

1  
2 UNITED STATES OF AMERICA  
3 NUCLEAR REGULATORY COMMISSION

4 INTERVIEW

5  
6 OF

7 RONALD G. TOLSON

8  
9  
10 Conference Room No. 2  
11 Visitors Information Center  
12 Texas Utility Generating Company  
13 P. O. Box 2300  
14 Glen Rose, Texas 76043

15 Friday, December 2, 1983

16 The interview commenced, pursuant to notice,  
17 at 10:20 a.m.

18 PARTIES PRESENT:

19 On Behalf of the NRC Office of Investigations:

20 H. BROOKS GRIFFIN, Investigator  
21 DONALD D. DRISKILL, Investigator  
22 U. S. Nuclear Regulatory Commission  
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On Behalf of Texas Utility Generating Company:

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WITNESS:

EXAMINATION BY

MR. GRIFFIN:

MR. DRISKILL

Ronald G. Tolson

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MR. GRIFFIN: We are on the record.

This is an interview of Ronald Tolson. He is employed by Texas Utilities Generating Corporation -- is that right, Ron?

MR. TOLSON: Yes.

MR. GRIFFIN: -- Company.

The location of this interview is the Comanche Peak Steam Electric Station near Glen Rose, Texas. Present at this interview are for TUGCO Ron Tolson, his personal representative, McNeill Watkins, an attorney with the Law Firm of Debevoise & Lieberman.

This interview is being transcribed by a court reporter.

Ron, if you would rise. I need to swear you for the contents of your statement.

Whereupon,

RONALD G. TOLSON

having first been duly sworn by Investigator Griffin, was examined and testified as follows:

EXAMINATION ON BEHALF OF NRC

BY MR. GRIFFIN:

Q What is your present title?

A Construction QA Supervisor.

Q And you are a TUGCO employee.

1 A That's correct.

2 Q Who is your immediate supervisor?

3 A David Chapman.

4 Q I have a number of areas that I want to ask you  
5 about. We will just be jumping from one subject to another.

6 The first one is, were you aware of an NRC that  
7 was written in March of 1982 by Charles Atchison regarding  
8 bender welds on the pressurizer tank in Unit 1?

9 A You used the phrase "was." What I think you are  
10 asking is, the 822 incident that we discussed in licensing  
11 hearings.

12 Q I believe that's right.

13 A I would have to say the correct answer is, no.

14 Q Okay, you didn't have anything to do with that  
15 situation?

16 A Not in the context of, was I aware of it in March  
17 of '82, no.

18 Q Okay. Were you involved in anything that had to  
19 do with that situation prior to the hearings?

20 A No. Well, I became aware of the existence of a  
21 numbered 822 NRC form in prefiled testimony.

22 Q So that the sequence of events that occurred that  
23 related to the finding of the NRC by one of the employees  
24 out here, you had nothing to do with any of those events,  
25 no knowledge of it as the events occurred?



1 A No.

2 Q Were you involved in the decision to issue the NCR  
3 after Atchison's termination? I think this was in August  
4 of '82.

5 A Let me answer the question this way: When the  
6 blank NRC came to my attention, which was either through  
7 prefiled or a limited appearance statement, as I recall, by  
8 Henry or Darlene Steiner -- I can't recall which -- I  
9 directed that the NRC be put in the system at that point in  
10 time.

11 Q And was it issued?

12 A Yes, it was.

13 Q Are you aware of any threats, pressure, attempted  
14 intimidation, intimidation that was perpetrated against  
15 Mr. Atchison as related to this affair during the time you  
16 were still employed on site?

17 A No, sir.

18 Q Okay, I want to switch subjects now.

19 Did you ever review an NCR that related to bolt  
20 failure which occurred during hydrotorquing in Unit 1, that  
21 resulted in an NCR written by Charles Atchison?

22 A I am familiar with the NCR. I don't recall having  
23 reviewed it, again, until it became a hearing topic.

24 Q Were you involved in anything regarding this  
25 incident as it developed?

1 A I don't recall.

2 Q Was your first knowledge of this incident in the  
3 hearings?

4 A As I recall, yes.

5 Q So, the people involved like Tom Brand didn't  
6 consult you about this affair.

7 A I don't remember any consultation on that particular  
8 issue.

9 Q Did you ever, at any point in time, have occasion  
10 to counsel or discuss this issue with Atchison while he was  
11 an employee on the site?

12 A No, sir.

13 Q Are you aware of any testing on these same bolts,  
14 following the issuance of the NRC, the test being conducted  
15 by Chicago Bridge & Irons?

16 A I don't recall CB&I doing any testing. I know  
17 there were some tests performed.

18 Q Okay. Did these bolts fail during this test?

19 A No, they passed.

20 Q Has this issue been completely resolved at this  
21 time?

22 A To the best of my understanding, yes.

23 Q Are you aware of any threats, intimidation,  
24 attempted intimidation, levelled at Mr. Atchison as a result  
25 of this NCR --

1           A     No, sir.

2           Q     -- through third parties?

3           A     No, sir.

4           Q     I am going to switch subjects again.

5                     Do you recall an incident in February, 1982,  
6 when Atchison refused to sign off on design changes on a  
7 Westinghouse whip restraint, or whip restraints, without  
8 blueprints containing Westinghouse headquarters approval?

9           A     At the time, no.

10          Q     Did you become involved, or were you aware of  
11 this as the situation developed?

12          A     He testified in a hearing something along that  
13 line.

14          Q     Did you have any contact with this issue prior to  
15 the hearings?

16          A     No, sir.

17          Q     Are you aware of any threats against Atchison's  
18 person made by Millwright Lead over this incident?

19          A     No, sir.

20          Q     Did you ever have a personal counseling session  
21 with Atchison during his employment in which you told  
22 Atchison to back off, or I'll fire you?

23          A     No.

24          Q     Okay, I am going to switch subjects again.

25                     What was your involvement in the termination of

1 Robert Hamilton, Joe Krolak, and Sherman Shelton?

2 A I was consulted on the issue before the fact,  
3 contrary to what Mr. Hamilton testified to. In his testimony  
4 said something to the extent that he thought I was off-site,  
5 and that's incorrect.

6 I was conceptually aware of the refusal to perform  
7 the inspections and probably indicated to Mr. Brandt that  
8 he and Mr. Purdy maybe get together and make a decision.

9 Q What is your understanding of the reason that these  
10 three men were unwilling to perform this inspection?

11 A I'm not sure I understand why they didn't do it,  
12 factually. They just, in my judgment, decided one day that  
13 they were not going to do the job. That is the only thing I  
14 can tell you. I have never talked to any of them individually  
15 about it, relative to their motivation or what.

16 But it seemed a little odd to me that they had  
17 been essentially requiring this work for some period of time,  
18 and all of a sudden on one day they decided they were not  
19 going to do it.

20 Q Are you aware of any incidents, events, other  
21 considerations, that might shed light on their refusal to  
22 conduct this particular inspection, that may have been on-going  
23 at that time?

