UNITED STATES OF AMERICA

3

4

6

*.

8

10

11

1.00

13

14

15

16

17

18

19

20

21

24

25

8410310074 831202 PDR ADDCK 05000445 INTERVIEN

OF.

RONALD G. TOLSON

Conference Room No. 2 Visitors Information Center Texas Utility Generating Company P. O. Box 2300 Glen Rose, Texas 70043

Friday, December 2, 1983

The interview commenced, pursuant to notice,

PARTIES PRESENT:

at 10:20 a.m.

On Benalf or the NHC Office of Investigations:

H. BROOKS GRIFFIN, Investigator
DONALD E. DRISKILL, Investigator
U. S. Naclear Regulatory Commission
Region IV
Ell Ryan Plaza Drive
Batte 1000
Arlington, Texas 75001

On Benalf of Texas Utility Senerating Company:

MCNEILE WATKINS, II, ESQ. Depevoise & Lieberman 1200 Seventeenth Street, N. W. Washington, D. C. 20036

> TAYLOE ASSOCIATES 1625 | STREET, N.W. - SUITE 1004 WASHINGTON, D.C. 20006 (202) 293-3950

1		TABLE	OF CONTENT	s		
2	WITNESS:	MR. GRIFFIN: MR. DRISKILL				
3	Ronald G. Tolson		3			50
5			53			
6						
7						
8						
10						
11						

PROCEEDINGS

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.

17 Whereupon,

· · · · · · · · ·

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

18

19

20

21

22

23

24

25

RONALD G. TOLSON

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

EXAMINATION ON BEHALF OF NRC

BY MR. GRIFFIN:

- what is your present title?
- A Construction QA Supervisor.
- And you are a TUGCO employee.

out here, you had nothing to do with any of those events,

no knowledge of it as the events occurred?

24

A No.

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

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

- Q And was it issued?
- 12 A Yes, it was.
 - Q Are you aware of any threats, pressure, attempted intimidation, intimidation that was perpetrated against Mr. Atchison as related to this affair during the time you were still employed on site?
 - A No, sir.
 - Q Okay, I want to switch subjects now.

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

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

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

- A I don't recall. Was your first knowledge of this incident in the 2 hearings? 3 A As I recall, yes. So, the people involved like Tom Brand didn't 5 consult you about this affair. A I don't remember any consultation on that particular issue. Did you ever, at any point in time, have occasion 9 to counsel or discuss this issue with Atchison while he was 10 an employee on the site? 11 A No. sir. 12 Are you aware of any testing on these same bolts, 13 following the issuance of the NRC, the test being conducted 14 by Chicago Bridge & Irons? 15 A I don't recall CB&I doing any testing. I know 16 there were some tests performed. 17 O Okay. Did these bolts fail during this test? 18 A No, they passed. 19 Has this issue been completely resolved at this 20 time? 21
- A To the best of my understanding, yes.

23

24

25

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

A No, sir. 1 -- through third parties? 2 3 A No, sir. I am going to switch subjects again. 4 0 Do you recall an incident in February, 1982, 5 when Atchison refused to sign off on design changes on a 6 Westinghouse whip restraint, or whip restraints, without 7 blueprints containing Westinghouse headquarters approval? 8 At the time, no. 9 Did you become involved, or were you aware of 10 this as the situation developed? 11 He testified in a hearing something along that 12 13 line. Did you have any contact with this issue prior to 14 the hearings? 15 No, sir. 16 A Are you aware of any threats against Atchison's 17 person made by Millwright Lead over this incident? 18 No, sir. 19 A Did you ever have a personal counseling session 20 with Atchison during his employment in which you told 21 Atchison to back off, or I'll fire you? 22 23

No. A

24

25

Okay, I am going to switch subjects again. What "is your involvement in the termination of Robert Hamilton, Joe Krolak, and Sherman Shelton?

24 .

