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October 26, 1984

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UNITED STATES OF AMERICA
 NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

CASE BRIEF IN OPPOSITION TO APPLICANT REQUEST
 FOR NON-DISCLOSURE OF RELEVANT LIPINSKY DOCUMENTS

In a letter to the Licensing Board dated October 18, 1984, Applicant refused to provide the parties with relevant documents regarding O.B. Cannon and J.J. Lipinsky, asserting that those documents were privileged because prepared in anticipation of litigation. (See letter to the Board, October 18, 1984) CASE opposes the assertion of privilege and requests that the Board order production of all of the withheld documents.

CASE and Applicant agree that if the materials sought represent attorney-work product then the standard to apply in deciding whether to produce them is:

A party may obtain discovery of documents and tangible things otherwise discoverable under paragraph (b)(1) of this section and prepared in anticipation of or for the hearing by or for another party's representative (including his attorney, consultant, surety, indemnitor, insurer, or agent) only upon a showing that the party seeking discovery has substantial need of the materials in the preparation of this

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case and that he is unable without undue hardship to obtain the substantial equivalent of the materials by other means. In ordering discovery of such materials when the required showing has been made, the presiding officer shall protect against disclosure of the mental impressions, conclusions, opinions, or legal theories of an attorney or other representative of a party concerning the proceeding.

10 C.F.R. §2.740(b)(2).

At the outset it is crucial to place the information being withheld into the context of the issue involved. The issue is whether, as the result of pressure brought to bear by Applicant or its counsel on Mr. Lipinsky and/or O.B. Cannon, Mr. Lipinsky modified his previously held opinions regarding the adequacy of the paint coatings, and QA/QC related to it, at CPSES. A part of that issue is whether Mr. Lipinsky had what he had indicated and believed was a reliable basis for changing his opinion. What is not at issue at this point is the adequacy of the paint coatings program as such, an issue to be fully explored in the other phase of the hearings. (It was apparently in preparation for the former issue that Mr. Lipinsky was preparing testimony.)

In summary, CASE believes that Mr. Lipinsky was pressured, coerced, or influenced into recanting and changing the conclusions that he originally reached about coatings and related quality control at Comanche Peak. In his original report of August 8, 1983 about his trip to Comanche Peak on July 26-28, 1983, Mr. Lipinsky expressed a number of serious concerns about the adequacy of the coatings quality control program at Comanche Peak. Nonetheless, over time Mr. Lipinsky recanted those concerns, ultimately culminating in an affidavit filed with the Board on September 28, 1984. CASE believes that numerous factors

point to the very real possibility that Mr. Lipinsky was improperly pressured or influenced into changing his conclusions about quality control at Comanche Peak, and indeed may have been coerced into participating in a "cover-up" of serious quality concerns.

Because CASE has a substantial need of any evidence of pressure on Mr. Lipinsky to recant the concerns that he expressed in his August 8, 1983 trip report and because any evidence of such pressure is clearly relevant to these harassment and intimidation proceedings, Applicant should be compelled to produce all of the relevant documents which it has until now withheld. The withheld information apparently contains draft testimony proposed by Applicant's counsel representing what they wanted Mr. Lipinsky to testify to regarding the adequacy of the paint coatings at CPSES; the information also apparently contains Mr. Lipinsky's reaction to that proposed testimony. Meeting notes and letters apparently further memorialize the exchanges between Mr. Lipinsky and the Applicant's counsel on exactly what Mr. Lipinsky would and would not say. Thus the withheld information will likely provide important evidence of any actual attempt to pressure Mr. Lipinsky and of any evolution of his testimony or views thereby potentially proving that such pressure had been brought to bear.

A number of factors point very strongly to the likelihood that Mr. Lipinsky was pressured, coerced or influenced into changing his appraisal of the coatings program at Comanche Peak. First, Mr. Lipinsky never undertook any audit of Comanche Peak

subsequent to the July, 1983 trip on which he based his initial trip report. At least as late as four months after that initial trip, Mr. Lipinsky noted in his "diary" (produced in discovery by O.B. Cannon) on November 17, 1983, that any full audit of coatings at Comanche Peak "would or might confirm JJJ's concerns". The only "data" that Mr. Lipinsky received on the quality control program at Comanche Peak subsequent to his initial visit was the information he received during the November 10-11 meetings with Ron Tolson, John Merritt and others (meetings which took place prior to the November 17 diary entry cited above, and in which Lipinsky indicated that his concerns might be confirmed by a full audit). Nonetheless, by the time he met with NRC inspector Hawkins in January, 1984, and certainly by the time of his September, 1984 affidavit, Mr. Lipinsky, without the benefit of any new information, had reached radically different conclusions about the quality of the coatings program at Comanche Peak.

Further evidence that Mr. Lipinsky was improperly pressured into changing the conclusions that he had reached in his August 8 trip report can be found in numerous other entries in Mr. Lipinsky's diary. On a number of occasions after the November 10-11 meetings (in which his initial report was "discussed" by Tolson, Merritt and others), Lipinsky made entries in his diary which indicate that an attempt was being made to cover-up the concerns voiced in the August 8 trip report. For example, Mr. Lipinsky was clearly concerned that he might be pressured into perjuring himself: on November 14-15 he wrote at least three

times that he would not commit perjury, and felt the need to express that feeling to Norris, Roth, and Trallo. On November 17, Mr. Lipinsky wrote that O.B. Cannon President Roth was demanding that he sign a changed version of his original trip report; Lipinsky did not. In refusing to sign the modified report, Lipinsky expressed a concern that "the more JJN/RBR [Norris/Roth] talk to the utility or try to ~~cover-up~~, the deeper OBC gets -- OBC could have serious problems if federal agencies perceive OBC committing fraud." (See Lipinsky 11/17 diary entry; received from Applicant in discovery) (Emphasis added)

Lipinsky further wrote on November 17 that:

JJL pointed out [to Roth] that JJL has problem in signing a changed trip report (may be thought of as fraud). RBR (Roth) became flush and said that was not fraud, but final copy of memo/trip report, and JJL was to sign the changed trip report and place a copy in the blue three ring binder today. JJL said "yes sir" but did not sign the changed trip report. JJL drafted a memo from RBR for RBR signature (telling JJL to sign the changed trip report), if RBR forces JJL to sign the changed trip report.

Lipinsky was clearly feeling pressure to cover up and ignore his concerns. The pressure he felt was so intense that he felt the need to protect himself by drafting a letter in Roth's name detailing that he had been forced to alter the report and to sign the changed copy against his will. CASE has no way of knowing to a certainty why Roth was pressuring Lipinsky -- i.e., CASE cannot be certain that Roth was himself being pressured by the Applicant or their counsel. Clearly, other correspondence between Lipinsky, O.B. Cannon, the Applicant and their counsel, and any draft testimony prepared during this period for Lipinsky will shed light on the degree to which Lipinsky was pressured and

coerced into ultimately completely recanting the very real concerns that he strongly felt after the November 10-11 meetings at Comanche Peak.

Mr. Lipinsky's diary contains numerous other indications that the recantation of his concerns was not completely voluntary, indications that will almost certainly be further evidenced if the documents that Applicant has refused to produce are in fact produced. For instance, in notes on his November 22 meeting with TUGCO attorney Nicholas Reynolds, Lipinsky wrote: "JL [Lipinsky] asked attorney (NSR) whose side they represented. Indications are that OBC [Cannon] is not getting all info." The next day, Lipinsky wrote that he pointed out to Trallo "that 2 out of 2 meetings were not what JL had been led to believe -- what is going on, someone is not above board." These diary entries by Lipinsky are compelling evidence that the concerns that he voiced in his August 8 trip report were recanted because he felt coerced or was in some other way influenced to change his position. (See Exhibit 1)

Additional evidence that Lipinsky was pressured into changing his story about the adequacy of coatings and related quality control at Comanche Peak lies in the fact that at the November 10-11 meetings at Comanche Peak, officiated by John Merritt and attended by Tolson, Lipinsky, Trallo, Norris and four others (see CHI Exhibit 4 of CASE's Preliminary Proposed Findings of Fact), Lipinsky said almost nothing. At that meeting, Tolson, Merritt and sometimes others characterized Lipinsky's concerns and purported to "address" them, but Lipinsky himself apparently did

not feel comfortable enough himself to say much of anything. By either his own admission or the recognition of someone else at the meeting (contained in notes appended to the diary produced by O.B. Cannon in discovery), there was a "lack of JJJ talking on tape" (of the November 10-11 meeting). Those meetings could hardly have convinced Lipinsky that his concerns about coatings and quality control at Comanche Peak were unfounded.

The likelihood that Lipinsky was coerced into participating in a "cover-up" of his concerns is lent additional support by the fact that O.B. Cannon President Roth was extremely sympathetic to the concerns of TUGCO and even hostile to the concerns voiced by Lipinsky. This "motive" for Roth to cover-up is evidenced not only by the diary entries cited above, but also by Roth's own categorization of Cannon's concerns. In a November 3, 1983 meeting with Joe George, Dave Chapman, John Merritt, Billy Clements, Tony Vega, J.J. Norris and himself, Roth "apologized again for the lack of security at OBC, in that an in house memo 'leaked out' and had caused our client such consternation and new additional exposure to intervenors" (from Roth memo to file, dated 11/4/83, Exhibit 2). In a November 28, 1983 letter to Nicholas Reynolds, Roth wrote that "Cannon's posture is to support TUGCO/TUSI with whatever objective and honest effort we can render". When these professions of support for and apology to "their client" are viewed in the light of the intense pressure applied by Roth to Lipinsky to sign an altered version of his trip report, the clear inference arises that the O.B. Cannon president, the Applicant, and/or their attorneys may have been seeking to paper over and cover up Lipinsky's concerns.

Finally, support for the argument that Lipinsky was pressured into retracting his initial concerns is found in the repeated insistence by both Lipinsky and Trallo that the concerns raised in the August 8 trip report would only be either allayed or conformed if a full audit of the plant were undertaken. For example, Trallo wrote in his November 28, 1983 trip report that "Comanche Peak Site Management adequately detailed the program and controls in place, which would relieve or allay the concerns raised in the "Lipinsky Memo". (See Exhibit 4) Cannon has no basis to confirm that these programs and controls are in place and are being effectively implemented. Confirmation could only be provided by a detailed audit. Similarly, Lipinsky wrote in his diary on November 17 that only an audit, which would require four to five weeks could confirm or allay his initial concerns. (See also the October 28, 1983 Lipinsky letter, Exhibit 3) Nonetheless, by the time he met with NRC inspector Hawkins in January, 1984, Lipinsky was much less concerned with the adequacy of coatings at Comanche Peak than he had been only a month earlier. (CASE is also concerned about the possible inferences arising from the awarding to Lipinsky of a raise only one and one-half weeks before his crucial meeting with Hawkins (see Lipinsky's December 23, 1983 diary entry), especially when viewed in the light of Lipinsky's fear for his job only six weeks earlier. (See Lipinsky's November 14 diary entry)

Based on the documents that CASE has received thus far through discovery in these proceedings, there is simply no adequate explanation for Lipinsky's 180 degree about-face with

regard to his feelings about the adequacy of coatings and related quality control at Comanche Peak. It seems incredible that Lipinsky simply accepted the explanations given by Tolson at the November 10-11 meetings and by Brandt in his testimony. On the contrary, substantial evidence exists which gives rise to the inference that Lipinsky recanted his August 8, 1983 conclusions either because of pressure applied to him to cover up or some other reason unexplained and unimaginable. As detailed below, a substantiated belief in the likelihood of a cover-up provides a sufficient showing of necessity to require production of documents that might otherwise be undiscoverable under 10 C.F.R. §2.740(b)(2) or Federal Rule of Civil Procedure 26(b)(3).

