Q And the fact that you might lose it a little
20 faster is not important?

21 A No, sir.

22 CROSS-EXAMINATION (Continued)

23 BY MR. ROISMAN:

24 Q Mr. Brandt, going back to the cleaning of the
25 inside weld, using the question -- the grinding brushes

1 that we talked about before.

2 Isn't one of the reasons why there are specified types
3 of ways, types of brushes to use for the grinding, so that
4 the grinding does not result in compromising the
5 rustproof character of the stainless steel?

6 A It doesn't compromise the rustproof character of
7 the stainless steel. What it does do is when -- brushes
8 that have been used on carbon steel are used on stainless
9 steel, there's a possibility of embedding minute particles
10 of carbon steel in the stainless steel as part of the
11 grinding operation.

12 Q And those carbon steel particles, if they were
13 embedded, would themselves be vulnerable to rust; is that
14 not correct? Is that correct?

15 A Yes, sir. Exposed in the right atmosphere; yes,
16 sir.

17 Q Correct. And if they begin to rust, they can
18 cause the stainless steel around them to start to rust too?

19 A No, sir, stainless steel will not rust.

20 Q Even in the presence of a rusty carbon steel
21 particle?

22 A The carbon steel particle could completely
23 oxidize itself to iron oxide which would be contained
24 within the stainless steel grain structure. The stainless
25 steel grain structure itself will not rust.

1 Q So that you would never get a defect or a hole
2 any larger than the size of the carbon steel particle that
3 was deposited in the stainless steel surface?

4 A Depending on how it disintegrated, Mr. Roisman.
5 If you have a particle, a particle has three dimensions.
6 It contains a certain volume.

7 To assume that it's going to decompose to the same
8 dimensions, to the same three dimensions it started with
9 is not an assumption you can make.

10 Q You mean it could actually exert a physical
11 pressure on the shape in which it is embedded and reshape
12 the hole?

13 A I don't know that it's a physical pressure.
14 Carbon steel can work its way interstitially between the
15 grain structure of the stainless steel.

16 Q Eat its way out of the stainless steel?

17 A No.

18 Q You just wouldn't use that, would you?

19 A No, I wouldn't.

20 JUDGE BLOCH: You wouldn't say "eat its way in,"
21 would you? All right.

22 BY MR. ROISMAN:

23 Q Now, why would that be a problem? Why would
24 there be a concern about having minute particles of the
25 carbon steel deposited on the surface of the stainless

1 steel at the point where the -- on the inside weld side of
2 this liner plate?

3 A The liner plate itself? Well, for example, it
4 will rust. Cleanup is the concern. Decontamination.

5 Q And it's -- in your judgment, it is not related
6 to the watertightness of the weld?

7 A No, sir.

8 Q Just a moment ago, in discussing the -- what did
9 you call it, transfer tunnel that's between --

10 A Transfer tube.

11 Q All right. Transfer tube that's between the
12 containment building and the fuel pool building, you
13 indicated the need for seismic qualification of the welds
14 for that because of a concern that the two buildings could
15 move independently of each other; am I correct, that that
16 was what you said?

17 A I believe that's the postulated possibility;
18 yes, sir, Mr. Roisman. I know those welds are seismicly
19 qualified. I also know they are radiographed.

20 Q I also assume an earthquake is one of the ways
21 that might happen?

22 A Yes, sir.

23 Q And probably one of the few ways it might happen?

24 A Yes, sir.

25 Q And your understanding is that the effects of an

1 earthquake on the internal components of the containment
2 building itself, namely the reactor cavity and its liner
3 plates, is such that that kind of disproportionate
4 movement would not occur and thus there was no reason to
5 have seismic qualification for those liner plate welds?

6 A Mr. Roisman, I am not an expert on seismic
7 qualification. Yesterday I was stating my understanding
8 of it, and I believe I told you I did not believe that the
9 welds between the two consecutive liner plates had to be
10 seismicly qualified.

11 Q Okay --

12 JUDGE BLOCH: You mean the welds within the
13 liner plates.

14 THE WITNESS: I said between two adjacent liner
15 plates. That's what I meant to say, if I didn't.

16 JUDGE BLOCH: Okay.

17 THE WITNESS: I believe when the question that
18 the Chairman raised yesterday as far as design requirement
19 and code applicability of the stainless steel liners
20 themselves is answered, that answer will lead you -- will
21 either correct my testimony or confirm my testimony on the
22 seismic qualifications of the wells.

23 BY MR. ROISMAN:

24 Q All right. So on page 45,444 of your testimony,
25 at the bottom of the page, the last sentence of that page,

1 it is not intended to give us an expert opinion on this
2 question, but rather, at least in this context, your lay
3 opinion of what would happen in the event of an earthquake?
4 And why one would not need to seismicly qualify the welds;
5 is that correct?

6 A Are you talking about the last answer that
7 begins on --

8 Q I'm talking about the last sentence, actually,
9 on page 45444.

10 JUDGE BLOCH: This is not dealing with seismic
11 qualifications, as I read it.

12 MR. ROISMAN: In this case it's dealing with
13 being bumped by something.

14 THE WITNESS: What that answer was an answer to,
15 Mr. Roisman, was a postulation by CASE that a fuel bundle
16 can bang into the liner. That's simply not the case.

17 JUDGE BLOCH: That's not the case, that it can
18 bang into the liner?

19 THE WITNESS: Yes, sir.

20 BY MR. ROISMAN:

21 Q This statement down here seems to take --
22 perhaps in your judgment as an improbable premise, but
23 nevertheless a premise -- that it would, but then that "it
24 would simply not cause enough plate flexure to cause
25 breach of the weld in case something did hit it."

1 A To that extent, Mr. Roisman, you are right. In
2 this particular answer, as far as force exerted by this
3 fuel bundle that you have postulated that's going to swing
4 over and bang into the liner -- right. That's a lay
5 opinion.

6 Q Looking at your statement further up on the page,
7 beginning at line 3 and continuing through line 9, one
8 reason that you indicate that there, in your judgment,
9 would not be any contact with the sides of the cavity in
10 the event of movement of fuel bundles is the physical
11 width of the fuel bundle on the one hand compared to the
12 total width of the cavity on the other?

13 A Yes, sir.

14 Q And the fact that the bundle is moved down the
15 center of the cavity?

16 A Yes, sir.

17 Q But on the preceding page you indicate, and I
18 think correctly, that the fuel bundles are themselves
19 moved inside a spent fuel cask; correct?

20 A Talking -- there's both new fuel and spent fuel.

21 Q The spent fuel is moved inside a cask?

22 A A cask.

23 Q And the cask is substantially wider than a foot?
24 Or to put it differently, substantially closer to the side
25 of the reactor cavity?

1 A I don't like the term "substantially," but if
2 you are talking about the difference between a foot, 3
3 feet, in a distance of 25 feet, if that's substantial I'll
4 agree with you.

5 Q Have you ever seen a spent fuel cask?

6 A Yes, I have. They are wider than 3 feet, but
7 they are not approaching 25 feet. Not in diameter they
8 are not. Not the pictures I have seen.

9 JUDGE BLOCH: Mr. Brandt, do you know whether --

10 THE WITNESS: I have seen pictures.

11 JUDGE BLOCH: Do you know whether a cask drop is
12 a design basis accident for the fuel pool -- the fuel line?

13 THE WITNESS: The liner itself, reading the FSAR
14 last night, looking for the answer to your question, the
15 structure itself has to be -- and I shouldn't really
16 answer this, I'm telling you from memory --

17 JUDGE BLOCH: The structure has to withstand the
18 cask drop but not the liner? Is that what you are saying?

19 THE WITNESS: Yes. That's to the best of my
20 recollection from reading the FSAR last night.

21 BY MR. ROISMAN:

22 Q Mr. Brandt, I what like to now show you a
23 document marked as Staff Exhibit 120. It was offered into
24 this side of the proceeding at the hearing on September 18,
25 1984, at the start of your testimony, and tentatively

1 accepted. I don't know what that meant, Mr. Chairman. I
2 don't have that transcript here in front of me.

3 In any event I'm going to ask you a question about it.
4 The document --

5 JUDGE BLOCH: Do you think it was just subject
6 to objection if there was a problem with the accuracy of
7 the document?

8 MR. ROISMAN: The document is a letter addressed
9 to Texas Utilities from the Nuclear Regulatory Commission,
10 and it deals with an investigation conducted of activities
11 for the plant. It appears to be a standard NRC
12 investigation.

13 JUDGE BLOCH: Are you just using it as an
14 exhibit right now, because I don't know how to resolve the
15 evidentiary questions.

16 MR. ROISMAN: I'm going to ask him some
17 questions about it. I'm going to give Mr. Brandt a copy
18 of the document, which consists of a cover letter of two
19 pages and then a nine-page inspection report.

20 Mr. Brandt -- do you want to look over it for a few
21 moments before I ask you any questions about it?

22 MR. WATKINS: Yes. I would like him to.

23 MR. ROISMAN: Do you want to do what your
24 counsel wants you to do, Mr. Brandt?

25 MR. WATKINS: Do you have a standard answer for

1 that question, Mr. Brandt?

2 JUDGE BLOCH: We'll take a seven-minute recess.

3 (Recess.)

4 BY MR. ROISMAN:

5 Q Mr. Brandt, just before we took the break, I
6 handed you a document that had been offered in evidence at
7 the beginning of your testimony back in September, and
8 that represents a letter and an attached inspection report
9 conducted by the Nuclear Regulatory Commission with
10 respect to Comanche Peak. Have you had a chance to look
11 at that document during the break?

12 A No, I haven't. No, I haven't, Mr. Roisman.
13 I'll read through it real quickly, if you would like.

14 MR. ROISMAN: This is the issue on which we
15 ended. Your counsel indicated you wanted to read through
16 it before I ask the question, so --

17 JUDGE BLOCH: Let's not argue about it. Let's
18 let him do it.

19 MR. ROISMAN: Shall we go off the record, again?

20 JUDGE BLOCH: On or off the record, as long as
21 we are quiet.

22 (Discussion off the record.)

23 THE WITNESS: Okay.

24 BY MR. ROISMAN:

25 Q Mr. Brandt, I think we can both agree that both

1 the report itself and the incidents to which it referred
2 took place prior to the time that you came to Comanche
3 Peak site; is that correct?

4 A Yes, sir.

5 Q Is this the first time that you have looked over
6 this document in any detail?

7 A I believe I read it for the first time,
8 Mr. Roisman, when it was either introduced or attempted to
9 be introduced in the September hearings.

10 Q Okay. In the discussion -- in the conclusion
11 section of the report that begins at page 4 of the report
12 attached to the letter -- no, let's look at page 7. Page
13 7 includes a discussion of the CPSES final safety analysis
14 report, which was examined by the NRC in order to
15 determine the safety classification of various pools and
16 pool liners and to review the functional descriptions.
17 Reading that over, does that discussion, which continues
18 on through the bottom of the page, refresh your memory or
19 give you information regarding the basis that you had been
20 discussing yesterday of the classification of the spent
21 fuel pool liners as nonsafety-related and not seismic
22 category 1?

23 MR. WATKINS: Objection. Mr. Brandt has stated
24 on numerous occasions that he has not testified these are
25 nonsafety-related.

1 JUDGE BLOCH: I believe the testimony was that
2 they are not ASME, and not seismic category 1?

3 THE WITNESS: No, sir. I believe -- and I guess
4 we are all stating what we believe now -- that my
5 testimony --

6 JUDGE BLOCH: Why don't you not talk about what
7 your testimony was? Why don't you --

8 THE WITNESS: My testimony is that the liners
9 are not ASME, they are considered not safety-related by
10 the architect engineer. And the answer to Mr. Roisman's
11 questions do the welds between the plates have to be
12 seismically qualified, I answered "I don't believe so."

13 BY MR. ROISMAN:

14 Q You can come back and testify, if the
15 information were available, as to whether or not the FSAR
16 classification of these documents did or did not appear in
17 the table, I believe 17-A(1); is that right? And my
18 question to you is, does this give you any more
19 information and do you want to adopt what's said here?

20 A I don't wish to adopt what's said here,
21 necessarily, Mr. Roisman. My review last night, as I said,
22 it was hurried. It indicates that part of the equipment
23 that's associated with these, for example, the refueling
24 gates, are listed in that table. But they are marked NNS,
25 I believe.

1 JUDGE BLOCH: They are marked how?

2 THE WITNESS: NNS;non-nuclear safety.

3 Table 17-A(1) is a listing of -- it's essentially a "Q"
4 list, a list of safety-related items within the plant,
5 and discusses the various degrees of quality levels of
6 those items.

7 In this most recent break we just took, I got off the
8 phone with Texas Utility's lead licensing engineer and his
9 review essentially showed the same as mine, that it's not
10 considered -- or it's not included, the pool liners
11 themselves are not included in that "Q" list. Portions of,
12 as I stated, the transfer tube -- which we discussed
13 earlier -- and the refueling gates, which I just mentioned,
14 are in that list. The liners themselves are not, and
15 essentially the discussion -- although I won't verify
16 accuracy of paragraph references because I don't have the
17 reference in front of me -- the discussion of the writer
18 of this inspection report, under subparagraph 3,
19 "investigation," on page 7, his discussion is essentially
20 the way I view the issue.

21 BY MR. ROISMAN:

22 Q Now, if I understand what you've just said, the
23 portion of all of the liner plates that are installed at
24 the plant that have been the principal subject of our
25 discussions here in the last two days -- namely those in

1 reactor cavity unit number 2, are not seismic 1 and are
2 not ASME -- but that other liner plates in other parts of
3 the total plant are seismic 1, and are also ASME?

4 A No, sir. No part -- excuse me. The -- as far
5 as installation requirements, the fuel transfer tube was
6 fabricated in accordance with ASME subsection MC
7 requirements, because it forms part of the containment
8 boundary. It is required to be -- it's an MC component
9 because it's part of the containment structure.

10 Q All right.

11 A The containment structure at Comanche Peak was
12 built, although not -- to a draft copy of ASME, section 3,
13 division 2. The plate-to-plate welds, which we have spent
14 most of our time talking about, are not ASME. The FSAR
15 does not include them on the "Q" list. The specification,
16 however, is a safety-related specification and does impose,
17 as the writer of this report imposed, 10 CFR50, appendix B,
18 on the fabrication and installation work.

19 No document, to my knowledge, requires that any of
20 these liners be ASME code.

21 Q Now, the procedures which the inspectors are to
22 follow in doing their inspections of these various
23 stainless steel liner installation and fabrication are the
24 procedures which you've previously provided to us in this
25 proceeding, the most recent version, I believe, being

1 QIQP11.114-, rev 6 and the first one being CP-QCI-2.11-1 rev
2 0.

3 Is that correct?

4 A I believe you might have got an extra 1 in the
5 QIQP11.14-6, Mr. Roisman. But other than that, you are
6 correct.

7 Q Okay. And is it in this document that we would
8 find, if there are any variations in the way various
9 different types of stainless steel liner fabrication and
10 installations are to be inspected, depending upon where
11 they are physically located, we would find that in these
12 documents; is that correct? If it existed?

13 JUDGE BLOCH: Would you like the question --

14 THE WITNESS: I'm not sure I understand the
15 question.

16 JUDGE BLOCH: Are there any other documents that
17 indicate there are changes in the inspection procedures
18 for the liner plates?