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

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

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

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

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

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

- A Nothing that I'm aware of.
- Q Are you aware of an incident that occurred about

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

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

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

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

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

We will be getting to that in a little while.

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

A I was unaware of anything that was following that at

the time it occurred and I have never since reviewed their 1 2 files. 3 Who made the final decision to terminate these three men? A All three were Brown & Root employees, so it would have to be Mr. Purdy. Do you know, or are you personally aware of any other considerations for their termination, other than they were unwilling to perform the inspection? That is the only thing that I am aware of. 10 A Do you know if part of the reason of their 11 termination was based on the fact that they were inspecting too well, or generating too many NCRs? 13 14 A No, sir. 15 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. Chapman of any significant personnel actions. As to whether 19 or not it occurred in this case, I can't recall. 20 21 Do you recall whether Chapmen, or Clements, or any of their associates had any input prior to the termination? 22 23 A No, sir. Q Okay, I am going to switch subjects again. 24

Do you recall, or are you aware of an incident

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

 A I can't make the tie to Mrs. Steiner. It has been brought to my attention on occasion, what I will refer
 - been brought to my attention on occasion, what I will refer to as willful destruction of walls. As to whether it was QC training, I don't know. It has occurred. As to whether not it is tied with her, I don't know.
 - Q Do you recall a specific instance? Did you ever counsel or have discussions with Ms. Steiner on a similar incident?
 - A No.

- Q Did you ever personally instruct Darlene Steiner to perform plug welds?
- A No.
- Q Are you aware of any other supervisors on site that had given instructions to Ms. Steiner to use or accept plug welds?
- A Again, the only knowledge I have of that subject is what Ms. Steiner has said in the licensing hearings.
- Q Do you recall an incident regarding vendor welds on large doors which Ms. Steiner wrote an NCR on?
 - A I'm not aware of anything associated with large

doors and Mrs. Steiner. So, you don't recall any such incident? 2 3 A No. 0 You don't recall counseling or discussing an issue with Ms. Steiner. 5 6 Do you recall any incident related to a problem with vendor welds on large doors? 7 A Yes. Do you recall who was involved? 3 Q A My QC group. 10 But not any individual name? 11 Q 12 A I can't associate it with names. 13 Do you know if these vendor welds with NCRs were 0 written on the vendor's doors, vendor welds on these doors? 14 There have probably been some NCRs written on 15 doors, yes, sir, relative to welding. 16 But do you remember a specific incident? 17 0 No, sir. 18 A Have you ever had occasion to instruct Ms. Steiner 19 to confine herself to reporting deficiencies, or conducting 20 21 inspections to only those inspections to which she was assigned? 22 23 I don't recall discussing that subject with her. 24 Are you aware for yourself, or any of the other

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	
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	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 of a women
15	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
23	own, I am very familiar I am just
24	uncomfortable with that situation, particularly with the

The second time was subsequent to her testimony at the hearings. The purpose of the meeting was to -- and she was reaching a point in time to where she was going to have to leave work 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 not for the

The only reason for this was not for the

because obviously that would have been covered. But I wanted

to be sure that she got the appropriate counsel on

complications 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 the possibility of

The way I understood the insurance coverage, the

I wanted to be sure that she had the benefit of making the proper decision to protect herself from the insurnace standpoint.

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

- A I am sure there have been some.
- Q That you personally knew about.
- A No. Well, other than what you see walking up and down the hall. But none that were working in what I consider to be a somewhat hazardous situation for their personal health.
- Q In your second meeting, did you encourage or suggest to Ms. Steiner that she leave her employment?
- A What I think we recommended for her consideration was that if she wanted to take a leave of absence, it could be arranged, with the insurance coverage to be extended.

 That was the purpose of this session.
- Did Ms. Steiner's appearance before the SLB prior to this second meeting have any influence, was it the result of this special attention given to Ms. Steiner?
- A Yes, it had some influence because obviously at that point in time she was a protected employee. It did not take any genius to figure that out. And to a certain extent I felt like I was sitting on a keg of dynamite ready to go off. We have all had the press coverage and various and sundry accusations and "untrues" that have been told. You know, I am sitting there just waiting for the next one,

and we did not take appropriate protection because she was one of them that was testifying against us.