10 C.F.R. §2.740(b)(2), adapted from Rule 26(b)(3) of the Federal Rules of Civil Procedure, allows discovery of trial preparation materials upon a showing by the party seeking discovery of "substantial need of the materials in the preparation of his case and that he is unable without undue hardship to obtain the substantial equivalent of the material by other means." The allegations detailed and substantiated above and in Exhibits 1-5 satisfy the requirements of this standard: Applicant should therefore be compelled to produce all of the relevant Lipinsky documents.

As a preliminary matter, CASE notes that no time need be spent on the "undue hardship" prong of this standard: CASE obviously cannot hope to obtain the substantial equivalent of the materials withheld here by other means. The contemporaneous notes and written drafts of positions taken by or proposed to Mr.

Lipinsky are the uniquely superior evidence of what transpired -- possible pressure, coercion, cover-up -- and no similarly reliable evidence exists anywhere else.

CASE's need for the withheld Lipinsky documents is apparent. If Mr. Lipinsky recanted his initial concerns about quality at Comanche Peak only because he was pressured into doing so, and only as part of a larger attempt to cover up the quality control problems at Comanche Peak, then his initial concerns still stand. Indeed, those concerns cast serious doubt over the adequacy of Comanche Peak's coatings program.^{1/}

Claims of necessity very similar to CASE's claim in this motion have been recognized by the Federal courts as a sufficient showing of necessity to justify production of otherwise undiscoverable work-product documents. In In Re Grand Jury Subpoena Dated November 9, 1979, 484 F.Supp. 1099 (S.D.N.Y. 1980), the district court ordered defendant's lawyers to produce withheld documents which the Government (the party seeking discovery) alleged would provide evidence of a cover-up. The court characterized the Government's claim of necessity as compelling, stating that an assertion that documents sought will provide evidence of a cover-up is an even stronger claim of

^{1/} This issue is not moot if, in reality, the sought after documents contain evidence of attempts (regardless of their success) by TUCGO QA management to cover up the seriousness of Lipinsky's initial concerns. On October 19, 1984 Applicant submitted to the NRC its Program Plan responding to the findings of the NRC's Technical Review Team (TRT). Mr. Ron Tolson, the very individual described by several witnesses in this proceeding as the cause of the QA deficiencies in coatings, was named as Project Leader for the resolution of all coatings problems. (See Exhibit 5)

necessity than other claims routinely accepted by courts. 484 F.Supp. at 1103. (The court in In Re Grand Jury applied the standard of Rule 26(b)(3) even though the case before it involved a grand jury case, not a civil suit. 484 F.Supp. at 1102)

The courts in both In Re Grand Jury Subpoena Dated November 9, 1979, 484 F.Supp. 1099, 1105 (S.D.N.Y. 1980) and In Re Grand Jury Investigation, 599 F.2d 1224, 1232 (3d Cir. 1979) recognized that a mere naked assertion of a cover-up does not constitute a sufficient showing of necessity to warrant ordering discovery of work product. However, in this proceeding, as in In Re Grand Jury Subpoena, 484 F.Supp. at 1105, a substantiated claim of a suspected cover-up has been alleged. The requirement of substantiation means only that the party making the assertion of cover-up substantiate its belief -- the party needn't prove its allegations in order to compel discovery. 484 F.Supp. at 1105. CASE has offered a quantum of evidence substantiating allegations of a cover-up. Attached to this brief are the October 31, 1983 memo in which Mr. Lipinsky reconfirmed his initial concerns; a November 28 memo in which Mr. Trallo emphasized that none of the concerns raised in the August 8, 1983 trip report could be completely put to rest unless a full audit was done (and none ever was done); and numerous excerpts from Lipinsky's diary which indicate that he was pressured into recanting his testimony and may have been forced to participate in a cover-up of the concerns raised in the initial report. Further, the record in these proceedings contains the August 8 trip report, a transcript of the November 10-11 meetings, the January interview of Lipinsky by Hawkins, and the September 28, 1984 affidavit of Lipinsky.

However, in view of the fact that Lipinsky ultimately recanted his initial concerns without ever performing a subsequent audit at Comanche Peak, the record completely lacks any legitimate reason for Lipinsky's shift. Indeed, the gaping lack of a legitimate explanation for Lipinsky's shift lends further support for the argument that Lipinsky was pressured or coerced into recanting and covering up.

Finally, CASE does not concede that the documents withheld by Applicant are either privileged or contain attorney work product prepared in anticipation of litigation. Indeed, without seeing those documents, CASE cannot be sure what they contain. There is substantial evidence that the drafts of testimony and other documents likely contain proof of improper pressure on Mr. Lipinsky to recant his story; evidence of this improper pressure is not "privileged attorney work product."^{2/}

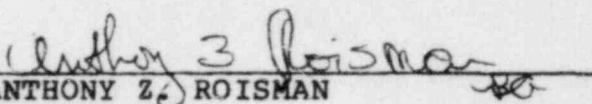
Even if the Board does find that the documents do contain privileged work product, CASE has demonstrated its substantial need for those documents. Lastly, if the Board is reluctant to

^{2/} Consumers Power Co. (Midland Plant, Units 1 and 2), ALAB-691, 16 N.R.C. 897, 917 (1982), cited by Applicant as justification for withholding the relevant Lipinsky documents does not control this case. First, Consumers dealt with the possible discoverability of ordinary drafts of testimony. However, the Lipinsky drafts were very unlike the typical draft testimony case. Here the focus is on the possibility that those drafts will point to pressure and coercion of Mr. Lipinsky to change his original story. The documents sought are sought precisely to show that the ultimate testimony was coerced and thus unreliable, not to probe attorney thought processes. Second, though Consumers addressed the possibility that drafts of testimony might be privileged from discovery, it did not reach the merits of that question. The Board in Consumers decided only that counsel who asserted the privilege could not be censured for making that assertion, it did not decide whether the drafts were in fact privileged.

allow CASE to view the documents in their entirety without first ascertaining their contents, CASE urges the Board to view those documents in camera to determine whether they contain evidence of pressure and cover-up. If they do, then Applicant should be denied its assertion of privilege.

For all of the above reasons, CASE requests that the Board order production of all of the withheld documents.

Respectfully submitted,


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Trial Lawyers for Public Justice
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Washington, D.C. 20036
(202) 463-8600

Counsel for CASE

November	October	November 1983	December
Wednesday	S M T W T F S	S M T W T F S	S M T W T F S
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	23 24 25 26 27 28 29	27 28 29 30	25 26 27 28 29 30 31
	30 31		

- * ARRIVE @ CP (H3201) SITE w/MKM AND MET w/J. MERRITT
 - PROVIDED COPY OF PROPOSED AUDIT PLAN
 - J. MERRITT (JM) WANTED TO KNOW WHERE JJN WAS → T. CONN. RAT TO DETERMINE WHERE JJN WAS
 - J. MERRITT INFORMED MKM & JLL TO RETURN TO HOTEL AND NOT RETURN w/O JJN (NO ACTION OBC PART w/O DEFINED AUDIT SCOPE AND PLAN)
- * T. CONN. w/RAT - MKM & JLL TO STAY IN HOTEL
- * T. CONN. w/JJN - WANTED JLL TO COME TO SITE (DID NOT INFORM JLL OF 1300 HR EST MTG. TO GO OVER TRIP REPORT) - JLL INFORMED JJN TO CONTACT RAT
- * T. CONN. w/RAT - INFORMED JLL OF TENTATIVE 1300 HR. MTG. POSTPONED UNTIL 11/10 - RAT INFORMED JLL THAT JLL "CAN'T REALLY REFUSE TO DISCUSS TRIP REPORT"
- * PICK-UP RAT AT JFW w/MKM
- * UPDATE RAT ON STATUS & IMPRESSIONS
- * T. CONN. w/H.B. GRIFFIN (AIRC) SET UP MTG. FOR 1215 HRS ON 11/10/13

January 1984

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February

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March

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November

Thursday

10

- * MTG. ON SITE - SEE TAPES / TRANSCRIPT
- * MISC. MTG. / DISCUSSIONS W/ JLL, RAT, MKM ON STATUS AND OPTIONS AVAILABLE TO OEC
- * MTG. W/ H.B. GRIFFIN (NRC) (≈ 20-30 MINUTES LATE DUE TO JLL)
 - MAINLY DISCUSSED CONFIDENTIALITY ISSUE - JLL VIOLATED TERMS OF CONFIDENTIALITY (NRC TERMS) BY TALKING W/ RER - JLL POINTED OUT THAT UNTIL THAT MOMENT JLL WAS NOT AWARE OF THOSE TERMS - H.B. GRIFFIN TO GET NRC RULING
 - HBG ALSO TO GET OPINION ON JLL JOB STATUS RELATIVE TO TRIP REPORT
 - JLL WENT OVER D.J. DRISKILL (NRC) MEMO ON 10/14/83 TELEPHONIC INTERVIEW
 - JLL POINTED OUT MINOR INACCURACIES
 - JLL TO CALL HBG BACK ON 11/14/83
 - HBG ASSURED JLL THAT NRC WILL NOT ATTEMPT TO FIND OUT HOW JLL TRIP REPORT SURFACED - HBG STATED THAT THE NRC IS ONLY CONCERNED W/ THE TECHNICAL CONTENT OF THE JLL TRIP REPORT

November

October

November 1983

December

Friday

11

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30	31																					

* WRAP UP MTG. ON CP (H7301) SITE
 (SEE TAPES/ TRANSCRIPT) - ADVISED
 R. TOLSON THAT TRIP REPORT NOT AN
 * DRAFT TRIP REPORT, GIVE SAME TO RAT

* EVE (X 1800 HRS EST) MEET BRIEFLY W/

RAT & RER - RBR OPENED FED. EXP.
 PACKAGE SENT TO JLL BY J. ELLIS (CASE)
 - RBR REVIEWED CONTENTS AND GAVE
 PACKAGE TO RAT FOR REVIEW & COMMENT
 (JLL TO GET ON MONDAY 11/14/83)

ALSO BRIEFLY DISCUSSED IF & HOW RBA
 WOULD EXPLAIN TO TUGCO WHY THERE
 IS MORE THAN ONE VERSION OF JLL
 TRIP REPORT

Ⓢ ATTEMPT TO MALIGN

Veterans Day

January 1984

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February

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March

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November

Sat. / Sun.