24 A Nothing that I'm aware of.

25 Q Are you aware of an incident that occurred about

1 approximately a year earlier on a similar type safety  
2 inspection on which a former supervisor by the name of  
3 Hawkins indicated that the inspections in the same area were  
4 unsat?

5 A The only thing I am aware of is, again, is what  
6 Hamilton appeared to have said in his testimony, and it was  
7 not the same incident, it was Unit 1 as opposed to Unit 2.  
8 So, that is as close as I can come to it because I was not  
9 personally involved in either situation.

10 Q Had these three men performed adequately in their  
11 jobs, performed their jobs adequately, prior to their  
12 termination?

13 A I have no direct knowledge of that. Shelton had  
14 been here a year or so previously in an inspection, rebar  
15 and concrete. I do not recall any negative performance  
16 aspect on him at that time.

17 In the case of Hamilton, I need to catch this in  
18 the proper way, I was not pleased with the decision that  
19 was made back in '79 to discontinue following the documentation  
20 requirements of the QA program.

21 Q We will be getting to that in a little while.

22 Do you know of anything in these three gentlemen's  
23 personnel evaluations that was inadequate or had listed them  
24 as unsatisfactory employees?

25 A I was unaware of anything that was following that at

1 the time it occurred and I have never since reviewed their  
2 files.

3 Q Who made the final decision to terminate these  
4 three men?

5 A All three were Brown & Root employees, so it would  
6 have to be Mr. Purdy.

7 Q Do you know, or are you personally aware of any  
8 other considerations for their termination, other than they  
9 were unwilling to perform the inspection?

10 A That is the only thing that I am aware of.

11 Q Do you know if part of the reason of their  
12 termination was based on the fact that they were inspecting  
13 too well, or generating too many NCRs?

14 A No, sir.

15 Q Was the decision or the discussions prior to the  
16 decision made to terminate these men discussed with any  
17 corporate officials of TUGCO like Mr. Chapman or Mr. Clements?

18 A That's too far back. I typically informed Mr.  
19 Chapman of any significant personnel actions. As to whether  
20 or not it occurred in this case, I can't recall.

21 Q Do you recall whether Chapman, or Clements, or any  
22 of their associates had any input prior to the termination?

23 A No, sir.

24 Q Okay, I am going to switch subjects again.

25 Do you recall, or are you aware of an incident



1 involving Darlene Steiner and a QC trainee who was applying  
2 copious amounts of liquid penetrant on a wall during a  
3 training exercise in which Ms. Steiner was overseeing her  
4 activities, or in the area where her activities were taking  
5 place?

6 A I can't make the tie to Mrs. Steiner. It has  
7 been brought to my attention on occasion, what I will refer  
8 to as willful destruction of walls. As to whether it was QC  
9 training, I don't know. It has occurred. As to whether  
10 not it is tied with her, I don't know.

11 Q Do you recall a specific instance? Did you ever  
12 counsel or have discussions with Ms. Steiner on a similar  
13 incident?

14 A No.

15 Q Did you ever personally instruct Darlene Steiner  
16 to perform plug welds?

17 A No.

18 Q Are you aware of any other supervisors on site  
19 that had given instructions to Ms. Steiner to use or accept  
20 plug welds?

21 A Again, the only knowledge I have of that subject is  
22 what Ms. Steiner has said in the licensing hearings.

23 Q Do you recall an incident regarding vendor welds  
24 on large doors which Ms. Steiner wrote an NCR on?

25 A I'm not aware of anything associated with large



1 doors and Mrs. Steiner.

2 Q So, you don't recall any such incident?

3 A No.

4 Q You don't recall counseling or discussing an issue  
5 with Ms. Steiner.

6 Do you recall any incident related to a problem  
7 with vendor welds on large doors?

8 A Yes.

9 Q Do you recall who was involved?

10 A My QC group.

11 Q But not any individual name?

12 A I can't associate it with names.

13 Q Do you know if these vendor welds with NCRs were  
14 written on the vendor's doors, vendor welds on these doors?

15 A There have probably been some NCRs written on  
16 doors, yes, sir, relative to welding.

17 Q But do you remember a specific incident?

18 A No, sir.

19 Q Have you ever had occasion to instruct Ms. Steiner  
20 to confine herself to reporting deficiencies, or conducting  
21 inspections to only those inspections to which she was  
22 assigned?

23 A I don't recall discussing that subject with her.

24 Q Are you aware for yourself, or any of the other  
25 supervisors, ever having occasion to counsel Ms. Steiner to

1 stop her from making what I will term random inspections?

2 A No, sir.

3 Q Do you recall meetings between you and Ms. Steiner

4 [REDACTED]

5 A Yes.

6 Q How many of these meetings were there, do you  
7 recall?

8 A There were probably two.

9 Q What was the purpose of these meetings?

10 A The first one was, it was reported to me that she  
11 [REDACTED] I sensed a need to -- because

12 she was in a position in the field of climbing, et cetera --

13 I wanted to be sure she understood that if she continued in  
14 that activity, I was uncomfortable with the idea [REDACTED]

15 [REDACTED] working in the field. I  
16 guess that is the best way to state it. So, I wanted to be  
17 sure that she understood what she was doing.

18 Q Did you encourage or suggest to Ms. Steiner that  
19 she leave her employment?

20 A No, I didn't couch it in that way. I suspect  
21 you are talking now about the second time, not the first  
22 time. The first time it was just -- [REDACTED]

23 [REDACTED] I am just

24 uncomfortable with that situation, [REDACTED]

25 [REDACTED]

The second time was subsequent to her testimony at the hearings. The purpose of the meeting was to -- and

[REDACTED]

[REDACTED]

[REDACTED] and I wanted to be sure she understood the ramifications of the insurance coverage that she carries at Brown & Root, to be sure that we communicate with her her options that were available to her to maintain insurance coverage.

The only reason for this was [REDACTED] because obviously that would have been covered. But I wanted to be sure that she got the appropriate counsel on complications [REDACTED] in the event that she had to go beyond that because if she wasn't careful on how she handled that she might have -- she had mentioned to me [REDACTED]

The way I understood the insurance coverage, the

[REDACTED]

[REDACTED] that is a very expensive [REDACTED] I wanted to be sure that she had the benefit of making the proper decision to protect herself from the insurance standpoint.

Q Since you have been on site, you have been employed at this site, have there been other people under your supervision [REDACTED]

1 A I am sure there have been some.

2 Q That you personally knew about.

3 A No. Well, other than what you see walking up and  
4 down the hall. But none that were working in what I  
5 consider to be a somewhat hazardous situation for their  
6 personal health.

7 Q In your second meeting, did you encourage or  
8 suggest to Ms. Steiner that she leave her employment?

9 A What I think we recommended for her consideration  
10 was that if she wanted to take a leave of absence, it could  
11 be arranged, with the insurance coverage to be extended.  
12 That was the purpose of this session.

13 Q Did Ms. Steiner's appearance before the SLB  
14 prior to this second meeting have any influence, was it  
15 the result of this special attention given to Ms. Steiner?