1 So, yes, that influenced me in talking to her 2 personally. 3 Did Ms. Steiner's duties change 5 Yes, they did. A Could you tell me briefly what those changes were? 6 7 Basically, we moved her to the Fab Shop location where she would not have to climb, she could conduct 8 inspections, still paid and work in the QC group, with 9 much lighter duties that what she would have had if she had 10 remained in the field force. You do away with the climbing 11 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, so she 15 did not strain herself walking or anything like that. 16 Q Have you ever made similar arrangements for any 17 employees? other 18 A Again, I have not had much experience with QC 19 people in the field but it is common policy to provide certain 20 on people 21 privileges. 22 Q Was Ms. Steiner's work considered adequate? 23 A At the time, yes. 24 And you recall that there were two such sessions

25

where you counselled her

```
A
              That's right.
1
               MR. WATKINS: By "counseling" --
2
               MR. GRIFFIN: I did not mean that in the formal
3
     sense, just discussing the situation.
              MR. WATKINS: Meetings to discuss the subject.
5
               BY MR. GRIFFIN:
6
          Q Ron, do you consider Ms. Steiner's testimony before
7
     the Board having raised any legitimate concerns?
              Without going back and reading every detail, the
9
     answer to the question is, no, I don't. There has been a lot
10
     of testimony and a lot of talk. So, just from my personal
11
     participation in reading the transcript, I would have to
12
13
     say, no.
             And a different subject, were you involved in the
14
15
     decision to terminate Henry Steiner?
16
         A
              No.
17
              Were you involved in the incident in any way?
         0
18
         A
              No.
              Were you aware as it was developing?
19
         0
         A
              No.
20
              Are you aware of why Henry Steiner was terminated?
21
         Q
              Not anything other than what he said in the
22
    hearings and what cross-examination brought out. I did not
23
    even know who he was until he showed up in the hearings.
24
             Have you ever heard discussion indicating Mr. Steiner
25
```

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

- A Nothing other than what he said in hearings.
- Q Are you familiar with the relationship between the timing of the reporting of this defect and his termination?
 - A No, sir.

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

I have had an opportunity to look at the historical file and the quality instructions that relate to coatings.

If I am reading the file correctly, prior to Revision 4 of the quality instructions, I believe I was looking at one relating to steel. Prior to Revision 4 which was October, 1981, NRC 16.0 was included in the quality instructions.

Do you know why in Revision 4 NCRs were removed?

- A Do you have a date sequence because I don't associate Rev numbers with sequence.
- Q If my recall, my review of the file, is correct,
 October of 1981 the IR Program was implemented and NCRs were
 removed from the procedure.
- A It doesn't ring a bell to me because I have had the inspection report concept built in on the QA program since 1978. But what you are saying from your review does not make sense to me.
- Q Are you aware that 16.0 was dropped from QIs relating to accatings inspections for a period of time, from

1 '81 tc '83?

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

- Q Well, it did not appear in Revisions 4 through 15.
- A I would have to go check the file. We can have the file brought up, whatever you choose.
- Q Okay. Well, I am asking you as to what you are aware of right now, rather than asking you to review.
 - A What you are saying doesn't ring a bell with me.
- Q Okay. Were you aware of an approximate 14-month gap between 1980 and '81 in which no NCRs were generated in the coatings arena by the inspectors?
- A I am aware of the accusation that Mr. Hamilton made, and I have been made aware of an apparent gap in the record.
- Q Do you have an explanation? If this is true, if there were no NCRs written in coatings for a 14-month period, are you aware of the reasoning or why this occurred?
- A The only thing that makes sense to me is from sometime in '79 -- and I am thinking in late fall, early winter -- until approximately the same time frame in '81, nothing that was prescribed in the program really got carried out the way it was intended to be.

