

October 22, 1984

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

USNRC

In the Matter of: )  
)  
TEXAS UTILITIES ELECTRIC ) Dockets Nos. 50-445-2 and  
COMPANY, et al. ) 50-446-2  
)  
(Comanche Peak Steam Electric ) (Applications for  
Station, Units 1 and 2) ) Operating License)

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PREFILED REBUTTAL TESTIMONY  
OF C. THOMAS BRANDT

- Q1. Mr. Brandt, are you familiar with the testimony of Cory Allen given in this proceeding?
- A1. Yes, I am.
- Q2. When did you first meet Mr. Allen?
- A2. The last week of December, 1982.
- Q3. For context, Mr. Brandt, what was your job title at that time?
- A3. I was the non-ASME Mechanical/Civil QA/QC Supervisor at Comanche Peak.
- Q4. How long had you been in that job at the time you interviewed Mr. Allen?
- A4. Approximately eleven months.
- Q5. Under what circumstances did you meet Mr. Allen?
- A5. I interviewed him for a job.
- Q6. Had you seen anything regarding his qualifications prior to the time that you met him?

- A6. Yes. EBASCO's Office in New York City had mailed me a copy of his resume. I understand that Mr. Allen applied to EBASCO in New York for employment, and New York referred his resume to me for possible employment with EBASCO at Comanche Peak.
- Q7. What was your reaction to Mr. Allen's resume?
- A7. He seemed to me to be seeking a position for which he was overqualified.
- Q8. With reference to Mr. Allen's resume, what in particular caused you concern that he was overqualified to be a QC inspector?
- A8. His resume indicated that he has a Master of Science in Polymer Science from the University of Southern Mississippi. It also indicated that Mr. Allen had worked as a coatings engineer in the context of nuclear power plants.
- Q9. Why did these qualifications concern you?
- A9. I was concerned that, due to Mr. Allen's educational background and work experience, he would not be intellectually satisfied with restricting his activities to performing QC inspections day after day. I was also concerned with the possibility that, rather than limiting his work to the performance of inspections, Mr. Allen would question the adequacy of coatings specification and procedures. I did not need people doing that. I already had several inspectors who were doing that. That was beyond their job scope.
- Q10. Did you express your concerns to Mr. Allen?

A10. Yes. I told Mr. Allen that I was interviewing him for the job of QC inspector, not as a coatings quality engineer. I told him that he appeared to be overqualified for such a position.

Q11. What did he respond?

A11. He told me he had been in an engineering function at South Texas and with Bechtel and no longer desired such a position. What he was looking for was a position as a QC inspector in the protective coatings area. Mr. Allen assured me that he was not interested in attempting to function as an engineer.

Q12. Were you satisfied with his response?

A12. I was satisfied with it to the extent that he seemed sincere. I was cautious. I felt a little concern because, from my experience, people with Mr. Allen's degree of education and experience are not normally satisfied very long in a position as a QC inspector. In any event, I offered Mr. Allen a job as an inspector.

Q13. Was the decision to hire Mr. Allen your decision?

A13. Yes, it was. The decision to extend an offer to Mr. Allen was my decision.

Q14. When did Mr. Allen commence work for EBASCO at Comanche Peak?

A14. Early January, 1983.

Q15. When did you next have a conversation with Mr. Allen?

A15. By "next have a conversation" with him, I assume you mean have a conversation of any substance. I'm sure I might have said "Hi, Cory," or "How's it going," to him in passing. But as far as any discussion of substance, it was on February 11, 1983.

Q16. What was the occasion for that discussion on February 11, 1983?

A16. I was told by someone, I believe it was Bob Wallace, that Mr. Allen had been to see Ron Tolson the day before, asking questions about the design review process.

Q17. What was Mr. Wallace's position at that time?

A17. He was Mr. Allen's lead inspector.

Q18. As Mr. Wallace related it to you, what was the nature of Mr. Allen's concern?

A18. It had something to do with the issuance of design change authorizations.

Q19. Under what circumstances did you discuss this matter with Mr. Allen?

A19. On the afternoon of February 11, I asked Mr. Allen to come to my office.

Q20. Mr. Brandt, where were you on February 10, 1983?

A20. I don't recall, but I was not on the site.

Q21. Why did you send for Mr. Allen after you had learned that Mr. Allen had had a conversation with Mr. Tolson?

A21. As I recall, Bob Wallace indicated to me that Mr. Allen still had some doubt in his mind over the question that he had posed to Mr. Tolson. I wanted to make sure that Mr. Allen's concern was fully addressed and resolved.

Q22. Where did your discussion with Mr. Allen take place?

A22. In my office.

Q23. Was anyone present during the conversation, other than the two of you?

A23. Not that I recall, no.

Q24. Would you relate the substance of your conversation with Mr. Allen?

A24. I told Mr. Allen that I had heard that he had been in and posed several questions to Mr. Tolson, and I had also heard that he was still concerned or not clear as a result of Mr. Tolson's explanation. I asked him what his concerns were. He described to me his concern over ALARA review and design review of design change authorizations.

Q25. What does ALARA stand for, Mr. Brandt?

A25. As low as reasonably achievable.

Q26. What did Mr. Allen explain was his problem with ALARA and design review?

A26. He explained that, from his experience with Bechtel and Brown & Root, the design change authorization itself normally had more signatures on the face of the document. He

was concerned that, due to the lack of these signatures, the design change authorizations at Comanche Peak were not receiving the required ALARA and design reviews.

Q27. What did you respond?

A27. I explained to Mr. Allen that the way design change authorizations were processed at Comanche Peak, they were approved on-site by the discipline engineer and that both design review and ALARA review were conducted by Gibbs & Hill, the project Architect/Engineer, off-site. I advised Mr. Allen that, at Comanche Peak, DCAs are implemented upon approval of the discipline engineer on a construction-risk basis, subject to final design review by Gibbs & Hill.

Q28. What do you mean by "on a construction-risk basis"?

A28. When the DCA is approved by the discipline engineer, construction is free to implement the design change in the field. If Gibbs & Hill does not approve a design change under either design review or ALARA review, then the component or structure in question may require rework or removal.

Q29. Mr. Brandt, do you know whether the Comanche Peak Architect/Engineer conducts its design review and ALARA review differently than other nuclear plants?

A29. Only as to the timing of the reviews. Substantively, the review is conducted very much the same. At the time that Mr. Allen posed the question, Comanche Peak differed from other A/Es in that the design change was not design reviewed

prior to implementation of that design change, and construction proceeded on a risk basis pending satisfactory design review.

Q30. Does that mean that at other plants the design change would undergo design review prior to implementation in the field?

A30. Yes, it does.

Q31. Do you know how design reviews were conducted at the South Texas project during 1982?

A31. It is my understanding that, when Brown & Root was the A/E for the South Texas Project, it performed design review prior to field implementation of design changes.

Q32. In your view, was the problem that Mr. Allen expressed to you based on the differences in the timing of design review and ALARA review between South Texas and Comanche Peak?

A32. Yes.

Q33. Mr. Brandt, did Mr. Allen appear satisfied with your technical explanation of the ALARA and design review issues?

A33. Yes, he did.

Q34. Did he state that he was satisfied?

A34. Yes, In fact, he asked me why Mr. Tolson had not explained it that way the day before. I didn't speculate as to why he didn't understand Mr. Tolson's explanation. I did ask, however, whether he had any further concerns.

Q35. Did he?

A35. He said he had one other question, but he had been told the day previously to restrict his activities to performing inspections, and that's what he intended to do.

Q36. What was your response?

A36. I said, "Now I want to know what your concern is."

Q37. Did he express that concern?

A37. We might have gone back and forth once or twice, with him explaining that it clearly wasn't within his scope of job responsibilities and that he had been cautioned against doing so only the day before. I told him that I wanted to know. Whether that happened immediately or, as I said, we went back and forth once or twice, I don't remember. He eventually did explain his concern to me.

Q38. What was that concern?

A38. He was concerned that the coatings in the reactor core cavity were not qualified to the combined gamma and neutron radiation dosage levels that they would receive during the operating life of the plant.

Q39. Had Mr. Allen been inspecting coatings in the reactor core cavity?

A39. I don't know.

Q40. Did you have a technical answer to the issue that he raised?

A40. No, I did not.

Q41. What did you do?

A41. I told him to write an NCR.

Q42. From what he told you, was this a non-conforming condition?



A42. I wasn't sure whether the dosage levels Mr. Allen had quoted to me that these coatings would receive was accurate. I wasn't sure of the exact location of the recirc pumps within the containment structure or, for that matter, the exact elevation of the reactor core cavity. The answer to your question is, I wasn't sure that the condition was non-conforming. The vehicle for finding out, however, was the issuance of an NCR.