19 THE WITNESS: I'm still at a loss. Those are --
20 as of the date those were provided, that was birth to
21 death on liner plates as far as inspection --

22 JUDGE BLOCH: As far as memoranda, liner plates,
23 there's no memoranda that varies the meaning of the
24 procedures themselves?

25 THE WITNESS: Change the meaning of the

1 procedures?

2 JUDGE BLOCH: Or interpret them in a different
3 way?

4 THE WITNESS: No.

5 BY MR. ROISMAN:

6 Q Let me give you a specific example. I think
7 that you have indicated on a couple of occasions that
8 certain pieces of the inspections that are identified in
9 the hold points listed in these inspection procedures are
10 not to be used, or NA, depending upon whether you are
11 dealing with a certain type of connection versus another
12 type of connection.

13 I have looked through these documents and I can't find
14 anything in the document that would tell me that for that
15 particular one, I can NA this inspection as opposed to
16 having to do the inspection. And, just to be sure, is it
17 your testimony that there isn't any document which will
18 tell us that as -- in terms of directing the inspector to --
19 as to excluding or including a particular test?

20 A Keeping in mind, Mr. Roisman, that these
21 inspection procedures are geared for a certified inspector
22 to understand -- not necessarily legal counsel -- it is
23 evident for the types of welds that we are talking about,
24 whether an inspector looks at a drawing and notes that
25 there's no leak chase channel, for example, that the

1 inspection hold point for a leak chase channel is not
2 applicable. That's on the drawing itself.

3 It is also evident to a certified inspector that
4 there's not two sides to a fillet weld, to where you would
5 inspect the inside of the weld and the outside of the weld.

6 Q All right, Mr. Brandt. In CP-QCI-2.11-1 rev 2,
7 on page 1 under "References," there's a reference listed
8 as 1-C. And that reference is CP-QCP-2.11, and is
9 entitled "Inspection of Stainless Steel Pool Liner Systems."
10 What is that document?

11 A The Comanche Peak scheme, if you will -- I can't
12 think of a better word. I don't like that word, but I
13 can't think of a better one --

14 JUDGE BLOCH: Arrangement.

15 THE WITNESS: Arrangement. Thank you. -- of
16 inspection instructions and procedures, is to have a very
17 general inspection procedure, which essentially meets
18 appendix B requirements in real general terms and also
19 outlines the fact that specific inspection instructions
20 will exist for each inspection activity. The actual
21 instruction that governed the inspection of these
22 stainless steel liners was this instruction.

23 BY MR. ROISMAN:

24 Q As an inspector, would you not have to be
25 familiar with the reference 1-C, as long as you were

1 familiar with this document that we have just been looking
2 at?

3 A Mr. Roisman, this document, once again, predates
4 me. I have not seen it.

5 If it falls in with using, in the Chairman's word, the
6 "arrangement" that we have used on everything else,
7 essentially the methodology of procedures and instructions
8 are that procedures are typically a couple of pages long
9 and address things in a real general sort of way. And the
10 inspections are the specific nuts and bolts, if you will --
11 guidelines to the inspector.

12 The inspector would have been aware of it, but specific
13 inspection criteria are probably not contained within it.

14 There's sufficient inspection criteria in this
15 instruction that you've got in front of you for an
16 inspector to properly perform the inspection.

17 MR. ROISMAN: Mr. Chairman, it does seem to me
18 that the earlier request of the board for the procedures
19 associated with the stainless steel liners encompassed the
20 document CP-QCP-2.11; and, if it doesn't, I would like to
21 request that the procedure be made available. I don't
22 think it's irrelevant based on what the witness just said.

23 JUDGE BLOCH: Let me clarify one thing before
24 Mr. Watkins responds. What is the purpose of the apparent
25 cross-reference, Mr. Brandt, the QCI references to the

1 other document?

2 THE WITNESS: Yes. Do you see how it references
3 it?

4 JUDGE BLOCH: Doesn't it?

5 THE WITNESS: No. I'm asking you the question:
6 Do you see in what context it's referenced? Referenced
7 only in section 2.0, which says general. And I will read
8 it into the record. It says: "This instruction has been
9 prepared to establish inspection and documentation
10 requirements associated with the fabrication and erection
11 of stainless steel fuel pool liners and refueling gates to
12 meet the requirements of references 1-A, 1-B, 1-C, and 1-J."

13 Reference 1-A is the spec, SS18. 1-B is the
14 construction procedure, CCP38. 1-C is this general QC
15 procedure which Mr. Roisman referred to, and J is the SS17
16 for the refueling gates.

17 The reason it's referenced there, it is saying this
18 instruction is written to meet the requirements of those
19 four.

20 JUDGE BLOCH: If I understood your testimony, it
21 was that generally speaking those documents would not help
22 the inspector know what to do, but that you really don't
23 have specific knowledge about that? This particular --

24 THE WITNESS: I said, if it fell within the
25 arrangement, using your term, or the convention, maybe, is

1 a better term, of having quality procedures which are real
2 general, that don't address specific inspection attributes,
3 but provide for the existence of quality control
4 instructions, it's the same on both the non-ASME side of
5 the house as it is on the ASME. The only thing I'm making
6 clear to Mr. Roisman so the record is made clear,
7 attempting to make clear, is I haven't seen this procedure.

8 All I'm saying is it falls into the same convention
9 that we have used now for the same, almost five years.
10 That's what that procedure was saying.

11 JUDGE BLOCH: Mr. Watkins?

12 MR. WATKINS: I don't believe it was responsive
13 to the request, and as Mr. Brandt has said, it's not
14 necessary for the inspector to use the construction
15 procedure in performing his duties, any more than it is to
16 specification. It's not relevant, therefore, to the
17 question here.

18 JUDGE BLOCH: I guess I'd feel more comfortable
19 if Mr. Brandt was able to tell me it wasn't relevant. He
20 tells me he hasn't read it. He tells me generally it
21 would not be relevant -- he certainly expects it would not
22 be relevant, but he doesn't know.

23 MR. WATKINS: If Mr. Brandt can tell me that all
24 that is required from the inspector is contained in the
25 inspection procedure, it really doesn't make any

1 difference whether he's read the construction procedure or
2 not.

3 JUDGE JORDAN: Mr. Brandt, would that procedure,
4 1-C, be relevant to the man who was writing the procedures?

5 THE WITNESS: Yes, sir -- writing the
6 instruction -- writing this quality control instruction.

7 JUDGE BLOCH: Is it possible it might be helpful
8 if there's any question in the inspector's mind how to
9 interpret the inspection procedure?

10 THE WITNESS: No, sir. I don't believe it. And
11 once again my testimony is that it's strictly from the
12 convention that was used for at least the last five years,
13 it would not help you interpret this.

14 JUDGE BLOCH: How do you feel about the request
15 that additional documents be provided, Mr. Bachman?

16 MR. BACHMANN: I don't think the Staff would
17 have any objection to something like that at this stage.
18 As you know, the Staff has not yet presented its testimony
19 and has not yet been able to give the board a date for
20 presenting its testimony. So I don't think it's going to
21 be a situation of holding up the proceeding at this stage
22 of the proceeding.

23 JUDGE BLOCH: Since these procedures relate to a
24 period prior to the time Mr. Brandt was at the plant, we
25 would like to see them.

1 MR. WATKINS: Will the record be clear,
2 Mr. Roisman, as to what exactly it is?

3 MR. ROISMAN: Well, I mean depending on the revs,
4 and its different variations, this reference does not
5 continue to appear in the documents that are subsequently
6 called QIQP. When that designation begins to appear,
7 which is immediately following this CP-QCI document, then
8 there is no longer a reference to this particular item.

9 JUDGE BLOCH: So you believe that the dates of
10 the QCPs are what?

11 MR. ROISMAN: Well, that's -- that's what you
12 really can't tell. The only reference we have, and I
13 believe that it's consistent throughout, is that the three
14 versions of CP-QCI-2.11 that we have, all have as
15 reference 1-C, the same number for this QCP document.

16 JUDGE BLOCH: So what we want is the QCP
17 documents that are referenced; is that right?

18 MR. ROISMAN: That's correct. There is no
19 subsequently-referenced counterpart of that document.
20 There is a QIQP document for inspection of stud welding
21 that's referenced. But they no longer seem to be
22 referencing that.

23 I guess if, in fact, it turned out that that procedure
24 continued to exist in a different form, and it wasn't
25 incorporated in the subsequent QIQP document, we would

1 want to see it, but we don't have anything here that tells
2 us that it was so.

3 MR. WATKINS: The fact that it was deleted from
4 the quality instructions, the quality procedures itself,
5 is evidence that it wasn't necessary for the inspector to
6 do his job.

7 JUDGE BLOCH: At least after that time.

8 MR. WATKINS: At least after that time.

9 JUDGE BLOCH: Why don't we take the referenced
10 QCPs, and if it turns out that they are not relevant to
11 the use of the QCI, then we are done with that. If it
12 turns out they are relevant, then we need some further
13 explanation for further documents.

14 THE WITNESS: Mr. Chairman, are we talking about --
15 just so I know, because I'm probably going to have to get
16 the documents together -- are we talking about reference
17 1-C, in CP-QCP 2.11-1, all revisions? Is that the request?

18 JUDGE BLOCH: Mr. Roisman?

19 MR. ROISMAN: Yes. Assuming that it's called
20 1-C in all three.

21 THE WITNESS: Excuse me, QC-QCP.11, all
22 revisions?

23 MR. ROISMAN: All revisions.

24 THE WITNESS: That's the request.

25 MR. WATKINS: Within the relevant time period.

1 MR. ROISMAN: Yes.

2 JUDGE BLOCH: All right. I guess we should have
3 that a week from Friday or show cause where you can't get
4 it.

5 MR. WATKINS: A week from Friday?

6 JUDGE BLOCH: No, unless you want to give it to
7 us earlier. We never object.

8 BY MR. ROISMAN:

9 Q Mr. Brandt, in reviewing the document that I
10 gave you just before the break that relates to the NRC's
11 inspection, the conclusion section begins on page 4, and
12 contains, in the paragraphs 1 through 6, which end on page
13 5, a variety of findings by the NRC's investigators
14 regarding the existence or nonexistence of the facts which
15 underlie the claims made by the allegeders.

16 For instance, as to allegation number 1, the last line
17 of the statement on page 4 says, "the allegation, while
18 probably true, has no safety consequence."

19 And, with regard to other allegations, there are
20 similar conclusions about whether the underlying facts as
21 to whether the events in question occurred were correct or
22 not, are either accepted or rejected.

23 Assuming for a moment that the factual findings as
24 opposed to the conclusions based on them are correct, do
25 any of them raise for you, as a person with

1 responsibilities or who at one time had responsibility for
2 QC inspection, any questions about the adequacy of the
3 inspection procedures that you feel should -- should have
4 been or should now be investigated?

5 MR. WATKINS: I'll object to the generality of
6 the question without giving Mr. Brandt substantially more
7 time to review all of the allegations and the materials
8 underlying them.

9 JUDGE BLOCH: Why don't you just break it down
10 into separate allegations and see whether --

11 MR. ROISMAN: Let's start with number 1.

12 JUDGE BLOCH: Let's understand when we are done,
13 Mr. Roisman may then say, "looking at the whole thing
14 together" -- so, don't forget them as you go by each one.
15 Mr. Roisman?

16 MR. ROISMAN: I'm looking now on page 4, the
17 page that begins with the word "conclusions."

18 They say the RRI, "based on the interview with the
19 allegor and with other welders, has become reasonably sure
20 that there were difficulties encountered by the welders
21 with water, moisture and in some instances with concrete
22 on the weld surfaces and in some instances the welds may
23 not be completely sound internally. The weldings, however,
24 serve no strength purpose and need only to be smooth and
25 leakfree, factors which are established by visual

1 inspection, by penetrant examinations, and by vacuum box
2 test of the joint after it's complete. The allegation,
3 while probably true, has no safety significance."

4 And my question to you is: If the allegation is true,
5 even if it has no safety significance, does it raise for
6 you any concerns that you feel, as a QC inspector/supervisor
7 or one who was in that role, should have warranted an
8 investigation then or should warrant an investigation now?

9 MR. WATKINS: Objection. There is not a
10 foundation. There are not enough facts based on that
11 paragraph to ask Mr. Brandt to render an opinion.

12 We don't have the interview with the allexer.
13 Mr. Brandt does not, at this moment, have access to that.

14 We know that there were difficulties encountered by the
15 welders, or at least allegations that there were, with
16 regard to water, moisture, or with concrete; but we have
17 no idea from this paragraph what the -- how much of that
18 there was, how many welds we were talking about -- I think
19 it's unfair to ask Mr. Brandt to offer an opinion based
20 just on this paragraph.

21 JUDGE BLOCH: Do we know Applicant's response to
22 this NRC finding?

23 MR. WATKINS: I do not.

24 THE WITNESS: It is not a finding, Mr. Chairman.
25 The cover letter says no items of noncompliance or

1 deviation were identified. It's merely a transmittal of
2 an inspection report.

3 JUDGE BLOCH: Do you know whether there were any
4 follow-up investigations with respect to that report?

5 THE WITNESS: I know - although I prefer not to
6 disclose his name because I don't know what the situation
7 is on confidentiality - I know who individual B was. I
8 know that individual B as the details of the inspection
9 report state, the site supervisor also informed the
10 resident reactor inspector that another welder, individual
11 B, had expressed similar concerns to the project
12 construction manager on May 23, 1979; and that concerns
13 have been forwarded to the site, quality assurance, for
14 investigation.

15 The RRI was provided an informal memorandum giving the
16 results of the investigation dated May 23, 1979.

17 I know from talking to individual B that his concerns
18 were explained, answers were provided to his concerns, to
19 his satisfaction, by the then TUGCO quality assurance
20 group.

21 Other than that, I know no investigations or follow-up
22 that was conducted by the Utility as a result of ' s.

23 JUDGE BLOCH: So the May 23rd memorandum is the
24 Applicant's report on its investigation into these matters?
25 The May 23, '79?

1 THE WITNESS: It says informal memorandum.
2 Mr. Chairman, I don't know who it was from. It was
3 probably to the, at that time, resident reactor inspector.
4 I have not seen the memorandum nor do I know of anybody in
5 the company, if anybody in the company has seen them.

6 JUDGE BLOCH: Well, the NRC should have it. Can
7 the NRC produce a May 23, '79 memorandum to the reactor
8 resident inspector, Mr. Bachman? Are there any complaints
9 of Mr. Dillingham?

10 MR. ROISMAN: I believe this is the inspection
11 report of the NRC as to which the board has already
12 directed the Staff to reopen an investigation.

13 MR. BACHMANN: Is that inspection report 7915?

14 JUDGE BLOCH: Mr. Roisman, is that correct?

15 MR. ROISMAN: Yes, report 50-445/50-446.

16 JUDGE BLOCH: I will allow the question only
17 with whether or not the Applicants should have
18 investigated further to determine whether or not there was
19 importance at the site. We won't assume that the facts
20 were correct because we don't know that. The question is
21 whether the Applicants should have pursued the matter to
22 determine whether the facts were correct. And, to know
23 that we have to know what the consequence might be for the
24 QC program, so the hypothetical questions are allowed.

25 MR. ROISMAN: Mr. Chairman, I'm embarrassed to

1 say this, but Mr. Watkins convinced me. I think
2 Mr. Brandt should have an opportunity to look at the full
3 factual background to do two things: One, to be able to
4 give us a report on what, if any, follow-up. Because he's
5 only saying that he doesn't know whether the company did
6 some follow-up other than the May 23rd memo. And he
7 indicated if there was any other follow-up -- and
8 indicated whether there was any other follow-up. And
9 second, having looked at those, to answer my question
10 which I'm very satisfied to have in writing, at least on
11 an initial basis.