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

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

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

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

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

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

7 8

this time?

- A According to Hamilton's testimony, to the best of my recollection that is the first time I became aware of any such order that he was in fact told not to use NCRs.
- Do you have any recollection of making any such statement or instruction, giving him such instructions?
- A It is totally inconsistent with my obligation under Appendix B.
 - Q But even if it is inconsistent, do you recall?
- A No.
- Q Okay.
- A I need to clarify that, though, and re-emphasize the fact that the non-ASME QA program was designed to utilize to the maximum extent possible an inspection report which accomplishes the same thing as an NCR.
- Q Okay. As relates to the Inspection Report Program, how were inspection reports used to report the deficiencies that were identified that were not part of assigned inspections?
 - A I am not with you.
- Q If a deficiency was identified that was not a part of an assigned inspection, how were inspection reports used to report the deficiencies?
 - A I am not sure they were. But you are losing me.
 - Q It is my understanding that inspectors who were

assigned specific inspections, if they identified a deficiency that was not part of their assigned inspection, what method did they use, or how did they go about transmitting this?

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

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

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

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

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

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

- Report" but again, accomplished the same thing.
 - Q I see the distinction you are making.
- A Okay.

- When I refer to the Inspection Report or IR program,

 I am speaking of the use of this new reporting form which

 was, again, in fall of '81.
 - So, as I refer to it during the rest of this interview, that is what I am referring to.
 - A I keep hammering -- excuse me -- on one point, that it was not a new form.
 - Q Okay.
 - A It was just, the old forms on the coatings --
- 13 Q Were check lists --
 - A No, it was the same thing, still an inspection report, still a check list. It very likely had a different title on top of it, but it still accomplished the same thing. It is "the" things that an inspector has to do to satisfy the QA Program from an inspection standpoint.
 - Q Okay.
 - A Obviously, the people had trouble with the old forms, otherwise, I would presume, they would have filled them out properly. So, we thought we had had great luck with the "Inspection Report Form" and simply revised the attributes that were in the old forms under the Inspection Report Form and made that a viable part of the coating program.

1 In my review of the historical file on quality 2 instructions, prior to the implementation and use of this new form, the Inspection Report Form, I notice that the QIs referenced final acceptance as related to the -- I think you mentioned a while ago -- the FDRs; is that it? 6 A You are losing me again. 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 You are leaving me with the impression that you have 16 not reviewed the entire program. 17 0 That may be true. 18 You are leaving me with the impression that you 19 reviewed only a very small portion of it. 20 I just looked at the historical file, 4.1. 21

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

Q I think this was steel.

22

23

24

- A Again, there is more than one just for steel.
 - Q Is there?
- 3 A Yes.

2

7

8

9

10

11

12

13

14

15

16

17

18

19

- Q Okay. Well, let's move on, then.
- 5 A I think.
- 6 Q "How are "unsats" on IRs dispositioned?
 - A There are at least two, and possibly three ways, that that is accomplished. That is either fixed, which is the preferred method, or it can be converted for a non-conformance report or, I believe, as Mr. Brandt testified in the hearings last year, in selected areas that engineering can get involved with the discrepancy on an inspection report and issue a change or deviation to the spec or drawing, and it can be closed on that basis.
 - Q You indicated the preferred method was to have it fixed. How does the "unsat" on the IR, how is that transmitted to Craft?
 - A A copy.
 - Q It is just given to Craft?
 - 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

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

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

- Q Could you describe the system prior to use of the computer?
- A We relied on the Craft, the transmittal of the copy to Craft and construction management to see that the problems got resolved.
 - Q So, it was not formally tracked?