Q43. What do you mean by, "The vehicle for finding out"?

A43. Well, a QC inspector had come to me as his supervisor with a question I couldn't answer. He seemed to feel that qualification of the coatings was inadequate. Issuance of an NCR would trigger engineering review of the question.

Q44. Was Mr. Allen reluctant to write an NCR?

A44. Yes, he was, very reluctant.

Q45. Did you instruct him to do so?

A45. Yes, I instructed him to do so in that very meeting. I also told him that, if he felt uncomfortable with the NCR, I'd write it. He could put my name on it.

Q46. Mr. Brandt, I'll refer you to page 5 of 5 of Attachment 1 to this testimony. Would you identify page 5?

A46. This is the hand-written draft of the NCR on the reactor core cavity coatings that Mr. Allen presented to me on the 11th of February, 1983, after our discussion.

Q47. When Mr. Allen gave it to you, did the NCR have an NCR number on it?

A47. Yes, I believe it did.

Q48. What did a QC inspector at Comanche Peak have to do to get an NCR number?

A48. Pick up the telephone and call the Non-Conformance Report coordinator.

Q49. Once an NCR number had been assigned, what was the effect of that assignment?

A49. The NCR would be retained as part of the permanent plant records, regardless of whether it was issued for disposition or whether it was voided.

Q50. Could a QC supervisor cancel or discard the NCR once the number had been assigned?

A50. They could void it. There is a procedure that governs the process of voiding NCRs.

Q51. What does voiding an NCR mean?

A51. It means that the NCR or the non-conforming condition identified by the inspector was in fact not a non-conforming condition.

Q52. Were you hostile to Mr. Allen's raising the ALARA and design review issues and the reactor core cavity coatings issue with you?

A52. Absolutely not. I thought they were legitimate concerns at the time we discussed it.

Q53. Did you so indicate to Mr. Allen?

A53. Yes, I believe I did.

Q54. Did you indicate to Mr. Allen that he was not in the future to identify such concerns or to report such concerns to you or to QC supervision?

A54. Absolutely not.

Q55. Did you invite Mr. Allen to raise any other concerns that he had with you?

A55. I believe I did, yes.

Q56. During this discussion, the meeting on February 11 with Mr. Allen, did he raise any other technical concerns with you?

A56. No, he did not.

Q57. Did he raise any personnel concerns with you?

A57. No, he did not.

Q58. Specifically, did Mr. Allen refer to the skimmer pump room or an incident that had taken place regarding the skimmer pump room with you?

A58. No, he did not.

Q59. Mr. Brandt, please refer to page 4 of Attachment 1 to your testimony. Could you explain the difference between that document and the hand-written draft of the NCR, which is page 5 of Attachment 1?

A59. The only difference is that page 4 is a typed version and that page 4 has an action addressee on it; page 5 does not.

Q60. Who is the action addressee?

A60. Mike McBay.

Q61. Who is Mr. McBay?

A61. At the time, he was the manager of Engineering at Comanche Peak.

Q62. Mr. Brandt, the NCR references what appears to be Criterion 11 of 10 CFR, Part 50, Appendix B; is that correct?

A62. Yes it does.

Q63. What is your understanding of the non-conformance with respect to Criterion 11?

A63. I thought then and think now that Mr. Allen had probably incorrectly referenced Appendix B, Criterion 11, as the document that was violated. Criterion 11 states that, "A test program shall be established to assure that all testing required to demonstrate that structures, systems, and components will perform satisfactorily," and that really is not the description of the non-conformance. I believe that what Mr. Allen was trying to convey was that the qualification of coatings systems required by ANSI N101.2 had not been conducted for combined dosages of gamma and neutron radiation which existed in the reactor core cavity.

Q64. Does the ANSI standard to which you refer require such qualification?

A64. Yes, it does.

Q65. Is Comanche Peak committed to that ANSI standard?

A65. Yes, we are.

Q66. Mr. Brandt, please refer to page 3 of Attachment 1 and identify that document, if you will.

A66. This is a copy of NCR C-83-00461, Revision 1.

Q67. What is the difference between the original Rev 0 and Rev 1?

A67. In Rev 1, the hold tag was removed to allow work to continue in the reactor core cavity.

Q68. Is that the only difference?

A68. Between Revision 0 and Revision 1?

Q69. Yes.

A69. Yes.

Q70. Now, page 3 of Attachment 1, under "Disposition" indicates, "See attached." Do you know what the attachment was?

A70. It's the telex, or TWX, which is page 2 of this attachment.

Q71. Would you describe page 2, please?

A71. It's the Gibbs & Hill response to Mr. Allen's NCR on the qualification of reactor core cavity coatings.

Q72. Would you summarize the technical content of the Gibbs & Hill telex?

A72. Coatings in the reactor core cavity serve no safeguard function. They don't protect any safety-related equipment. Consequently, there is no safety concern in the event that these coatings should fail, as far as corrosion occurring within the reactor cavity. The third paragraph goes on to state that, should these coatings fail in a post-accident environment, water would flow into the reactor cavity sump and there would be no flowpath by which water could escape the reactor core cavity and find their way to the recirculation sump from which the recirc pumps draw their water inventory for accident cooling.

Q73. Mr. Brandt, please refer to page 1 of Attachment 1 and identify that document, if you will.

A73. This is a typed version of the disposition, Revision 1, and closure of the non-conformance report.

Q74. When was this NCR closed?

A74. March 28, 1984.

Q75. Mr. Brandt, at the bottom of page 1 of Attachment 1, is that your signature?

A75. On the last two lines of the form, yes, those are my signatures.

Q76. One appears to be for QE review and approval. What does your signature in that line signify?

A76. That the disposition is adequate for the described non-conforming condition.

Q77. And what does your signature next to disposition verification and closure signify?

A77. It means that the non-conforming condition has been adequately addressed and the non-conformance report is closed.

Q78. Do you recall having a conversation with Mr. Allen regarding the closure of the NCR?

A78. Yes, I do.

Q79. Do you recall when that conversation took place?

A79. I believe on the day that the NCR was closed, on March 28, 1983.

Q80. Who initiated the conversation?

A80. I did.

Q81. How did you do so?

A81. I asked Mr. Allen to come to my office.

Q82. Why did you ask Mr. Allen in to discuss the closure of the NCR?

A82. As Mr. Allen had originally brought the NCR to my attention and I had directed that the NCR be written in the first place, I felt that it was right that I should explain to Mr. Allen the nature of the disposition.

Q83. Would you relate the substance of your conversation with Mr. Allen on that occasion?

A83. I advised him that the Architect-Engineer had come back with the disposition that was attached to the non-conformance report; that I personally felt that the non-conformance report disposition was adequate; that I was closing the non-conformance report; and that I personally didn't intend to pursue it any further.

Q84. Did you show Mr. Allen a copy of the telex from Gibbs & Hill?

A84. I believe so. I had a copy of the entire NCR package in front of me.

Q85. Did he read it?

A85. As I recall, he did.

Q86. What was Mr. Allen's response to your explanation and to the closed NCR?

A86. To the best of my recollection, he was almost without reaction. I don't know whether Mr. Allen agreed or disagreed with the NCR's disposition. But it was my impression that he understood what I had said.

Q87. When you indicated to Mr. Allen that you didn't intend to pursue the NCR any further, what did you mean by that?

A87. Mr. Allen had seemed hesitant to raise this coatings issue in the first place, and didn't want to write the NCR in the beginning. It got to the point that I had to direct him to write the NCR. Essentially, I had chased his concern for him. The engineering disposition had been provided for me. I felt the disposition acceptable and I explained to Mr. Allen that I didn't intend to take any more time chasing this particular concern. I was satisfied with the response.

Q88. Did Mr. Allen indicate to you that he disagreed with the disposition?

A88. No, as I stated earlier, he was almost reactionless.

Q89. Did he ask you to take it any further?

A89. No, he did not.

Q90. Mr. Brandt, what is the current status of the coatings in the reactor core cavity?

A90. Those coatings have been placed on the protective coatings exempt log.

Q91. What is the protective coatings exempt log?