12 And I don't know that there would be any reason to ask
13 him any other questions for him to provide the answer.
14 And the question is a very simple one: Based on the facts,
15 he can say -- I looked at these facts -- identify whatever
16 he looks at beyond this, if he wants to -- I would have
17 thought an investigation should take place, or I do now
18 think one should take place. Or I don't. Or I didn't.
19 Or there was one and here it is -- whatever.

20 JUDGE BLOCH: Mr. Watkins, a fair request?

21 MR. WATKINS: I think not. Especially if the
22 Staff has reopened its investigation into this matter.
23 Applicants will of course be involved in that
24 investigation and our response should be to the NRC Staff.

25 JUDGE BLOCH: Why does the Staff investigation

1 say whether or not the Applicants fulfilled their
2 obligations with respect to this report?

3 MR. WATKINS: As Mr. Brandt stated, there were
4 no obligations with respect to this report because they
5 had no safety significance.

6 JUDGE BLOCH: I guess the thrust of Mr. Roisman's
7 questions is, even if they may have not had any safety
8 significance, they may have indicated serious QC problems.

9 MR. WATKINS: That was his question to
10 Mr. Brandt -- do they?

11 JUDGE BLOCH: So therefore there is a question
12 whether the Applicants should have followed up on it
13 because of the possible QC problems, not because of the
14 safety significance.

15 MR. WATKINS: I would like to discuss it with
16 Mr. Brandt. I hate to say I would like to think it over,
17 but at a minimum I would like to discuss it with him.
18 Along with the other dozen items on my agenda for which
19 the board and the parties have asked for further
20 information.

21 JUDGE BLOCH: Why don't we finish cross, if we
22 can.

23 MR. ROISMAN: I am finished. That was my last
24 question.

25 JUDGE BLOCH: You would like a recess before you

1 begin redirect? Is that what you are requesting?

2 MR. WATKINS: Well, I have got some discussion
3 before that, and of course the Staff has to conduct its
4 redirect.

5 MR. ROISMAN: Cross, I hope.

6 MR. WATKINS: Cross.

7 JUDGE BLOCH: I have several questions before we
8 continue.

9 One has to do with the possible existence of carbon
10 copies of the chits. And I just want to clarify what your
11 testimony was.

12 Do you know whether or not there was a time when carbon
13 copies were routinely made of chits?

14 MR. WATKINS: Mr. Chairman, I assume you are
15 using the word "carbon copy" deliberately?

16 JUDGE BLOCH: Yes. Carbons.

17 THE WITNESS: My testimony on that was that all
18 chits I have personally seen are originals. They are not
19 carbon copies.

20 JUDGE BLOCH: We thought we saw a carbon copy
21 attached to one of the documents this morning, because we
22 inferred from the documents themselves -- do you remember
23 the one with the two chits that seemed to be copies of
24 each other that we discussed in some detail?

25 THE WITNESS: Right.

1 JUDGE BLOCH: The writing appears to be
2 identical on both copies, except that the line is a
3 different distance from the signature. Did you observe
4 that as you looked at that?

5 THE WITNESS: I believe my testimony on that
6 specific one, Chairman Bloch, was that I hadn't seen that
7 specific weld. I believe we reached a conclusion we'd
8 provide the originals on that weld.

9 JUDGE BLOCH: But we thought from the fact that
10 it wasn't an exact Xerox reproduction, but that there was
11 a difference where the line was, but that the line was
12 quite similar, that there was a strong suggestion that
13 carbon copies might have been used.

14 What I would like to know is how we can be assured
15 whether or not there are carbon copies of those chits
16 available on the site have come right now.

17 THE WITNESS: Covering the entire universe of
18 welds we are looking at? Or for that particular weld? I
19 don't understand.

20 JUDGE BLOCH: Any carbons on the chits on the
21 welds and the liner plates.

22 THE WITNESS: That's something -- you know, an
23 answer can be provided. But it certainly can't be
24 provided right now or with a simple telephone call.

25 JUDGE BLOCH: Why don't we add that to the

1 things we would like to know about.

2 I would also like to ask you, in thinking about the
3 overall dimensions of your testimony, whether you have
4 reached any conclusions as to the overall pattern with
5 respect to what the root cause of the problems on the
6 documentation are.

7 THE WITNESS: I think my conclusion,
8 Mr. Chairman, would be the same that I made two months ago,
9 on the first day that you and I -- I think you asked the
10 same question, or a very similar question.

11 JUDGE BLOCH: If I recall, at that time you said
12 it was due to the fact that the wrong form was used in the
13 field.

14 THE WITNESS: Yes, sir. I think if they had
15 stayed with the eight-line form, and had never introduced
16 that five-line form, be it an eight-line form that looked
17 like what CASE attached as Exhibit 2 -- is that right, Mr.
18 Roisman, in your latest filing?

19 MR. ROISMAN: Yes.

20 THE WITNESS: I'm just asking for terminology.
21 I think we called that Exhibit 2. It was a form that was
22 used -- I believe the example was weld 988 on the north
23 transfer canal in the fuel building, if they had used that
24 form or an eight-line form similar to what we are using
25 now, I believe the documentation would be probably the

1 overwhelming majority of what we've now discussed ad
2 nauseam, would not have happened.

3 Q But isn't it the case that anyone who was
4 thoroughly familiar with the procedures that were in
5 effect at the time would have known that they were using
6 the wrong form?

7 A Well, Mr. Chairman, that's something I tried to
8 clarify in the -- I think last week that we held in Fort
9 Worth, that, for a short period of time there was two
10 forms used. There was one form in the construction
11 procedure and one form in the inspection procedure.

12 Q But your inspectors know that they work for the
13 inspection procedures; don't they?

14 A I understand that. I can't explain that.

15 Q Doesn't that suggest any problem in training or
16 following the procedures in addition to the fact that the
17 wrong form somehow got dropped into the field?

18 A Obviously they used the wrong form. I can't
19 dispute that fact. To that extent they were not following --
20 correctly following procedure as far as documentation of
21 their inspections. Maybe my answer to your question is
22 more pointed than you intended. But if I was going to
23 select any single element to say that is the root cause,
24 using your term, of this situation we've now spent hours
25 talking about, it was the fact that they introduced this

1 five-line form.

2 And, if you want to carry on logically with the
3 argument, the fact that the procedures -- excuse me --
4 that the QC inspectors used this form rather than the form
5 they were supposed to be using.

6 Q Isn't it generally true on the site that when a
7 QC inspector does an inspection, he documents it on an
8 approved form?

9 A Yes, sir.

10 Q Isn't it the case that in this particular
11 procedure that the QC inspector did an inspection, he was
12 supposed to document it on an approved form?

13 A Yes, sir.

14 Q How do you account for the fact that a QC
15 inspector would do an inspection and not document it on an
16 approved form?

17 A Judge Bloch, I don't mean to be evasive or not
18 answering your question -- I don't know. It's beyond me
19 how, using the example Mr. Roisman cited yesterday, how
20 Mr. Wilkerson can use the wrong form for a year, and then
21 because the construction procedure changed and introduced
22 this five-line form, that he stopped using the old form
23 and used the new one. I don't understand how that
24 happened. I asked questions trying to figure out how it
25 happened and come up empty.

1 Q I guess I've got the same problem; I don't
2 understand how it could happen either.

3 A You and I have something in common, then. I
4 don't understand it myself. And I've looked at them --
5 I have spent a lot of time looking at this issue.

6 Q It is ridiculous. It seems any conscientious QC
7 inspector would at least have asked what's going on if he
8 had read the procedures, and I don't understand why
9 someone didn't complain about it. But I guess you don't
10 know of complaints?

11 A No, sir. As I said, this happened before my
12 time. Maybe it never really -- what they were doing or
13 what they were creating in '79 that we would be examining
14 in '84 really hit home to the inspector. Because at that
15 time when the form was introduced, almost all if not all,
16 except the top angle around the pool, which is above the
17 water level anyway, almost all of the outside welding was
18 done.

19 Even the example that Mr. Roisman attached for weld 988
20 indicates that the outside welding was all done on the old
21 form. But they started with the new form on the inside
22 welding.

23 Q I don't understand the relevance of what you
24 just said.

25 A The only reason you need an eight-line form is

1 if you have to do both the outside weld and inside weld on
2 the same form.

3 I can at least offer as a somewhat logical explanation,
4 although I'm not saying that was what went on, that
5 possibly it didn't enter the inspectors' minds at that
6 time, or anybody's minds at that time, for that matter,
7 that there would be such confusion five years after the
8 fact over what that signature on line 1 stood for, as the
9 majority, the overwhelming majority if not all of the
10 outside welding was done; and essentially all that
11 remained was the inside weld.

12 Q Have you ever inquired of the QC officials at
13 that time, as to what was going on?

14 A I'm not sure that anybody is still around.

15 Q Do you mean they are dead?

16 A No. They are not dead. They are just not on
17 the site.

18 Some of them -- I generally know where they are at, but
19 I don't specifically know.

20 JUDGE JORDAN: Would this have been an item that
21 should have been looked into by the Dallas QA organization
22 which I guess at that time was under Mr. Vega?

23 JUDGE BLOCH: Dr. Jordan, I don't know what if
24 any audits were done. It would certainly fall within the
25 scope of the audits program. Whether they were done and

1 the audits simply missed it or whether they didn't cover
2 fabrication and erection, I don't know.

3 JUDGE BLOCH: Mr. Bachmann?

4 CROSS-EXAMINATION

5 BY MR. BACHMANN:

6 Q Mr. Brandt, I would like to have you refer to a
7 certain number of travelers. During the process of the
8 hearing today I discovered one or two other ones that I
9 did not provide your counsel last night on the list. So,
10 bear with me.

11 The first traveler has already been introduced into
12 evidence, number 236. For purposes of the record it was
13 bound in as 20645.

14 A As my copy was bound in, Mr. Bachmann, I don't
15 have it in front of me.

16 MR. WATKINS: I have one for you.

17 BY MR. BACHMANN:

18 Q I would like to ask you some questions about the
19 NCR that's in this package. I would like to note for the
20 record that we have attempted to refer to travelers that
21 have Ms. Neumeyer's signature on it, just to try to bring
22 this issue back to where it started from.

23 I believe there was previous testimony that there was a
24 revision made to this NCR, changing and deleting the word
25 "random" in the comments -- in the nonconforming condition

1 section; is that correct?

2 A Yes, sir.

3 JUDGE BLOCH: The transcript citation for the NCR --

4 MR. BACHMANN: The traveler? The NCR would be --

5 THE WITNESS: 20654.

6 BY MR. BACHMANN:

7 Q I'll repeat the question. I believe there was
8 previous testimony, and if my notes indicate correctly on
9 the 12th of September by yourself, indicating that there
10 had been a revision made to this NCR, and that the word "random"
11 had been deleted from the explanation of the nonconforming
12 condition. Is that correct?

13 A Yes, it is.

14 Q Could you -- I read the transcript. I'm not
15 quite certain how that affected the NCR. And I wish you
16 would please re-explain it.

17 In fact, let me just phrase it for the board here. The
18 original nonconforming condition, if I'm correct, wrote a
19 review of the nonconforming stainless steel liners, et
20 cetera. And then there was a revision to the NCR, and the
21 word "random" was deleted.

22 Can you explain to me why it was deleted and if, in
23 your opinion, it had any substantive effect upon the
24 nonconforming condition.

25 JUDGE BLOCH: First let's clarify your source of

1 knowledge about why it was deleted.

2 THE WITNESS: Personal knowledge.

3 JUDGE BLOCH: Okay. Why was it deleted?

4 THE WITNESS: It was deleted essentially at my
5 direction, Mr. Chairman, to settle an argument between a
6 QC supervisor and a quality engineer, over what the word
7 "random" meant.

8 The author of the NCR had included the word "random" in
9 it. The quality engineer that was working with
10 engineering at the time, to try to disposition it,
11 maintained that the word "random" was confusing, in that
12 it didn't indicate there this was a random review by well
13 number and that he selected 20 weldings out of 1300 and
14 randomly reviewed those or whether it was a random review
15 of, for example, only line 1 of the traveler but didn't
16 include the rest of the traveler; or whether it was a
17 combination of both -- if it was a random review of each
18 individual traveler or a random group of travelers.

19 In my estimation, the NCR more clearly reflects what's
20 happened the way it stands now, as it indicates clearly
21 that a review was done, that the unsat fit-up/cleanliness
22 inspections cannot be verified; and that a list of the
23 affected welds is attached.

24 BY MR. BACHMANN:

25 Q Now, Mr. Brandt, by deleting the word "random"

1 you now have the words "a review."

2 A Yes.

3 Q Does that mean a review of all -- just what's
4 written here on the stainless -- excuse me, on the NCR
5 here. Does that mean you reviewed all of the stainless
6 steel liner travelers for the number 2 cavity?

7 A No, sir.

8 Q So what is reviewed? What is a random review by
9 someone else's definition?

10 A Yes, sir, it was.

11 Q In what way was it random?

12 A It didn't include all of them.

13 Q So --

14 JUDGE BLOCH: In effect it wasn't random --

15 THE WITNESS: It was doubly random. Did not
16 include all of them and did include only a review for the
17 one inspection attribute that's specified.

18 JUDGE BLOCH: In a statistical sense it may not
19 have been random because there was no random number table
20 used?

21 THE WITNESS: Oh, to that the population smaller
22 than the entire population of liners for the unit 2 refuel
23 cavity was reviewed.

24 BY MR. BACHMANN:

25 Q Now, attached to the NCR is a list of weld

1 numbers.

2 A Yes, sir.

3 Q Am I to understand, then, that this also could
4 be considered a random list, since you took it from a
5 random population? What I'm getting at, do you consider
6 this --

7 A I don't mean to be difficult, Mr. Bachman. I
8 just want to be sure we understand each other. This is a
9 list that Randall Smith, C.C. Randall, and, on rev 2,
10 Louis Tessier, intended to be reported as nonconforming
11 because they could not verify that the inside fit-up and
12 cleanliness inspection was performed.

13 Q Was it intended to be an exhaustive list? In
14 other words, what are the limits of this list? Shall we
15 consider this just the ones they were able to find, or
16 what sort of review was done to determine this list?

17 A They did not review all of them. I can tell you
18 that there are more NCRs for the same thing than this,
19 some of which I just wrote last Wednesday.

20 Q Okay, in your opinion -- and I'm talking now
21 about the reactor 2 cavity -- have they pretty much gone
22 through enough of the travelers to feel that they have
23 caught those welds which have this nonconforming condition,
24 as of, say, last Wednesday?

25 A As of last Wednesday, an exhaustive review had

1 not been conducted. The point I would like to make,
2 Mr. Bachman, is that I said in September it would make no
3 difference if there was three more welds as far as the
4 disposition of the hardware. It would make no difference
5 if there was three more welds or 300 more welds attached
6 to the NCR. The disposition would be the same.

7 Q In your opinion, or to the best of your
8 knowledge and/or, have these, the results of the
9 investigations that lead to these NCRs, been communicated
10 to the TRT while they were on-site?

11 A What do you refer to by "these investigations"?
12 These NCRs?

13 Q Whatever reviews were done to generate the NCRs
14 where there were problems with generating whether or not
15 you had the fit and cleanliness inspections on both sides
16 of the welds.