- A It's always been formally tracked through a log system as far as I am concerned, but from a completion standpoint it was a little bit informal as far as Craft was concerned.
- Q Who was responsible, who did attempt to keep up with these "unsats" on the IRs?
- A Well, we had copies in our files and we, of course, still had an open log entry. What the Craft did, I do not know.
- Now, if I have this right, all IRs were given numbers and they were tracked as a group. Are you telling me that there was no separate tracking for those IRs that

contained "unsats"?

- A Not until this computer program.
- Q Okay.

2

3

11

14

15

16

17

18

19

20

21

23

- 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.
 - Q Who maintained this log?
- 8 A QC.
- 9 Q Is there any individual within QC that had that 10 responsibility?
 - A At that time, it was done by each discipline.
- 12 Q Was each inspector required to make entries in the 13 log?
 - A No, it was done by clerks, as I recall, working for the discipline's supervisor.
 - Q What instructions do coatings QC inspectors have if they should identify a deficiency that is not part of the assigned inspection attributes?
 - A I'm not aware of any that they have, that are not part of the program.
 - Q So, the inspection, hypothetically, if the Inspection Report had 17 attributes, they are required to address all 17, or are there instances where they are asked to address, say, just a portion thereof?
- 25 A Well, it depends on the circumstances the Inspection

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

Now, if for a given inspection requirement or

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

- Q If there were a deficiency that was covered under one of those other attributes, are the inspectors liable to make entries even if it is not part of the assigned, or --
 - A Certainly, as far as I know they do.
- Q Are inspectors allowed to make random or routine inspections that they are not assigned?
 - A It is not preferred.

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

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

BY MR. GRIFFIN:

- I have a point here I want to communicate to you, and it relates to unassigned inspections. Do you understand what I am talking about when I say "unassigned" inspections?
- A Let me paint a scenario and let's see if we understand.

Q Okay.

- A If what you are alluding to is Atchison's testimony,
 then I can relate to that.
 - Q I have not read his testimony. But what I am trying to refer to is, if an inspector were walking around and looked at something that was not part of an assigned inspection he had been asked to perform, are inspectors allowed to do that?
 - A As far as I know, yes.

 Now, let's be careful.
 - Q In what sense?
 - A I do not want 300 people just arbitrarily walking around the plant site, that presents me with a management problem.
 - Q Well, my follow-up question was, if they do that, they do get in trouble? Or are they discouraged from doing that?
 - A It depends on the circumstances. We are beating around the bush here, I think, to a certain extent and perhaps I will volunteer some stuff and maybe we will come to the point.
 - Q Okay.
 - A If I am working Elevation 905 linerplate and what we are trying to do from the project standpoint is come out of the reactor building, working from the top down to

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

Q Okay.

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

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

A Certainly.

Q Is he discouraged from doing that?

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

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

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

A I am going to have resist every time you say "new report." Q Okay, new format. 3 A No, wait a minute. The word "new" is what I am having trouble with. The inspection report has been in the program since 1978, okay. It was incorporated into the Protective Coating Program in '81. But it is not a new 7 form. 8 Q I'll tell you what, Ron, rather than repeat this 25 times every time I say "inspection report," what term 10 11 can I use to differentiate the inspection report from the old check list? 12 13 If I cannot say inspection report, if that is not satisfactory --14 A Just drop the word "new" and then I won't have to bring it up every time because it is not a new form, 16 semantically, to me. 17 Q Well, I spent a lot of time in your vault there 18 looking at those old check lists, and when I look at that inspection report it looks new to me because it is different 20 than those old check lists. 21 A It's new -- maybe we just ought to drop it and 22 I'll just ignore "new." 23 Q Okay. I am not trying to inflame you or anything, 24

I am just trying to move this thing on. When I say "inspection

report" --

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

Q All right.

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

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

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

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

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

A That's correct.