16 A Yes, it had some influence because obviously at  
17 that point in time she was a protected employee. It did not  
18 take any genius to figure that out. And to a certain extent  
19 I felt like I was sitting on a keg of dynamite ready to go  
20 off. We have all had the press coverage and various and  
21 sundry accusations and "untruths" that have been told. You  
22 know, I am sitting there just waiting for the next one,

23 [REDACTED] for  
24 example, and we did not take appropriate protection because  
25 she was one of them that was testifying against us.

1 So, yes, that influenced me in talking to her  
2 personally.

3 Q Did Ms. Steiner's duties change [REDACTED]  
4 [REDACTED]

5 A Yes, they did.

6 Q Could you tell me briefly what those changes were?

7 A Basically, we moved her to the Fab Shop location  
8 where she would not have to climb, she could conduct  
9 inspections, still paid and work in the QC group, with  
10 much lighter duties than what she would have had if she had  
11 remained in the field force. You do away with the climbing  
12 and this sort of thing.

13 The other thing is, we did arrange to provide  
14 transportation for her from the gate to the Fab Shop, [REDACTED]  
15 [REDACTED] or anything like that.

16 Q Have you ever made similar arrangements for any  
17 [REDACTED]

18 A Again, I have not had much experience with QC  
19 people in the field [REDACTED] but it is common policy  
20 on people that [REDACTED] to provide certain  
21 privileges.

22 Q Was Ms. Steiner's work considered adequate?

23 A At the time, yes.

24 Q And you recall that there were two such sessions  
25 where you counselled her [REDACTED]



1           A     That's right.

2           MR. WATKINS: By "counseling"

3           MR. GRIFFIN: I did not mean that in the formal  
4 sense, just discussing the situation.

5           MR. WATKINS: Meetings to discuss the subject.

6           BY MR. GRIFFIN:

7           Q     Ron, do you consider Ms. Steiner's testimony before  
8 the Board having raised any legitimate concerns?

9           A     Without going back and reading every detail, the  
10 answer to the question is, no, I don't. There has been a lot  
11 of testimony and a lot of talk. So, just from my personal  
12 participation in reading the transcript, I would have to  
13 say, no.

14          Q     And a different subject, were you involved in the  
15 decision to terminate Henry Steiner?

16          A     No.

17          Q     Were you involved in the incident in any way?

18          A     No.

19          Q     Were you aware as it was developing?

20          A     No.

21          Q     Are you aware of why Henry Steiner was terminated?

22          A     Not anything other than what he said in the  
23 hearings and what cross-examination brought out. I did not  
24 even know who he was until he showed up in the hearings.

25          Q     Have you ever heard discussion indicating Mr. Steiner

1 may have been fired for reporting a deficiency or defect to  
2 QC?

3 A Nothing other than what he said in hearings.

4 Q Are you familiar with the relationship between the  
5 timing of the reporting of this defect and his termination?

6 A No, sir.

7 Q Okay, I'll go on to another subject.

8 I have had an opportunity to look at the historical  
9 file and the quality instructions that relate to coatings.  
10 If I am reading the file correctly, prior to Revision 4 of  
11 the quality instructions, I believe I was looking at one  
12 relating to steel. Prior to Revision 4 which was October,  
13 1981, NRC 16.0 was included in the quality instructions.

14 Do you know why in Revision 4 NCRs were removed?

15 A Do you have a date sequence because I don't  
16 associate Rev numbers with sequence.

17 Q If my recall, my review of the file, is correct,  
18 October of 1981 the IR Program was implemented and NCRs were  
19 removed from the procedure.

20 A It doesn't ring a bell to me because I have had the  
21 inspection report concept built in on the QA program since  
22 1978. But what you are saying from your review does not  
23 make sense to me.

24 Q Are you aware that 16.0 was dropped from QIs  
25 relating to coatings inspections for a period of time, from



1 '81 to '83?

2 A That time frame doesn't make sense to me. I guess  
3 I would have to disagree with the term "dropped."

4 Q Well, it did not appear in Revisions 4 through 15.

5 A I would have to go check the file. We can have the  
6 file brought up, whatever you choose.

7 Q Okay. Well, I am asking you as to what you are  
8 aware of right now, rather than asking you to review.

9 A What you are saying doesn't ring a bell with me.

10 Q Okay. Were you aware of an approximate 14-month  
11 gap between 1980 and '81 in which no NCRs were generated in  
12 the coatings arena by the inspectors?

13 A I am aware of the accusation that Mr. Hamilton  
14 made, and I have been made aware of an apparent gap in the  
15 record.

16 Q Do you have an explanation? If this is true, if  
17 there were no NCRs written in coatings for a 14-month period,  
18 are you aware of the reasoning or why this occurred?

19 A The only thing that makes sense to me is from  
20 sometime in '79 -- and I am thinking in late fall, early  
21 winter -- until approximately the same time frame in '81,  
22 nothing that was prescribed in the program really got carried  
23 out the way it was intended to be.

24 That goes back to the detailed documentation  
25 requirements that we mentioned earlier, as I recall from

1 Claude Johnson's investigation and some other results that  
 2 kept informal sets of logs documenting the inspections that  
 3 they accomplished. They had opened but not closed a number  
 4 of "final inspections" on the liner specifically under the  
 5 pretense that we do that later because all the mechanical  
 6 damage was bothering them, and this type of thing.

7 The only other thing that seems to add up to me,  
 8 that the liner at that point in time was probably well on  
 9 the way to being primed. It had a thin seal coat on it, as  
 10 I recall, a top coat, just to protect the prime. And we  
 11 probably -- and I have not studied the production records --  
 12 may not have been pushing at the finished coat on the liner  
 13 at that point in time.

14 If that is true, then the majority of the paint  
 15 work that was being accomplished would have been hangers  
 16 or bulk steel, and in the Paint Fab Shop which is a go-no-go  
 17 type situation, it either meets the requirements or it does  
 18 not.

19 With the philosophy that they appeared to develop --  
 20 to my chagrin -- logs, et cetera, it is not too hard or too  
 21 difficult for me to perceive a gap in an "NCR log" for some  
 22 period of time.

23 Q Do you know or do you recall, did you or any of  
 24 your subordinates issue orders or instructed anybody in the  
 25 coatings department to suspend NCRs for any period during

1 this time?

2 A According to Hamilton's testimony, to the best of  
3 my recollection that is the first time I became aware of any  
4 such order that he was in fact told not to use NCRs.

5 Q Do you have any recollection of making any such  
6 statement or instruction, giving him such instructions?

7 A It is totally inconsistent with my obligation under  
8 Appendix B.

9 Q But even if it is inconsistent, do you recall?

10 A No.

11 Q Okay..

12 A I need to clarify that, though, and re-emphasize  
13 the fact that the non-ASME QA program was designed to  
14 utilize to the maximum extent possible an inspection report  
15 which accomplishes the same thing as an NCR.

16 Q Okay. As relates to the Inspection Report Program,  
17 how were inspection reports used to report the deficiencies  
18 that were identified that were not part of assigned  
19 inspections?