17 MR. WATKINS: The NCRs.

18 MR. BACHMANN: The results of the NCRs that
19 generated the ongoing condition. I was just wondering if
20 there was communication with the team.

21 MR. WATKINS: It is the result.

22 MR. BACHMANN: Do you know whether --

23 THE WITNESS: I feel reasonably confident, and
24 I'm reasonably confident the TR team was provided them.
25 As to being given copies of the travelers, I don't know

1 what the TRT was given.

2 BY MR. BACHMANN:

3 Q Can you get ahold of traveler number 107.

4 A Yes, sir?

5 Q I would just like you to compare number 107 to
6 number 236. Is there a reason, other than number 107 was
7 not looked at during the review, why it would not be on an
8 NCR similarly to 236?

9 A It is.

10 Q It is.

11 A It is on an NCR. Your observation is correct up
12 until last Wednesday. It just hadn't -- apparently hadn't
13 got there, either by someone not reviewing it or someone
14 erring in judgment. It's now on an NCR.

15 The point I would like to make on 236 is, even though
16 it's on the nonconformance report, there's enough evidence
17 to satisfy me that the inside fit-up and cleanliness
18 inspection was performed. The reason the NCR was not
19 revised to delete those welds for which adequate
20 documentation exists is that it makes no difference.

21 The vacuum box -- excuse me -- the hydrostatic testing
22 and the vacuum -- let me look at the NCR disposition.

23 Vacuum box testing and hydrostatic testing will be
24 performed on weld 236 as a matter of course anyway, so it
25 made no -- it was not a critical issue, whether it was

1 included or excluded from the NCR. What was critical was
2 the condition was identified properly -- properly
3 dispositioned.

4 Q I want to get into an area that was the subject
5 of cross-examination by Mr. Roisman to you; and in this
6 case I would sort of like you to explain it in your words
7 to me without trying to find a particular aspect of it.

8 In the event that the inside portion of a plate to
9 plate weld had not been -- indeed had not been inspected
10 for cleanliness -- I'm not just talking about missing
11 documentation. Let's just say it simply had not been
12 inspected for cleanliness. In your opinion, what is the
13 worst case result from welding on a dirty situation?

14 A If you weld over water you have a terribly
15 difficult time making an acceptable-looking weld. If you
16 weld over concrete it's much the same. If you weld over
17 grease it's much the same.

18 The worst situation, approaching it from a conservative
19 basis, I guess, would be a weld that had internal defects
20 but was acceptable on the surface, sufficient to the
21 extent that it would pass vacuum box testing, it would
22 pass hydrostatic testing, and therefore would be deemed
23 acceptable.

24 Even at that worst case basis, as this NCR clearly
25 indicates, that is still an acceptable condition to design

1 engineering.

2 Q Maybe I didn't quite understand your answer. If
3 it's the worst case basis, a weld that contains defects
4 that appears okay on the surface, it would pass the tests,
5 it would be acceptable to the design engineer on the basis
6 of it having passed the tests?

7 A That's what the NCR indicates. The NCR
8 disposition states: "Subject welds are seam welds
9 utilized to provide leak tightness of the liner.
10 Acceptability of the welds shall be based on vacuum box
11 and hydrostatic tests." That's essentially the same
12 situation as identified on the original NCR.

13 Q So, if I understand your answer the
14 acceptability of the welds based on the vacuum box and
15 hydrostatic test is not Mr. Brandt's evaluation, but it's
16 engineering's evaluation?

17 A Yes, sir. Engineering has approved that
18 evaluation. That's indicated on the NCR.

19 JUDGE BLOCH: Was there a more complete
20 explanation by engineering than the statement on the NCR,
21 at 20654?

22 THE WITNESS: No, sir.

23 JUDGE BLOCH: The answer was "no"?

24 THE WITNESS: That's correct. The answer is
25 "no."

1 BY MR. BACHMANN:

2 Q Do you intend to create NCRs on these welds?

3 A I guess at the risk of getting into a discussion
4 wing the Chairman again, probably so. They are program
5 deficiencies. They should be identified.

6 Q Okay. There's one other area I would like to
7 talk to you about. That is the prewritten, preprinted,
8 pretyped or whatever "sat"; and could you refer to weld
9 number 120, please.

10 JUDGE BLOCH: You know you are not illustrating
11 the record with the documents. That's okay if you think
12 that's acceptable for the record.

13 MR. BACHMANN: 120 I think I'm going to ask to
14 be bound in for illustration. The others were answered
15 without the need to have the document put in.

16 THE WITNESS: Yes, sir?

17 BY MR. BACHMANN:

18 Q Would you look at step 3, please?

19 A Yes, sir.

20 Q Could you give me your opinion as to why the
21 "sat" and date are crossed out and dated and initialed?

22 A Somebody had written "sat" in on the line when
23 in fact the inspection pull point is not applicable.
24 Larry Wilkerson corrected that error and entered "NA" and
25 initialed and dated it.

1 Q Does it appear to you by looking at this that
2 very -- excuse me. I don't want to characterize it. Does
3 it appear to you by looking at this that perhaps someone
4 other than Wilkerson, perhaps craft, had written in "sat"
5 and the dates for steps 2, 3, and 4, prior to Wilkerson's
6 inspection?

7 A Are you asking me to analyze the handwriting,
8 Mr. Bachmann?

9 Q Well --

10 A There's not that clear a difference in the
11 handwriting, in my opinion, between Mr. Wilkerson's
12 signature and the word "sat" to make that determination.
13 That's possible. I'm not a handwriting expert.

14 JUDGE BLOCH: But it wouldn't surprise you if
15 they were different, because the practice was just to have
16 them filled in; right?

17 THE WITNESS: It appears that was the practice;
18 yes.

19 BY MR. BACHMANN:

20 Q Mr. Brandt, you have testified earlier that the
21 practice by craft, or apparently craft, of putting in "sat"
22 before the inspector has signed off on a particular hold
23 point and the possibility, as we see here, of even the
24 date -- everything but the signature; do you consider that,
25 in your opinion, a good or a bad practice? Or whatever

1 your opinion is?

2 A I'd say, Mr. Bachmann, the "sat" is meaningless.
3 It could have been written in, typed in; it could have
4 been omitted, for that matter. I don't think the preestablishment
5 of the date is necessarily good practice.

6 If I had -- if it was my decision to design the form I
7 would have just had an inspection signature and the date.

8 Q The reason I asked the question the way I did,
9 and perhaps I didn't phrase it properly is, the point I'm
10 trying to get to is that would there ever be a reason for
11 an inspector, according to either the procedures of the
12 plant or the practices of the inspectors, now, to write
13 "unsat" in that box?

14 A In all the travelers I have looked at,
15 Mr. Bachmann, I have never seen that occurred.

16 EXAMINATION

17 BY JUDGE BLOCH:

18 Q He asked would the procedures have required them
19 to put "unsat" in that box if in fact it was unsat?

20 A Once again Mr. Chairman, we are back to a form
21 that's not been procedurally prescribed.

22 Q On the one that was procedurally prescribed was
23 it necessary to mark "unsat"?

24 A It doesn't appear to be procedurally prescribed
25 one way or the other.

1 Q Was it procedurally required that there be
2 trending with respect to these liners?

3 A In the timeframe that these were done, Judge
4 Bloch, I'm not sure.

5 Q You think they weren't cover by appendix B?

6 A That's not what -- that's not -- appendix B
7 requires conditions significantly adverse to quality, or
8 that nonconforming conditions be evaluated for -- I think
9 the word is "significant," in the corrective action which
10 has been historically applied as trending. I think I can
11 make an argument that a missed inspection hold point
12 that's not even required by specification, couldn't
13 possibly be significant to quality.

14 Q It's your testimony that it was not necessary to
15 document did he have fish earn cease within this pool?

16 A That's not my testimony at all, Mr. Chairman. I
17 don't have appendix B in front of me. That would help.

18 Q That's easy. (Handing).

19 A Criterion 16 states that "measures shall be
20 established to assure that conditions adverse to quality
21 such as failures, malfunctions, deficiencies, deviations,
22 defective material, and equipment, and nonconformances are
23 promptly identified and corrected. In the case of
24 significant conditions adverse to quality, the measure
25 shall assure that the cause of the condition is determined

1 and corrective action taken to preclude repetition."

2 Q So the difference is whether you have to trend
3 it -- but you have to promptly identify a deficiency.

4 A Identify it. Yes, sir.

5 Q For example, suppose you are called over after a
6 weld is finished to do a visual inspection and it turns
7 out to be "unsat"; would that have to be documented?

8 A You mean because of lack of surface preparation?

9 Q Porosity.

10 A These walls were only inspected to the extent
11 that they were ready for performance in the liquid
12 penetrant test.

13 Q I thought there was a visual.

14 A It says visual of surface condition, but --

15 Q On the visual surface condition, would you have
16 to indicate that and keep track of it or not?

17 A I think I would tend, on the particular example
18 we are talking about, as far as a weld not being ready for
19 proper performance of a liquid penetrant examination, to
20 fall more in the category of incomplete construction
21 rather than deficient construction.

22 Q But generally speaking, even though you are
23 called over for an inspection by craft because they think
24 they are done, and it's deficient, you can still clarify
25 it as "in process" and continue on that basis?

1 A We are talking about one specific example. You
2 asked me if they were called over for a final visual which
3 is required prior to liquid penetrant test. In that
4 instance, I believe that it's incomplete construction.

5 Q If there's an unsatisfactory liquid penetrants
6 test, is that different?

7 A That's reported. That's on an unsat PT report;
8 yes, sir.

9 Q Were there on the line for -- I see, that's a
10 separate form. That's not on that traveler.

11 A It's on page 2 of the traveler, I believe.

12 Q Okay.

13 A Right now they are using a separate form in
14 addition to the traveler. They are using a PT report.

15 Q Okay. And isn't it also your testimony than on
16 each of the lines of the traveler that was being used,
17 that there was never a reason to have you indicate "unsat"
18 under appendix B?

19 A Judge Bloch, I think what I'm having trouble
20 with is, you know every bit as well as I do that Comanche
21 Peak has used a multitude of forms over the seven or eight
22 years of construction, to document deficiencies, from
23 inspection reports to nonconformance reports to field
24 deficiency reports to nondestructive examination reports.
25 And I'm not sure at that time that they weren't using, for

1 example, FDRs to report discrepant conditions when they
2 found them, and that all you'll see on this traveler is
3 the final inspection at "satisfaction."

4 Q Okay. But the testimony that we have so far
5 over --

6 A From what I have seen on the travelers, the only
7 indication on the traveler itself is
8 "satisfactory." I saw no traveler marked "unsat."

9 Q All right. In fact, they are sort of preprinted
10 "sat." And the usual procedure, if it were "unsat," if I
11 understand your testimony, really is to tell the craft to
12 do it again.

13 A We have only talked about fit-up inspection and
14 a final visual inspection, two examples in which I
15 indicated that it was incomplete construction.

16 Q But the sats are okayed on all the lines before
17 they get to the inspectors; aren't they? And many of the
18 forms?

19 A I think we are presupposing that. It's evident
20 from some of the forms, for example -- I don't know where
21 we are at -- weld 12 is in front of me. Like 12 has "sat"
22 written on it. There's no signature. It is quite evident
23 that the "sat" is on it and the signature isn't here.

24 Q Do you know that there was a regular practice of
25 documenting deficiencies in an acceptable form under

1 appendix B with respect to the lines on which "sat" was
2 put in? As we sit here now?

3 A Deficiencies? Yes, sir. There were
4 nonconformances written. I know for a fact.

5 Q Regular practice, whenever there was a
6 nonconformance condition, was to write a nonconformance
7 report?

8 A I think the -- where we are getting hung up on
9 this discussion is the term "unsat" condition versus the
10 term "deficiency."

11 By "unsat" condition, using my definition, there's two
12 subgroups. There's deficiency and there's incomplete
13 construction. I'm not sure that you are grouping it that
14 way in asking your question. I'm not trying to evade the
15 question, I'm just trying to make sure that we are asking
16 the same thing.

17 Q So it would be acceptable when a QC person is
18 called over for an inspection for him to look at something
19 and say that it's an incomplete -- it's not completed at
20 this point? It's not complete construction --

21 A It's not ready for construction.

22 Q And therefore he just lets the craft go back and
23 do it again and there's no document on it?

24 A On the two examples we talked about, on fit-up
25 and final revision.

1 Q Okay. And is that acceptable?

2 A In my opinion, yes, for those two examples.

3 Q And on the other lines, do we know what the
4 practices were with respect to whether or not --

5 A I have a hard time believing you could make an
6 unacceptable tack weld. That's line 2. I mean --

7 Q I'm sure I could.

8 A Possibly by burning a hole in the liner. But
9 other than that I'm not sure you can make an unacceptable
10 tack weld, to where the weld isn't -- basically the only
11 thing that can happen to a crack tack weld is that it can
12 crack.

13 Q Some of those tack welds were continuous welds.

14 A That was signed off on line 4.

15 Q That might have said "sat"; right?

16 A Right. But once again, that's a final visual
17 inspection.

18 Q The final visual would always have to be
19 documented or could they say to them when they do the
20 final visual, "construction can fix it up now and argue it
21 later"?

22 A Maybe I can redefine my position more clearly.

23 On this particular construction activity -- and please
24 let's limit the scope of our discussion only to
25 installation and fabrication of these liner plates - if

1 just by going back and working on it more, for example
2 grinding the weld more, or if the gap was 7/16 and the
3 maximum permissible was 3/8, so they brought it in closer
4 by 1/16 of an inch; if they could repair the discrepant
5 condition, the unacceptable condition, using your
6 definition, by just doing more construction work that was
7 already procedurally prescribed to get it to an acceptable
8 condition, it is my opinion, once again limiting the
9 discussion to these liner plates, that that, by handing it
10 back to the craft and saying: You are not ready for
11 inspection yet; meet the requirements of appendix B.

12 Q Why is that different for pipe supports? Or
13 isn't it? Would it also be acceptable for pipe supports
14 to do the same thing?

15 A In my opinion; yes, sir. If they could have
16 corrected it under normal construction. I'm not talking
17 about --

18 Q For example, a leak weld of over 445 diameters
19 could be repaired?

20 A No, sir. That's violation of procedure.

21 Q So was a weld with too much porosity.

22 A Well, let me try to redefine my position again.
23 It could be accomplished by normal construction rework,
24 prescribedproscribed, if you will, repair methods -- just
25 by going back and doing more work on it and does not

1 require any engineering evaluation.

2 Q It's my understanding of the welding on the
3 supports is that almost anything that the QC inspector
4 could find could be repaired during an in-process
5 construction activity by the welder. The only difference
6 whether you document it or not was whether there was a QC
7 inspector. Am I wrong about that?

8 A If your question is, if a welder noted a defect
9 in process that he could repair -- yes, sir, he could
10 repair it without calling QC.

11 Q When QC came over and saw it, they could never
12 say "go back and continue"; could they?

13 A Are you asking what the procedure required,
14 Judge Bloch, or from a practical matter?

15 Q What the procedure requires.

16 A I don't know. I don't have it in front of me.

17 Q What appendix B requirements?

18 A It is my opinion if the weld -- for example,
19 using a weld that has too much porosity in it. You just
20 finished the weld, you call me to come inspect it. I say
21 you have too much porosity.

22 In my opinion, I could tell you to remove the porosity
23 and come back for inspection when you have met appendix B
24 requirements.