12/13

* MISC. T.CONV. w/ VARIOUS REPORTERS in
DALLAS / FORT WORTH AREA REFERED
ALL CALLS TO APM

* T.CONV. w/ JJN - UPDATE JJN on
CURRENT STATUS (CASE, REPORTERS ETC) -
VOICE CONCERN ON REL ACTIONS on TRIP
REPORT - ASK STATUS on TAPES &
TRANSCRIPT - JJN TO PROVIDE QUESTIONS
ASKED BY CASE

November

October

November 1983

December

Monday

14

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* T. CONN. W/ J. ELLIS (CASE) SEE SUMMARY OF CONVERSATION

* T. CONN. W/ H. B. GRIFFIN (NRC) WAIVER OF CONFIDENTIALITY (NRC OFFERED TO EXTEND CONFIDENTIALITY - BUT PROBABLY A MPT ISSUE)

* DRAFT WAIVER HAVE RBR REVIEW & APPROVE SAME (RBR CHANGED FIRST SENTENCE SECOND PARAGRAPH)

* RBR WENT OVER CHRONOLOGICALLY (SP?)

HOW CHANGED COPY OF TRIP REPORT WAS SENT TO J. MERRITT (TUGEO) -

WANTED JIL TO FENCIL SAME - ALSO EXPECTED JIL TO SIGN CHANGED REPORT

* T. CONN. W/ J. J. DRISKILL & H. B. GRIFFIN (NRC)

- JIL WENT OVER WAIVER & DDD/HBG SAID WAIVER WAS OK

- APOLOGIZED (SP?) FOR CURRENT SITUATION (THOUGH NOT BROUGHT ON BY NRC)

- SUGGESTED JIL START LOG OR DIARY ON CP (HS301) STATUS WITH RELATION TO JIL EMPLOYMENT SITUATION - CBC MAY NOT FIRE FOR CP (HS301) INCIDENT BUT LOG MAY OR MAY NOT SUBSTAN. ANY CLAIMS - ADVISED JIL THAT HAVE 30 DAYS FROM TERMINATION TO FILE AND JIL CONTACT DDD OR HBG IF FIRED

* HAVE D. ELMAN NOTARIZE WAIVER

* ADVISE RBR THAT JIL WILL NOT PERJURE HIMSELF (JIL) TO SUPPORT HOW TWO TRIP REPORTS EXIST - RBR SAID JIL SHOULD NOT COME IF PERJURY

CONTINUED ON PRECEDING PAGE DATE NOV 12/13

January 1984

February

March

November

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31						

Tuesday

15

CONTINUED ON NEXT PAGE UNDER 11/16

- * START DIARY LOG - GO BACK TO 11/9/83
- * RBR CALLED JIL IN RER OFFICE FIRST THING THIS MORNING (2:00 PM EST) AND WENT THROUGH WHAT RBR TOLD J. MERRITT
 - INTEREST BY PRESS, APM HANDLING, NO COMMENT DUE TO PENDING LITIGATION
 - WENT THROUGH CHRONOLOGICAL (LPT) SEQUENCE OF TRIP REPORTS AS DEVELOPED BY RBR TO EXPLAIN WHY TWO DIFFERENT TRIP REPORTS EXIST (RBR DID NOT MENTION THAT RBR WANTED JIL TO SIGN THE CHANGED REPORT)
 - TOLD J. MERRITT THAT THE WRONG REPORT (YELLOW) WAS TAKEN
- * T. CONN. W/ RAT (3058284444) ADVISE RAT OF CURRENT STATUS & RER COMMENTS ALSO THAT JIL WILL NOT PERJURE ON TRIP REPORT; RAT SAID WORK ON 3318 AFTER JIL GETS SETTLED DOWN
- * T. CONN. W/ JIN RE: GO OVER RBR COMMENTS & FACT THAT JIL WILL NOT COMMIT PERJURY ON TRIP REPORT
- * T. CONN. W/ J. ELLIS (CASE) READ ARTICLE FROM JALAC TIME HERALD - JIL POINTED OUT THAT JIL TALKED TO T. MILLER NO MORE OR LESS THAN OTHER INSPECTORS - SEE SUMMARY
- * T. CONN. W/ P. MCBEE RE: PM SUGGESTED THAT JIL CALL NRC AND TELL ABOUT RER & CHANGED TRIP REPORT
- * SEND WAIVER TO NRC - CERTIFIED MAIL PH40 730072
- * MISC. CONN. W/ JIL RE: COPY OF NEWSPAPER ARTICLE TELECOPIED W/ TO PHILA. OFFICE; NOT SENDING INFO. SUPPLIED BY TUGCO BECAUSE ORG PHILA. ALREADY KNEW; WANT TO GET TOGETHER ON RESPONSES BEFORE TESTIMONY USING D. CHAPMAN MEMO AS BASE (JIL IS JIN RESPONSIBLE); CUT OFF BECAUSE JIN HAD T. VEGAN (TUGCO OPE) ON PHONE
- * NEWSPAPER ARTICLE TELECOPIED TO ORG PHILA, E. SMITH MADE COPY GAVE TO MR. R.L. - APM LET JIL READ THE ARTICLE IN APM OFFICE (COPY OF TOO POOR A QUALITY TO REPRODUCE)
- * T. CONN. W/ RAT ADVISED RAT ON NEWSPAPER COVERAGE ALSO INFORMED RAT ON JIL PERSONAL OPINION THAT ORG IS SPENDING TOO MUCH TIME DEFENDING THE TRIP REPORT - SHOULD GIVE FACTUAL ACCOUNT AND LET THE UNITS CALL WHATEVER THEY WANT

November	October	November 1983	December
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16 * T. CONN. W/ RAT (CONTINUED FROM 11/15)

RAT AGREED W/ JLL THAT JLL SHOULD NOT ALLOW TUGCO TO LIABLE JLL

* T. CONN. W/ JLN

- TUGCO PR MAN SAID NOT GOOD TO STONEWALL; SHORT HALF LIFE BUT IF REOCCURS MAY WANT JLL TO TALK W/ REPORTERS - JLL POINTED OUT TO JLN THAT APM/ABR HANDLING PRESS & JLL DOING WHAT ABR DIRECTS W/ REGARD TO PRESS
- JLN TRIED TO QUESTION JLL ON HAN REPORT WAS LEAKED - JLL INDICATED THAT JLL KNEW BASED ON D.D. WRC MEMO BUT WOULD NOT DISCUSS AT ALL DUE TO CONFIDENTIALITY ISSUE
- JLN ASKED IF JLL READ NEWSPAPER ARTICLE THAT WAS TELECOPIED TO OBC PHILA. OFFICE - JLL SAID YES BUT NOT GIVEN A COPY & THEREFORE NOT FAMILIAR W/ ARTICLE - JLN ASKED JLL WHY JLL DID NOT RECEIVE A COPY TO WHICH JLL RESPONDED THAT JLL DID NOT KNOW
- JLN SAID THAT HE WOULD SEND COPY TO JLL HOME ADDRESS

* EVE TRY TO GET LINE^{ON}OUT OF TOWN

(DALLAS / FORT WORTH) NEWSPAPERS
END OF 11/15/83 ENTRY

* @ 1050 HR (EST) 11/16/83 T. CONN. W/ JLN

- JLL MADE HOUSTON POST. JLN SAID THAT TUGCO PR REP. SAID THAT THIS USUALLY CLOWS OVER IN @ 12 HOURS.

CONTINUED ON NEXT PAGE UNDER 11/17/83

January 1984

February

March

November

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Thursday

17

* T. CONN. w/ JLN CONC'D FROM PREVIOUS PAGE

- JLN SAID OBC MAY BE AT RISK (TUGCO FEEL THAT JLN LEAVED COPY OF TRIP REPORT - JLN EXPLAINED TO JLN THAT JLN LET E. MOUSER READ REPORT AND JLN GAVE E. MOUSER A COPY OF PROCEDURE [JLN REQ'D RBR APPROVAL PRIOR TO GIVING COPY OF PROCEDURE] BUT CANNOT RECALL IF E. MOUSER GIVEN A COPY OF TRIP REPORT - OTHER THAN THAT JLN CERTAIN THAT NOBODY BUT JLN OR RBR REQ'D COPY OF REPORT FROM JLN)

- JLN SAID THAT THE NRC REPORT (D. DRISKILL MEMO) WILL VINDICATE OBC (JLN DID NOT GIVE ANY OTHER DETAIL OR INFO. ON D. DRISKILL MEMO)

* ≈ 1545 HRS (EST) 11/10/83 CONN w/ RBR

RBR TOLD JLN (WHEN JLN WAS PICKING UP BLUE THESE KING BINDER ON CP ITEMS MAINTAINED BY RBR) THAT ALL THAT REMAINS IS TO HAVE JLN SIGN THE CHANGED (BY RBR) AND THIS WOULD BE FINAL DRAFT - JLN REPLIED YES SIR & LEFT - JLN DID NOT SIGN THE CHANGED TRIP REPORT

END OF 11/10/83 ENTRY

11/11 ≈ 0720 HRS (EST) T. CONN. w/ RAT - JLN INFORMED RAT

- JLN CONCERN ON OBC RISK w/ TUGCO

- RBR DEMAND FOR JLN TO SIGN CHANGE TRIP REPORT (GAVE LAWYERS OPINION THAT JLN SHOULD NOT SIGN)

- RAT SAID HE COULDN'T TELL JLN WHAT TO DO BUT

RAT WOULD NOT SIGN A CHANGED REPORT

- JLN EXPRESSED CONCERN THAT THE MORE JLN'RBR TALK TO THE UTILITY ARTY TO COVER UP THE DEEPER OBC GETS - OBC COULD HAVE SERIOUS PROBLEMS IF FEDERAL AGENCIES PERCEIVE OBC COMMITTING FRAUD

RAT AGREED

* ≈ 0820 HRS (EST) 11/10/83 KING JLN, (K. J. KING) w/ RBR

- RBR DISMISSED POSSIBLY CALLING NEWSPAPERS IN AN EFFORT TO SETTLE DUST - JLN ADVISED AGAINST NOT IN RETROSPECT SAID IT PROBABLY WOULD HAVE BEEN BETTER IF JLN TRIED TO PRESS INITIALLY AND EXPLAIN AN/OC INTERPRETED TRIP REPORT

CONTINUED ON NEXT PAGE UNDER 11/11/83

January 1984

February

March

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Sat. / Sun.