20 A I am not with you.

21 Q If a deficiency was identified that was not a part  
22 of an assigned inspection, how were inspection reports used  
23 to report the deficiencies?

24 A I am not sure they were. But you are losing me.

25 Q It is my understanding that inspectors who were

1 assigned specific inspections, if they identified a  
2 deficiency that was not part of their assigned inspection,  
3 what method did they use, or how did they go about trans-  
4 mitting this?

5 A We have used different forms at different times,  
6 but the NCR certainly has always been available. At one  
7 point in time we used what we called FDR, which is a field  
8 deficiency report, and that vehicle was available to them  
9 and they used that in a large number of cases. It was  
10 primarily for things like inadvertent damage to equipment  
11 or something like that.

12 Q Was this field deficiency report removed from the  
13 procedures when the IR Program was brought in?

14 A No. It was removed from -- again, to go back,  
15 the IR program concept has been in place since the advent  
16 of the "non-ASME QA Program."

17 Q Well, wasn't it '81 when it was incorporated in  
18 coatings, in the procedures for coatings, the quality  
19 instructions for coatings?

20 A I need to be careful with semantics here. The  
21 inspection report form that I have been using since '78 was  
22 in fact incorporated in the coatings program in, as I recall,  
23 early winter of '81.

24 However, the coatings program always had a  
25 documentation format that didn't carry the title "Inspection

1 Report" but again, accomplished the same thing.

2 Q I see the distinction you are making.

3 A Okay.

4 Q When I refer to the Inspection Report or IR program,  
5 I am speaking of the use of this new reporting form which  
6 was, again, in fall of '81.

7 So, as I refer to it during the rest of this  
8 interview, that is what I am referring to.

9 A I keep hammering -- excuse me -- on one point,  
10 that it was not a new form.

11 Q Okay.

12 A It was just, the old forms on the coatings --

13 Q Were check lists --

14 A No, it was the same thing, still an inspection  
15 report, still a check list. It very likely had a different  
16 title on top of it, but it still accomplished the same thing.  
17 It is "the" things that an inspector has to do to satisfy  
18 the QA Program from an inspection standpoint.

19 Q Okay.

20 A Obviously, the people had trouble with the old  
21 forms, otherwise, I would presume, they would have filled them  
22 out properly. So, we thought we had had great luck with the  
23 "Inspection Report Form" and simply revised the attributes  
24 that were in the old forms under the Inspection Report Form  
25 and made that a viable part of the coating program.

1 Q In my review of the historical file on quality  
2 instructions, prior to the implementation and use of this  
3 new form, the Inspection Report Form, I notice that the  
4 QIs referenced final acceptance as related to the -- I think  
5 you mentioned a while ago -- the FDRs; is that it?

6 A You are losing me again.

7 Q Okay. I wish I had a copy of that here.

8 In my review when the inspection report, the new  
9 Inspection Report Form was implemented, which I believe  
10 is Revision 4, in October '81, this final acceptance criteria  
11 is referenced in the Inspection Report or the Check List  
12 Report, was dropped.

13 I didn't know whether this indicated a change in  
14 the program or not --

15 A You are leaving me with the impression that you have  
16 not reviewed the entire program.

17 Q That may be true.

18 A You are leaving me with the impression that you  
19 reviewed only a very small portion of it.

20 Q I just looked at the historical file, 4.1.

21 A That's the impression you are leaving. I think your  
22 question answers itself if you look at the birth-and-death  
23 type concept that is involved -- there is more than one  
24 instruction in the protection coatings program.

25 Q I think this was steel.



1 A Again, there is more than one just for steel.

2 Q Is there?

3 A Yes.

4 Q Okay. Well, let's move on, then.

5 A I think.

6 Q How are "unsats" on IRs dispositioned?

7 A There are at least two, and possibly three ways,  
8 that that is accomplished. That is either fixed, which is  
9 the preferred method, or it can be converted for a non-  
10 conformance report or, I believe, as Mr. Brandt testified  
11 in the hearings last year, in selected areas that engineering  
12 can get involved with the discrepancy on an inspection  
13 report and issue a change or deviation to the spec or  
14 drawing, and it can be closed on that basis.

15 Q You indicated the preferred method was to have it  
16 fixed. How does the "unsat" on the IR, how is that  
17 transmitted to Craft?

18 A A copy.

19 Q It is just given to Craft?

20 A Yes.

21 Q How are "unsats" on IRs tracked?

22 A I am not with you.

23 Q How do you keep up with all these "unsats" that  
24 are going to require rework or dispositioning?

25 A Okay, prior to some time this year -- and I don't



1 remember exactly when -- we didn't have the world's best  
2 tracking system for "unsat" IRs. We have always had a good  
3 handle on total accountability for IRs but not specific  
4 "unsats."

5 It became very obvious in the first part of the  
6 year when we worked up a plan and are currently tracking  
7 all of the "unsat" IRs through a computer program.

8 Q Could you describe the system prior to use of the  
9 computer?

10 A We relied on the Craft, the transmittal of the  
11 copy to Craft and construction management to see that the  
12 problems got resolved.

13 Q So, it was not formally tracked?

14 A It's always been formally tracked through a log  
15 system as far as I am concerned, but from a completion  
16 standpoint it was a little bit informal as far as Craft was  
17 concerned.

18 Q Who was responsible, who did attempt to keep up  
19 with these "unsats" on the IRs?

20 A Well, we had copies in our files and we, of course,  
21 still had an open log entry. What the Craft did, I do not  
22 know.

23 Q Now, if I have this right, all IRs were given  
24 numbers and they were tracked as a group. Are you telling me  
25 that there was no separate tracking for those IRs that

1 contained "unsats"?

2 A Not until this computer program.

3 Q Okay.

4 A Other than the log. Keep in mind, the log  
5 serves the same purpose as the computer, it is just not as  
6 easy to communicate.

7 Q Who maintained this log?

8 A QC.

9 Q Is there any individual within QC that had that  
10 responsibility?

11 A At that time, it was done by each discipline.

12 Q Was each inspector required to make entries in the  
13 log?

14 A No, it was done by clerks, as I recall, working  
15 for the discipline's supervisor.

16 Q What instructions do coatings QC inspectors have  
17 if they should identify a deficiency that is not part of the  
18 assigned inspection attributes?

19 A I'm not aware of any that they have, that are not  
20 part of the program.

21 Q So, the inspection, hypothetically, if the  
22 Inspection Report had 17 attributes, they are required to  
23 address all 17, or are there instances where they are asked  
24 to address, say, just a portion thereof?

25 A Well, it depends on the circumstances the Inspection

1 Report Form covers. Let's just take the primary application  
2 on steel, as an example. It would cover all of the  
3 attributes that were required to complete the primer and  
4 could conceivably include things like the primer repair.

5 Now, if for a given inspection requirement or  
6 function the only thing that had to be accomplished was  
7 primer repair, then all the other steps would be marked  
8 N/A because they are obviously not applicable.

