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Operations William F.

Page 3 of 3

Ass't. General Manager - Operations Nuclear Plant Yogtle

1989 YEAR END PERFORMANCE

GOAL NO.	INDICATOR	VALUE	LEVEL	
NG-1	INPO RATING	2	A	26
NG-2	NUCLEAR SAFETY			20
	SALP RATING	1.66	4	12
NG-3	PLANT BELIABILITY BOULVALENT AVAILABILITY	91.96%	5	26
NG-4	UNPLANKED AUTOMATIC	2	5	6
NG-5	INDUSTRIAL SAFETY LOST TIME ACCIDENTS	0	5	6
MG-6	RADIATION EXPOSURE			
	COLLECTIVE MANREME	30.52	5 .	6
NG-7	O a M BUDGET	-19.6%	5	16
8~DM	CAPITAL BUDGET	-12.38	5	2

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of	Docket Nos. 50-424-OLA-3 50-425-OLA-3
GEORGIA POWER COMPANY,) et al.)	Re: License Amendment (Transfer to Southern Nuclear)
(Vogtle Electric Generating Plant,) Units 1 and 2)	ASLBP No. 93-671-01-0LA-3

REBUTTAL TESTIMONY OF W.F. KITCHENS

REBUTTAL TESTIMONY OF W.F. KITCHENS

- 2 Q. PLEASE STATE YOUR NAME AND POSITION.
- 3 A. My name is W.F. Kitchens. I am Assistant General Manager,
- 4 Plant Support, Plant Vogtle, Georgia Power Company.
- 5 Q. WHAT POSITION DID YOU HOLD IN 1990?
- 6 A. In 1990, I was employed by Georgia Power Company as Assistant
- 7 General Manager, Operations at Plant Vogtle.
- 8 Q. WHAT ARE YOUR PROFESSIONAL QUALIFICATIONS IN THE NUCLEAR
- 9 FIELD?
- 10 A. My professional qualifications are attached hereto as Exhibit
- 11 A.

- 12 Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY NOW BEING
- 13 PROVIDED?
- 14 A. The purpose of this rebuttal testimony is to respond to three
- issues raised in the Prefiled Testimony of Allen L. Mosbaugh:
- 16 (1) Mr. Mosbaugh's testimony concerning a January 1990
- meeting with George Bockhold that I attended; (2) Mr.
- 18 Mosbaugh's testimony concerning alleged intimidation by Mr.
- Bockhold of members of the Plant Review Board; and (3) issues
- 20 relating to dewpoint readings and air quality.

JANUARY 1990 TEAM BUILDING MEETING

- Q. ON PAGES 8-9 OF MR. MOSBAUGH'S RETYPED PREFILED TESTIMONY, HE

 DESCRIBES A MEETING THAT HE ATTENDED WITH YOU AND MR. BOCKHOLD

 IN JANUARY 1990. COULD YOU EXPLAIN THE REASON THAT THE

 MEETING WAS CALLED AND WHAT HAPPENED AT THAT MEETING?
 - A. Yes. In January, 1990, Mr. Bockhold requested that we meet to have a "team building" meeting to improve communications between my organization (operations) and Mr. Mosbaugh's organization (plant support). This meeting was requested by Mr. Bockhold and scheduled in advance. While Mr. Mosbaugh says in his prefiled testimony that the meeting occurred on January 19, 1990, my daytimer indicates that this meeting was scheduled for January 12, 1990. My recollection is that the meeting took place on January 12.

Mr. Bockhold said that he had called the meeting because he had received outside feedback that the operations organization (which I headed) was not working well together with the plant support organization (which Mr. Mosbaugh headed). The meeting lasted 30 to 45 minutes. Mr. Bockhold asked both me and Mr. Mosbaugh to provide candid feedback about each other, both positive and negative. Mr. Mosbaugh and I also provided both positive and negative feedback to Mr. Bockhold.

- 1 Q. MR. MOSBAUGH SAYS, ON PAGE 8 OF HIS RETYPED PREFILED TESTIMONY
 2 THAT DURING THAT MEETING, "BOCKHOLD PROCEEDED TO EXPLAIN TO ME
 3 THAT THE ORGANIZATION WOULD NOT TOLERATE BACKSTABBING." DO
 4 YOU HAVE ANY COMMENT ON THIS TESTIMONY?
- A. I do not recall Mr. Bockhold's use of the word "backstabbing"

 at that meeting, although I see that Mr. Mosbaugh's notes

 apparently taken at that meeting do include that term.
- 9 AT THAT MEETING WERE IN REFERENCE TO MR. MOSBAUGH'S
 10 "CONTACTING THE NRC AND ALLEGING THAT YOU HAD WILLFULLY
 11 VIOLATED THE DILUTION VALVE TECH. SPEC," AS ALLEGED ON PAGE 8
 12 OF MR. MOSBAUGH'S RETYPED PREFILED TESTIMONY?