19/20

11/18/83 ENTRY CONTINUED FROM PICTURES PAGE

1/2 EDWARDS (EST) 11/18/83 COMM. W/ JPM - JLN CALLED
 APM AT HOME & ADVISED THAT COPY OF JLN REPORT IN POSSESSION OF M. UDALL (SP?) - JLN SHOULD TALK W/ JLN PER MERRY

1/2 1108 HRS (EST) 11/18/83 T. GENAL. W/ RER
 - ASKED JLN IF JLN HAD FINISHED GOING THROUGH THE TRANSCRIPTS
 JLN REPLIED NO, ONLY ON PG #2 & FOUND MISTAKES WHEN COMPARED TO TAPES - RER STATED JLN THOUGHT TO MERRIT AND JLN & JLN 1. GO TO WASHINGTON (ASSUME D.C.) NEXT TUESDAY (11/22/83) TO GC OVER MEMO W/ TUGER WASHINGTON BASED ATTORNEYS

1/2 1126 HRS (EST) 11/18/83 COMM. W/ ZAT - TRIP OFF, RER TO CALL MERRIT AND EXPLAIN THAT AT THIS TIME A MTE. IS NOT APPROPRIATE

11/19 & 20/83 SPEND ≈ SEVEN (7) HOURS ON GOING OVER TAPES AND TRANSCRIPTS

November

October

November 1983

December

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~ 0845 HRS (EST) 11/21/83 PROVIDE RAT MARKED UP COPY OF TRANSCRIPT & EXPLAIN THAT THERE ARE A LOT OF CHANGES/MISTAKES/ADDITIONS; ALSO ADVISE RAT THAT WE (RER & RAT) SHOULD GO OVER ADVANTAGES/DISADVANTAGES ON TESTIFYING AS A CASE OR BOARD WITNESS

~ 0905 HRS (EST) 11/21/83 RER LEFT MESSAGE W/ OEF TALK OF JLL & JLN GOING TO WASH. THIS WEEK - PLANS NEGATED HELP J.R.R. ON TRANSCRIPT AS NEEDED - HAVE OEF REPORT ON TRANSCRIPT AFTER LUNCH

MESSAGE FROM J.M. (IN HOUSTON) ~ 1205 HRS EST 11/21/83 JLN ON WAY TO AIRPORT TO WASH. DC. TO TUGCA ATTORNEY -> JLL ASKED RAT WHATS UP & RAT SAID THAT MTB WAS TO HAVE BEEN CANCELED

~ 1315 HRS (EST) 11/21/83 COMM. W/ RER & RAT - JLL TO MEET JLN AT DEBEVON & LEIDERMAN 1200 17TH ST WASHINGTON DC AT 0930 HRS ON 11/22/83 TO SEE NICK REYNOLDS - RER, RAT, & JLL TO GET TOGETHER AFTER STAFF ON 11/21/83

~ 1330 HRS (EST) 11/21/83 COMM. W/ RAT RE: RAT WOULD NOT SIGN THE CHARGED TRIP REPORT W/O MORE INFO.; PURPOSE OF MTB. W/ TUGCA ATTORNEY - NOT SURE; JLL FEELS THAT JLN ACTIVITIES MAY BE COUNTER PRODUCTIVE - RAT AGREED; JLL ALSO ADVISED RAT THAT PRETTY MUCH EVERYONE WAS AWARE (IN DC) OF C.A. VIOLATION

WRITE LETTER TO L.A. IN RESPONSE TO ARTICLES & INFO. LA. SENT JLL

~ 1630 HRS (EST) 11/21/83 MTB. W/ RER & RAT RE: PURPOSE OF MTB. ON 11/22/83 W/ ATTORNEY RER STATED THAT 1/2 TO 2/3 OF TIME WOULD BE BRINGING ATTORNEY UP TO SPEED ALSO RER WENT OVER JLL RESPONSE IF ASKED ABOUT REVERSING TRIP REPORT TO E. MOUSER (JLL EXPLAINED THAT JLL DID NOT RECALL - DOESN'T BELIEVE E. MOUSER PROVIDED W/COPY BUT E. MOUSER WOULD HAVE BEEN ONLY INDIVIDUAL) RER INSTRUCTED JLL TO SAY "NO" AND DON'T ELABORATE OR EXPLAIN ABOUT E. MOUSER MTB ENDED ~ 1730 HRS.

January 1984

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Tuesday

22

0620 HES - 0930 HES (EST) 11/22/83
TRAVEL TO TUGCO ATTORNEYS' OFFICE
FROM PHILA.

0930 HES TO 1710 HES (EST) 11/22/83 MTS. (WORK THROUGH
LUNCH) NICK S. REYNOLDS (LIC. ATTORNEY), BILL MORRIS (LIC. ATTORNEY)
RICK WALKER (LABOR ATTORNEY) DAVID CHAPMAN (TUGCO QAMB)
(RICK WALKER & BILL MORRIS LEFT MTS 1415 HRS & CHAPMAN
LEFT MTS 1630 HRS ALSO NSR. SEC. SAME ID 1430 HRS)
TALKED ABOUT EVERYTHING THAT LED UP TO OCE GOING TO
CP (HESCO) SITE; WHO JL TALKED WITH AND WHAT WAS SAID;
IF JL OFFERED PERSONAL JOBS - NO TALKED ABOUT POSSIBILITY
THOUGH; JL TRIP REPORT; JL MTS & CONCL. W/ NSR; JL
CONCL. W/ JELLY; JL BACKGROUND; MIX. ITEMS AS WELL AS
OTHER PERTINENT (if?) ITEMS

1715 HES TO 2120 HES TRAVEL FROM TUGCO ATTORNEYS OFFICE
TO PHILA.

2130 HES. T. CONCL. W/ RAT @ RAT HOME

- 1) ATTORNEY WANTS JL; JLN TO GO & TESTIFY AS A TESTIMONIAL
- 2) JL POINTED OUT THAT OCE WANTED TO GO AS LEAD WITNESS
- NSR ASKED IF OCE WOULD GO AS FORCE WITNESS
JL SAID UP TO OCE JLN YES NO PROBLEM
- 3) POSSIBILITY OF EMOUSER RELIEVING REPORT - NOT JUST
YES OR NO AS PER NSR - JL EXPLAINED
- 4) JL ASKED ATTORNEY (NSR) WHOSE SIDE THEY REPRESENTED
INDICATIONS ARE THAT OCE IS NOT GETTING ALL INFO
- 5) JLN AND MAYBE ATTORNEY WANT JL TO PERFORM AUDIT
- THIS FACTOR AND MKA RELUCTANCE
- 6) APPARENTLY JLN RESPONSES TO CHAPMAN MEMO IN ATTORNEY
POSSESSION - NOW, NSR INDICATED THAT RESPONSES NOT SENT
- 7) NSR HANDWRITTEN NOTE & JL ORAL SUMMARY IN W/ ATTORNEY
- 8) JL HAD PROBLEM W/ JLN OFFERING "HELP" TO RICK WALKER
ON LABOR MATTERS & CHAPMAN ON EXPERT WITNESS
- JLN VOL. NOT BEING ASKED
- 9) JL WANTS TO KNOW WHAT QUALIFIES JL TO MAKE
STATEMENTS ON ANST, OCE QS PRACTICES, REASONING
BEHIND JL MEMO & STATEMENTS - WHAT IS JLN UP TO?
- 10) NSR ASKED IF OCE HAD AN ATTORNEY
- 11) NSR NOT PLEASED THAT 11/10 & 11/13 MTS TRANSCRIBED
- 12) NSR SAID JL SHOULD HAVE BEEN KNIGHTED PRIOR TO SITE TRIP
DID OF 11/22/83 ENTRY

November
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23

= OPSOINER (EST) 11/23/83 JIL POINTED OUT TO RAT THAT 2 OUT OF 2 MTS. NOT WHAT JIL HAD BEEN LED TO BELIEVE - WHAT IS GOING ON, SOMEONE IS NOT ABON BOARD AS 1030 HRS (EST) 11/23/83 UNTIL 1340 HRS (EST)

- MTG. w/ RBR, RAT, JIL, & JIL (SIEV NOTES) JIL DISCUSSED
- ① MTE. WHAT WAS SAID AND DISCUSSED AT MTE w/ TUG CO ATTORNEY SEE NOTES FOR DETAIL
 - ② GO IN DEPTH ON HILL'S DISAPPOINTMENT AND FAMILIARIZATION - BOTH RBR & RAT POINTED OUT TO JIL THAT OBC COMPLIES WITH AND SATISFIES ALL ANSI REQUIREMENTS
 - ③ GO IN DEPTH ON PERS & BALS OF AN OBC AUDIT

- AS RESULT OF MTE.
- ① RBR TO CALL NCR TO ASSURE THAT JIL HAS NO AXE TO GRIND AND IS WILLING TO PERFORM AN OBJECTIVE AUDIT
 - ② OBC WOULD APPEAR AS TUGCO/TUSE WITNESS IF NCR
 - ③ OBC WANT A HOLD HARMLESS? (FROM JIL) OBC TO COOPERATE BUT WANT TWO WAY STREET w/ TUGCO/TUSE.
 - ④ OBC TO OFFER AUDIT AGAIN
 - ⑤ OBC IS AND WILL CONTINUE TO BE OBJECTIVE
 - ⑥ TO THE LINE OF COMMUNICATION BETWEEN RBR/RAT/JIL/JL

11/23/83 NCR ADVISED DIL (ATTORNEY) INTERVIEW AND SUMMARY COMMENTS ON INTERVIEW JIL POINTED OUT TO JIL & RAT THAT INFO. IN INTERVIEWS WAS INACCURATE IN SOME AREAS AND/OR MISLEADING.

11/30/83 (EST) RBR INFORMED RAT/JIL/JIL THAT RBR THREW OUT NCR AND NCR WANTED ORIGINAL OF DIL INFO THAT JIL PICKED-UP (ALSO WANTED ALL COPIES) - NCR SAID TO RBR THAT JIL MESS ON HILL - RBR CONVEYED THAT JIL HAD NO AXE TO GRIND - RBR ALSO SAID THAT OBC HAS SHOULD ENGAGE AT LEAST TWICE - RBR SAID PHONE CONVERSATION WENT WELL

November

October

November 1983

December

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≈ 1230 HRS (EST) 11/28/83 T. CONN. W/ F. HAWKINS

(NRC) WANTED TO SET UP MTG. W/ JLL (PREFERABLY AFTER WORK OR ON WEEKEND) TO DISCUSS AREAS INTO WHICH F. HAWKINS COULD PURSUE. JLL POINTED OUT OBC POSITION AND OFFERED TO COOPERATE.

≈ 1240 HRS (EST) INFORM FIRST RAT THEN T. CONN. W/ JLL AND ADVISE ON T. CONN. W/ F. HAWKINS

SPEND MOST OF DAY ON FINAL PROOF READ ON 11/10 & 11/83 MTG. TRANSCRIPT

≈ 1850 HRS (EST) RAT SUGGESTED THAT JLL CONTACT N. REYNOLDS ON NRC MTG. (JLL HAD POINTED OUT TO RAT EARLIER THAT JLL WOULD NOT BE ABLE TO PROVIDE F. HAWKINS W/ SPECIFICS BUT ONLY SUGGEST AREAS INTO WHICH F. HAWKINS SHOULD CHECK OUT)

January 1984

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Tuesday

29

NSR (EST) 11/29/83 T.CONN. W/NSR
(TUGCD ATTORNEY) LEFT MESSAGE

T.CONN. W/NSR (DINAC RECORD TIME) ON UPCOMING 12/8/83 MTG.
W/F. HAWKINS (NRC) - WANTED ON JIL OWN TIME NOT COMPANY -
JIL WOULD NOT BE ABLE TO PROVIDE SPECIFICS ONLY AROTT OR
AVENUE FOR F. HAWKINS TO PURSUE

T.CONN. W/NSR (TUGCD ATTORNEY) & F. HAWKINS (NRC) @ 1:55 PM.
EXPLAINED TO F. HAWKINS THAT NSR REPRESENTS JIL ON THIS
ITEM - ALSO EXPLAIN TO F. HAWKINS THAT JIL BASED MEMO W/O
TUGCD'S SIDE OF STORY AND THAT IF TUGCD IS DOING ALL
THAT THEY (TUGCD) SAYS THEN JIL'S CONCERNS WOULD BE
MITIGATED (JIL CAN NOT PROVE ONE WAY OR THE
OTHER) - AGREED TO MEET IN CHICAGO ON 12/8/83
(NSR TO ARR. @ 4:00 PM IN CHICAGO)

ADVISE RBR ON STATUS (RBR MENTIONED TWICE
TODAY JIL WORKLOAD) W/NSR & NRC
ADVISE RAT ON STATUS W/NSR & NRC

DURING T.CONN. W/W. CZEZOTAR SHE MENTIONED
THAT LADAMS (HER SISTER) TALKED W/HER
ON C.P. & JIL SITUATION

December

November

December 1983

January 1984

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SEE FIRST TWO ENTRIES FOR 12/7/83
(MISTAKENLY ENTERED UNDER WRONG DAY)

T. CONN. W/NSR (OFFICE) TWICE

#1 LEFT MESSAGE W/MS. REAP - JLR RECD

NSR LETTER OF 12/3 AND WOULD MEET

NSR PLANE @ O'HARE (NSR HAS ROOM

@ HILTON AS WELL AS FLIGHT RES. FOR EVE. 12/7)

#2 LEFT MESSAGE PER F.H. REQUEST

ADVISE JLN ON NSR LETTER OF 12/3/83 - SEND

COPY W/ TEXAS NEWSPAPER ARTICLES

GIVE RBR COPY OF NSR LETTER & NEWSPAPER ART.