- A91. The exempt log includes all unqualified coatings in the containment building. By "unqualified," I mean coatings that are either unqualified by design, or coatings that have been applied outside the application parameters, or have not been inspected for one reason or another.
- Q92. Why was it necessary to place the reactor core cavity coatings on the exempt log, in light of the fact that Mr. Allen's NCR was dispositioned?
- A92. The coatings on the exempt log include all unqualified coatings, without regard to whether a transport mechanism from the coatings' point to failure to the recirc sump could be postulated. Indeed, there are several items on the exempt log as to which, should the coatings fail, I don't believe could be transported from the point of failure to the recirc sump.
- Q93. Does the fact that the reactor core cavity coatings have been placed on the exempt log in any way indicate that this disposition of Mr. Allen's NCR was inadequate or incorrect?
- A93. Absolutely not.
- Q94. What is the next conversation with Mr. Allen that you can recall taking place after your meeting with him on March 28, 1983?
- A94. I believe it was mid-June, 1983.
- Q95. What was the occasion?

A95. I had just talked to Bill Dunham, who was irritated about the way he was being treated by Harry Williams. This discussion took place in Ron Tolson's office with Mr. Dunham, Mr. Tolson, Gordon Purdy, and myself. Mr. Dunham alleged that Harry Williams had shown little respect for him in that he had disciplined Mr. Dunham in front of the craft. Mr. Dunham stated that Cory Allen could confirm the incident, and indicated that we should talk to Mr. Allen. I closed the meeting by telling Mr. Dunham that I would look into his concerns, and that I would talk to the coatings inspectors. I left the meeting, and the first inspector that I talked to was Cory Allen.

Q96. Where did this conversation with Mr. Allen take place?

A96. In my office.

Q97. Was anyone else present?

A97. Ron Tolson walked into the room during the discussion, stayed maybe a minute or two to ask me something totally unrelated, got the answer that he was looking for, and left. My discussion with Mr. Allen was initiated before Mr. Tolson's entrance, continued while Mr. Tolson was there, and continued after Mr. Tolson's departure.

Q98. What was the substance of your conversation with Mr. Allen?

A98. I asked Mr. Allen to describe the incident to which Mr. Dunham had referred. Mr. Allen could not.

Q99. Mr. Allen did not remember the incident to which Mr. Dunham referred?

A99. That's correct. I asked Mr. Allen whether he had ever been directed by his supervisor to accept something that he thought was unacceptable. Mr. Allen replied that he had not. We discussed Mr. Williams' ability to communicate with the group of people that he supervised, and I asked Mr. Allen about the degree of confidence the group had in Mr. Williams. Mr. Allen explained that he thought Mr. Williams was trying, and was probably doing the best he could. But Mr. Allen didn't think that the QC people had much confidence in Harry.

Q100. Did you ask Mr. Allen whether he was suffering harassment?

A100. Yes, I did.

Q101. What was his response?

A101. He said no. I told him that, if he ever was, I had a Gai-Tronics on my wall, that he could call me over that or on the phone and I would immediately come and resolve the problem for him.

Q102. Mr. Brandt, what is a Gai-Tronics?

A102. It's a public address system installed within the plant. I had a speaker mounted in my office so that either inspection or construction personnel that were seeking my attention could get in touch with me.

Q103. Mr. Brandt, did Mr. Allen indicate to you in this meeting that he was unhappy with his work?

A103. No, he did not.

Q104. Did he indicate to you that he was mistreated in any way by his supervisors?

A104. I don't think "mistreated" was a good term. I believe we had a short discussion about Bob Wallace who had been Mr. Allen's lead inspector at one point. Mr. Allen had a low opinion of Mr. Wallace.

Q105. Was Mr. Wallace employed at Comanche Peak at the time of your discussion with Mr. Allen?

A105. No, Mr. Wallace left Comanche Peak on May 16, 1983.

Q106. Did Mr. Allen raise any technical concerns with you at this meeting?

A106. No, he did not.

Q107. Did anything that Mr. Allen told you at this meeting, other than his observations regarding Harry Williams, give you cause for concern or cause you to conduct further investigations?

A107. No.

Q108. Mr. Brandt, let me quote to you from Mr. Allen's testimony in this proceeding, at transcript page 16911, beginning on line 20.

"Q. Did you discuss with them [Brandt and Tolson] at that meeting all the problems that you perceived existed with regard to the paint coatings inspection work at the plant site at that time?

"A. No sir. I don't think I told them of any existing problems whatever. In fact, I probably left them with a favorable impression of what was going on."

Mr. Brandt, is that an accurate summary of your conversation with Mr. Allen?

A108. Yes, it is quite accurate. In fact, I was a little bit surprised at Mr. Allen's comments because Bill Dunham had singled Mr. Allen out as someone who would support Mr. Dunham's contention that Harry Williams was giving the inspectors a hard time. Although Mr. Allen indicated that he didn't have a lot of confidence in Harry's abilities as a supervisor, he definitely left me with the impression that it was not nearly so bad a situation as Bill Dunham had painted only minutes before.

Q109. Your meeting with Mr. Allen was on the same day, as you recall, as your meeting with Mr. Dunham?

A109. Probably within an hour of the conclusion of the Dunham meeting.

Q110. Mr. Brandt, do you recall Mr. Allen's testimony regarding a three-part memorandum that he wrote to you in June, 1983, complaining about the conduct of craftsmen?

A110. Yes, I do.

Q111. Mr. Brandt, I'll hand you Attachment 2 to your testimony and ask you if that is the three-part memo about which Mr. Allen testified.

A111. Yes, it is.

Q112. Is that your writing on the bottom of page 1 of Attachment 2?

A112. Yes, along with my initials and the date.

Q113. Do you recall whether you received the memo before or after the meeting that you have just described with Mr. Allen?

A113. It was after.

Q114. What was your reaction when you received that memo?

A114. I had three distinct reactions to it. First, I think one of the last things we discussed in our meeting earlier, in the month of June, was that, if Cory had a complaint, he should bring it to my attention and I would take personal action on it. I was pleased to see that he thought enough of my offer to carry through with it.

My second reaction was that Cory may have been over-reacting a little bit by stating it was a "blatant example of a Brown & Root paint foreman ordering a QC inspector to perform" when he had asked him to go re-inspect an area.

My third reaction was that if indeed, as Mr. Allen indicated, it wasn't an interrogative request but a command from the craft for a QC to go do something, that there was definitely something I could do about that, and that we would sit down and resolve it.

Q115. What did you do?

A115. I called a meeting in my office with all parties concerned.

Q116. How soon did you convene this meeting after you received the memo?

A116. It was either the same day I received the memo or the next day.

Q117. Where did the meeting take place?

A117. In my office.

Q118. Who attended?

A118. Junior Haley, who was the Brown & Root coating superintendent. Harry Williams, who was Mr. Allen's supervisor. Jim Brackin, who was a general foreman working for Mr. Haley, and Billy Remington and Wayne Williams.

Q119. You testified that you called this meeting. Did you direct the meeting?

A119. Yes, I did.

Q120. What did you ascertain?

A120. Wayne Williams, Remington and, to some extent, Brackin, immediately got on the defensive. I perceived that it was going to boil down to a "Whose version do you believe" situation. The craftsmen tried to justify their actions to me.

Q121. Were you interested in their justifications?

A121. No, not really.

Q122. What did you say to them regarding their actions?

A122. Once I decided that it was going to boil down to a credibility situation, I thought it more pertinent to address the issue and make clear to construction what my position on the subject was.

Q123. What was that position, as you expressed it to them?

A123. That construction wasn't going to be directing QC to do anything as far as mandating or issuing imperative commands, as Mr. Allen called it. When it got to the point that the QC inspector thought that it was a form of harassment, I told the craft that they had gone too far and I wasn't going to tolerate it.

Q124. Was Mr. Haley the senior craftsperson at that meeting?

A124. Yes, he was.

Q125. What was his response to your statement?

A125. Mr. Haley agreed with me.

Q126. Why did you invite Harry Williams to this meeting?

A126. He was Mr. Allen's supervisor. I wanted both sides of the fence -- that is, construction and QC -- to understand the significance of the situation, what my attitude on it was, and how we were going to handle it in the future. I got total support from the construction superintendent, Mr. Haley.

Q127. Did you indicate to the craftsmen that if they had future disagreements with QC inspectors, how they were to resolve them?

A127. Yes. If a painter had a problem, the way I saw to resolve the problem was for the painter to go to his foreman. If the foreman felt that he had to go to a general foreman or to Junior Haley to get the situation resolved, that was fine. But they were not to have any arguments with QC inspectors. If it got down to the point where there was



going to be argument, they should take it to Mr. Haley, and Mr. Haley was not to pursue the matter with QC inspectors, but with me personally. That did occur after this meeting.

Q128. Did you ask Mr. Allen to remain after this meeting?

A128. Yes, I did.

Q129. Did you have a private conversation with him?