25 Q Do you think the people working for you knew

1 this opinion?

2 A I never told the people; no, sir.

3 Q You never told the people?

4 A No. It's clearly defined, conforming conditions.
5 It was geared to inspection reports. The results of all
6 inspections were documented.

7 I'm not saying what you and I have discussed is the
8 preferable way to do it. I'm saying I believe it meets
9 appendix B requirements.

10 JUDGE GROSSMAN: Mr. Brandt, as a practical
11 matter, if a particular weld would fail an inspection and
12 you didn't have paper generated that traveled along with
13 that weld, what would preclude the craftsmen from going to
14 another inspector and asking him to inspect that weld and
15 perhaps get a favorable inspection, a "sat" on it?

16 THE WITNESS: Nothing.

17 JUDGE JORDAN: I seem to remember that the
18 procedures for inspection of the pipe supports -- and I'm
19 not referring necessarily to the ASME pipes -- that they
20 seem to be quite different in this particular respect.
21 That if the inspector came and found that the weld was not
22 done properly, that he would surely write an "unsat."

23 Then, this could be taken care of by repairing the weld.
24 But then he would eventually get a "sat."

25 Am I wrong about this? Are there two types? Are there

1 different procedures with respect to liner plates and with
2 respect to pipe liners?

3 THE WITNESS: There are different procedures,
4 Dr. Jordan. I'm glad you brought that point out.

5 In answering the Chairman's questions earlier, I was
6 thinking of ASME pipe supports. I'm intimately familiar
7 with what the requirements are because I work on a daily
8 basis with class 5 pipes. There's been a sat or nonsat to
9 fill out in connection with your inspection. I am not
10 familiar with your inspection today as to the class 2 or 3
11 pipe supports. I was referring to section N supports and
12 I was trying to remember historically how it was done and
13 my answer is simply I don't remember. I don't have the
14 procedure in front of me.

15 JUDGE BLOCH: In the last four or five reports,
16 you do remember, Dr. Jordan is right?

17 THE WITNESS: Class 5 and 6 supports are
18 inspected on an inspection report which had a column for
19 sat and nonsat. Dr. Jordan is exactly right.

20 JUDGE BLOCH: That was to be used? Not to refer
21 the craft back for further work?

22 JUDGE GROSSMAN: Mr. Brandt, if there were some
23 paper generated on an unsatisfactory condition, would you
24 expect that paper to become part of this traveler package?

25 THE WITNESS: On these liner plates, Judge

1 Grossman?

2 JUDGE GROSSMAN: Yes.

3 THE WITNESS: No, sir.

4 JUDGE GROSSMAN: No, sir?

5 THE WITNESS: That was my answer; yes, sir.

6 JUDGE BLOCH: Mr. Bachmann. Thank you.

7 MR. ROISMAN: Mr. Chairman, excuse me. I wonder
8 if I may request an indulgence at this point? There are a
9 number of procedures which address directly the line of
10 questioning which you have just asked Mr. Brandt. And for
11 the clarity of the record and the board -- with the board's
12 permission, I would simply reference those procedures here.

13 I might add that my view of those procedures is that
14 they require that "unsat" be recorded and in some
15 instances, depending upon the nature of some references
16 that I don't have in front of me, even the deficiency
17 paper be produced.

18 All I would like to do is simply read the references so
19 that at this point in the record that piece of the
20 information is available to people who are looking at this
21 question.

22 As you know, it's CASE's position that the cases govern.
23 We questioned Mr. Brandt's position on these procedures
24 because we think the procedures do govern.

25 THE WITNESS: I was -- if I can add something --

1 I was answering the questions. I am just clarifying what
2 I just said. My answer on the liner plate was on the ones
3 I had in front of me and I'm talking the timeframe '76, '79,
4 '80. I'm not talking about current timeframe. I'm quite
5 aware of what the current criteria are.

6 JUDGE BLOCH: Do you have a reaction?

7 MR. WATKINS: Yes. He wants to interrupt the
8 proceedings to make a legal argument.

9 JUDGE BLOCH: If you don't want to hear, he can
10 cite them later. Mr. Roisman, why don't you cite them?

11 MR. ROISMAN: In CP-QCI-2.11, revision 2, page 1,
12 paragraph 3.1, it requires that the results of the QC
13 inspection of the listed items be recorded.

14 In the procedure QIQP 11.14-6, revision 1, dated
15 September 8, '82, at page 4 of 7, paragraph 3.8, requires
16 that the inspections be documented. And paragraph 3.9
17 addresses the question of nonconformances. It has a
18 parenthetical -- not a parenthetical, but a qualifier in
19 it regarding sometimes you would not do a nonconformance
20 paper, depending upon the reworking capability.

21 Now, as I understand it, you are not interested in it
22 so I won't burden the record here with references to the
23 procedures dated is through January 10 of '84. They begin
24 to vary somewhat with respect to these issues, but I think
25 those are the timeframes.

1 JUDGE BLOCH: Mr. Bachmann?

2 MR. BACHMANN: Thank you.

3 CROSS-EXAMINATION

4 BY MR. BACHMANN:

5 Q One last line of questioning here, Mr. Brandt.
6 Yesterday you were giving a description of what I would
7 have to call, or what I think you may have called a
8 "hypothetical traveler." And you referred to what you
9 would consider a line, which would be line 1-A and 1-B.

10 1-A, I believe, would have been the fit-up and
11 cleanliness of the concrete side of the plate to plate
12 weld. And 1-B would be the fit-up and cleanliness of the
13 water side of a plate-to-plate weld; is that correct?

14 A I believe my references, Mr. Bachmann. You may
15 be right or not. I believe my reference was, for line 1,
16 which would be the outside weld; and line 1-A, which would
17 be the inside.

18 Q Fine.

19 A The concept is the same.

20 Q Yes. Okay. However, we do not live in a world
21 with this particular traveler, unfortunately. And we have
22 this five-line traveler. And we have line 1 and no 1-A.

23 In your opinion, would a signature on line 1 -- what
24 should that refer to? A "sat"? A signature? A date?
25 Line 1, what in your opinion should that refer to?

1 A It should refer to both the outside fit-up and
2 cleanliness was performed, and the inside cleanliness and
3 fit-up and inspection were performed.

4 Q In other words, unless there was some other
5 qualifying wording such as "inside" or "outside" or
6 something like that, a signature there constitutes that
7 both -- would represent that both inspections were done?

8 A That he had verified that the outside inspection --
9 generally the line was signed, as I said, on the inside --
10 when the inside inspection was performed. But the -- he
11 should have verified that the outside inspection for
12 fit-up and cleanliness was also performed when he signed
13 that line.

14 Q So a signature on that line, in your opinion,
15 should mean that both inspections have been done; is that
16 correct?

17 A Yes, sir.

18 JUDGE BLOCH: You are sure that does not relate
19 to any procedure, does it?

20 THE WITNESS: Mr. Chairman, once again we are
21 talking about a traveler that was never procedurally
22 endorsed.

23 JUDGE BLOCH: So, what you mean by "should have"
24 is that if the Applicants had properly inspected, but
25 using the wrong form, and these people understood the

1 whole picture, then they would have indicated in one
2 signature that they had approved the two welds -- two
3 inspections.

4 THE WITNESS: No, they would indicate by that
5 procedure that they were signing for the inside well but
6 they had verified that something existed to verify the
7 fit-up and inspection on the outside well; yes, sir.

8 BY MR. BACHMANN:

9 Q So at the time when Ms. Neumeyer was filling in
10 and signing off late entries on line 1, that the only
11 proper way that she could sign line 1 was that she could
12 verify that both fit-up and cleanliness inspections had
13 been done?

14 A Yes, sir.

15 MR. BACHMANN: I have no further questions.

16 JUDGE BLOCH: Mr. Watkins?

17 MR. WATKINS: Mr. Chairman, we have some direct
18 that we would like to do this afternoon. We have some
19 direct for which Mr. Brandt has to communicate with the
20 plant, commute to the plant, or otherwise communicate with
21 the plant. And we have some items in between.

22 JUDGE BLOCH: Are you suggesting a spiritual
23 communication?

24 MR. WATKINS: This is very spiritual. And we
25 have -- ethereal, I think is the word.

1 We have some items in between that we might be able to
2 do this afternoon and find out whether he learned enough
3 to do it. I have to talk with him. Can I have a 10-minute
4 recess?

5 JUDGE BLOCH: Please. 4:15 will be our
6 resumption time.

7 (Recess.)

8 JUDGE BLOCH: The hearing will come to order.
9 Mr. Watkins?

10 MR. WATKINS: Mr. Chairman, during the break we
11 reviewed the numerous items -- I have 13 -- about which
12 Mr. Brandt and the Applicants have been asked to provide
13 additional information.

14 Subject to objection, may we suggest that we file all
15 of that material a week from this coming Friday? I
16 believe the deadline established for some of the
17 production and some of the items was a week from Friday.

18 MR. ROISMAN: I believe there was none that were
19 to be filed before Mr. Brandt had left here this week.

20 JUDGE BLOCH: Some were unspecified. I think
21 some were unspecified --

22 MR. WATKINS: Well, for example, the reason for
23 which travelers were reviewed by Mr. Tessier and others in
24 connection with being transferred from the permanent plant
25 vault to the interim vault, I don't think there was a

1 deadline on that. I propose to file an affidavit or
2 statement by Applicants, whatever the board wishes, along
3 with all the other documents in production.

4 MR. ROISMAN: I have no other problem with that.
5 Does that encompass the requests that we have with regard
6 to the NRC document? What is the status of that?

7 JUDGE BLOCH: That's the response to the
8 investigation you are going to do into the follow-up the
9 Applicants made of the NRC document, the investigation
10 report.

11 MR. WATKINS: That was the hypothetical question
12 requiring Mr. Brandt to speculate what he might have done
13 had he been on the site?

14 JUDGE BLOCH: That was the genesis of it.

15 MR. WATKINS: I don't want to mischaracterize
16 like that. You can strike that.

17 JUDGE BLOCH: That's on the list?

18 MR. ROISMAN: I don't have any problem with it
19 being next Friday. I don't see that it slows us down or
20 deters us in our progress.

21 MR. BACHMANN: I take it, Mr. Chairman, the
22 Staff then need not search its files for that particular
23 document?

24 JUDGE BLOCH: I'm not sure. I thought
25 Mr. Brandt said he didn't think he had the particular

1 document which was referenced.

2 THE WITNESS: I don't. I think in order to make
3 a logical comment, Mr. Chairman, on what my position is, I
4 need to have the same thing in front of me that the
5 resident reactor inspector did when he wrote the report.

6 JUDGE BLOCH: So actually it would be helpful
7 for the Staff to get it fast, if it can.

8 MR. BACHMANN: The document that I understood
9 the board wanted was a memo to the NRC, not from the NRC.

10 JUDGE BLOCH: I just assumed we might have it in
11 NRC files, just because it was given to the resident
12 inspector, and mentioned in an inspection report.

13 MR. BACHMANN: We will certainly look for it.
14 Is there a particular time you would like us to have that
15 one filed? Or would that also be a week from Friday?

16 JUDGE BLOCH: The week from Friday is acceptable,
17 but the Applicants need it in order to prepare their
18 response, what Mr. Brandt will say. So if you can do it
19 faster it will facilitate matters. They might have to ask
20 for pause, for an extension about that.

21 THE WITNESS: Will that include, Mr. Chairman,
22 the interviews that were conducted by the resident reactor
23 inspector? The notes from those interviews?

24 JUDGE BLOCH: You would like those too?

25 MR. BACHMANN: I don't know what I'm being asked

1 to comment on.

2 JUDGE BLOCH: Well, Mr. Roisman gave you some
3 leeway. He wants to know how you understand the facts to
4 have been at that time -- I'm sure it states in the record
5 what he wants -- and then make conclusions from the facts
6 as you understand them to be at that time.

7 THE WITNESS: There's not many facts presented
8 in that inspection report.

9 JUDGE BLOCH: So the suggestion of Applicant's
10 counsel is approved. Do you still have direct?

11 MR. WATKINS: I have limited redirect.

12 REDIRECT EXAMINATION

13 BY MR. WATKINS:

14 Q Mr. Brandt, do you have the traveler for weld
15 236 open in front of you? For the record that's at
16 transcript 20645.

17 A 20649, Mr. Watkins.

18 Q I stand corrected. As part of the traveler
19 package, is there a copy of MCR M83-00795?

20 A Yes, there is.

21 Q Do you recall testifying in response to
22 Mr. Bachmann's question that in your view, adequate
23 documentation existed with respect to the traveler for
24 weld 236, with regard to item 1, line 1 of the traveler?

25 A Yes, I do.

1 Q Was this a nonconforming condition with respect
2 to that NCR?

3 A In my judgment, no.

4 Q Would you explain why not?

5 A As I said in discussion with Mr. Bachmann
6 earlier, in my opinion adequate documentation does exist
7 to substantiate the performance of that inspection.

8 Q Is that documentation in the package?

9 A Yes, it is.

10 Q Would you identify the documentation by
11 transcript page number?

12 A 20652.

13 Q And what is the document at that page?

14 A It's a chit prepared for a cleanliness and
15 fit-up inspection of weld 236 signed by Billie Snelgrove
16 on the 12th of January, 1982.

17 Q Would you refer to the page number of the NCR on
18 which appears a list of nonconforming travelers for
19 different welds?

20 A That's transcript 20655.

21 Q Do you know whether any of those other travelers
22 also contained in your judgment adequate documentation?

23 A Yes, sir.

24 Q What are those?

25 A I don't remember the actual numbers. There's

1 about, approximately 15 of those welds that in my judgment
2 actually have adequate documentation.

3 Q In your judgment, do those travelers represent
4 nonconforming conditions within the meaning of this NCR?

5 A In my judgment, no, sir. For the same reason I
6 have stated on weld 236. Documentation exists in the
7 package sufficient to convince me that the inside fit-up
8 inspection was performed and documented.

9 JUDGE BLOCH: Inside?

10 THE WITNESS: The inside. Which was the
11 contention of the nonconformance report itself.

12 MR. WATKINS: Mr. Chairman, we would like to
13 have Mr. Brandt identify those travelers now, but that
14 would be time-consuming. We could do it now or we could
15 alternatively supply a list.

16 JUDGE BLOCH: Why don't you attempt to reach a
17 stipulation with counsel on that. Would that be
18 acceptable, Mr. Roisman?

19 MR. ROISMAN: We don't even need to stipulate.
20 I'll stipulate now that whatever he says are the ones, are
21 the ones that he says. Not that they of course are
22 nonconforming conditions or conforming conditions; but I'm
23 willing to accept a list when it is received.

24 JUDGE BLOCH: Okay. We will arrange for it to
25 be incorporated in the transcript whether we get it.

1 MR. WATKINS: We can just file it next Friday
2 with the other materials.

3 JUDGE BLOCH: But it has evidentiary status?
4 Mr. Roisman plan?

5 MR. ROISMAN: We'll reserve as to all the
6 materials that will be provided next Friday, as to whether
7 we think it requires a witness to be recalled. But I mean
8 with that reservation we have no objection to Mr. Watkins
9 offering it for whatever purpose he wishes to offer it for.

10 MR. WATKINS: Much as Mr. Brandt will hate to
11 hear this, I believe Mr. Roisman is correct.

12 JUDGE BLOCH: Please continue.

13 BY MR. WATKINS:

14 Q Mr. Brandt, with respect to stainless steel
15 liners, to what ANSI standard or standards was Comanche
16 Peak committed?