T. CONN. W/E. MOUSER (SAI) E. MOUSER HAD TALKED

W/R. WALKER & IS TO TESTIFY AT DULHAM

MEMORIALS - E.M. COULDN'T REMALL IF JR

SAVES COPY OF TRIP REPORT TO E.M. -

SEE NOTES - NOTES NOT CLEAR & AS A RESULT
WERE DESTROYED

December

November

December 1983 January 1984

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7 12/5/83
 RBR CALLED JIL INTO RBR OFFICE & HAD
 JIL READ & COMMENT ON INFO. SENT TO
 OBC (JIL) BY N.S.R. ALSO RBR WENT OVER
 INFO. FOR JIL TO EMPHASIS (SP?) WHEN W/NRC
 (RBR LATER TOLD JIL TO GIVE NSR THE ARTICLE)
 12/5/83 T. CONN. W/ F.H. (NRC) O'HARE HILTON
 RM 2115 5-9 PM (SHOULD'VE TAKEN MORE
 THAN 1-2 HRS.) ASKED JIL TO CALL NSR

12/7/83 MESSAGE FROM MR. HORIU (202-
 857-9837) THAT THE MTG. IN CHICAGO
 WAS CANCELLED TRIED TO CALL &
 LEFT MESSAGE

12/7/83 ≈ 0900 (EST) T. CONN. W/ F.H. (NRC)
 MTG. POSTPONED (NRC ATTORNEYS HAD
 PROBLEM W/ NSR BEING @ MTG.)

12/7/83 ≈ 0935 (EST) T. CONN. W/ WM. HORIU
 (202-857-9837) NRC HAS PROBLEM
 FROM A POLICY STANDPOINT W/ ALL
 ATTORNEY BEING PRESENT DURING ALL INTERVIEW

12/7/83 ≈ 0940 (EST) LEFT MESSAGE (CHICAGO
 MTG. CANCELLED -NRC HAD PROBLEM W/
 ATTORNEY BEING PRESENT) FOR JIL

12/7/83 INFORM RAT ON MTG. STATUS

12/7/83 ASKED TED TO RELAY MESSAGE TO RBR

December

November

December 1983

January 1984

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2 3 HRS. START REVIEW OF TRANSCRIPT ON 11/10/11/83 AT

T. COMM. W/NSR SER LEFT MESSAGE THAT JIL COULD NOT MAKE MTG. ON 12/20/83 - TRIED TO RESCHEDULE - NSR OR SER. WILL CALL BACK TO RESCHEDULE

T. COMM. W/JIN (12 19 HRS. EST) TOLD JIN IN OBC FLORIDA OFFICE -> JIL CALLED OBC FLA. OFFICE AND LEFT MESSAGE

T. COMM. W/RBR (OBC FLA. OFFICE @ 1230 HRS EST) GO OVER NSR T. COMM. OF 12/8/83 (EXCEPT #6,7,8)

T. COMM. W/NSR (1511 HRS. EST) MWE MTG. TO 12/21/83 @ 0930 HRS IN WASH., DC.

December

November

December 1983

January 1984

Friday

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16

21045 HRS. (EST) 12/16/83 T. CONN. W/

F. HAWKINS (NSR) WANTS TO RESCHEDULE
MTG. FOR 1/4/84 IN CHICAGO IN MORNING

-NO PROBLEM FOR NSR TO BE PRESENT
JLL TO CALL NSR THEN CONFIRM W/ F.H. @

312-790-5660

21107 HRS. (EST) 12/16/83 ADVISE RBR &
RAT ON T. CONN. W/ F.H. ; RBR DIRECTED JLL
TO CALL NSR THEN SWITCH NSR UP TO RBR

21125 (EST) 12/16/83 LEFT MESSAGE
W/ SECRETARY

21208 (EST) 12/16/83 T. CONN. W/ R. REMP
(NSR - SEC.) ON RESCHEDULED MTG.

21400 HRS (EST) 12/16/83 T. CONN. W/ NSR
RE: MTG. IN CHICAGO ON 1/4/84 OK W/ NSR

February

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April

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December

Tuesday

20

T. CONN. w/E. REAP RE. CONFRA

12/21/83 MTS. w/NJR ALSO

ADVISE OF FLT # & ARRIVAL TIMES TO CHICAGO ON 1/1/84

T. CONN. w/F. HAWKINS (1/20 HES) ADVISE ON FLT. TIMES

December

November

December 1983

January 1984

Wednesday

21

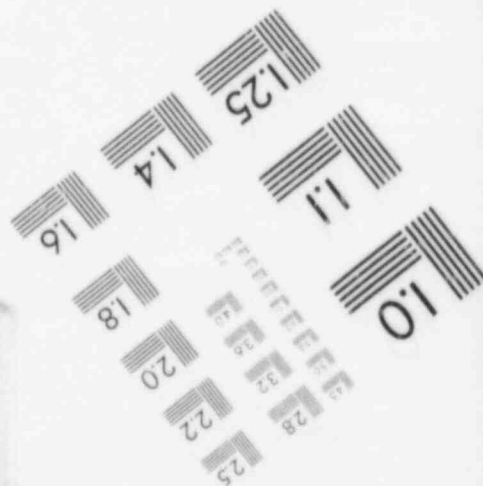
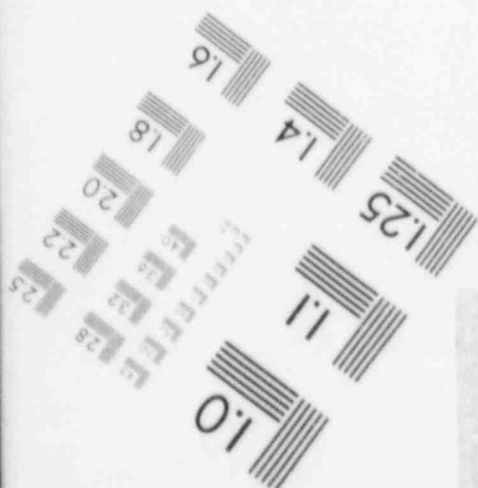
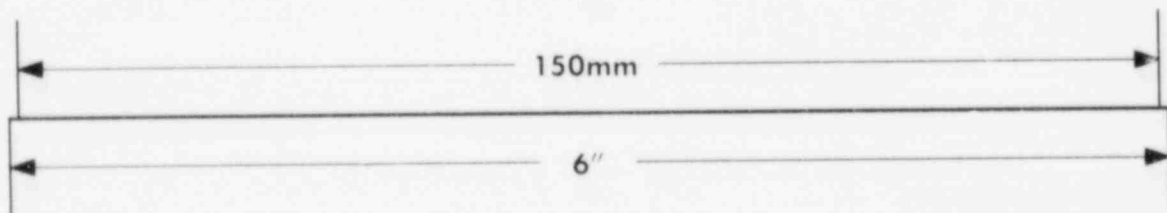
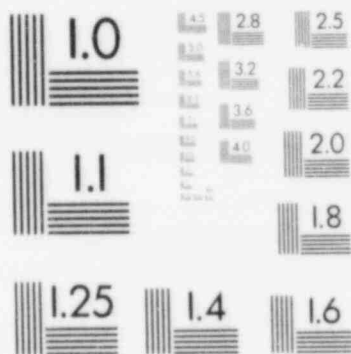
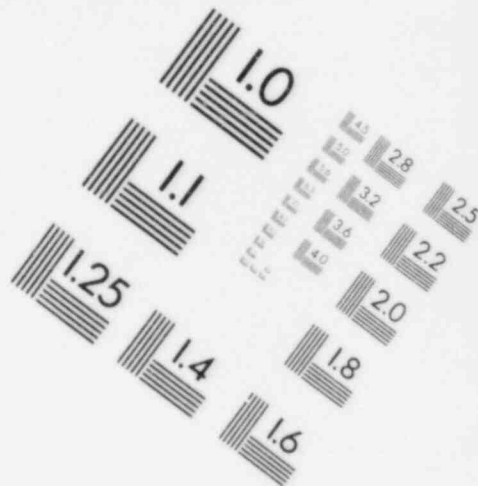
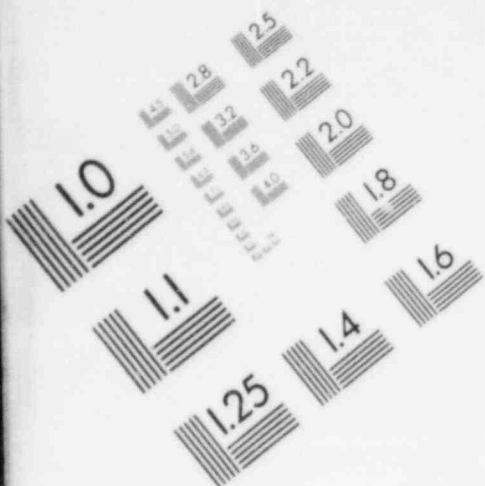
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LI. FOR WASH. DC @ 0620HRS
 = 940 HRS (EST) MTG. W/ M. WATKINS,
 N.S. REYNOLDS & E. REAP (SEZ) WORK THROUGH
 LUNCH MTG ENDED AT 1500HRS (EST)

- GO OVER DRAFT OF TESTIMONY
- EXPAND & ELABORATE ON DRAFT OF TESTIMONY
- DISCUSS JIL QUAL TO TESTIFY - JIL NOT COMFORTABLE STATING THAT JIL IS AN EXPERT ON NUCLEAR WORK - NSR TO CONTACT RBR & PERHAPS GO W/ RAT (JIL HAD NO PROBLEM W/ RAT)
- DISCUSSED TRIP REPORT CHANGED BY RBR
- DISCUSSED NSR MTG & HEARING FORMAT
- JIL ADVISED NSR THAT JIL HAS OPINIONS ON CP QUALITY BUT WOULD PREFER NOT TO DISCUSS OTHER THAN THOSE OPINIONS ALREADY EXPRESSED IN 8/8/83 TRIP REPORT

@ 1540 HRS (EST) T. CONN. W/ RAT BRIEFLY
 REVIEW W/ RAT MTG. W/ NSR & MLW.