A129. Yes, I did.

Q130. What did you tell Mr. Allen?

A131. I told Mr. Allen that I was pleased that he had brought the matter to my attention. That's exactly what I wanted him to do. And, as I stated in the memo, if the situation didn't improve, to get back with me.

Q132. What was his response?

A132. He understood and he seemed appreciative of my response to his memo.

Q133. Did Mr. Allen indicate to you any dissatisfaction with the conduct of the meeting?

A133. No, he did not.

Q134. Did he state to you that in his view Mr. Haley should have disciplined the craftsmen who were involved in this incident?

A134. No, he did not.

Q135. Mr. Brandt, do you recall Mr. Allen's testimony regarding an NCR that he wrote concerning the use of detergent?

A135. Yes, I do.

Q136. How did you become aware that he had written an NCR?

A136. Either Harry Williams or Mike Foote called me and told me that they thought Cory was a little out of line regarding an NCR that he had just written.

Q137. What do you mean by "out of line"?

A137. Mr. Allen was over-reacting.

Q138. In what way was he over-reacting?

A138. He was implying that construction was trying to deceive him by using this detergent.

Q139. Mr. Brandt, I will show you a two-page document that has been marked as Attachment 3 to your testimony. Is that the NCR Mr. Allen wrote regarding the use of detergent?

A139. Yes, it is.

Q140. What is the technical problem identified by the NCR?

A140. The NCR describes a potential residue being left on a coated surface after the use of a cleaning agent that would serve to insulate the coated surface and preclude proper holiday detection of that coated surface.

Q141. How soon after Mr. Williams or Mr. Foote called you regarding this matter did you meet with Mr. Allen?

A141. It was late that afternoon.

Q142. Would you relate the substance of your conversation with Mr. Allen regarding this matter?

A142. I believe I saw the NCR at about the same time that Cory arrived in my office. Mike Foote had described the content of the NCR to me over the phone. Cory arrived in my office and I asked him what his problem was. He said it was his

opinion that the craft was trying to deceive QC inspectors by wiping down surfaces with this detergent prior to the performance of the holiday detection.

It struck me unusual that Mr. Allen was making this complaint. I told him that I thought that he, as a chemist, would have understood the lack of technical significance of a detergent solution being used on the surface after a finish coat had been applied. I did not agree with, and saw no basis for, his theory that detergent would provide some sort of insulative barrier. I was disappointed in that respect. I was also disappointed with the fact that he was presuming that the craft was deliberately trying to deceive him or circumvent the inspection process by using this cleaning agent.

Q143. Did he tell you that that was what he thought?

A143. He told me that he thought that was why they were doing it.

Q144. Which craftsman actually performed the cleaning with this detergent?

A144. Laborers.

Q145. Are laborers painters?

A145. No, they are not.

Q146. Are the laborers to which you refer part of the paint department?

A146. No, they are not.

Q147. Why were these detergents used in cleaning coated surfaces?

A147. Literally, to wash the walls, to clean the dirt off the walls.

Q148. Was this cleaning being done so that the inspections could be performed?

A148. Yes, it was.

Q149. What did you advise Mr. Allen with regard to his concern?

A149. I told him I thought he was getting a little bit carried away. I suppose I could understand Mr. Allen's raising the technical issue as to the performance of the holiday detection test, even though I considered the issue marginally significant. I told him, however, that in implying that the Paint Department was trying to deceive QC inspectors, I thought he was letting his imagination run away with itself.

Q150. Do you know whether Mr. Allen was asked to leave the site for a day as a result of his writing the NCR?

A150. I have no knowledge of him being asked to leave for a day.

Q151. At this meeting did Mr. Allen express any other concerns to you?

A151. Not that I recall.

Q152. At one point in his testimony regarding Comanche Peak inspection procedures, Mr. Allen referred to "EBASCO" procedures. To what was he referring?

A152. I don't know. All protective coatings inspection procedures at Comanche Peak were and are TUGCO quality control instructions. They were not and are not EBASCO procedures.

Q153. Mr. Brandt, have you reviewed Mr. Allen's testimony regarding an incident between him and a paint foreman on the polar crane?

A153. Yes.

Q154. Did you hear of this incident at the time it happened?

A154. Yes, I believe Mr. Allen told me about it on the same day it occurred.

Q155. Did you take any action as a result?

A155. Yes. That same day I discussed the incident with Junior Haley, the paint superintendent.

Q156. What did you tell Mr. Haley?

A156. I told him that I didn't want his people interfering with my inspectors, especially where it appeared that the craft foreman in question needed training in the use of instruments.

Q156. Did you conclude, then, from what Mr. Allen had told you, that the foreman had acted improperly?

A156. Yes.

Q157. Did you call Mr. Allen in to discuss this matter?

A157. No. As I recall, he came to see me about it.

Q158. Mr. Brandt, do you recall Mr. Allen's testimony regarding a policy instituted in the summer of 1983 requiring the use of inspection reports instead of nonconformance reports to report discrepant conditions?

A158. Yes, I do.

Q159. Do you recall Mr. Allen testifying that he had difficulty with that policy because, in his view, there were certain conditions that could not adequately be reported or resolved by using an unsat inspection report?

A159. Yes, I do.

Q160. Mr. Brandt, in your view, are there any conditions that cannot adequately be reported on an unsat IR with respect to protective coatings?

A160. No, there are not.

Q161. Why?

A161. As I have explained many times in this proceeding, once an unsat inspection report is issued, before it can ever be closed, it must be deemed satisfactory.

If the unsatisfactory condition can be resolved by craft rework, the craft may merely rework the item to an acceptable state and present it for reinspection.

If, however, the craft cannot rework an item to a satisfactory condition, they must direct the issue to engineering. When that is done, the unsatisfactory condition may be addressed in one of two manners. The inspection report can be closed based on the issuance of a nonconformance report, which is procedurally described in the inspection report procedure, or engineering can issue a design change authorization accepting the condition described in the unsatisfactory inspection report.

Q162. Mr. Allen testified that the use of an inspection report was not, in his view, an adequate means of identifying the discrepant conditions that he identified in three NCR's that he wrote. Do you recall that testimony?

A162. Yes, I do.

Q163. Mr. Allen's NCR C-83-02396, which appears at transcript page 17587 reports that certain coatings were applied by an uncertified painter, "M. Jackson." Could that condition have been adequately reported on an IR?

A163. Yes. In fact, if you look at transcript page 17501, which is the second page of one of the IR's attached to the NCR, one of the inspection items that Mr. Allen filled out is whether the painter was qualified. "M. Jackson" is listed as one of the painters, and Mr. Allen marked "sat," indicating that the painter was qualified.

Q164. Why did Mr. Allen mark "sat" for painter qualification if, as the NCR states, M. Jackson was not certified?

A164. I have no idea.

Q165. If Mr. Allen had discovered the certification problem after filling out the IR and marking "sat" for painter qualification, how should he have reported the condition?

A165. He could have corrected the IR with a late entry, much as he did with regard to the IRs involving the traceability issue.

Q166. Mr. Allen's NCR C-83-02604, which appears at transcript page 17566, reports uncured coatings and the absence of a QC inspection prior to the application of the coatings. Could these conditions have adequately been reported on an IR?

A166. Yes. In fact, transcript page 17567, one of the inspection reports attached to the NCR, shows that Mr. Allen marked the curing attribute "unsat." As to the absence of a prior QC inspection, Mr. Allen could either have filled out the IR specified in QI-QP-11.4-5, which lists the attributes relevant to the prior inspection, or simply added an additional attribute to the IR that he did fill out. In either case, the result would have been the same as the condition reported in the NCR.

Q167. Mr. Allen's NCR C-83-02938, which appears at transcript page 17531, reports a traceability problem with respect to certain coating materials. Could that condition have adequately been reported on an IR?

A167. Yes. In fact, the problem should have been reported in the IR to begin with. Referring to transcript page 17535, for example, which is one of the IRs attached to the NCR, Mr. Allen originally marked "sat" for each of the traceability parameters for the coatings in question. He later marked these "unsat," apparently at the direction of his supervisor.

Q168. How should an inspector report a discrepant condition if the attribute in question does not appear on the IR?



A168. As I have testified before in this proceeding, quality procedure CP-QP-18.0 provides that additional inspection attributes may be added to an IR by the inspector.

Q169. Mr. Brandt, after the new policy regarding the use of unsat IRs became effective, did inspectors continue to write NCRs?

A169. Yes, they did.

Q170. Why was that?

A170. In some cases the building QC supervisors felt that a condition warranted the issuance of an NCR. In other cases it was simply the QC inspectors' failure to follow procedural requirements.