A. No. I recall no mention of the dilution valve technical specification issue at that meeting; Mr. Mosbaugh's notes confirm my recollection. In fact, as I recall it, Mr. Bockhold's criticism was directed as much toward me as it was toward Mr. Mosbaugh. I specifically recall that Mr. Bockhold called me "pig-headed" at that meeting. Mr. Bockhold said that I was stubborn and that I could improve by being more willing to keep in open mind. I left that meeting with the belief that Mr. Bockhold had raised a significant issue about my performance and that it could affect my career if I failed to address that issue. Mr. Mosbaugh's notes also indicate that Mr. Mosbaugh and I expressed our own criticisms of Mr.

Bockhold at that meeting. This was a very candid exchange of views.

In addition, at the time of this meeting, I did not know that Mr. Mosbaugh had made allegations to the NRC. I recall I became aware of the OI investigation into the dilution valve issue on February 7, 1990, so there was no way I could have known that Mr. Mosbaugh was the alleger in January. I did not learn that Mr. Mosbaugh was the alleger on the dilution valve issue until several months later.

10 Q. WAS THIS PERFORMANCE ISSUE DISCUSSED AT ANY OTHER TIME?

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- Yes. I pursued this performance issue further with Mr. 11 A. Mosbaugh after the meeting. We discussed how we could improve 13 the communications between our organizations. I suggested 13 that we attend each others' staff meetings. While I attended 14 several plant support staff meetings, Mr. Mosbaugh did not 15 attend any operations staff meetings. This effort was 16 recognized by Mr. Bockhold in my annual Performance Appraisal 17 later in 1990. He wrote that Mr. Mosbaugh and I had achieved 18 "peaceful coexistence" and that our organizations "worked 19 effectively together," but that more cooperation was required 20 in this regard. A copy of this Performance Appraisal is 21 attached hereto as Exhibit B. 22
- Q. ON PAGES 8-9 OF MR. MOSBAUGH'S RETYPED PREFILED TESTIMONY, HE
 SAYS THAT MR. BOCKHOLD "WAS TRYING TO INTIMIDATE" HIM FROM

- 1 PURSUING HIS CONCERN ABOUT DILUTION VALVES. DO YOU HAVE ANY
 2 COMMENT ON THAT TESTIMONY?
- A. I perceived no attempt by anyone at that meeting to intimidate

 Mr. Mosbaugh. This was simply a frank and open discussion

 with the intent of improving the communication, cooperation,

 and performance of the nuclear organization.

ALLEGED INTIMIDATION OF MEMBERS OF THE PLANT REVIEW BOARD BY MR. BOCKHOLD

- 9 Q. ON PAGE 9 OF MR. MOSBAUGH'S RETYPED PREFILED TESTIMONY, HE
 10 SAYS THAT MR. BOCKHOLD INTIMIDATED AT LEAST ONE MEMBER OF THE
 11 PLANT REVIEW BOARD. DO YOU HAVE ANY COMMENTS ON THIS
 12 TESTIMONY?
 - A. Yes. Mr. Bockhold attended a PRB meeting on March 1, 1990 at which time he briefed the board on what he perceived its responsibilities to be. Mr. Bockhold told the PRB members that his presence at PRB meetings should not intimidate them, and that he wanted open and candid discussions by all meeting attendees. He also said that PRB recommendations were very valuable, and that they would lose their value if only "yes men" sat on the board. He asked the PRB members to discuss his briefing with their PRB alternate members, and to ensure that these alternate members felt comfortable with speaking their minds in Mr. Bockhold's presence.

1 Q. ON PAGE 10 OF MR. MOSBAUGH'S RETYPED PREFILED TESTIMONY, HE
2 ASSERTS THAT AT THAT TIME "PEOPLE WERE AFRAID TO RAISE
3 UNPOPULAR ISSUES." DO YOU HAVE ANY COMMENTS ON THIS
4 TESTIMONY?

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There was no fear on the PRB or, to the best of my Yes. A. knowledge, elsewhere at Plant Vogtle. As chairman of the PRB during the time at issue, I am not aware of any occasion where any individual failed to make a comment or vote as he wished because of any pressure or intimidation. Personnel who worked for me frequently brought issues and concerns to my attention, and I felt no hesitancy about taking such concerns to Mr. During PRB meetings, it was not uncommon that Bockhold. there would be differing points of view. Mr. Mosbaugh's assertion that people were afraid to speak up makes no sense given the fact that there were many varying opinions expressed In fact, sometimes when there were at PRB meetings. dissenting opinions recorded at PRB meetings, I would ask Mr. Bockhold to attend PRB meetings so that he could hear the members' differing views first hand.