IMAGE EVALUATION
TEST TARGET (MT-3)



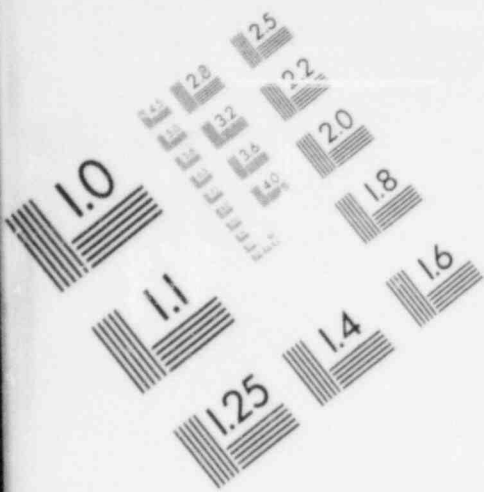
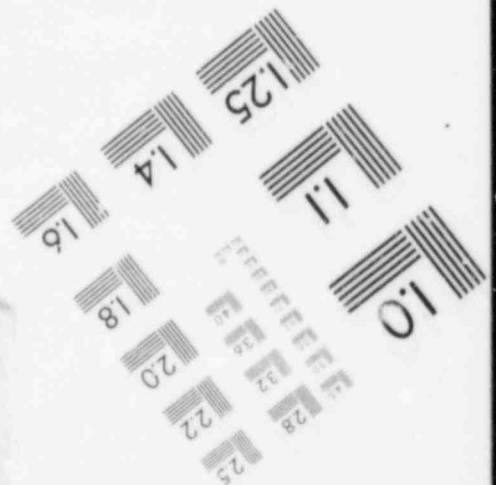
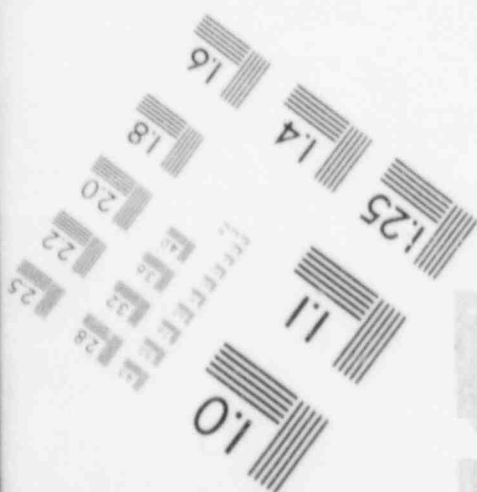
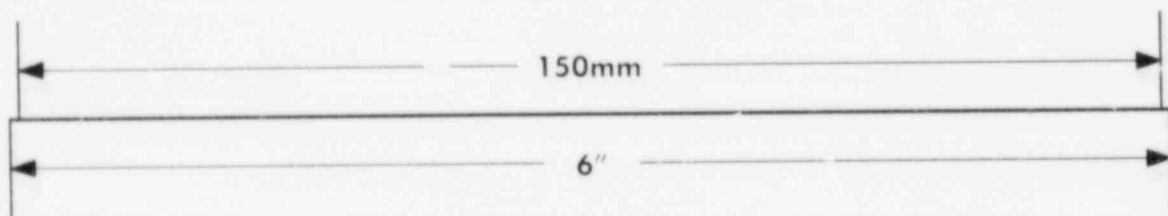
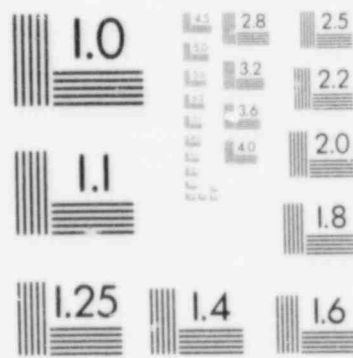
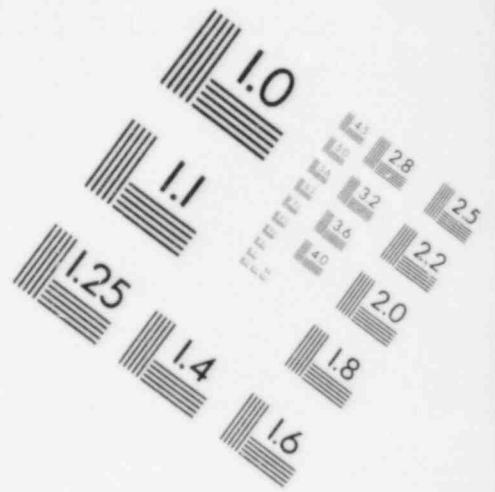


IMAGE EVALUATION
TEST TARGET (MT-3)



December

November

December 1983

January 1984

Friday

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23

≈ 0940 HRS (EST) 12/23/83 COMM. W/RBR

RE: NEW DRAFT OF JLL TESTIMONY DID NOT ARRIVE; RBR WENT OVER JLL PERFORMANCE APPRAISAL - ONLY NEGATIVE COMMENT WAS THAT JLL SHOULD DO A BETTER JOB ON SETTING DEADLINES & THAT JLL SHOULD KNOW EXACTLY WHAT EVERYONE IS DOING IN JLL'S DEPT. JLL ADVISED RBR THAT DEADLINES CAN BE SET & MET BUT DAY TO DAY & RUSH ITEMS WOULD SUFFER (RBR SAID THAT HE WANTS DEADLINES & CURRENT WORK NOT TO SUFFER); JLL SALARY TO INC. 2K/YR. ALSO IC PORTION FOR '83 SHOULD BE ≈ 5.5K

ADVISED E. REED THAT NEW DRAFT DID NOT ARRIVE - COPY TO BE SENT TO JLL C/O MR & MRS E.A. GULLIDGE

February

March

April

December

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Tuesday

27

— REVIEW NEW DRAFT OF
LL TESTIMONY

DEPARTMENTAL CORRESPONDENCE

DATE November 4, 1983

SUBJECT Meeting TUSI - Dallas Headquarters - Wednesday 11/3/83 - RE: COMANCHE PEAK COATINGS

TO File cc: JJNorris, RATrallo

FROM RERoth

Joe George, Vice President - TUSI

Dave Chapman, Corporate QA Manager - TUGO

John Merritt, Jr., Assistant Project
General Manager - TUSI

Billy R. Clements, Vice President-Operations -
TUGO

Tony Vega, QA Manager to Chapman - TUGO

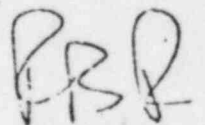
R. B. Roth & J. J. Norris - O. B. Cannon & Son, Inc.

1. Session started at 3:00 p.m. and was principally on clients reaction to August 8, 1983 Joe Lipinsky trip report. In general, with only a three day site visit in July, 1983, certain of the positions taken by Joe, and stated as 'factual', would have taken weeks of close examination and evaluation, according to the clients people.
2. RER apologized again for the lack of security at OBC, in that an in house memo 'leaked out' and had caused our client such consternation and now additional exposure to intervenors.
3. In answer to RER specific questions, Billy Clements said that site Q. C. reports directly to him, also, contrary to Lipinsky memo, site QA Manager, Tolsen, reports to him and not to Production. Dave Chapman readily confirmed this. Further, Toulson is a TUCO man and not Brown & Root.
4. Joe George is Vice President and has complete charge of C. Peak. He emphasized that Brown & Root, currently are essentially Labor Brokers and he is calling the shots. Hence; as suggested by Lipinsky memo, whether Brown & Root would be receptive to, or responsive to a Cannon audit and/or the findings thereof is a mute point with TUSI.
5. JJNorris raised point of writing NCR's, or the lack thereof, and Clements and Dave Chapman responded that nothing in IOCFR50 requires "NCR". TUCO elected to have 'unsatisfactory reports' as their mechanism for identifying construction or equipment deficiencies.

Meeting TUSI - Dallas Headquarters

Page 2

6. RBRoth asked further who has responsibilities for generating QCP's, QAP's and QIP's and Chapman answered, TUGO, through Toulson's group. Jack added that he was present, when JLLipinsky met with Toulson and Toulson's remark about 'not his concern' related to the Plant Licensing Procedure and not to JLLipinkys's voicing his view of the quality of work and inspection at the site.
7. RBRoth suggested that to further address Cannon and TUSI concerns on the Class I coatings, and recognizing its been three months or better since Cannon made any actual site inspections, that Cannon set up a Taskforce Group, to visit the site ASAP and take whatever time is required to come up with a realistic overview of the coatings effort, especially since the retro-fit program was effected around the first of September.
8. All agreed - we were thanked for coming to Dallas on short notice and the meeting adjourned.
9. RBRoth to set up the Taskforce Group, to commence site visit November 9, 1983.


R. B. Roth

/s

DEPARTMENTAL CORRESPONDENCE

DATE October 28, 1983

SUBJECT Texas Utilities Services - Letter dated October 27, 1983

R. B. Roth

FROM J. Lipinsky

1. In addition to the individuals identified in the subject trip report, the writer met with a number of the coating quality control inspectors.

These individuals were:

- Lanette Adams
- Dave Ambrose
- Gary Corrigan
- Joe Deshanbo (sp?)
- Margaret Lucke
- Evert Mouser
- Casendra Owen

Note: The writer met other inspectors but cannot recall the individual names.

The writer discussed job status, project conditions, work activities and other miscellaneous items with the above individuals. The writer has either employed or worked with the above listed individuals on one or more nuclear projects.

2. As stated repeatedly by the writer, a thorough review/audit would be required to provide specifics on the six items listed by D. N. Chapman. However, the following explanation is provided for each item as listed by D. N. Chapman.
 - A. Material Storage - the writer observed that the coating material is mixed, and set on pick up pallets outside Containment. None of the material had tags attached (status or mix information), and there is no apparent control on how long mixed material sits on the pallets.
 - B. Workmanship - at the time of the writer's visit the applicator qualification program was being administered by production personnel with no inspection or monitoring of the qualification process (before during or after) by quality control. This information was provided to the writer by Mark Wells of site engineering and quality control.

With regard to the quality of the work, the writer observed numerous areas of in place work which by appearance was less than the quality of work put in place by Cannon on nuclear and non-nuclear projects.

To: R. B. Roth
Re: Texas Utilities Services
Letter Dated 10/27/83

October 28, 1983
Page 2

Additionally, the writer was informed on more than one occasion by engineering and/or production that a low percentage of the individuals (34 out of 452 individuals) employed as painters were no any good as painters.

C. Compliance with ANSI Requirements - the writer only briefly examined the report format utilized on site. However, indications were that all of the required data was not included on the inspection reports. Also, ANSI has requirements for applicator qualification (in addition there are forms to be completed), material storage, tagging, and manufacturers' instructions, to name a few.