9 Q If there were a deficiency that was covered under  
10 one of those other attributes, are the inspectors liable  
11 to make entries even if it is not part of the assigned, or --

12 A Certainly as far as I know they do.

13 Q Are inspectors allowed to make random or routine  
14 inspections that they are not assigned?

15 A It is not preferred.

16 Q Do inspectors get into trouble with QC supervision  
17 if they conduct these routine or random inspections?

18 MR. WATKINS: Excuse me, routine or random? They  
19 are two different things.

20 BY MR. GRIFFIN:

21 Q I have a point here I want to communicate to you,  
22 and it relates to unassigned inspections. Do you understand  
23 what I am talking about when I say "unassigned" inspections?

24 A Let me paint a scenario and let's see if we under-  
25 stand.

1 Q Okay.

2 A If what you are alluding to is Atchison's testimony,  
3 then I can relate to that.

4 Q I have not read his testimony. But what I am trying  
5 to refer to is, if an inspector were walking around and  
6 looked at something that was not part of an assigned  
7 inspection he had been asked to perform, are inspectors  
8 allowed to do that?

9 A As far as I know, yes.

10 Now, let's be careful.

11 Q In what sense?

12 A I do not want 300 people just arbitrarily walking  
13 around the plant site, that presents me with a management  
14 problem.

15 Q Well, my follow-up question was, if they do that,  
16 they do get in trouble? Or are they discouraged from doing  
17 that?

18 A It depends on the circumstances. We are beating  
19 around the bush here, I think, to a certain extent and  
20 perhaps I will volunteer some stuff and maybe we will come  
21 to the point.

22 Q Okay.

23 A If I am working Elevation 905 linerplate and what  
24 we are trying to do from the project standpoint is come out  
25 of the reactor building, working from the top down to

1 approximately Elevation 830 and from the bottom up to  
2 approximately 830, and then go out the hatch, if I sent an  
3 individual to work for paint inspection at Elevation 905,  
4 that is where I expect him to be and to stay.

5 Q Okay.

6 A Now, if all of a sudden he starts wandering around  
7 in 810, identifying things -- and I don't like your term  
8 "trouble," he is not in any trouble, but he will be called  
9 in and told to get back to 905.

10 Q Okay, let's take another hypothetical. If an  
11 inspector is assigned to perform an inspection and it's  
12 right in front of him, but three feet to his right there is  
13 something else -- and we are talking about the arena of  
14 coatings here -- and he sees something that is not part of  
15 his inspection and he identifies a deficiency on this, is  
16 he allowed to report that?

17 A Certainly.

18 Q Is he discouraged from doing that?

19 A I am not aware of any discouragement along that  
20 line.

21 Q Okay, that's the point I am trying to make. That  
22 is my question.

23 In identifying deficiencies under the use of this  
24 new inspection report format that was implemented in the fall  
25 of '81 and is in current use --

1           A     I am going to have resist every time you say "new  
2 report."

3           Q     Okay, new format.

4           A     No, wait a minute. The word "new" is what I am  
5 having trouble with. The inspection report has been in the  
6 program since 1978, okay. It was incorporated into the  
7 Protective Coating Program in '81. But it is not a new  
8 form.

9           Q     I'll tell you what, Ron, rather than repeat this  
10 25 times every time I say "inspection report," what term  
11 can I use to differentiate the inspection report from the  
12 old check list?

13                     If I cannot say inspection report, if that is not  
14 satisfactory --

15           A     Just drop the word "new" and then I won't have to  
16 bring it up every time because it is not a new form,  
17 semantically, to me.

18           Q     Well, I spent a lot of time in your vault there  
19 looking at those old check lists, and when I look at that  
20 inspection report it looks new to me because it is different  
21 than those old check lists.

22           A     It's new -- maybe we just ought to drop it and  
23 I'll just ignore "new."

24           Q     Okay. I am not trying to inflame you or anything,  
25 I am just trying to move this thing on. When I say "inspection



1 report" --

2 A Why don't we just agree, check list for the  
3 coating program is in existence prior to '81, and inspection  
4 report subsequent to '81, and I won't have to repeat this.

5 Q All right.

6 When deficiencies were identified under this system  
7 used after October '81, were reject tags used to --

8 A They are used now. I don't recall when they felt  
9 the need to start using a status indicator like that. I  
10 would have to go back to the instructions myself to get that  
11 time frame.

12 Q Was the purpose just to quickly identify exactly  
13 what area of the inspection required examination, or rework  
14 or repair?

15 A It is simply a physical indicator to the Craft  
16 that there is something that is holding up completion in  
17 this area.

18 Q So, the reject tag does not communicate the same  
19 intent like a hold tag which accompanies an NCR?

20 A That's correct.

21 Q Okay. I believe earlier that NCRs have been part  
22 of coatings procedures, since '81; is that correct? Or  
23 to your knowledge, your personal knowledge?

24 A To our knowledge, they have been part of the  
25 program since its inception.



1 Q Okay. Say, between 1981 and 1983, were coatings  
2 inspectors allowed to write NCRs and attach hold tags if  
3 they didn't find a deficiency?

4 A They have always been permitted, if in their  
5 judgment they needed to issue an NCR and to apply a hold tag,  
6 then and now.

7 Q Okay. Who does the final review for NCRs generated  
8 in coatings, by coatings inspectors, which supervisor?

9 A Well, it would be under Brandt.

10 Q So, he would be the final reviewer?

11 A I don't know.

12 Q Well, where I am going with this is, the inspector  
13 writes it. His first-line supervisor reviews it. Does his  
14 first-line supervisor have the authority to void NCRs?

15 A He doesn't have authority to void it. He has the  
16 authority to recommend voiding it.

17 Q Does that then put it on Brandt to make the final  
18 decision?

19 A Yes.

20 Q Are hold tags applied before Brandt's decision?

21 A Yes.

22 Q Can individual inspectors call and receive NCR  
23 numbers prior to Brandt's approval?

24 A Most definitely.

25 Q I want to touch on an area that was not incorporated.

1 I already know that it was not incorporated, but I want to  
2 touch on it briefly.

3 I recently became aware of the fact that for a  
4 time consideration was given to having Craft supervision  
5 conduct in-process inspections of codes.

6 A That's correct.

7 Q Was this possible program addressed to the NRC  
8 for consideration or approval?

9 A It's a chicken-and-egg type of situation. There  
10 was no discussion with the resident until prior to making  
11 the decision to draft the procedure, to see if it could be  
12 done.

13 Upon receipt of the procedure and some external  
14 activities, I changed my mind.

15 Q So, you were the one that created the possible  
16 idea, and you were also the one that decided not to go  
17 with this?

18 A Yes. Now, as I often do over the years and have  
19 done, I tend to use the resident as a sounding vehicle  
20 relative to the wisdom of my independent thought process.

21 I have never approached him for approval, nor  
22 would he endorse anything I do other than to advise me on  
23 the brilliance or ignorance associated with a particular  
24 move.

25 Q Okay. It's my understanding that recent procedure

1 change. in the coatings area dropped dry spray, overspray,  
2 imbedded particles from the inspection criteria. Are you  
3 familiar with this?