Q171. Did inspectors who wrote NCRs during the period after the policy became effective suffer any adverse consequences as a result of writing the NCRs?

A171. No, they did not.

Q172. Mr. Brandt, was there any intent on the part of quality management to decrease or discourage the reporting of discrepant conditions by instituting the policy requiring the use of unsat IRs to report discrepant conditions?

A172. Absolutely not.

Q173. Did you emphasize that to the inspectors?

A173. Yes, I did.

Q174. What did you say to them?

A174. I held a group meeting with them in September, 1983. I explained the rationale for the policy, and described the requirements of Appendix B as far as reporting nonconforming

and deficient conditions. I explained why unsat IRs would serve the same purpose as nonconformance reports, and emphasized that it wasn't a matter of not reporting deficient conditions. That definitely was not our goal. To the contrary, we wanted them to report all deficient conditions.

Q175. Was this meeting after the meeting that Mr. Allen testified he attended in Mr. Tolson's office where this policy was discussed?

A175. Yes, it was.

Q176. Do you know how long after?

A176. Maybe a month.

Q177. Did you, at this group meeting, ask inspectors to express their concerns and ask questions?

A177. Yes, I did.

Q178. Did Mr. Allen attend that meeting?

A178. Yes, he did.

Q179. Did he express any concerns?

A179. He did not.

Q180. Did he have any questions concerning the new policy?

A181. No.

Q182. Did Mr. Allen ever express any concerns regarding this policy to you?

A182. No, he did not, not to me.

Q183. Mr. Brandt, do you recall Mr. Allen's testimony regarding the incident with the cigarette filters?

A183. Yes, I do.

Q184. Were you aware, prior to the time that you discussed this matter with Mr. Allen, that craftsmen were using cigarette filters in their spray guns?

A184. I was aware that it had been done in the past.

Q185. Did you have any concern with that practice?

A185. No, I did not.

Q186. How did you become aware tht Mr. Allen was concerned with the practice?

A186. Harry Williams advised me that Mr. Allen had a problem with the use of filters.

Q187. Did you discuss this matter with Mr. Allen?

A187. Yes, I went out to the field to talk with him about it.

Q188. Would you relate the substance of that conversation?

A188. Cory explained that once again he thought the craft was trying to deceive QC into accepting something that really wasn't acceptable, and I asked him what he meant by that. He said that the craft were installing the filters just long enough to pass the air acceptability test. Then, he claimed, they would remove the filter when it becomes clogged.

I asked Mr. Allen whether he had ever seen them remove any filters. He had not. We then discussed the possible effects of using spray guns without the filters, assuming that Cory's supposition that they were removing them was accurate.

We discussed the presence of grease, oil or water in both inorganic zinc primers and epoxy top coats. As I recall, Mr. Allen agreed with me that grease and oil would be detectable in the applied coatings. He wasn't so sure on what water would do to the epoxy top coat if it was applied as a fine mist within the top coat itself as it was sprayed.

Q189. Mr. Brandt, why were the craftsmen using cigarette filters in their spray guns?

A189. The air supply system for the building was old. It had been used since, I believe, 1977, and the in-line water separators, moisture separators and traps weren't always sufficient to remove all oil and moisture from the air supply. The cigarette filters reduced these contaminants.

Q190. Would you explain your statement that, even if the filters were removed, oil that was sprayed on with the paint would be detectable?

A190. Yes. There would be characteristics in the coated surface that would allow you to detect the oil and grease.

Q191. Is that condition something that procedures require the QC inspector to identify during the subsequent inspection?

A191. Yes. It would be visually detectable.

Q192. What if water were to be sprayed on along with the paint?

A192. If water were sprayed on with an inorganic zinc primer, it would probably serve to enhance the cure of the primer. If water were sprayed on with an epoxy top coat, you would see a white haze on the top coat itself when it cured.

As I stated, Mr. Allen, I think, agreed with my explanation, with the possible exception of what water in an epoxy top coat would do. He told me he was unsure of the effects of water on the epoxy top coat. I told him I didn't have a problem with it.

Q193. Did you suggest to Mr. Allen that, if he continued to have a problem with the practice, he should take it up with someone else?

A193. I believe I told him that, if he didn't accept my explanation, he could write an NCR on it, and that if he wanted to get engineering evaluation, he could certainly do that.

Q194. Mr. Brandt, Mr. Allen testified that he was concerned that inspectors were not permitted to identify defects that they encountered in areas other than the areas that they were assigned to inspect. Do you recall that testimony?

A194. Yes, I do.

Q195. Assuming that mechanical or other damage to coatings takes place after the final top coat has been accepted by a QC inspector, does any procedure require that these coatings undergo further inspection?

A195. Yes.

Q196. What is that procedure?

A196. There is a procedure for a final engineering walkdown of all coated surfaces.

Q197. Would you describe the requirements of that procedure?

A197. It requires a walkdown inspection to assure that all damage or defects in coated surfaces are identified and repaired.

Q198. Under the procedure, when is that inspection to take place?

A198. When the area is secured and access is limited.

Q199. Is construction work finished at that time?

A199. The final walkdowns take place when construction work is at a minimum level. There are a minimal number of crafts people in the area, which would tend to preclude the possibility of further mechanical damage to the coated surfaces.

Q200. What is the rationale for the final walkdown inspections?

A200. Essentially, the walkdown procedure serves to defer the identification and repair of mechanical damage and similar defects until the final stages of construction. Any time that you have large numbers of crafts people working in an area, be they iron workers, electricians, or whatever, a certain amount of mechanical damage is going to occur to coated surfaces. Economically, it would make no sense to repair and to keep repairing a surface. Moreover, if you attempted to repair defects as you went along, you would have a practically never-ending and self-duplicating process and, ultimately, in my view, you would end up with a lower-quality coating system than if all defects were repaired at one time.

Q201. Mr. Brandt, is there any regulatory requirement of which you are aware requiring that coatings defects be identified and repaired continually during the construction process?

A201. No, there is not.

Q202. Did Mr. Allen ever express any concern to you during the period he was employed at Comanche Peak regarding QC inspectors' ability to identify defects in coatings other than those that they were assigned to inspect?

A202. No, he did not.

Q203. Mr. Brandt, do you recall having a conversation with Mr. Allen on the roof of the pressurizer room?

A203. Yes, I do.

Q204. When did this conversation take place?

A204. In the fall of 1983.

Q205. What was Mr. Allen doing on the roof of the pressurizer room?

A205. He was standing there, and had been standing there most of the morning, with Cindy Dittmar waiting for paint.

Q206. Would you describe the location of the pressurizer room roof?

A206. It is approximately 20 or 25 feet off the operating deck at elevation 905, which is the top floor slab inside the reactor containment building.

Q207. Did you travel to the roof to have this conversation?

A207. Yes, I did.

Q208. Was that out of your way?

A208. Yes, it was.

Q209. Why did you go to the roof of the pressurizer room to have a conversation with Mr. Allen?

A209. There were several reasons. I had observed that he was standing up there with Cindy Dittmar doing virtually nothing. I asked the craft foreman, as I recall, who was standing next to the call box on elevation 905, what Mr. Allen was doing up there. The foreman told me he thought Mr. Allen was waiting for paint.

During this period, construction was voicing concern over the availability of inspectors, and I was concerned if I had two inspectors up there all morning waiting for paint, then construction probably wasn't managing their effort with much prudence. If they didn't have paint available for the crew of painters on top of the pressurizer room, they could have told Mr. Allen and Miss Dittmar that they weren't ready for them and they could come back later.

Q210. Was this situation in any way attributable to Mr. Allen?

A210. No. In no instance was it Mr. Allen's fault. That was the craft's fault, which was one of the reasons I went up there.

Q211. For what other reasons did you go up there?

A211. I had spent all morning that day up in the building talking to people to try to get a feel of how things were going, what the average QC inspector thought of his job, and whether the situation between the craft and the QC inspectors had improved any and if the communication channels had gotten any better. I wanted to ask Mr. Allen for his views.



I was also concerned at this time about Mr. Allen in particular, because it seemed to me that Cory seemed to think that somebody was after him constantly. We had had two discussions in which Mr. Allen felt that construction was trying to deceive him, or QC in general.

Q212. Have you discussed those instances earlier in your testimony?

A212. Yes, I have, the incident with the cigarette filters and the incident with the detergent washing of the containment liner wall. My general concern was whether Cory was being reasonable or unreasonable. That is, was the construction force singling Cory out and deliberately giving him a hard time, or was it a matter of paranoia on his part that somebody was out to get him.