17 A I imagine you are committed to the -- AN45.2,
18 1971.

19 Q What does the 1971 mean?

20 A The year of the standard.

21 Q What's the difference between a groove weld and
22 an open butt weld?

23 A All open butt welds are groove welds. All
24 groove welds are not open butt. So the term "open butt"
25 is a subset of a larger group of welds, termed "groove

1 welds.

2 Q Do you recall the cover sheet for the traveler
3 package, sheet 308, that you discussed this morning?

4 A Was that the cover sheet that was the index from
5 the interim records vault?

6 MR. WATKINS: Do we still have that package or
7 is that sent off?

8 MR. ROISMAN: His recollection is correct.
9 That's what it was.

10 THE WITNESS: If that's what it was I recall it.

11 BY MR. WATKINS:

12 Q What's the function, cover sheet?

13 A Essentially as Mr. Roisman suggested, an index
14 provided to the keeper of the files in the interim records
15 vault.

16 Q Does the cover sheet have any quality
17 significance?

18 A No, it does not.

19 MR. WATKINS: That's all we have.

20 JUDGE BLOCH: Well, Mr. Roisman?

21 MR. ROISMAN: Yes. I just want to be clear on
22 something. When Mr. Watkins -- when we took the break I
23 think he suggested that there were three possibilities.
24 Information that he could do redirect on this information
25 that he could not do redirect on this afternoon; and

1 information that was indeterminate and that he wouldn't
2 talk to Mr. Brandt about.

3 Do I understand that Mr. Watkins is now through with
4 redirect of Mr. Brandt? There is no more redirect of
5 Mr. Brandt? He's just going to supply some record
6 information that's been requested and that's the end of it?
7 Or that there is going to be another period of redirect of
8 Mr. Brandt?

9 JUDGE BLOCH: Mr. Watkins?

10 MR. WATKINS: Well, perhaps the easiest way to
11 do this would be to enumerate the items that I have and
12 then describe what we propose to do about it.

13 Some of what we have is going to be in the nature of
14 redirect. For example, Mr. Brandt, or somebody's
15 explanation of the transfer from the permanent plant
16 records vault to the interim vault. That is not something
17 that we can track down this afternoon.

18 The other items are -- there was a question, I believe,
19 from the board about what quality engineering reviewed? What
20 conclusions they reached? What deficiencies they
21 identified in liner plate packages in connection with the
22 TRT review.

23 JUDGE BLOCH: Could you state that again? That
24 doesn't sound familiar in that form.

25 MR. WATKINS: Mr. Brandt stated, as to his

1 source for a few items of information, that he talked with
2 quality engineering regarding that, and, as I recall,
3 there was a discussion about how they knew, or what
4 reviews they were conducting. And, Mr. Chairman, I
5 believe you suggested that the board wanted to know what
6 the company knew as a whole, not just what Mr. Brandt knew.

7 JUDGE BLOCH: Okay, that was a general piece of
8 guidance as to all of the testimony.

9 MR. WATKINS: If you don't want us to go back we
10 won't.

11 JUDGE BLOCH: You should check with those people.
12 You may wind up filing nothing or you may wind up filing
13 something. I do want to know the Applicants were giving
14 me their current best information; yes. But I understand
15 that, incidentally, to be a general obligation in our
16 hearings. That's nothing new.

17 MR. WATKINS: Sure. I think the question
18 whether, and if so to what extent with regard to liner
19 plates, Comanche Peak is committed to the ASME code, is
20 still open. We would like to identify the page number, or
21 have Mr. Brandt identify the page numbers, and if
22 necessary supply an affidavit explaining the basis for
23 that.

24 The NCRs and other deficiency papers regarding Mr. Cole's
25 retraining or whatever it was that we said about that.

1 There was an open question that we could not -- that
2 Mr. Brandt could not track down because he doesn't have
access to drawings, regarding when continuous fillet welds
4 versus tack welds are required in connection with embeds.

5 JUDGE BLOCH: You said embeds. I understood it
6 to have to do with the backing strips generally.

7 MR. WATKINS: Well, there was another question
8 about what the drawings require with respect to backing
9 strips where there's no leak chase channel.

10 JUDGE BLOCH: That's an embed by definition?

11 MR. WATKINS: No, the -- well, Mr. Brandt?

12 THE WITNESS: The discussion, as I recall it,
13 Judge Bloch, was a discussion between you and I on where
14 intermittent fillet or tack welds were required and where
15 continuous fillet welds were required. I believe I stated
16 that they had, indeed, used continuous fillet welds to
17 weld the backing strip to the embed plate for the embed
18 inserts. The question from you, then, was was this a
19 construction practice or was it required by the drawing?
20 And I stated I did not know, but I would check on it.

21 JUDGE BLOCH: Thank you.

22 MR. WATKINS: The matter of why travelers were
23 reviewed or under what circumstances, when the packages
24 were transferred from the permanent vault to the interim
25 vault.

1 Production of the construction procedures for liner
2 plate.

3 Mr. Brandt's answer --

4 JUDGE GROSSMAN: Excuse me. Mr. Brandt has some --

5 THE WITNESS: That was faulty quality control
6 procedures that went with the associated quality control
7 instructions.

8 MR. WATKINS: Mr. Brandt's response to the
9 hypothetical question regarding the 1979 NRC report.

10 JUDGE BLOCH: Okay. I think if you look at the
11 record it's more specific than that, but that's where it
12 came from.

13 MR. WATKINS: I'm not claiming to adequately or
14 accurately summarize. I'm just trying to hit the
15 highlights here.

16 Whether carbon copies of the chits exist. And that's
17 it.

18 MR. ROISMAN: I just want to be clear: That is
19 it? There is no other information that is now being
20 reserved by the Applicant for purposes of redirect of this
21 witness on these issues? This, what Mr. Watkins has just
22 described and within the fair bounds of those
23 interpretations, is what is to be offered and it would
24 require a motion and an answer, opportunity for us and a
25 ruling by the board, to submit additional information in

1 the nature of redirect or direct on this issue; am I
2 correct?

3 MR. WATKINS: I understand that to be the case.

4 JUDGE GROSSMAN: Excuse me, I have a question on
5 the redirect that we've just heard.

6 It is my understanding from your testimony earlier,
7 that where there were inspections of the inside and the
8 outside of the weld at different times, that the procedure
9 was to sign off on line 1 of the five-line traveler at the
10 time the last inspection was made. Isn't that correct,
11 sir?

12 THE WITNESS: At the time that the inside fit-up
13 inspection was made; yes, Judge Grossman.

14 JUDGE GROSSMAN: Why would you then conclude,
15 from looking at traveler 236 --

16 JUDGE BLOCH: Transcript 20649.

17 JUDGE GROSSMAN: -- that the chit that's shown
18 at 20,652, was signed -- which was signed and an entry not
19 made on line 1, would represent the second inspection?
20 That is, the inside inspection rather than the original
21 inspection?

22 THE WITNESS: The back side of the weld was no
23 longer accessible. I'm not saying the traveler was
24 properly signed, Judge Grossman. I'm saying adequate
25 documentation exists to lead me to believe that both the

1 outside and inside fit-up inspections were performed as
2 required.

3 JUDGE GROSSMAN: The reason you testified that
4 was the inside inspection was because the outside, at that
5 time -- that is on 1/12/82 -- would not have been
6 accessible to inspection?

7 THE WITNESS: That's true. The chit, you might
8 note, is clearly marked: The inspection is a cleanliness
9 and fit-up inspection.

10 MR. WATKINS: Judge Grossman, you reminded me
11 that I neglected to include in my list Mr. Brandt's list
12 of additional travelers that he believes are now listed on
13 the NCR that he doesn't believe represent nonconforming
14 conditions.

15 JUDGE BLOCH: That's an additional open end.

16 MR. BACHMANN: Judge Bloch, one minor point here?
17 It has been brought to my attention I referred to two
18 travelers during my cross-examination and did not request
19 that they be bound in or admitted into evidence at the
20 time. They were only being used as comparison. If the
21 board wishes, I think it might be well worth it to then
22 just have them bound in at the end of this transcript for
23 illustrative purposes. I have no desire, unless any of
24 the other parties do, to have them admitted into evidence.
25 This is travelers 107 and 120.

1 JUDGE BLOCH: There being no objections, that
2 may be done.

3 You may want to show them to Mr. Brandt. It has been
4 their policy to ascertain that you've got the right copy.

5 Mr. Watkins, are we prepared to proceed on the Corry
6 Allen matter?

7 MR. ROISMAN: Is there recross?

8 JUDGE BLOCH: I thought we had ended. Okay.
9 Mr. Roisman?

10 MR. ROISMAN: Just a couple of points. I'll --
11 I'm waiting for Mr. Brandt to finish the review.

12 (Discussion off the record.)

13 JUDGE BLOCH: In the off-the-record discussion
14 it was ascertained that Staff seeks to have the two
15 documents being bound in be in evidence. They may be
16 admitted.

17 FURTHER CROSS-EXAMINATION

18 BY MR. ROISMAN:

19 Q Mr. Brandt, during your examination by
20 Mr. Bachmann you made reference to the liner plate
21 traveler that was 988, that was used on the north transfer
22 canal. I believe what you said was that this document was
23 used until a new document, one produced apparently by the
24 craft, came into existence, and then that every inspector
25 started using the new craft document. Did I hear you

1 correctly?

2 MR. WATKINS: Objection. This is beyond the
3 scope of the redirect. It was not touched on in the
4 redirect.

5 MR. ROISMAN: It was touched on in cross by
6 Staff. I believe the procedure has been that if areas are
7 opened --

8 JUDGE GROSSMAN: Mr. Bachmann, you are shaking
9 your head. It wasn't touched on cross?

10 MR. BACHMANN: No, sir, it wasn't. I know what
11 Mr. Roisman is referring to, and I believe it might have
12 been yesterday; but I certainly didn't ask any questions
13 about the traveler that was used prior to the five-line
14 traveler. I believe that is what Mr. Roisman is referring
15 to.

16 JUDGE BLOCH: You are talking about the use of
17 the traveler in the other portion of the plant; right?

18 MR. ROISMAN: Yes. My understanding of what the
19 witness' testimony was today, during answering questions
20 to Mr. Bachmann -- or perhaps board questions while
21 Mr. Bachmann was doing his examination -- was that he
22 indicated that this particular traveler was used for a
23 period of time and then a new traveler came into existence;
24 and suggested that he believed, or I thought he said
25 rather clearly that it was his position that this traveler

1 form, the one that's in 988 for the north transfer canal,
2 was not used simultaneously with the use of the incorrect
3 five-line traveler form.

4 JUDGE BLOCH: It's your recollection that was in
5 response to board questions during --

6 MR. ROISMAN: Yes. Ms. -- Ms. Garde thinks that
7 it was during the answer to your "root cause" question.
8 It was during the course of Mr. Bachmann's cross.

9 JUDGE BLOCH: I'll allow it on the basis of your
10 memory of that. Let's continue.

11 BY MR. ROISMAN:

12 Q Mr. Brandt, first of all, did I hear you
13 correctly at an earlier time today, that you indicated
14 that the traveler, shown on 988 for the north transfer
15 canal, was used prior to, and not at any time
16 simultaneously with, the use of the five-line traveler?

17 A Mr. Roisman, I don't remember exactly what I
18 said. I'll explain my position if it clarifies the issue.

19 Q That will be great. Thank you.

20 A I think -- if I can have just a second I think I
21 can nail down the date I'm talking about. That will make
22 it more meaningful.

23 JUDGE BLOCH: Please look at anything that's
24 necessary to refresh your recollection.

25 THE WITNESS: It appears to me that interim

1 notice 2 to construction procedure CCP38 rev 2, which was
2 approved on August 14, 1978 --

3 MR. ROISMAN: Just a moment. I would like to
4 get that in front of me. Do you have it in front of you?

5 THE WITNESS: Yes. That's easier.

6 BY MR. ROISMAN:

7 Q Okay. Go ahead.

8 A -- proceduralized the use of five-line traveler.
9 It appears to me from what I've seen, that inspections
10 performed prior to this date were documented on the
11 traveler that was contained in CP QCI2.11-1, and it was
12 not until the adoption in the construction procedure of
13 this five-line traveler did QC start documenting
14 inspections on the five-line traveler. That is what I was
15 attempting to say earlier.

16 If I misspoke earlier, that is my position.

17 Q And you said, based on what you have seen. What
18 is it that you have seen, specifically, that leads you to
19 that conclusion?

20 A I have reviewed a number of travelers in the
21 unit 1 refuel cavity. Reviewed travelers for both the
22 unit 1 and unit 2 spent fuel pool. And the transfers
23 canal -- transfer -- transfer canals. Excuse me.

24 It appears that sometime in the summer of 1978, that
25 the adoption, ICN, CCP-38, it was about this time that QC

1 started documenting inspections on the five-line, and
2 discontinued documenting inspections on the old
3 CPQCI-2.11-1.

4 There are some cases to where double documentation
5 exists where a hold point was signed off on both the
6 five-line traveler and the old traveler. But I found in
7 no cases for new work initiated after August 14, '78, was
8 the old form used.

9 Q Did you conduct a specific investigation in
10 order to -- I don't mean if you looked at every traveler.
11 But when you looked at those travelers were you looking in
12 particular to attempt to identify whether the five-line
13 traveler was being used exclusively after a certain date,
14 and whether the proper traveler was being used exclusively
15 only up until a certain date?

16 A No, Mr. Roisman. That's an observation I made.
17 The reason for my review, the only review I conducted
18 of anything within the fuel building or the unit 1
19 refueling cavity, was to see if the same type condition
20 existed for unit 1 reactor in the fuel building as exists
21 for these 1300 travelers.

22 Q By the "same condition" you mean the use of the
23 incorrect form?

24 A Virtual exclusive use of the incorrect form in
25 the 1978-79, and partially '80 timeframe.

1 As it turns out, the majority of the outside walls for
2 the fuel building, and the reactor 1 refueling cavity,
3 were done prior to this time. So the outside fit-up and
4 cleanliness inspection, the divisional inspection of the
5 tack welds of the backer strip -- not the liner strip and
6 the fillet wells that attaches it to the liner plate --
7 are documented on the old form on QCCPI2.11-1, and then
8 the other picks up on this one.

9 Q The inside inspection picks up on -- when you
10 say "this form," you mean the form that's attached to the
11 construction procedure?

12 A Yes, sir.

13 Q And did I understand you to say that there were
14 sometimes when you found both forms were in existence,
15 being used at the same time? And I don't mean for the
16 same weld, but for inspections being conducted at the same
17 time?

18 A No. I think your first assumption was correct,
19 Mr. Roisman. To the best of my recollection, I don't have
20 my notes in front of me -- in the unit 1, either in the
21 unit 1 refueling cavity and/or the liners within the fuel
22 building, for example, the inside fit-up might have been
23 signed off on both the old traveler out of the old CPQCI,
24 and the five-line traveler. Line 1 of the five-line
25 traveler.

1 Q So that the same inspection was signed off on on
2 both forms?

3 A On two different documents; yes, sir.

4 Q And did you find any instances in which the form
5 that is the appropriate form under CPQCI-2.11 was being
6 used subsequent to the date of ICN number 2, 8/14/78, that
7 you referred to there in your examination?

8 A Are you saying exclusively used, Mr. Roisman?
9 Are you eliminating the -- we just discussed in some cases
10 some inspections were documented in both forms.