4 A No, I am not.

5 Q Also, another change that I believe has been  
6 either pending or it's already been incorporated is  
7 instructions that inspections are to be conducted at arm's  
8 length, using a flashlight at a 90-degree angle; are you  
9 familiar with this?

10 A Yes, I am familiar with that.

11 Q Could you tell me what the background thought is?

12 A It's my understanding from some people I have  
13 reason to believe know what they are talking about, that  
14 that is a common inspection technique in the area of  
15 protective coatings industry wide, not just Comanche Peak.

16 Q Tell me this, based on your knowledge of coatings  
17 and coatings inspections, does using this method, arm's length,  
18 flashlight, is an inspector -- average inspector -- likely  
19 to be able to accomplish and evaluate all the attributes  
20 that he should consider in a coatings inspection?

21 A Yes.

22 Q Do you know exactly why those changes were  
23 incorporated?

24 A Again, it's my understanding that that is a common  
25 technique. There was, I think, lack of specific direction

1 relative to technique in particular construction and I would  
2 assume therefore that was the reason for incorporating the  
3 technique.

4 Q I understand that recently a number of painters have  
5 been brought over to be incorporated in the QC inspection  
6 program. They are being trained and certified; is that  
7 true?

8 A Yes. I am not sure the term "painter" is all  
9 inclusive, but there are people that --

10 Q That have been already employed here.

11 A Have been employed in the Craft site that we have  
12 selected for QC people.

13 Q Has there been some recent change or something --  
14 has there been an increase in the amount of paint applied,  
15 or something, that has caused -- from which you have  
16 anticipated the need for large numbers of new QC inspectors?

17 A Yes. We expect to be up to around 35 paint crews,  
18 which will include prep people and applicators. Our plan  
19 is to have a qualified inspector for each group.

20 Q Are these crews going to be working in Unit 1 or  
21 both?

22 A In Unit 1 primarily.

23 Q Is this an indefinite program, or is the need going  
24 to be for a limited period of time?

25 A Hopefully, it is going to be limited. The word

1 "indefinite" has a connotation associated with fuel load  
2 that I do not think I like. So, in that context I would  
3 hope that it would be a short period.

4 Q I am trying to find out if you are gearing up for  
5 a particular short period of time to, you know, accomplish  
6 a great deal of painting, or in subsequent inspections --

7 A We plan to paint the Unit 1 reactor building,  
8 finish painting. Most of it is repair or finish-coat  
9 application. I mentioned earlier those thin seal coats on  
10 the liner. So, as we come down again from the top to 832  
11 and from above, our plan is to paint the reactor building.

12 Q Does this include rework or repair of damage?

13 A Yes.

14 Q Once you have completed the repainting or the  
15 paint that you anticipate applying, that will be applied to  
16 Unit 1, what normally takes place and what do you anticipate  
17 taking place as related to all these QC inspectors?

18 A The question is a little premature because we  
19 have not, at least at my level, developed a detailed schedule  
20 for Unit 2. One thing that could happen is that they would  
21 simply flop the Unit 1 group to Unit 2 and proceed with the  
22 same concept.

23 But again, it is premature. Until we decide for  
24 sure what we are going to do with Unit 1, my personal plan  
25 is to keep the necessary number of inspection people to

1 support the Unit 2 schedule, whatever that may be.

2 Q Prior to the completion of Unit 1, this painting  
3 and inspections, do you anticipate the termination of any of  
4 the coatings QC inspectors currently employed?

5 A I'm not going to terminate them.

6 Q Ron, as the normal practice, are employees on site  
7 normally debriefed by supervisors following their interviews  
8 with NRC?

9 A It's not a policy. I am sure it has occurred on  
10 occasion but it is not a policy.

11 Q Have you ever directed anybody to have an employee  
12 debriefed or interviewed concerning his testimony to the  
13 NRC?

14 A I don't recall having done that. I'm inquisitive,  
15 so it's possible that I may have asked a question. But I  
16 don't normally dictate to people what they do. We all like  
17 to know what's going on.

18 Q Is it a policy of your department to conduct a  
19 concurrent investigation of your own when you become aware of  
20 on-going NRC investigations?

21 A I will object to the term "concurrent." If I hear  
22 of something, I am going to launch into an evaluation, or  
23 Mr. Chapman will.

24 I have no way of knowing what you guys are doing.  
25 So, if it's concurrent it is purely coincidental.



1 Q Well, if we come on site and we start bringing  
2 people in and question them in some area, does that trigger  
3 you to begin an investigation on similar --

4 A No, only those things which the people feel strong  
5 enough about to bring to my attention.

6 Q You mean Chapman or Clements?

7 A I can't speak for them. I am just talking about  
8 myself.

9 Q Okay. I want to go back to, in October, 1981 Paul  
10 Johnson, an NRC inspector, wrote a Notice of Violation  
11 regarding coatings which resulted in NCRs being written in  
12 various divisions on things that had paint applied to them  
13 like liner plate, concrete.

14 What was the original intention for the disposition  
15 of these NCRs?

16 A The intention of any NCR of that magnitude is to  
17 evaluate possible paths for corrective action. I don't know  
18 that there was any single path even considered prior to the  
19 issuance of the NCRs, just a routine procedure.

20 Q Well, were you all considering total backfit at  
21 that time?

22 A No. I would say, no. Like I said, I didn't have  
23 any single thing in mind except, you know, it was a type of  
24 a situation where we had what you would call an indeterminate  
25 condition which technically gets an NCR issued. Then you go

1 through the evaluation process between engineering and my  
2 people and come out with a course of action that we are  
3 comfortable with.

4 Q Was a decision made to completely backfit concrete  
5 and liner plate?

6 A Subsequently, yes.

7 Q Was that your decision?

8 A Yes, I have to endorse it.

9 Q What did you decide is related to miscellaneous  
10 steel which included conduit, support and cable tray support?

11 A I think we adopted a consistent pattern across  
12 the board. We just looked at everything.

13 Q All right. It's my understanding representative  
14 sampling was used in the miscellaneous steel to --

15 A Not initially.

16 Q Okay. But as backfit continued, a decision was  
17 made?

18 A Recently.

19 Q Okay. And was the sampling conducted?

20 A Yes.

21 Q What was the outcome?

22 A Let me put it in my words. Approximately -- and I  
23 get weekly reports on the status of the backfit since its  
24 inception, relative to percent complete, and we needed some  
25 idea where we stood from a scheduling standpoint. Approximately

1 99 percent of the liner had been completed; 80, 85 percent  
2 of the concrete backfit had been completed, and approximately  
3 80 percent of miscellaneous steel had been completed, at  
4 which time I asked our corporate QE group to review the  
5 records and advise me on one or two possible future courses  
6 of action -- one of which is to continue as is. The other  
7 is to delete things which statistically are not increasing  
8 the quality of the work effort.

9 It was their recommendation, as I recall, to  
10 delete on this miscellaneous steel the destructive aspects  
11 or destructive testing aspects of backfit, which is essentially  
12 the scratch test and adhesion test.