Q213. What did you ask Mr. Allen?

A213. I discussed three topics with him, that I remember. First, I asked him whether he had been waiting for paint all morning. He indicated that he had been, that he didn't know what the problem was, but that the craft didn't seem to be able to get their act together. He and Ms. Dittmar had been there for three hours and the paint still hadn't shown up.

After some small talk, I then asked him about how his job was going. He indicated pretty well, as I recall. I asked Mr. Allen what he thought about Evert Mouser, who had become the coatings QC supervisor. Mr. Allen reported that he hadn't had to much to do with Mr. Mouser. As I recall,

however, he was much happier with Mr. Mouser than he had been with Harry Williams, who by that time had transferred to another job.

I specifically asked Mr. Allen if he felt he was being intimidated. His response was to kind of smile, and to say "No, this job isn't bad. I've worked in places where you had to carry a spec in one hand and inspect with the other because with every call you made someone was arguing with you."

Q214. By "spec," did you understand Mr. Allen to mean specification?

A214. Yes, I did. He indicated that he considered disagreements with craft to a certain extent part of the job, as long as it was done in a professional manner, but he didn't think Comanche Peak was any worse than a lot of places. In fact, he indicated that it was better than a lot of places he had been.

Q215. Was he referring to his job experience as a QC inspector?

A215. Yes. He specifically mentioned inspections and referred to "shops," and I took it that he was talking about his experience as a vendor inspector with Bechtel.

The last question that I distinctly remember asking him was how Cindy Dittmar was coming along. Ms. Dittmar was a trainee at the time. Cory's response was that she was doing very well, and he thought she would be a very competent inspector. She was pretty bright and I agreed with him.

Q216. Did Miss Dittmar participate in this conversation?

A216. No. At the time it was very noisy inside the containment. As a matter of fact, you had to have ear plugs to even go on elevation 905. I was standing on one side of a scaffolding and Cory was standing on the roof of the pressurizer room itself, maybe a foot and a half or two feet above me in elevation. Mr. Allen is somewhat shorter than I am. So I would say we were in reasonable proximity, but we were speaking rather loud to be heard due to the noise in the building. Cindy was standing probably six or eight feet away. She wasn't participating in the discussion, and I don't think she could hear us.

Q217. Did Mr. Allen express any concerns to you during this conversation?

A217. He didn't understand why it was taking the craft three or four hours to get paint to the building. I agreed with him and told him I intended to go find Charles Oxley and find out what they were doing. I did so when I left the pressurizer room.

Q218. Did Mr. Allen express any other concerns?

A218. Not that I recall.

Q219. Did he seem satisfied with his job?

A219. He seemed to be.

Q220. Did he express any unhappiness with his supervision during that conversation?

A220. No, he did not.

Q221. Mr. Brandt, I am going to show you a two-page document that Mr. Allen testified he filled out and signed when he left Comanche Peak. It is titled "Questionnaire for Persons Leaving QA/QC." Mr. Allen testified that one of the reasons that he filled out "No" to each of the questions on this form is because he feared some further adverse consequences in his employment with EBASCO had he noted all of his concerns.

As an EBASCO supervisor, would you comment on Mr. Allen's statement?

A221. That is simply not true. This questionnaire is designed by Texas Utilities to find out at the earliest possible date any safety concerns that a person leaving might have.

In fact, some EBASCO employees that have left Comanche Peak have voiced concerns. Some EBASCO employees who remain EBASCO employees, I might add, have voiced concerns when they left Comanche Peak.

Q222. Do you personally encourage EBASCO employees, whether onsite or whether they are leaving the site, to express their concerns regarding quality at Comanche Peak?

A222. Yes, I do.

Q223. Did you have any discussions with Mr. Allen when he left Comanche Peak?

A223. Yes. Cory came in to shake hands with me when he left. We had earlier discussed his desire to get into corrosion engineering. I had told him I had checked on it and there

were no positions available. We shook hands, he started to leave, and, as he was waslking out my office door, he asked if he could use me as a reference.

Q224. What did you respond?

A224. Yes, he could.

Q225. Mr. Brandt, what is your assessment of Mr. Allen's abilities as a QC inspector based on his employment with EBASCO at Comanche Peak?

A225. From my observations of Cory Allen's performance as a QC inspector, functionally he is an excellent inspector. He is quite knowledgeable in the requirements for coating systems. He is an intelligent person and very hard worker. I couldn't ask for, as far as functionally, a much better employee.

The only reason I have to doubt Mr. Allen's performance relates to my initial concern in the job interview, that I didn't want and wasn't hiring a coatings engineer. I did not need someone who was unable to limit his job to inspection. Mr. Allen was not intellectually satisfied with the job of performing QC inspection. To that extent, my initial concern was, in my mind anyway, verified.

I also think Mr. Allen, to a certain extent, felt that someone was always after him. He seemed hesitant to talk to anybody, even his peer group, about what he felt. And, from the discussions that I had with him personally, he felt that people were always trying to trick him or deceive him, and I think that is an undesirable trait in a QC inspector.

But, as far as functionally performing the inspection,  
Cory Allen was excellent.

Q226. Does that conclude your testimony?

A226. Yes, it does.

TEXAS UTILITIES  
GENERATING CO.COMANCHE PEAK STEAM ELECTRIC STATION  
NONCONFORMANCE REPORT (NCR)NCR No.  
C-83-00461, R. 1

UNIT	STRUCTURE/SYSTEM	ITEM/COMPONENT	TAG/ID NUMBER	LOCATION OR ELEVATION	RIR NO.
1&2	Reactor Containment Building	Reactor Core Cavity	N/A	783'-7" to 834'-0"	N/A

## NONCONFORMING CONDITION

X1 Test Control - "A test program shall be established to assure that all testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents. ...test results shall be documented and evaluated to assure that test requirements have been satisfied."

Coatings applied on concrete and steel surfaces located in the reactor core cavity and extending up the core wall, Elev. 834'-0", have not been proven to perform satisfactorily to the combined 40-year dosages of gamma and neutron radiation.

No hold tag applied. Work may continue in affected area.

REFERENCE DOCUMENT: 10CFR50, Appendix B REV \_\_\_\_\_ PARA \_\_\_\_\_

REPORTED BY: Cory Allen/C. T. Brandt (Rev. 1) DATE: 2 / 11 / 83

QE REVIEW/APPROVAL: [Signature] DATE: 2/15/83

ACTION ADDRESSEE: J. B. George/Kissinger DEPARTMENT: Engineering

DISPOSITION: REWORK \_\_\_\_\_ REPAIR \_\_\_\_\_ USE AS IS XXX SCRAP \_\_\_\_\_

See attached.

ARMS  
INDEXED

DATE: \_\_\_\_\_

QA RECORD 1

RTN.	QA REVIEW
<u>L</u>	<u>4532583</u>
FILE NO.	<u>15.1</u>
SUBFILE NO.	<u>NCR NO.</u>

ENG. REVIEW/APPROVAL: [Signature] DATE: 3/25/83

QE REVIEW APPROVAL: [Signature] DATE: 3/28/83

DISPOSITION VERIFICATION & CLOSURE: [Signature] DATE: 3/28/83

COMMENTS: R. 1 issued to add to the disposition.

REPORTING PERSONNEL

Q

ACTION ADDRESSEE

QE

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429769 GHNY UI  
MSG ED394

MARCH 10, 1983

TUSI SITE  
TX NO. 9108908660

CTT-9572

J.R. GEORGE/M.R. MCPAY/R.M. KISSINGER/M. WELLS

SUB: GIPBS AND HILL RESPONSE TO REACTOR CAVITY COATING  
NCR C-83-00461, FEBRUARY 11, 1983

THIS NCR ESSENTIALLY STATES THAT A TEST PROGRAM HAS NOT BEEN ESTABLISHED FOR COATINGS IN THE REACTOR CORE CAVITY.

COATINGS IN THIS AREA SERVE NO SAFEGUARD FUNCTION. THEY ARE NOT NECESSARY TO PROTECT SAFETY-RELATED EQUIPMENT, OR TO ASSIST IN IT CARRYING OUT ITS SAFEGUARD FUNCTION. SINCE THE ATMOSPHERE IN THIS AREA IS MAINTAINED DRY AND AT LESS THAN 50C BY AN HVAC SYSTEM, CORROSION OF CARBON STEEL SURFACES WILL NOT BE PERCEPTIBLE. THE CONCRETE NEEDS NO PROTECTION.