D. "Possibly" coating integrity - see Item B and K on page 4

E. Possible document deficiencies - see Item C above

F. Morale problems - based on conversation with various inspection personnel, including those individuals listed in number 1 above, the writer concluded that the inspection personnel on the project were not satisfied with their jobs.

To the writer's knowledge, J. Deshanbo, E. Mouscr, C. Owen and H. Williams are no longer on the project site as of October 31, 1983.

3. As indicated in the subject trip report, when the writer advised R. Tolson that 'preliminary assessment by J. J. Lipinsky, that Comanche Peak has problems in areas of material storage, workmanship (quality of work and painter qualification and indoctrination), not satisfying ANSI requirements and possible coating integrity', he (R. Tolson) replied, "That's not my job or concern". The items indicated, with the possible exception of coating integrity (and that is debatable) deal, at least in the writer's opinion, with quality related matters and R. Tolson, the QA Manager state "That is not his job or concern". Therefore, the writer would be inclined to believe that R. Tolson was indicating that he (R. Tolson) was not concerned with quality.

4. C. Brandt and R. Tolson mentioned T. Miller specifically when the writer advised them (C. Brandt and R. Tolson) that approximately nine former Cannon employees (inspectors) were or are employed on the project.

5. The writer was referring to issues raised in Item 2 above.

6. See item 2B above.

7. In the writer's opinion and apparently in the opinion of those individual at the meeting of July 28, 1983 (see page 2) this was the situation. As result of this a get together was planned to bring the Quality Control inspectors and foreman together. However, this was later cancelled, based on follow-up conversations with the site personnel

To: R. B. Roth
Re: Texas Utilities Services
Letter dated 10/27/83

October 28, 1983
Page 3

8. Apparently, the air compressors or air supply lines were not providing clean (water and oil free) air, and up to half the shift, approximately five hours, was utilized to make the air quality acceptable.
9. Zimmer has problems related to coatings as a result of placing more emphasis on production than they (Zimmer) did on quality. It is the writer's opinion that this appears to be a hang-up at Comanche Peak.
10. The writer based this statement on conversations with inspection staff in what appeared to be poor instructions in the procedures (though the writer cannot recall specifics), coupled with the number of changes to the specifications (most of which catered toward relieving requirements on areas or items where requirements could not be satisfied.

The implications of the writer's statement is that somewhere down the road, another set of eyes may or may not concur with my assessment.

11. See Item 2 above.
12. As a result of the meetings attended by the writer, the site management people (R. Tolson) declined the offer of Cannon to perform an in-depth audit that would have either confirmed or satisfied the concerns I raised.
13. The writer based this on conversations with site inspection personnel and the apparently disinterested attitude of R. Tolson, when advised of potential coating quality problems.
14. See Item 2F above.
15. The writer is unable to recall the names of inspection personnel encountered while in the field. However, two of the topics frequently discussed were the quality of work and where employment possibilities may currently exist.
16. There is an honest internal disagreement in the manner in which ANSI requirements impact the cost of a project and the quality of the work.
17. See Item 12 above.
18. The writer based this observation on previous work experience, and suggests that the coating manufacturer be contacted to confirm same.

Note: Power grinding on isolated areas of one square foot or less should not be a problem.

19. Again, the writer based this observation on previous work experience and suggests that the coating manufacturer be contacted. However, old Phenolinc #305 (one year or more, with weld fume accumulation) may not

To: R. B. Roth
Re: Texas Utilities Services
Letter dated 10/27/83

October 28, 1983
Page 4

19. - continued

be adequately cleaned and provide sufficient intercoat adhesion by solvent wiping.

20. The writer's speciality is Quality Assurance/Quality Control, as these terms deal with coatings and the writer's offer of an in-depth audit (in order to confirm or allay quality concerns) was repeatedly rejected.

Also see Items 3 and 12.

21. Based on the writer's observations on site and my past Nuclear site experience, the work observed in place appears questionable with regard to quality. (Again, an in-depth audit/review may resolve this issue.)

Also, any attempt by Cannon or any qualified professional applicator to salvage "in place work", may not be practical or realistic. Certainly, isolated areas may prove acceptable and perhaps complete rooms may be okay. However, realistically and from a cost/effective viewpoint, "rework" is more logical considering production effort and the attendant documentation.

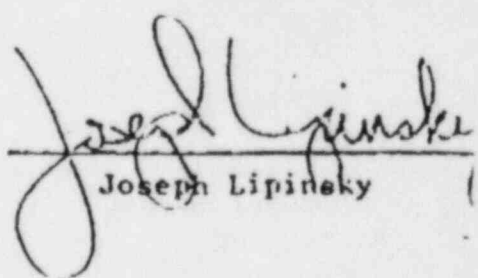
22. See Item 21 above.

Additionally, the retrofit program may well resolve the writer's concern but I have not reviewed the adequacy or results of the retrofit program. Realizing that the writer is not familiar with the results of the retrofit program, I cannot comment one way or the other on the acceptability of the retrofit program.

23. The writer distributed the trip report to R. B. Roth and J. J. Norris, on or around August 8, 1983.

24. The writer did discuss the subject matter in my trip report with E. Noue Field Coatings Quality Control Supervisor, on subsequent trips to the project site.

Dated: October 31, 1983


Joseph Lipinsky

DEPARTMENTAL CORRESPONDENCE

DATE November 28, 19831-3301 - Coatings Overview Task Group ReportRobert B. RothRalph A. Trallo

1. Background:

Company Personnel Concerned:

Robert B. Roth - President and Chief Executive Officer
 Ralph A. Trallo - Vice President Nuclear Services
 John J. Norris - Vice President and Project Account Manager
 John J. Lipinsky - Corporate Quality Assurance Director
 M. Keith Michels - Corporate Quality Assurance Lead Auditor

On November 4, 1983 a Cannon Task Group consisting of the writer, J. J. Norris, J. J. Lipinsky, and M. Keith Michels was established to perform follow-up evaluation of items previously addressed within the scope provided under our Consulting Services Contract¹ with this client.

This follow-up was to be in accordance with guidelines set forth in departmental correspondence from Robert B. Roth to the writer² and the principle purpose detailed was to evaluate the nuclear coatings retrofit program at Comanche Peak. Key areas included:

Material Storage and Control

Painter mechanic qualification/documentation

Working relationship between Production/Inspection

Status and adequacy of documentation/traceability

Implementation of coatings retrofit effort, see "Painting Minutes of Meeting", pages 1 to 4, dated 3/15/83, as prepared by R. M. Kissinger, Project Civil Engineer

Compliance of Nuclear coatings to Project Specifications requirements

Overview as to adequacy of current safety-related coatings in place, as per proper Industry practice, etc.

¹ TUGO Purchase Order No. CPF-15245

² Departmental correspondence R. B. Roth to R. A. Trallo, 11-4-83

H-8301 - Coatings Overview Task Group Report

TO: Robert B. Roth

November 28, 1983

Page Two

II. Preliminary Preparation:

The writer discussed the operation and purpose of the Cannon Task Group with the other participants. A point of departure schedule was established in accordance with Robert B. Roth's memo guidelines, and preliminary checklists were prepared to facilitate orderly progression and review.³ The intent was to have OBC QA Services (Lipinsky and Michels) and J. J. Norris (Account Manager) onsite for whatever time was required to complete the necessary reviews. R. A. Trallo was to visit the site to perform an overall evaluation as to the effectiveness of the Cannon Task Group activities. Commencement dates for site activities were: November 9, 1983, J. J. Norris, J. J. Lipinsky and M. Keith Michels onsite to begin preliminary reviews; November 10, 1983, the writer onsite to insure effective implementation of the Cannon Task Group activities.

III. Task Group Activities:

On November 8, 1983 I called John Merritt to advise him that Oliver B. Cannon personnel would be onsite November 9, 1983, and requested that he have available the following information for review:

Organizational chart with names and titles of individuals and positions filled

Copy of current revision of the QA Program

Complete cooperation with various onsite departments, organizations and individuals

List of names of all inspection personnel and level of certification

List of names and positions of production personnel (foremen and above)

List of certified painters and systems for which the painters are qualified

3. "J.J.L and M.K.M Comanche Peak Trip Plan" (4 Pages)

H-8301 - Coatings Overview Task Group Report

TO: Robert B. Roth

November 28, 1983

Page Three

III. Task Group Activities: (continued)

Liason or interface person for quality assurance, quality control, production, and other departments in order to expedite and aid in the performance of this review

Mr. Merritt requested that any reviews conducted by OBC were to be performed on a joint basis (ie. QA and Accout Management).

Cannon personnel were onsite the morning of November 9, 1983. At that time J. J. Lipinsky gave a copy of the preliminary review checklist³ to John Merritt. J. J. Norris and John Merritt discussed the checklist and Mr. Merritt requested a "kick off" meeting prior to any formal reviews or implementation of Cannon Task Group activities.

It became evident that the scope of the Cannon Task Group activities which had been previously outlined²; were not coincident with that perceived by TUGO. Mr. Merritt requested a review meeting to discuss the concerns of the "Lipinsky Memo"⁴ and based on the outcome of that meeting TUGO would re-define the scope of the Cannon Task Group activities. The review meeting was held commencing Thursday, AM, November 10, 1983, with John Merritt chairing.

Mr. Ron Tolson, Construction QA Supervisor, started the discussion. In essence the "Lipinsky Memo"⁴ was used as an agenda, and each memo paragraph, or statement, was discussed and clarified. The meeting was recorded and the transcript has been distributed for comment.⁵ It became evident that certain statements in the trip memo⁴ were incorrectly stated or misinterpreted. This was principally due to the organizational structure at Comanche Peak. (ie. A management team consisting of individual's employed by different organizations.)

2. - Departmental correspondence R. B. Roth to R. A. Trallo, 11-4-83
3. - "JLJ and MKM Comanche Peak Trip Plan" (4 Pages)
4. - Trip Report (JLJ to RBR) 8-3-83
5. - "Lipinsky Memo Meeting on November 10 and November 11, 1983"

H-8301 - Coatings Overview Task Group Report

TO: Robert B. Roth

November 28, 1983

Page Four

Mr. Tolson explained the operational roles of the individuals involved on the Comanche Peak Team, along with their proper titles, responsibilities, and lines of reporting.

Concerns raised in the "Lipinsky Memo"⁴ were for the most part, based on observations and discussions between Joe Lipinsky and site personnel. At face value this "information," would be the cause for raising concerns regarding the site coating activity. Throughout the course of the November 10 meeting, it was evident that Site QA Management at Comanche Peak was not interested in further audits, or program reviews, since they have been subject to numerous outside and internal reviews and audits in the past several years. These constant and sometimes redundant reviews, compounded by the apparent personnel matters, resulted in short or clipped responses, which could readily be misinterpreted.

Regarding areas of coatings material handling, personnel qualifications, non-conformances, and quality responsibility, Mr. Tolson discussed the current procedures and controls in effect at Comanche Peak. This detailed information not readily available to Joe Lipinsky during his site visit of July 26, 27, 28th, 1983, and on which visit he based his August 8, 1983 trip report to Robert B. Roth.