13 Upon receipt of their report to me I caused the  
14 program to be revised accordingly.

15 Q So, is this backfit complete in miscellaneous  
16 steel?

17 A As far as I am concerned, yes.

18 Q Have the NCRs that relate to miscellaneous steel  
19 been closed?

20 A I doubt that they have at this point, but they will  
21 be in the near future.

22 Q As related to the old coatings inspection records  
23 that were generated back in '77 through '79 or 1980, that  
24 are in your vault, it is my understanding that the basis for  
25 the Notice of Violation that Johnson wrote, are those records,

1 those old inspection records, being used -- currently being  
2 used -- for any purpose to attest to these old inspections?

3 A There is a possibility some of them may be. I am  
4 not that close to the intricate details. The concept we  
5 went into on the backfit was to backfit those things which  
6 we could not comfortably determine from the records that  
7 had been properly inspected.

8 If I am faced with a totally complete and  
9 believable record, then I very likely might not backfit that  
10 particular area.

11 What I really think has happened is that for  
12 various and sundry reasons the people under Brandt decided  
13 it was easier to backfit than try to review the records. I  
14 suspect I got redundant records.

15 Q I see. Well, it is my understanding in my  
16 inquiries prior to our meeting today that initially, following  
17 that Notice of Violation, Mike Foote and Richard Cummings  
18 performed a review of those old records and did some mapping  
19 that related to "sat" versus "unsat" records.

20 A That's correct.

21 Q And that later on, I think, Brandt was also  
22 involved in that. Then, later on, Neil Britton took over  
23 a similar review in which he made a log and mapped also as  
24 to whether areas were "sat" or "unsat" according to the  
25 records that existed.

1           My question to you is, did those areas that were  
2 mapped as having satisfactory documentation, were they  
3 included in the backfit?

4           A     They may or may not have been. That's why I said  
5 what I did earlier. I think there is a possibility of  
6 redundant records.

7           Q     But as far as you know, they were not systematically  
8 removed from the backfit in that a determination had been  
9 made by somebody -- Britton or whoever -- that adequate  
10 documentation existed.

11          A     The program, the way it was set up, certainly  
12 permitted that. There is nothing wrong with that. Whether  
13 or not they actually did that, I am getting conflicting  
14 input from a lot of different directions that leads me back  
15 to where I have said a minute ago, I think I have both  
16 efforts going on simultaneously. I have the mapping effort  
17 going on at the same time I have a field force out there  
18 slapping dollies on the wall and running scratch tests.

19          Q     Well, the reason I asked the question is because  
20 in that I have been looking at those old records. One of  
21 the questions I need, that I am looking for the answer to,  
22 is as to whether those records are going to be used for any  
23 purpose other than historical purposes. Whether they are  
24 going to be used to represent inspections that have occurred  
25 and attach to the conditions and sufficiency -- or whatever

1 the proper terminology would be -- as to the paint that was  
2 applied.

3 A I don't know myself right now which way they are  
4 going. I don't plan to throw anything away.

5 If the records can be comfortably tied to a given  
6 area and we have confidence that there has been no other  
7 work activity that causes those records to be invalid, then  
8 I would have no reservations to consider them a part of the  
9 protective coating formal records that eventually get  
10 transferred to operations.

11 At this point in time, I have not been asked to  
12 make the decision nor have I had the time to pursue it to  
13 that degree of detail.

14 Q Well, are any of your subordinates involved in a  
15 review, current review, of those records to see if any of them  
16 meet --

17 A Britton is doing some sorting work back there for  
18 me right now which is largely the result of a question that  
19 the resident asked. We have a pretty heavy effort to satisfy  
20 ourselves that we have identified anything that was "unsat."

21 It may well be that some of those older records may  
22 be picked up in that review.

23 Q Again, it is my understanding that Britton has  
24 already done a comprehensive review.. I am looking at a log  
25 that he has done. Some inquiries I was making indicate that



1 he has -- I forget the number, but 3,700 or somewhere around.  
2 He mapped these areas and also mapped them in his log as  
3 "sat" or "unsat."

4 Are you saying that you are having to go back over  
5 this same material again to give it a more critical --

6 A About two or three weeks ago, as a result of some  
7 overall restriction in the paper management with him, I  
8 found a cardboard box full of coating records, okay, and  
9 calmly but positively caused somebody to get with it and tell  
10 me what in the world is going on.

11 I now believe that I have captured all of the  
12 official, unofficial, incomplete or otherwise existing  
13 documentation on coatings and we are sorting through that  
14 right now, again to satisfy myself that any "unsat" conditions  
15 that need to be resolved have been identified.

16 Q And in consideration of Britton's efforts  
17 previously, in his log that identified various documents as  
18 "sat" or "unsat," are those that he identified as "sat"  
19 going to be used or do you anticipate their use as quality  
20 documents?

21 A They may be. Again, you are asking me a detailed  
22 question that I don't have first-hand knowledge on. But I  
23 do know that they put unique identifying numbers on a number  
24 of those records. I would assume that the only reason for  
25 them doing that is that in their judgment they felt the

1 documentation was adequate and therefore should  
2 incorporated into a record system.

3 So, those that you find with numbers, and I think  
4 most of those I have seen, preceded by the letters "PC"  
5 would in fact be incorporated as part of the permanent plant  
6 records.

7 Q Many of those records that are reviewed referenced  
8 NCRs. Does the referencing of an NCR indicate that they are  
9 unsatisfactory?

10 A In today's usage, no. What was going on back in  
11 those days, I would have to go look at specific records to be  
12 able to answer that question. Normally, not. In other  
13 words, normally the NCR stands on itself and the record  
14 that in essence led up to the NCR closes.

15 Q Well, if you took a random sampling in the vault  
16 of the OPC records and you pulled one out and it references  
17 an NCR on the records, NCR and the number, does that referencing  
18 of the NCR on that particular document render that document  
19 "sat" or "unsat," or does it tell you one way or the other?

20 A Probably "sat," but you would have to pull the  
21 NCR and answer that question because all you are doing is,  
22 you make a cross-reference mainly with the check list and  
23 the NCR.

24 Q Okay, then what would you rely on to determine whether  
25 a document was satisfactory for the purposes of possibly

1           ing it attest the point in consideration of your on-going  
2 program?

3           A       The incorporation of a PC number written at all,  
4 or whoever was charged with that, and the receipt of that  
5 record in the vault and indexing it into the computer  
6 system is all it takes.

7           Q       Okay. Now, many of the records that I have reviewed  
8 involved and did reference NCRs and did contain these PC  
9 numbers, were incomplete.

10          A       Did you pull the NCR?

11          Q       No.

12          A       You have to pull the NCR to be able to understand  
13 what they are trying to say. Without looking, it is very  
14 likely that the NCR numbers that are referenced on those  
15 records are the generic NCRs that we wrote against the  
16 incomplete documents.

17          Q       Well, now, I have reviewed it to that degree. Yes,  
18 they are.

19          A       Then those records are of no value to you.

20          Q       And the ones that do not reference the NCRs may  
21 be something that can be used?

22          A       Possibly.

23          Q       Okay. Do you anticipate that the records that you  
24 will use will among other things meet ANSI standards?