PROVIDING DEWPOINT DATA TO THE NRC

- MR. MOSBAUGH ASSERTS ON PAGES 90-92 OF HIS RETYPED PREFILED 2 THAT GEORGIA POWER PROVIDED INCOMPLETE AND TESTIMONY 3 INACCURATE INFORMATION TO THE NRC IN RESPONSE TO THE NRC'S REQUEST FOR A TABLE OF DEWPOINT RESULTS. SPECIFICALLY, HE CONTENDS THAT INTERVENORS' EXHIBIT II-82 (GPC EXHIBIT II-57) 6 IS NOT ACCURATE AND COMPLETE. WHAT WAS YOUR ROLE IN 7 RESPONDING TO THE NRC'S QUESTIONS ON AIR QUALITY FOLLOWING THE 8 MARCH 20, 1990 SITE AREA EMERGENCY? 9
- A. As the Assistant General Manager Operations, I assisted in addressing questions raised by the NRC's IIT concerning air quality. With regard to Intervenor's Exhibit II-82, I was involved in a conference call with members of the NRC's IIT on April 9, 1990 (IIT Document 206). A copy of the relevant portions of the transcript of that conference call has been admitted as GPC Exhibit II-61 (Ward Ex. C).
- 17 Q. WHAT TRANSPIRED DURING THE APRIL 9, 1990 CONFERENCE CALL?
- 18 A. During that call I advised the IIT of the latest dewpoint
 19 measurements. I told the IIT that all of the air receivers
 20 were in specification except for one, for which the
 21 measurement was 60.9° F. I told the IIT that I believed that
 22 a possible reason why the dewpoint was high on that one air
 23 receiver was because the air dryer had been inadvertently

turned off. As a follow-up, Mr. Chaffee asked about the "history of these air dryers," and then asked to be provided "information that addresses the air-dryer performance on" the Unit 1 air dryers. Mr. Chaffee explained that he needed "the information that shows us to what extent air poor quality [sic] might have had an impact on the operation of the Unit 1-A diesel." He suggested that maybe we could just give him a "table of these surveillance results over the past couple of years." I suggested that I could have somebody look up the dewpoint readings over the last year of preventive maintenance ("PM") work orders. I left the conversation with the understanding that this was acceptable -- that I was to provide to the IIT with monthly PM dewpoint measurement information the year prior to the March 1990 Site Area Emergency.

- 16 Q. MR. MOSBAUGH HAS STATED THAT "APPARENTLY" YOU HAD COMPLETED A

 17 COMPILATION OF DEWPOINT MEASUREMENTS AT THE TIME OF YOUR

 18 DISCUSSIONS WITH THE IIT. (Tr. 10518) IS HE CORRECT?
 - A. No, I do not believe so. The discussions with the IIT were in the morning of (9:02 a.m.) Monday, April 9. I expressly told Mr. Chaffee that I didn't have the data, but only a list of PM work orders (IIT 206, page 8, lines 6-9). The monthly PM dewpoint measurements were obtained after these discussions.

24 Q. WHAT INFORMATION DID YOU PROVIDE TO THE IIT?

- A. I provided the IIT with a table of dewpoint measurements for the 1A diesel generator going back to March 1989. This table has been admitted as GPC Exhibit II-57 (Bockhold K).
- Q. WHY DID THE LIST OF DATA INCLUDE DATA FROM APRIL 8, AND WHY

 DID IT NOT INCLUDE DATA FROM APRIL 5-7?

A. We omitted the April 5-7 data for two reasons. We did not believe the dewpoint readings taken on April 5-7 because the readings for all eight air receivers were outside the acceptable range at the same time. We did not believe these readings were accurate. There was some concern whether the instruments were giving accurate readings, and whether we were using the measurement instrumentation correctly. There was no point to giving the NRC dewpoint information that we did not believe to be correct.

Moreover, I believed at the time that the NRC was fully aware of the out-of-specification readings for the air receivers, and also that NRC knew that we questioned our measurement equipment. This is confirmed by the transcript of the April 9, 1990 conference call with the IIT. (GPC Exhibit II-61) During that call, Mr. Chaffee of NRC, apparently referring to a phone call he received on Saturday, April 7, said that what he "heard later that day [Saturday] was that you had gotten a new instrument, but when you did testing with it, you got negative numbers, which didn't make any sense. So, you were going to go get another instrument for measuring

the air quality from Hatch, and I don't know -- have you gotten that instrument and used it, or are you still waiting for it?" Tr. 3-4. To me, this shows that Mr. Chaffee knew of the high readings obtained prior to the first new instrument. Mr. Ward replied that we had received another instrument from the V.C. Summer plant that was "identical or similar to the [instrument] we originally had and all of the numbers that were reported Sunday were in the range of 36 to 45 degrees."

Id. at 4. This exchange illustrates that Mr. Chaffee had been informed about the out-of-specification numbers and knew about our concern with the instrumentation.

- 12 Q. MR. MOSBAUGH IMPLIES THAT THERE WAS SOME IMPROPER "PICKING
 13 AND CHOOSING" OF DATA TO BE INCLUDED IN DEWPOINT MEASUREMENTS
 14 PROVIDED TO THE NRC, RESULTING IN A LESS THAN COMPLETE AND
 15 ACCURATE SET OF DATA. (TR. 10520) DO YOU HAVE ANY COMMENTS
 16 ON HIS VIEW?
 - A. Mr. Mosbaugh is incorrect. I explained to Mr. Chaffee that I would endeavor to provide the NRC with the monthly PM results that show dewpoints (IIT 206, Tr. 7-9) for the last year. To me, the results showed the dewpoints over the requested period of time and was responsive.