Comanche Peak Management stated that they do not feel they have a problem in the areas of concern, as raised in the "Lipinsky Memo."⁴ A detailed indepth audit was not agreed to. However, a review of specific items could be scheduled, or program "paper" be made available for review, at Cannon's request. After consideration the Cannon Task Group decided that a limited review was unwarranted, since it would not provide sufficient support to a statistical extrapolation as to the entire coatings programs' effectiveness.

Detailed discussion and information is provided in the notes of the November 10 and November 11 meetings. (Reference footnote 5.)

4. - Trip Report (JJL to RBR) 8-8-83

H-8301 - Coatings Overview Task Group Report

TO: Robert B. Roth

November 28, 1983

Page Five

IV. Conclusion:

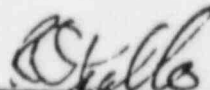
The Cannon Task Group did not perform the total overview function as originally scoped by Robert B. Roth. This was due to the request of our client to explore and review the "Lipinsky Memo"⁴ in further detail, paragraph by paragraph.

The site meetings of November 10 and 11, 1983 resulted in the following:

The concerns raised in the "Lipinsky Memo"⁴ were based on limited information and observations which were neither investigated nor discussed in sufficient detail, during his site visit, to either allay or to confirm.

Comanche Peak Site Management adequately detailed the programs and controls in place, which would relieve or allay the concerns raised in the "Lipinsky Memo."⁴ Cannon has no basis to confirm that these programs and controls are in place and are being effectively implemented. Confirmation could only be provided by a detailed audit. Such an audit could be redundant and certainly time consuming. Further, TUGO has neither requested same, nor is it required by the referenced Purchase of Services Agreement.

Based on the information provided by the Comanche Peak Site Organization we can assume that our concerns are unfounded, however, affirmation could only be finalized by further effort.



Ralph A. Trallo

RAT: jr

⁴ - Trip Report (JJL to RBR) 8-8-83

DEPARTMENTAL CORRESPONDENCE

DATE November 4, 1983

SUBJECT Job H8301-Coatings Overview Task Group, Cannon to TUSI, Comanche Peak
 TO R. A. Trallo, J. J. Norris, J. J. Lipinsky, K. Michels cc: APMc, Acct File
 FROM R. B. Roth

1. As a follow-up to our Consulting Services Contract over the past summer, for this client, I am assigning this Cannon Task Force to perform a Nuclear Coatings overview at the Comanche Peak Nuclear Plant, being constructed by Texas Utilities Services, Inc. at Glen Rose, Texas
2. Task Force to be:
 - R. A. Trallo - Vice President - Nuclear Services
 - J. J. Norris - Vice President Houston Operations
 - J. J. Lipinsky - Corporate QA/QC
 - K. Michels - Lead Corporate Auditor
3. Site effort to commence, Wednesday morning, November 9, 1983. Jack, Joe and Keith to report on Wednesday. Ralph may not be able to schedule till later in the week. There is no established time limit. I suspect from three to five days may be necessary, but the best judgment of our senior managers involved will so ascertain. Ralph is designated as Task Force Leader.
4. Principal purpose is to evaluate the Nuclear Coatings Retrofit Program that has been in effect over the last 3 to 4 months. Key areas would include:
 - Material Storage and Control
 - Painter mechanic qualification/documentation
 - Working relationship between Production/Inspection
 - Status and adequacy of documentation/traceability
 - Implementation of coatings retrofit effort, see "Painting Minutes of Meeting", pages 1 to 4, dated 8/15/83, as prepared by R. M. Kissinger, Project Civil Engineer
 - Compliance of Nuclear coatings to Project Specifications requirements.
 - Overview as to adequacy of current safety-related coatings in place, as per proper Industry practice, etc.

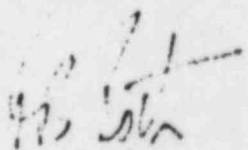
To: R. A. Trallo, J. J. Norris, J. J. Lipinsky, K. Michels
Re: Job H8301 - Task Group

November 4, 1983
Page 2

-
5. Separate individual and objective reports are due to Task Leader and his composite report shall be submitted to my office within five working days after site assignment.

Ralph is further charged with the security of the reports/observations given to him and his composite report shall be directed to me, and no other copies issued or distributed.

6. I shall then communicate the results of our effort to TUSI.
7. All costs and expenses involved shall be submitted in separate expense envelopes, with appropriate receipts and clearly marked with Job #H8301.
8. Any questions or clarifications to the above shall be addressed to my attention.


R. B. Roth

JJL & M/M COMANCHE PEAK TRIP

- NEED:
- Organizational chart with names and titles of individuals and positions filled
 - Copy of current revision of the QA Program
 - Complete cooperation with various on site departments, organizations and individuals
 - List of names of all inspection personnel and level of certification
 - List of names and positions of production personnel (foremen and above)
 - List of certified painters and systems for which the painters are qualified
 - Require liason or interface person for quality assurance, quality control, production, and other departments in order to expedite and aid in the performance of this review

Gene Cianc →

- DAY #1
- Review QA Program in general
 - Review QC Procedures and how those procedures related to the QA Program
 - Go over QC Procedure numbering sequence
 - Review site organization and responsibilities (both individual and company)
 - Review Retrofit program (why implemented, still on-going-why? why not?, what has been accomplished to date)
 - Tour Site (containment, paint shop, warehouse, calibration lab, etc.)

NOTE: Badge M/M as time allows

DAY #2

Non-Confirming Conditions

Review existing NCR's

Review procedure for unsatisfactory reports to determine adequacy

Review procedure for NCR to determine adequacy

Review logs for NCR and unsatisfactory report

Review status tag procedure and logs

Review NCR and/or unsatisfactory coordinator status

Procedure and Specification Revision Control

Review system and procedure for changes to specification and procedures

Review controls - assure that only most current revisions of specification and procedures are utilized

Examine on site situation to determine sequence of work activities

DAY # 3&4

Material Storage

Review procurement documents

Review receiving procedures and records

Review personnel qualifications for receiving personnel

Review product certification

Examine reject and hold areas (review tagging procedures and logs)

Examine facilities (take representative batches and determine if procedure followed)

Review warehousing records

Examine facilities and check calibration of recording thermographs (examine certificates of compliance for instruments, calibration records for instruments, personnel for individuals performing calibrations)

Determine traceability of material from receiving to in place work from warehousing records and daily reports (also going backwards from in place work)

DAY #5

Personnel Qualifications

Painter Qualifications

Review indoctrination and training program

Observe (if possible) class room session and field qualifications

Review documentation on personnel qualifications

Inspector Qualifications

Review indoctrination and training program

Review personnel qualification with regard to level of certification

Review documentation on personnel qualifications

Auditor Qualifications

Review personnel qualifications for auditors

Review documentation on personnel qualifications

Audits

Review audits of the coating operation

DAY #6

Calibration

Review calibration logs

Review certificates of compliance for test instruments

Review traceability of instruments to NBS

Review training and qualification of calibration personnel

Review documentation of personnel qualifications

DAY #7 & 8 Daily Inspection Reports

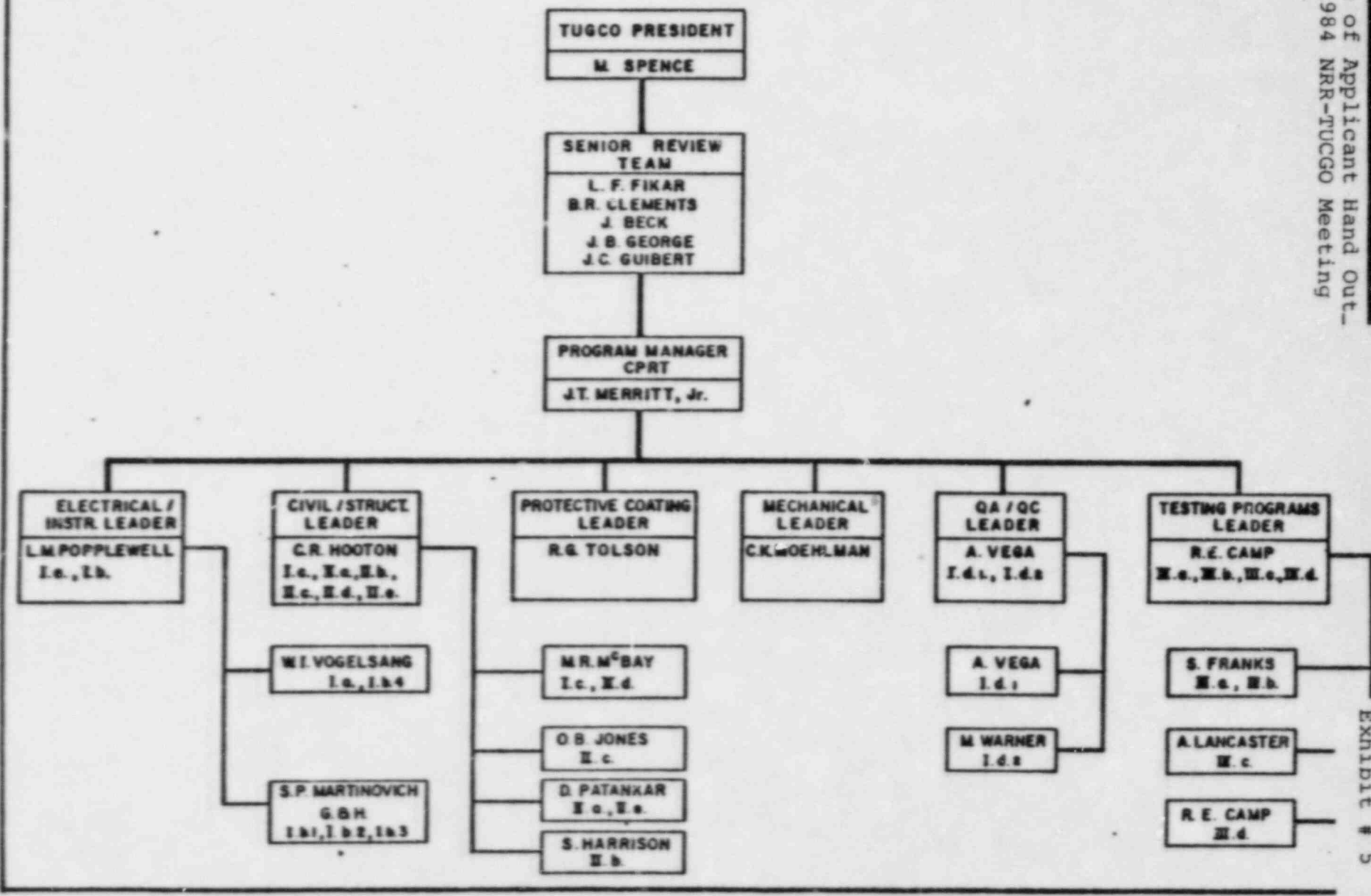
Review adequacy of daily inspection reports (compared to information required by ANSI)

Determine traceability of records for representative areas and/or items

DAY #9 & 10 Wrap up and tie together items that were examined earlier.

NOTE: The above schedule is tentative in nature and is not meant to be all inclusive. Areas or questions raised during the review will be pursued until a response is provided.

COMANCHE PEAK RESPONSE TEAM (CPRT)



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