CONCERN HAS BEEN EXPRESSED THAT FAILED COATINGS WILL INTERFERE WITH POST-ACCIDENT OPERATION OF THE SAFETY INJECTION SYSTEMS AND THE CONTAINMENT SPRAY SYSTEM, WHICH UTILIZE WATER DRAWING FROM THE CONTAINMENT SUMP (NOT THE REACTOR CAVITY SUMP). SUCH CONCERNS FORM THE BASIS FOR COATING TESTS FOR OTHER LOCATIONS IN THE CONTAINMENT; HOWEVER, IN SUCH OTHER LOCATIONS, THE RADIATION DOSE IS SIGNIFICANTLY LOWER. SUCH CONCERNS DO NOT EXIST IN THE REACTOR CORE CAVITY LOCATION, SINCE THE REACTOR CORE CAVITY IS NOT IN DIRECT COMMUNICATION WITH THE CONTAINMENT SUMP. IN CASE OF A LOCA, WATER WILL FLOW INTO, NOT OUT OF, THE REACTOR CORE CAVITY.

IF YOU HAVE ANY FURTHER QUESTIONS, PLEASE ADVISE.

R.E. BALLARD/M. CHIRUVOLU/K. FALK

GIPBSHILL, N.Y.

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COMANCHE PEAK STEAM ELECTRIC STATION  
NONCONFORMANCE REPORT (NCR)

2.18.82

NCR No.  
C-83-00461, R. 1

*Also Kissinger*

UNIT	STRUCTURE/SYSTEM	ITEM/COMPONENT	TAG/ID NUMBER	LOCATION OR ELEVATION	RIR NO.
1&2	Reactor Containment Building	Reactor Core Cavity	N/A	783'-7" to 834'-0"	N/A

NONCONFORMING CONDITION

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Coatings applied on concrete and steel surfaces located in the reactor core cavity and extending up the core wall, Elev. 834'-0", have not been proven to perform satisfactorily to the combined 40-year dosages of gamma and neutron radiation.

No hold tag applied. Work may continue in affected area.

REPORTING PERSONNEL

REFERENCE DOCUMENT: 10CFR50, Appendix B REV \_\_\_\_\_ PARA \_\_\_\_\_

REPORTED BY: Cory Allen/C. T. Brandt (Rev. 1) DATE: 2 / 11 / 83

QE REVIEW/APPROVAL: *[Signature]* DATE: 2.15.83

ACTION ADDRESSEE: J. B. George/Kissinger DEPARTMENT: Engineering

OE

DISPOSITION: REWORK \_\_\_\_\_ REPAIR \_\_\_\_\_ USE AS IS \_\_\_\_\_ SCRAP \_\_\_\_\_

*see attached*

ACTION ADDRESSEE

ENG. REVIEW/APPROVAL: *[Signature]* 3-17-83 DATE:    /   /   

QE REVIEW APPROVAL: *[Signature]* 3/23/83 DATE:    /   /   

DISPOSITION VERIFICATION & CLOSURE: \_\_\_\_\_ DATE:    /   /   

QE

COMMENTS:

UNIT	STRUCTURE/SYSTEM	ITEM/COMPONENT	TAG/ID NUMBER	LOCATION OR ELEVATION	RIR NO.
1 & 2	Reactor Containment Building	Reactor Core Cavity	N/A	783'-7" to 834'-0"	N/A

NONCONFORMING CONDITION

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REPORTING PERSONNEL

REFERENCE DOCUMENT: 10CFR50, Appendix B REV \_\_\_\_\_ PARA \_\_\_\_\_

REPORTED BY: *Cory Allen* DATE: 2 / 11 / 83

QE REVIEW/APPROVAL: *[Signature]* DATE: 2 / 11 / 83

ACTION ADDRESSEE: ~~J. B. George/Kissinger~~ *Mike McBay* DEPARTMENT: Engineering

DISPOSITION: REWORK \_\_\_\_\_ REPAIR \_\_\_\_\_ USE AS IS \_\_\_\_\_ SCRAP \_\_\_\_\_

ACTION ADDRESSEE

ENG. REVIEW/APPROVAL DATE: / /

QE REVIEW APPROVAL DATE: / /

DISPOSITION VERIFICATION & CLOSURE: DATE: / /

QE

COMMENTS:

UNIT	STRUCTURE/SYSTEM	ITEM/COMPONENT	TAG/ID/NUMBER	LOCATION OR ELEVATION	RIR NO.
1&2	REACTOR CONTAINMENT BUILDING	REACTOR CORE CAVITY	N/A	783'-7" TO 834'-0"	N/A

REPORTING PERSONNEL

NONCONFORMING CONDITION XI. TEST CONTROL

"A TEST PROGRAM SHALL BE ESTABLISHED TO ASSURE THAT ALL TESTING, REQUIRED TO DEMONSTRATE THAT STRUCTURES, SYSTEMS, AND COMPONENTS WILL PERFORM SATISFACTORILY IN SERVICE IS IDENTIFIED AND PERFORMED IN ACCORDANCE WITH WRITTEN TEST PROCEDURES WHICH INCORPORATE THE REQUIREMENTS AND ACCEPTANCE LIMITS CONTAINED IN APPLICABLE DESIGN DOCUMENTS. . . . TEST RESULTS SHALL BE DOCUMENTED AND EVALUATED TO ASSURE THAT TEST REQUIREMENTS HAVE BEEN SATISFIED."

COATINGS APPLIED ON CONCRETE AND STEEL SURFACES LOCATED IN THE REACTOR CORE CAVITY AND EXTENDING UP THE CORE WALL, EL. 834'-0" HAVE NOT BEEN PROVEN TO PERFORM SATISFACTORILY TO THE COMBINED 40-YEAR DOSAGES OF GAMMA AND NEUTRON RADIATION.

REFERENCE DOCUMENT: 10 CFR 50, APPENDIX B REV \_\_\_\_\_ PARA \_\_\_\_\_

REPORTED BY: CORY ALLEN DATE: 2/11/83

QE

QE REVIEW/ APPROVAL: [Signature] DATE: 2/11/83  
ACTION ADDRESSEE: \_\_\_\_\_ DEPARTMENT: \_\_\_\_\_

ACTION ADDRESSEE

DISPOSITION: REWORK \_\_\_\_\_ REPAIR \_\_\_\_\_ USE AS IS \_\_\_\_\_ SCRAP \_\_\_\_\_

QE

ENG. REVIEW/ APPROVAL: \_\_\_\_\_ DATE: / /  
QE REVIEW APPROVAL: \_\_\_\_\_ DATE: / /  
DISPOSITION VERIFICATION & CLOSURE: \_\_\_\_\_ DATE: / /

COMMENTS:

## Speed Letter.

PAGE 1

To TOM BRANDTFrom CORY ALLENSubject COMPLAINT AGAINST B&R PAINT FOREMAN

MESSAGE

Date 6/25 1983

ON 6/24/83 WHILE PERFORMING A HOLIDAY DETECTION TEST DURING A FINAL INSPECTION I WAS INTERRUPTED BY PAINT FOREMAN WAYNE WILLIAMS. HE INSTRUCTED ME TO CLIMB BACK UP SCALFOLDING TO REINSPECT A TAPED OFF 4"x4" GROSS DISCONTINUITY SO AS TO PROVE TO HIM THAT IT WAS AN UNSATISFACTORY AREA. IT WAS NOT AN INTERROGATIVE REQUEST BUT AN IMPERATIVE COMMAND FOR ME TO OBEY. THIS IS A BLATANT EXAMPLE OF A B&R PAINT FOREMAN ORDERING A QC INSPECTOR TO PERFORM. TO HIGHLIGHT THIS EXAMPLE, MR. WILLIAMS HAD B&R PAINT SUPERINTENDENT HALEY COMPLAIN TO HARRY D. WILLIAMS THAT I REFUSED TO FOLLOW THE FOREMAN'S INSTRUCTIONS AND RETEST THE AREA - WHICH IN FACT WAS INCORRECT. I TOLD THE FOREMAN AT THAT TIME THAT I WOULD RETURN TO THE AREA WHEN I WAS

Signed

*Cory Allen*

REPLY

Date \_\_\_\_\_ 19\_\_\_\_

As discussed w/ Construction (Haley, WILLIAMS, BRACKIN, REMINGTON) AND your supervision (H. Williams) and yourself, this type of harassment must cease. Construction has assured us that they will implement corrective action (as necessary) immediately. As we discussed verbally, if situation does not improve, please notify me again.

*OS 6/29/83*

Signed

Speed Letter.