11 Q Well, let's take it in two parts. First, were
12 there any inspections documented on the form that was
13 originally authorized by CPQCI 2.11, where the inspection
14 was dated on or after August 14, 1978?

15 A I can't say definitively on this date. I can
16 say it was around this timeframe that the use for the new
17 work of those forms seems to have discontinued.

18 Q Now, when you say "for new work," you mean newly
19 started welds? Or new inspections on already-existing
20 material?

21 A To the best of my recollection, both.

22 Q And what about for the situation where you found
23 the use of both forms for signing off for the same
24 inspection? Were those for inspections that were
25 occurring after the 14th of August, 1978?

1 A There was a short -- and once again to the best
2 of my recollection, there seemed to be a short period of
3 time to where, on some welds, both forms were signed. It
4 was around this time period. For welds performed much
5 after that date the form that was predominantly in use was
6 the five-line traveler.

7 Q And much after that date would be what, by --
8 are you talking about months?

9 A Months.

10 Q So by the end of the year, most, as far as your
11 investigation showed, most of the inspections were then
12 being recorded on the five-line traveler?

13 A On the five-line traveler in unit 1. And for
14 unit 2, on the chit as we have discussed. Because the
15 construction sequence for the unit 2 refueling cavity was
16 starting or was beginning, at that time. So the
17 instructions that were being performed were the outside
18 fit-up and cleanliness inspection, and -- for step 1. And
19 steps 2 and 3 and 4 of the five-line traveler were also
20 being signed off for unit 2 activity at that time.

21 Q In the documents that we have been looking at
22 already, when the eight-line traveler came into existence
23 with respect to welds for which a five-line traveler was
24 already being used, I believe you testified that the
25 procedure was that the next time an inspection was done,

1 the entries from the now outdated form were in some way
2 referenced on the new eight-line traveler, such as the "NA,"
3 or a specific asterisk with a new signature and a
4 reference back or something like that.

5 MR. WATKINS: Objection. This is a matter about
6 which Mr. Roisman has already cross-examined the witness.

7 MR. ROISMAN: It's a little difficult for me to
8 answer the question until the question is out. That was
9 the predicate for the question. The question now relates
10 to these forms, of course. Not to those. And the
11 question --

12 JUDGE BLOCH: Let's continue the question.

13 BY MR. ROISMAN:

14 Q The question is: Was that same procedure
15 followed when the form that was preceded by CPQCI-2.11 was
16 replaced by the improper five-line form, where the
17 CPQCI-2.11 form had been used for earlier inspections?

18 MR. WATKINS: I'll withdraw the objection.

19 MR. ROISMAN: I thought you would.

20 THE WITNESS: Mr. Roisman, it's my -- maybe you
21 misunderstood my earlier testimony. I was answering a
22 specific question on how the blank eight-line form got
23 incorporated. It was my testimony earlier in this
24 proceeding that if, when the procedure was corrected in '79
25 or '80, and the eight-line form put in the construction

1 procedure -- if at that time they had stopped and gone
2 back and put the eight-line form in all of the travelers
3 which only had the five-line form, the problem would be
4 much less in magnitude than we have today. That didn't
5 happen.

6 BY MR. ROISMAN:

7 Q I understand.

8 A It didn't happen uniformly. In some cases it
9 appears to have happened.

10 I can't say that uniformly, that this form which you've
11 attached for weld 988 in your attachment, or Exhibit 2,
12 which is the old form -- which we have been referring to
13 as the old form, I can't say in all cases. But when this
14 form was replaced on August 14, 1976, by the five-line
15 traveler in the construction procedure, that the five-line
16 traveler was added to the package.

17 Q Did you see any instances where it was added to
18 the package?

19 A Yes. There are instances where it was. The
20 example -- excuse me. I was thinking this was an example.
21 There are examples that exist that show the five-line
22 traveler stapled to this, what we called an "old" traveler.

23 Q Then, on the lines, on the five-line traveler,
24 that were to document the inspections which had been
25 previously documented on the old traveler, was a notation

1 made on the five-line traveler of that? Or were they just
2 stapled together in what you saw?

3 A The majority of ones that I looked at,
4 Mr. Roisman -- this is once again to the best of my
5 recollection, I'm trying to recall what they had -- most
6 of them had line 1 signed off on the line, on the
7 five-line traveler; line 5 signed off on the five-line
8 traveler; and lines 1, 2-A, 2 B, and 3 signed off on the
9 old traveler.

10 What was on lines 2, 3, and 4 of the five-line I don't
11 remember. If it referred you to the old traveler or if it
12 said "non A" or "nonapplicable," I don't remember.

13 Q And was it your understanding when you looked at
14 that that the signature on line 1 of the five-line
15 traveler attached to one of the old travelers was a
16 signature that the concrete side fit-up and cleanliness,
17 and the inside fit-up and cleanliness had been completed?

18 A Yes, sir. That's my understanding.

19 Q So that if you had seen some that were
20 sufficiently back in the process -- which, as I understand
21 given the way construction has moved at unit 1 was
22 probably not the case -- but if you had seen them before
23 the inside cleanup and fitness -- cleanliness and fit-up
24 had been done, that you would have expected not to see
25 line 1 on the five-line traveler signed at that point? Is

1 that unclear? I'll state it again.

2 A I don't understand your question.

3 JUDGE BLOCH: If you knew from the documentation
4 that the five-line hadn't been made, would you expect it
5 to be on the --

6 THE WITNESS: At the time I looked at it the
7 building was turned over.

8 BY MR. ROISMAN:

9 Q Is it your understanding that the proper way
10 would have or -- it would have or should have been done,
11 was that that line would not have been signed until the
12 inside fit-up and cleanliness had been completed?" That
13 line I'm talking about line 1 of the five-line traveler?

14 A If I can I want to walk through your
15 hypothetical, Mr. Roisman, just to make sure I understand
16 what you are saying. You are assuming the outside fit-up
17 was done and documented on the old traveler?

18 Q Correct.

19 A The backing strip and leak chase channel was
20 done on the old traveler.

21 Q Correct.

22 A And that the inside weld was not made?

23 Q At the time that the old traveler was being used
24 to record inspections; correct?

25 A That's the hypothetical we are in.

1 Q That's correct?

2 A I would have expected to see the five-line
3 traveler entirely blank.

4 Q And I assume that you would have expected to see
5 the five-line traveler blank if what are listed as steps
6 2-A, 2-B, and 3 on the old traveler had not been signed
7 off on the old traveler, and that you would -- is that
8 right?

9 A I think I just lost you.

10 Q If the old traveler had been attached to a
11 five-line traveler and the only inspection that had been
12 done on the old traveler at the time of the attachment was
13 the inspection for line 1 of the old traveler, then the
14 five-line traveler would still be blank; correct?

15 A Yes, sir.

16 Q Now, what would you expect would have happened
17 as soon as what is noted as the 2-A line on the old
18 traveler, that inspection -- and I guess that's line 2 of
19 the new traveler, of the five-line traveler -- when that
20 inspection was conducted on the five-line traveler, what
21 would have happened to line 1? What should have happened
22 to line 1, if it was done properly?

23 A What we have at this point, then, is a weld that
24 the outside fit-up and cleanliness has been made?

25 Q Correct.

1 A And documented on the old traveler?

2 Q Correct.

3 A And no other inspection performed?

4 Q And no other inspection performed.

5 A And we now have a five-line traveler?

6 Q Correct.

7 A I would have expected line 1 blank and line --
8 the next sequential inspection was the sequential
9 inspection of the backing strip tack welds, I would have
10 expected line 2 to be signed off on the five-line traveler.

11 Q Okay.

12 Q When you went back to look at these documents
13 for the unit 1 and the refueling building, did you go back
14 and talk to Larry Wilkerson who was there at the time and
15 was still at the plant site? To get some clarification on
16 what had gone on?

17 A I was only there, Mr. Roisman, for a short
18 period. This occurred after my October 3rd deposition, I
19 believe. Probably on the 4th of October, if that was a
20 Thursday. Because I went on vacation that Friday. I was
21 only there for a short time in the evening.

22 I had previously had someone ask Mr. Wilkerson about
23 the inspection practices, or how they signed out the
24 five-line traveler and had received input from him.

25 Granted it was secondhand. I did not talk to

1 Mr. Wilkerson directly.

2 Q Again, what did you learn in that secondhand
3 communication?

4 A Essentially what the inspection -- the fact that
5 they absolutely, to a person, everybody I've talked to
6 regarding this says that the only place that, when they
7 were using the five-line traveler, the only place that got
8 documented was the chit -- excuse me, the outside fit-up
9 and cleanliness inspection, the only place at the time the
10 five-line traveler was used, was on the chit.

11 If your question relates to Mr. Wilkerson, and this
12 traveler, I don't know. I haven't yet asked him, because
13 it was my impression, if you recall when I was in the
14 proceedings in September, that this form had not been used.
15 I did not know what had been used in unit 1, and that's
16 part of the reason I went to look.

17 Q So that you are -- you have not spoken with
18 anybody regarding the question, in a sense, about which
19 you have been testifying here, and that we -- that you
20 testified a little bit on during an earlier time this
21 afternoon, namely exactly when was the CPQCI 2.11 old form
22 used; when did that use stop when did the five-line
23 traveler start; and how much did they overlap if at all?

24 A My testimony there was based on personal
25 observation, Mr. Roisman.

1 Q Okay.

2 A As far as timeframes went, inspections were
3 signed off, and that came from my review which I did that
4 evening in roughly three or four hours.

5 Q Roughly how many travelers do you think you
6 looked at?

7 A If we can preface "looked at" by stating "just
8 looking at quickly to try to figure out the inspection
9 sequence of where they signed off" -- as far as review of
10 each document I didn't do that --

11 Q Right.

12 A I was looking to see logically how each document
13 step got documented, and that's all I was looking at -- I
14 looked at a couple of hundred travelers.

15 Q Now, during the examination by Mr. Bachmann, and
16 also your redirect from Mr. Watkins, you were answering
17 questions about the NCR attached to number 236. And I
18 think that Mr. Bachmann was probing the question of the
19 deletion of the word "random" from the rev 2 version,
20 which is the last version of the NCR -- or from one of the
21 versions. Was it rev 1 that got taken out?

22 A It was rev 1.

23 Q And I see in looking at that NCR that it says,
24 both on the top line in rev 2, "a review," and then on the
25 bottom line of the nonconforming condition description it

1 says, "see attached sheet for welds reviewed."

2 Is that an inaccurate statement? To "see attached
3 sheets for welds reviewed"?

4 A I don't believe it was intended to be a
5 comprehensive list of all the welds that they had seen for
6 which they did not have adequate documentation for the
7 inside fit-up and cleanliness inspection.

8 In retrospect, it's probably lack of clarity in the
9 nonconformance report itself. It probably is as much my
10 fault as anyone's, because there was a major disagreement
11 between two people who reported directly to me. And at
12 the time I made the decision that the easiest way to
13 resolve the difference was to delete the word "random."

14 As I said, subsequent NCRs have been written to
15 describe other welds for which the same condition exists.

16 Q Right. I only wanted to just be clear that we
17 shouldn't read literally the sentence "see attached sheet
18 for welds reviewed," and that in fact the universe of
19 welds reviewed is larger than the universe of welds that
20 are listed on the attachment?

21 A Yes, sir, that's my understanding.

22 Q And then in reference to a question by Judge
23 Grossman, who was asking about the chit and the absence of
24 the signature on line 1, I believe that you referenced a
25 chit for the -- what you feel is the inside weld fit-up

1 and cleanliness, and is the one dated 1/12/82, and signed
2 by Mr. Snelgrove; is that correct?

3 A Yes, sir.

4 Q And that is one of two chits that's attached to
5 the package; isn't that correct?

6 A Yes, sir.

7 Q And the signature of Ms. Neumeyer on line 1 of
8 the five-line traveler on page 1 of this packet has an
9 asterisk by the "at" and the notation at the bottom
10 indicates, "reference NDT chit attached." Not "chits."
11 Isn't that correct?

12 A Yes, sir.

13 Q Would you assume from that that at the time
14 Ms. Neumeyer looked at the documents, that there was only
15 a chit and not two chits?

16 A That's a conclusion that could be drawn,
17 Mr. Roisman. However the same annotation appears on all
18 the travelers reviewed by Ms. Neumeyer.

19 Whether or not she deliberately intended to be into "each
20 chit" in the singular, or plural, I can't say. Her note
21 is definitely in the singular.

22 Q According to your understanding of what the
23 proper procedure would be, if both chits had been attached,
24 the signature on line 1 would have required no asterisk of
25 any kind whatsoever, just as it does not on many of the

1 other five-line travelers where that line is signed off;
2 isn't that correct? Is that correct?

3 A Yes, sir. That is correct. It would have
4 required either an NA, which was in accordance with the
5 existing procedure at that point, or a reference to the
6 chit.

7 JUDGE BLOCH: I'm not sure, Mr. Roisman, but I
8 think the witness said "yes" and then said "no."

9 MR. ROISMAN: Shall I ask it again?

10 THE WITNESS: Will you repeat the question and
11 we'll get this cleared.

12 BY MR. ROISMAN:

13 Q The procedure that was in existence at the time,
14 whether you put an NA on line 1, assuming that both chits
15 were attached, or signed with a "sat" and a date, if both
16 chits were attached; in either event you would not have
17 been required to put an asterisk there and make the
18 notation made at the bottom of the page by Ms. Neumeyer,
19 if both chits had been attached, is that correct?

20 A If your question, Mr. Roisman, is: Would you
21 have been required?, " the answer is "no."

22 Q Okay. That was my question.

23 MR. ROISMAN: Mr. Chairman, the last thing I
24 would like to do on this, and again it's in order to keep
25 the records straight and together, is to ask that the

1 board pursuant to -- and I don't have the proper 10 CFR
2 citation here, but take official notice of an NRC document
3 dated February 8, 1983, addressed to the Consumers Power
4 Company, to which is attached report number 50-329-82-22
5 and 50-330-82-22; which imposes a fine, which is in a
6 letter accompanying it also dated February 8, 1983; and
7 direct the board's attention to section 5 on pages 7, 8,
8 and 9 of the document review of quality control activities
9 which indicate a rejection by the NRC as inappropriate
10 practice in the failure to trend nonconforming conditions
11 with respect to in-process inspections.

12 JUDGE BLOCH: Mr. Watkins, do you have any
13 objection to official notice of the documents?

14 MR. WATKINS: I would like to see the documents
15 first. It sounds a lot more like precedent, rather than
16 scientific or other facts.

17 (Discussion off the record.)

18 JUDGE BLOCH: In the off-the-record conversation
19 Mr. Roisman indicated that he wasn't sure whether
20 subsection H or I was the one that's applicable under
21 section 2.743 of our procedural rules. Mr. Roisman, would
22 you like to explain?

23 MR. ROISMAN: Yes. It certainly constitutes an
24 official document of the agency and would fit within the
25 category of H. The difficulty that I have with it is a

1 procedural one. If it fits under the category of H, it's
2 not clear from that that the parties have an opportunity
3 to rebut it or put in contrary evidence with respect to it,
4 and that might downgrade its evidentiary value, which I
5 would not want to have happen. Also, just as a matter of
6 procedural fairness, I think it would be unfair if I did
7 not say that I think that they have a chance to rebut it
8 if they want. Obviously, under I, it -- procedure is
9 established by which they have an opportunity to submit
10 rebuttal.