25          A       Yes.

1 Q Do you anticipate relying on Britton's already  
2 accomplished review and his log to determine which records  
3 may be used?

4 A I will rely on Mr. Britton subject to overview  
5 through the audit program.

6 Q Let me touch on another subject.

7 Does the phrase or term "corrective action program"  
8 mean anything to you?

9 A Sure, it's a requirement of Appendix B.

10 Q Do you have any other usage that you have made  
11 or invented that relates to problems with employees?

12 A I have a humorous tale that I have limited to the  
13 people that report directly to me which is four or five senior-  
14 level people, that I have humorously captioned a "Built-In --  
15 Correction Program."

16 They understand that, have no problem with it. It  
17 is nothing more than what I consider to be good common  
18 sense. I have worked very hard to select capable people to  
19 report directly to me so that I have a competent individual  
20 that I can delegate the various and sundry work activities  
21 to which I obviously could not possibly handle by myself --  
22 such as procedure, certification reviews, and responses to  
23 audit reports, responses to this, that, and the other.

24 The humorous tale I use with the senior guys is,  
25 "Look at it this way, fellows, if this scheme doesn't work,

1 at least I've got built in one more corrective action I can  
2 take with the Commission."

3 If I did all this, then I don't have any other  
4 built-in corrective action. Again, it's "HL," my good friend  
5 Atchison has decided to make an issue out of it. He has  
6 never heard it direct from me, nor has any inspector at  
7 Comanche Peak.

8 Q Along with the phrasing "Corrective Action Report"  
9 used in this sense, are your instructions or is the under-  
10 standing that you hoped to communicate to the inspectors to  
11 do what you say or you'll be fired?

12 A Never.

13 Q Even jokingly?

14 A Not even jokingly.

15 Q And this is not what has been put to your  
16 immediate subordinates in supervision?

17 A The thing that we try to do, I have tried to do my  
18 entire career, is to create confidence among my subordinates  
19 in terms of confidence as well as dedication and diligence  
20 to do their job properly, where they take the responsibility  
21 for doing it that way.

22 That has never been intended for anything other  
23 than that. It is no different than what is expected of me.  
24 All I am trying to do is develop that reason, logic,  
25 competence that people had to have to be senior, and do the

1 job right the first time.

2 MR. GRIFFIN: I think he only has a few questions.  
3 I think we are finished with this phase.

4 BY MR. DRISKILL:

5 Q Mr. Griffin asked you a question a little bit  
6 earlier on regarding how "unsats" on IRs are resolved, and  
7 you answered "In three ways."

8 A I believe what I said was at least two, and  
9 possibly three.

10 Q Okay. Well, one of your answers was to transfer  
11 the "unsat" characteristics on the report or information on  
12 there to an NCR.

13 A That's correct.

14 Q I would like to ask you, who is responsible for  
15 doing this?

16 A Well, I am ultimately responsible for anything  
17 that happens. But my senior people like Mr. Brandt certainly  
18 have the authority -- I'm not sure it's a responsibility --  
19 but the authority to close an inspection report in that way,  
20 if in their judgment that's appropriate and consistent with  
21 our charter under Appendix B.

22 Q Another area that I would like to clarify. There  
23 was some discussion going on a few minutes ago that had to  
24 do with hiring new QC inspectors in quality coatings, and  
25 you indicated that you have 35 crews, paint crews, and you



1 need additional people because you are currently concentrating  
2 your efforts on Unit 1; is that correct?

3 A Yes.

4 Q I want to ask you, is there any coatings work  
5 going on in Unit 2?

6 A Yes, there is.

7 Q There is. And are there coatings inspections  
8 going on?

9 A Yes, there are.

10 Q Okay. Another area. One of the responses you  
11 gave to a question -- and I don't recall specifically what  
12 the question was -- you made the statement that an  
13 indeterminate condition typically gets an NCR written.

14 A That's correct.

15 Q That goes back to the first question. Whose  
16 responsibility is it to see that an NCR gets written with  
17 respect to these indeterminate conditions?

18 A The same answer, I think, applies, that I am  
19 ultimately responsible, but my senior people typically take  
20 the lead and see that it gets done.

21 Q And do the inspectors have the right to write an  
22 inspection report when they identify a condition which is  
23 considered indeterminate?

24 A Did you mean inspection report or NCR?

25 Q I am talking about an NCR.

1 A Yes, they certainly have that authority.

2 Q Just one other area and I don't know how much you  
3 might really know about it. One of your quotes was, with  
4 respect to one of the questions that Brooks asked was,  
5 "Putting dollies on the wall and conducting scratch tests."

6 I wanted to ask you about the scratch test because  
7 it was something that came up a long time ago and it just  
8 clicked something in my mind.

9 Has that, as far as you know, been a standard  
10 test that has been used here for a long time, or since the  
11 coatings program began?

12 A No, it's only required -- the proper term is  
13 "tooke gauge." It is only required when you have some reason  
14 you want to go back and measure primer thickness and top coat  
15 thickness.

16 Q Would you describe how that test is performed?

17 A I have never run one, but I will do my best. It  
18 is some kind of a small -- I would presume -- device where  
19 you can scratch the coatings down to the base metal and a  
20 lighted boroscope or micrometer-type device where you can  
21 distinguish primer thickness from top coat thickness, and  
22 measure to a certain degree of precision both.

23 Q Well, I will say that I may have misunderstood  
24 what a scratch test was. I was going back and thinking about  
25 an explanation somebody was giving me about taking like a

1 pocket knife and cutting an "X" in a coat of paint.

2 A That sounds like willful damage to coatings.

3 (Laughter.)

4 THE WITNESS: It could be that a picket knife is  
5 used to get the scratch. I don't know, I am not that  
6 familiar with the technique.

7 MR. DRISKILL: I have no further questions.

8 BY MR. GRIFFIN:

9 Q Mr. Tolson, have I or any other NRC representative  
10 here threatened you in any manner, offered you any rewards  
11 in return for this statement?

12 A No, sir.

13 Q Have you given this statement freely and  
14 voluntarily?

15 A I was asked to appear, and I am here.

16 Q Okay. For the purposes of this phase of the  
17 inquiry, is there anything further that you would care to add  
18 to the record?

19 A Not at this time, no, sir.

20 MR. GRIFFIN: Thank you.

21 (Whereupon, at 11:50 a.m., the interview in the  
22 above-entitled matter was closed.)

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CERTIFICATE OF PROCEEDINGS

This is to certify that the attached proceedings of the  
Interview of RONALD G. TOLSON before the Office of  
Investigations at Texas Utility Generating Company,  
Comanche Peak Steam Electric Station, Glen Rose, Texas  
76043, on Friday, December 2, 1983, commencing at 10:20  
a.m., was held as herein appears, and that this is the  
original transcript for the files of the Office of  
Investigations, Region IV.

Mary C. Simons

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Official Reporter - Typed

*Mary C. Simons*  
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Official Reporter - Signature

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Ronald G. Tolson

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