PAGE 2

To TOM BRANDT

From CORY ALLEN

Subject

NO. 28 10 FOLD

MESSAGE

Date 6/25 1983

FINISHED WITH THE ENTIRE AREA (CONSISTING OF 873 FT<sup>2</sup>)

ANOTHER EXAMPLE OF PAINT DEPARTMENT HARASSMENT OCCURRED DAY BEFORE YESTERDAY, 6/23/83. GENERAL FOREMAN C. LAFAYETTE COMPLAINED TO HARRY O. WILLIAMS THAT I WAS WRITING NCR'S ON EXPIRED CZ-11 THAT HAD BEEN APPLIED BY W. REMINGTON'S CREW. THIS WAS AN OUTRAGEOUS FALSIFICATION. ALL I DID WAS SIMPLY WRITE AN UNSAT PRIMER REPAIR, WHICH WOULD REQUIRE STRIPPING THE CZ-11 (WHICH I EXPLAINED TO W. REMINGTON AT THAT TIME). WRITING A NCR NEVER ENTERED MY MIND UNTILL HARRY O. WILLIAMS QUESTIONED ME ABOUT IT BEFORE I EVEN HAD A CHANCE TO FINISH WRITING THE IR.

NO. 28 10 FOLD

Signed

*Cory Allen*

REPLY

Date 19

Signed

To TOM BRANDT

From CORY ALLEN

Subject

MESSAGE

Date 6/25 1983

LAST WEEK I HAD THREE DIFFERENT SHOOTING MATCHES DURING INSPECTIONS WITH THREE DIFFERENT I&R PAINT FOREMAN WHO TRIED TO ARGUE THEIR WAY OUT OF UNSAT COATINGS. OBVIOUSLY, I ALWAYS EXPLAIN TO THE PAINT FOREMAN AND JOURNEYMAN PAINTER THE RESULTS OF MY INSPECTION INCLUDING THE AZIMUTHS, ELEVATIONS, AND IR NUMBER. INEVITABLY, AN ARGUMENT FOLLOWS WITH COMPLAINTS TO HARRY O. WILLIAMS IF THOSE RESULTS ARE NEGATIVE.

I FEEL UNCOMFORTABLE ABOUT HAVING TO DEFEND MYSELF AGAINST ALLEGATIONS MADE BY A I&R SUPERINTENDENT <sup>TO MY SUPERVISOR!</sup> THIS HAS BECOME A DAILY OCCURRANCE FOR CORY ALLEN. I WOULD SUGGEST A NEW FORMAT FOR RECEIVING COMPLAINTS FROM THE PAINT DEPARTMENT

Signed

*Cory Allen*

REPLY

Date \_\_\_\_\_ 19\_\_

Signed

Speed Letter.

PAGE 4

To TOM BRANDT

From CORY ALLEN

Subject

-No. 88 10 FOLD

MESSAGE

Date 6/25 1983

AGAINST A CERTIFIED INSPECTOR FOR INSTANCE, REQUIRE THE PAINT DEPARTMENT REPRESENTATIVE TO MAKE THE COMPLAINT IN PERSON WITH THE INSPECTOR PRESENT SO THAT HE CAN DEFEND HIMSELF OR FOR THE PAINT DEPARTMENT TO PUT IT IN WRITING, SUCH AS I HAVE DONE.

-No. 87 FOLD

-No. 12 FOLD

Signed

Cory Allen

REPLY

Date 19

Signed

TEXAS UTILITIES  
GENERATING CO.

COMANCHE PEAK STEAM ELECTRIC STATION  
NONCONFORMANCE REPORT (NCR)

NCR No.

C-83-1694

UNIT	STRUCTURE/SYSTEM	ITEM/COMPONENT	TAG/ID NUMBER	LOCATION OR ELEVATION	RIR NO.
1	REACTOR CONTAINMENT BUILDING	LINER PLATE		AZ 266" -> 278" ELEV. 939'-8" -> 949'-5"	

NONCONFORMING CONDITION

PAINT DEPARTMENT WIPE-DOWN FINISH COATED AREA WITH AN UNSPECIFIED CLEANING AGENT PRIOR TO FINAL INSPECTION BY QC. THE CLEANING AGENT LEAVES A RESIDUE WHICH MAY INHIBIT HOLIDAY DETECTION AS PERFORMED IN ACCORDANCE WITH QI-QP-11.4-5, PARA. 3.6.4.

THE CLEANING AGENT IS: ECGO LEMON DISINFECTANT CLEANER - HOSPITAL TYPE MANUFACTURED BY GARLAND SUPPLY CO. FT. WORTH, TX.

REFERENCE DOCUMENT: QI-QP 11.4-5 REV 15 PARA 3.6.4

REPORTED BY: Tom Allen

DATE: 6/17/83

QE REVIEW/APPROVAL: Harry D. Williams

DATE: 6/17/83

ACTION ADDRESSEE: George / KISSINGER

DEPARTMENT: ENG.

DISPOSITION:

REWORK \_\_\_\_\_ REPAIR \_\_\_\_\_ USE AS IS XXX SCRAP \_\_\_\_\_

Holiday detection is performed by the "wet sponge" method utilizing a 67.5 volt detector. If a film or residue is left on the surface after washing down the coating, it will immediately rehydrate upon water contact. In addition a residue or thin film left after use of the above product will not create an insulating barrier.

**FOR INFORMATION ONLY**  
ARMS INDEXED

QA RECORD I

RTN.	QA REVIEW
<u>LGM</u>	<u>7-13-83</u>
FILE NO.	<u>15.1</u>
SUBFILE NO.	<u>NCR-NO.</u>

DATE: \_\_\_\_\_

ENG. REVIEW/APPROVAL

CR Houston

DATE: 6/24/83

QE REVIEW APPROVAL

C. Jones

DATE: 6/24/83

DISPOSITION VERIFICATION & CLOSURE:

MP

C. Jones

DATE: 7/12/83

COMMENTS:

DEPOSITION EXHIBIT  
Allen Ex. B

REPORTING PERSONNEL

ACTION ADDRESSEE



INSPECTION REPORT

SHEET 1 OF 1

NO. R102643

ITEM DESCRIPTION <i>PROTECTIVE COATING</i>		IDENTIFICATION NO. <i>LINER PLATE</i>		SYSTEM / STRUCTURE DESIGNATION <i>PCB #1</i>
SPEC. NO. <i>AS 31</i>	REV. <i>3</i>	REF. Q.C. DOC. & REV. & CHANGE NO. <i>1 6 QT-OP 11.4-5 215</i>	MEASURE OR TEST EQUIP. IDENT. NO. <i>N/A</i>	
<input type="checkbox"/> IN PROCESS INSPECTION		<input type="checkbox"/> PRE INSTALLATION VERIFICATION		<input checked="" type="checkbox"/> FINAL INSPECTION
		<input type="checkbox"/> INSTALLATION INSPECTION		<input type="checkbox"/> PRETEST INSPECTION

INSP. RESULT:

INSPECTION COMPLETED, ALL APPLICABLE ITEMS SATISFACTORY

INSPECTION COMPLETED, UNSATISFACTORY ITEMS LISTED BELOW

*Wm C. Williams* 7/2/83  
QC INSPECTOR DATE

ITEM NO.	INSPECTION ATTRIBUTES	SAT	UNSAT.	DATE	QC SIGNATURE
1	<i>PER DISPOSITION OF NCR C-83-01694 IS "USE AS IS"</i>	✓			
2	<i>HOW TAG REMOVED</i>	✓			
3	<i>THIS IE CLOSSES NCR C-83-01694</i>	✓			

FOR INFORMATION ONLY

REMARKS (DWGS, SPECS, ETC.)

RELATED NCR NO. <i>N/A</i>	15	I.R. CLOSED <i>N/A</i>	<input type="checkbox"/>	DATE <i>7/2/83</i>	SIGNATURE <i>N/A</i>	QC INSPECTOR
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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

DOCKETED  
USNRC

In the Matter of )  
) '84 OCT 22 P5:15  
TEXAS UTILITIES ELECTRIC ) Docket Nos. 50-445-2 and  
COMPANY, et al. ) 50-446-2  
)  
(Comanche Peak Steam Electric ) (Application for  
Station, Units 1 and 2) ) Operating Licenses)

SECRETARY  
DOCKETING & SERVICE  
BRANCH

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing document in the above-captioned matter was served upon the following persons by hand-delivery,\* overnight delivery,\*\* or by deposit in the United States mail,\*\*\* first class, postage prepaid, this 22nd day of October, 1984:

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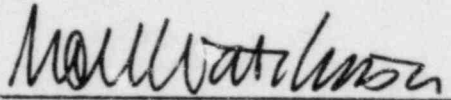
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