11 JUDGE BLOCH: I submit that is because H is,
12 after all, an evidence section, and all forms of evidence
13 which are suggested by a party are subject to rebuttal.
14 So you wouldn't have to provide it under H at all.

15 MR. ROISMAN: Maybe that's true. Maybe I is
16 different in that regard.

17 I do think that it fits the scientific fact, or
18 technical fact, which I think is a slightly broader
19 version of it, because it represents the NRC Staff's
20 interpretation of what its requirements are and what an
21 in-process inspection requirement is and in that sense
22 represents the expert opinion of an expert agency. So it
23 could fit into either category. And for my purposes, as
24 long as it's received, I'm not troubled by whether it's
25 received under H or I.

1 JUDGE BLOCH: Mr. Watkins?

2 MR. WATKINS: I haven't even had time to go
3 through the 29-page highly technical document that
4 accompanies the two-page cover letter.

5 JUDGE BLOCH: Let's break until 5:30.

6 MR. WATKINS: I was going to suggest that we
7 respond either tomorrow morning or some other time.

8 JUDGE BLOCH: Okay. What shall we do now?

9 MR. ROISMAN: I just want to be clear that it's
10 only section 5. The other sections, if they were relevant
11 to this proceeding, could go in. But we are offering only
12 section 5 of the inspection report and the cover letters
13 that go with it to put them into context.

14 JUDGE BLOCH: Do I understand from what you said
15 before that that section relates only to the
16 interpretation of NRC requirements but not particularly to
17 action taken by the Applicants?

18 MR. ROISMAN: No. It relates to the action
19 being taken by Consumers Power with regard to trending or
20 nontrending of in-process inspection deficiencies.

21 JUDGE BLOCH: To that extent it goes a little
22 bit beyond technical fact?

23 MS. GARDE: Identification.

24 MR. ROISMAN: Ms. Garde says I should also add,
25 and identification of the existence of such deficiencies.

1 JUDGE BLOCH: To that extent, it's not technical
2 fact.

3 MR. GARDE: Right.

4 MR. WATKINS: Or scientific fact.

5 MR. ROISMAN: That's right, and more, arguably,
6 of what would be in paragraph H than I.

7 JUDGE BLOCH: Let's set the responses to this
8 motion for the first thing tomorrow morning.

9 Now, Mr. Roisman, the next matter?

10 MR. ROISMAN: I believe the next matter, with
11 regard to any recross by us, is that we have no more.

12 JUDGE BLOCH: Thank you. Mr. Bachman, for the
13 Staff?

14 MR. BACHMANN: The Staff has no further
15 questions.

16 JUDGE BLOCH: Mr. Watkins for sur-whatever-this-
17 was?

18 MR. WATKINS: For what?

19 JUDGE BLOCH: You may have another chance.

20 MR. WATKINS: We decline.

21 Mr. Chairman, Mr. Brandt suggested to me an hour ago
22 that this has been, with respect to liner plates, an
23 exhausting --

24 JUDGE BLOCH: Granted.

25 MR. WATKINS: Tomorrow at 8:30, then?

1 JUDGE BLOCH: I think that's fair. Is there any
2 matter that we should handle by motion at this time?
3 There being none, adjourn to --

4 MR. WATKINS: For the record, Mr. Manning is
5 flying up tomorrow morning and he will be here tomorrow
6 afternoon.

7 JUDGE BLOCH: I'm not sure, seeing the progress
8 today, that that's required. Mr. Roisman's judgment that
9 his presence was needed was based on starting the Corry
10 Allen matters this afternoon. Does the fact that we have
11 not started on that affect your judgment that we need him
12 for tomorrow?

13 MR. ROISMAN: Just a moment. Let me talk to my
14 associate. I don't want to say the wrong thing.

15 (Discussion off the record.)

16 MR. ROISMAN: Mr. Chairman, it's not my money so
17 I'm particularly frugal with it. It does seem to me that
18 there's at least a good risk that Mr. Manning would have
19 made a trip fruitlessly. There's also a risk that we
20 would end with Mr. Brandt and there would have been enough
21 time to take Mr. Manning if he had been here.

22 If you are asking my judgment, I guess I'd say it's
23 probably better to assume that we would not be able to --
24 if we got to him -- finish him tomorrow.

25 JUDGE BLOCH: Okay. That's Mr. Roisman's best

1 judgment. The Applicants can be so advised and decide
2 what they want to do. There's no requirement he not be
3 here.

4 MR. WATKINS: I'm not going to fly him up here
5 twice and have him stand around, so I'm not going to fly
6 him up here.

7 JUDGE BLOCH: So we are adjourned until 8:40
8 tomorrow morning.

9 (Whereupon, at 5:25 p.m., the hearing was
10 adjourned, to reconvene at 8:40 a.m., November 28, 1984.)

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FOR INFORMATION ONLY

21-081

120

WELD NO.

SEALED STAINLESS STEEL LINER INSPECTION TRAVELER

PROJECT: GPOIS JOB NO.: 35-1195 UNIT 2 PAGE 1 OF 2

PLATE TO PLATE
 INSERT TO PLATE
 ANGLE TO PLATE
 OTHER Embed PA to A25

W/No. BB 2401A
 POOL Root liner #2
 METAL TYPE Stainless Steel
 MTL. THK. 1/2" + 3/16"
 PC. to PC. Embed to Plate

WELD NO.	WELD PROCED.	HOLD POINT
AEU A023290	88023	FF
AEO A069055	88023	243
AEO A069175	88023	4
EF0 B447	88025	1

- Fit up and cleanliness of above:
verified
 RESULTS: SAT INSPECTOR SIGNATURE: W. D. Turner DATE: 2-3-82
- V.T. of backing strip tack/fillet welds:
 RESULTS: Sat. INSPECTOR SIGNATURE: Sam Wilson DATE: 10-24-78
- Cleanliness of channel, liner, and backing strip:
 RESULTS: Sat N/A INSPECTOR SIGNATURE: N/A DATE: 10-24-78
- Final V.T. of channel fillet weld:
 RESULTS: Sat. INSPECTOR SIGNATURE: Sam Wilson DATE: 10-30-78
- Final V.T. of inside weld:
 RESULTS: SAT INSPECTOR SIGNATURE: _____ DATE: _____

Completion of weld inspection:

RESULTS _____ INSPECTOR SIGNATURE _____ DATE _____

FOR INFORMATION ONLY

21082

120

WELD NO. _____

B&R Stainless Steel Liner Inspection Traveler

Weld Inspection Sheet

Page ___ of ___

Acceptance Std.
Gibbs & Hill 2323-SS-18

- 7a. Penetrant Mfg. Magnaflux-Spotcheck _____
- Cleaner Mfg. Magnaflux-Spotcheck _____
- Developer Mfg. Magnaflux-Spotcheck _____

NDE Procedure

Final P.T. Level II

RESULTS	INSPECTOR SIGN.	DATE
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7b. Vacuum Box GASKET TYPE SOLUTION TYPE

_____ by _____

Pretest Cleaning ___ Pressure ___ Temperature ___ NDE Procedure _____

Solution Application Method ___ Post Test Cleaning _____

Gauge Serial Number _____ Pressure Differential
Maintained for ___ Sec. ___ Min.

Final V.B. _____

N/A - Not Applicable

Satisfactory	Unsatisfactory	Level II Inspector	Date
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FOR INFORMATION ONLY

WELD NO. 120

21083

B&R Stainless Steel Liner Inspection Traveler

QI-QP-11.14-6 REV.

PROJECT: CPSES JOB NO: 35-1195 UNIT 2 PAGE OF

BB-2401-A Reactor Liner #2 SAIDLESS STEEL 1/2" TO 3/16" EMBED TO PLATE
 Drawing No. Pool Metal Type Mtl. Thck. PC. to PC.

Plate to Plate Insert to Plate Angle to Plate Other PA TO A25

Welder Symbol	WFML No.	Weld Proced.	Hold Point

- Fit up and Cleanliness of Above
Results Inspector Signature Date
- V.T. of Backing Strip Tack/Fillet Welds:
Results Inspector Signature Date
- Cleanliness of Channel, Liner, and B. Strip:
Results Inspector Signature Date
- Final V.T. of Channel Fillet Weld:
Results Inspector Signature Date
- Seam Weld Fit Up and Cleanliness:
Results Inspector Signature Date
- Final V.T. of Welds for Surface Preps.
Results Inspector Signature Date
- Final P.T. and Vacuum Box of Seams
 (See Weld Inspection Sheet)
Results Inspector Signature Date
- Completion of Weld Inspection: QI-QP-11.14-6
Inspector Signature Date

NON DESTRUCTIVE TEST
INSPECTION REQUEST

FOREMAN

DATE 2-1-82

Fowler

WELDER: NA

DRAWING # B22401A

INSP. REQ.

CLEAN: FIT-UP

VISUAL: L.P.

FIELD WELD: 120

COMMENTS:

WFML:

of 8P 11.14-1

INSPECTOR: [Signature]

ACCEPT:

DATE: 2-1-82

FOR INFORMATION ONLY

NON DESTRUCTIVE
INSPECTION REQUEST

FOREMAN

Fowles

TIME

DATE
2-1-82

WELDER: *PA*

DRAWING # *Bb2401A*

INSP. REQ.

CLEAN FIT-UP

FIELD WELD # *120*

VISUAL

L.P.

FINAL

V.B.

COMMENTS:

WFML:

ES QP 11.14-1

INSPECTOR: *D.P. Fowles*

ACCEPT:

DATE: *2-1-82*

NON DESTRUCTIVE TEST
INSPECTION REQUEST

FOREMAN

TIME

DATE

10-24-78

WELDER:

Justice AEU

DRAWING #

BB 2401A

INSP. REQ.

CLEAN

FIT-UP

FIELD WELD JT. # *120*

VISUAL

L.P.

V.B.

FINAL

COMMENTS:

*Just fit up
and Chamber of
Embed To Plate*

WNR:

A023290 AEU

INSPECTOR:

S.M.M. Coq ACCEPT:

DATE:

10-24-78

FOR INFORMATION ONLY

FOR INFORMATION ONLY

R&R STAINLESS STEEL LINER INSPECTION TRAVELER

PROJECT: CPSES JOB NO.: 35-1195 UNIT Reactor #2 PAGE 1 OF 2

BB 2401 A Reactor Liner # 2 Stainless Steel 3/16" RAA20 to angle
Drawing No. POOL METAL TYPE MTL. THK. PC. to PC.

PLATE TO PLATE INSERT TO PLATE ANGLE TO PLATE OTHER

WELDER SYMBOL	WMR NO.	WELD PROCED.	HOLD POINT
AFK	A005669	88023	First P.P., 2, 3
AFK	A007509	88023	4
ARN	A007598	88023	4
ARN	A007606	88023	4
CCG	B463	88025	1
CCG	B477	88025	1

1. Fit up and cleanliness of above:
SAT RESULTS AA Mumm INSPECTOR SIGNATURE 3-11-83 DATE

2. V.T. of backing strip tack/fillet welds:
SAT RESULTS Sam Wilburn INSPECTOR SIGNATURE 8-10-78 DATE

3. Cleanliness of channel, liner, and backing strip:
SAT RESULTS Sam Wilburn INSPECTOR SIGNATURE 8-10-78 DATE

4. Final V.T. of channel fillet weld:
SAT RESULTS Sam Wilburn INSPECTOR SIGNATURE 10-30-78 DATE

5. Final V.T. of inside weld:
SAT N/A RESULTS N/A INSPECTOR SIGNATURE N/A DATE

Completion of weld inspection:

LATE ENTRY PER CP-QCI 2, 11-11 PAR95 RESULTS SEE NOTE: REFERENCE NDT CMT. ATTACHED DOCUMENTATION. INSPECTOR SIGNATURE DATE

FOR INFORMATION ONLY

21088

107

WELD NO.

B&R Stainless Steel Liner Inspection Traveler

Weld Inspection Sheet

Page ___ of ___

Acceptance Std.
Gibbs & Hill 2323-SS-18

- 7a. Penetrant Mfg. Magnaflux-Spotcheck _____
- Cleaner Mfg. Magnaflux-Spotcheck _____
- Developer Mfg. Magnaflux-Spotcheck _____

NDE Procedure

Final P.T.	Level II	RESULTS	INSPECTOR SIGN.	DATE
------------	----------	---------	-----------------	------

- 7b. Vacuum Box _____ GASKET TYPE _____ SOLUTION TYPE _____
- _____ by _____
- Pretest Cleaning _____ Pressure _____ Temperature _____ NDE Procedure _____
- Solution Application Method _____ Post Test Cleaning _____
- Gauge Serial Number _____ Pressure Differential _____
- Maintained for _____ Sec. _____ Min.
- Final V.B. _____
- N/A - Not Applicable

Satisfactory _____	Unsatisfactory _____	Level II Inspector _____	Date _____
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FOR INFORMATION ONLY

WELD NO. 107

21089

B&R Stainless Steel Liner Inspection Traveler

QI-QP-11.14-6 REV.

PROJECT: CPSES JOB NO: 35-1195 UNIT 2 PAGE ___ OF ___

BB2401-A REACTOR LINER #2 STAINLESS STEEL 3/16" PLATE TO ANGLE
 Drawing No. Pool Metal Type Mtl. Thck. PC. to PC.

Plate to Plate
 Insert to Plate
 Angle to Plate
 Other AA20 to E4

Welder Symbol	WFML No.	Weld Proced.	Hold Point

1. Fit up and Cleanliness of Above

Results Inspector Signature Date

2. V.T. of Backing Strip Tack/Fillet Welds:

Results Inspector Signature Date

3. Cleanliness of Channel, Liner, and B. Strip:

Results Inspector Signature Date

4. Final V.T. of Channel Fillet Weld:

Results Inspector Signature Date

5. Seam Weld Fit Up and Cleanliness:

Results Inspector Signature Date

6. Final V.T. of Welds for Surface Preps.

Results Inspector Signature Date

7. Final P.T. and Vacuum Box of Seams
 (See Weld Inspection Sheet)

Results Inspector Signature Date

8. Completion of Weld Inspection: QI-QP-11.14-6

Inspector Signature Date

NON DESTRUCTIVE TEST
SECTION REQUEST

FOREMAN

T³

DATE

8-10-78

WELDER:

Wright, Danny AFK

DRAWING #

LVW 7-10-78
WFB10559 - Job # 2401A Bestrom - Bergen

REACTOR # 2

INSP. REQ.

CLEAN

FIT-UP

FIELD WELD JT. # 107

VISUAL

L.P.

V.B.

FINAL

COMMENTS:

NR: A 205669 AFK

*Fit up and Cleanliness
of angle to plate*

INSPECTOR:

Danny Wright

ACCEPT:

DATE: 8-10-78

FOR INFORMATION ONLY

CERTIFICATE OF OFFICIAL REPORTER

This is to certify that the attached proceedings before the UNITED STATES NUCLEAR REGULATORY COMMISSION in the matter of:

NAME OF PROCEEDING: TEXAS UTILITIES GENERATING COMPANY, et al.

(Comanche Peak Steam Electric Station,
Units 1 and 2)

DOCKET NO.: 50-445-OL2
50-446-OL2

PLACE: BETHESDA, MARYLAND

DATE: TUESDAY, NOVEMBER 27, 1984

were held as herein appears, and that this is the original transcript thereof for the file of the United States Nuclear Regulatory Commission.

(sig)

(TYPED)

JOEL BREITNER

Official Reporter

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Reporter's Affiliation