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

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

Okay. Say, between 1981 and 1983, were coatings 1 inspectors allowed to write NCRs and attach hold tags if they didn't find a deficiency? They have always been permitted, if in their judgment they needed to issue an NCR and to apply a hold tag, then and now. Q Okay. Who does the final review for NCRs generated 8 in coatings, by coatings inspectors, which supervisor? 9 Well, it would be under Brandt. 10 So, he would be the final reviewer? 11 I don't know. 12 Well, where I am going with this is, the inspector 13 writes it. His first-line supervisor reviews it. Does his first-line supervisor have the authority to void NCRs? 14 15 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 Are hold tags applied before Brandt's decision? 21 Yes. A 22 Can individual inspectors call and receive NCR 23 numbers prior to Brandt's approval? 24 A Most definitely.

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

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

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

A That's correct.

- Q Was this possible program addressed to the NRC for consideration or approval?
- A It's a chicken-and-egg type of situation. There was no discussion with the resident until prior to making the decision to draft the procedure, to see if it could be done.

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

- Q So, you were the one that created the possible idea, and you were also the one that decided not to go with this?
- A Yes. Now, as I often do over the years and have done, I tend to use the resident as a sounding vehicle relative to the wisdom of my independent thought process.

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

Q Okay. It's my understanding that recent procedure

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

A No, I am not.

- Also, another change that I believe has been either pending or it's already been incorporated is instructions that inspections are to be conducted at arm's length, using a flashlight at a 90-degree angle; are you familiar with this?
 - A Yes, I am familiar with that.
 - Q Could you tell me what the background thought is?
- A It's my understanding from some people I have reason to believe know what they are talking about, that that is a common inspection technique in the area of protective coatings industry wide, not just Comanche Peak.
- Q Tell me this, based on your knowledge of coatings and coatings inspections, does using this method, arm's length, flashlight, is an inspector -- average inspector -- likely to be able to accomplish and evaluate all the attributes that he should consider in a coatings inspection?
 - A Yes.

- Q Do you know exactly why those changes were incorporated?
- A Again, it's my understanding that that is a common technique. There was, I think, lack of specific direction

relative to technique in particular construction and I would 1 2 assume therefore that was the reason for incorporating the 3 technique. Q I understand that recently a number of painters have 5 been brought over to be incorporated in the QC inspection program. They are being trained and certified; is that 7 true? 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 preps 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 In Unit 1 primarily. A 23 Is this an indefinite program, or is the need going 24 to be for a limited period of time?

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

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

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

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

- Q Does this include rework or repair of damage?
- A Yes.

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

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

But again, it is premature. Until we decide for sure what we are going to do with Unit 1, my personal plan 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 the coatings QC inspectors currently employed? 5 A I'm not going to terminate them. 6 Ron, as the normal practice, are employees on site 7 normally debriefed by supervisors following their interviews 8 with NRC? 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 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.

So, if it's concurrent it is purely coincidental.

Well, if we come on site and we start bringing 1 people in and question them in some area, does that trigger you to begin an investigation on similar --No, only those things which the people feel strong enough about to bring to my attention. You mean Chapman or Clements? 0 6

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

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

O Okav. I want to go back to, in October, 1981 4 Johnson, an NRC inspector, wrote a Notice of Violation regarding coatings which resulted in NCRs being written in various divisions on things that had paint applied to them like liner plate, concrete.

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

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

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

No. I would say, no. Like I said, I didn't have any single thing in mind except, you know, it was a type of a situation where we had what you would call an indeterminate 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. Q Was a decision made to completely backfit concrete 5 and liner plate? Subsequently, yes. Was that your decision? 8 Yes, I have to endorse it. A 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 Not initially. A 16 Okay. But as backfit continued, a decision was 17 made? 18 A Recently. 19 Okay. And was the sampling conducted? 20 A Yes. 21 What was the outcome? 0 22 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

idea where we stood from a scheduling standpoint. Approximate:

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

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

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

- Q So, is this backfit complete in miscellaneous steel?
 - A As far as I am concerned, yes.

- Q Have the NCRs that relate to miscellaneous steel been closed?
- A I doubt that they have at this point, but they will be in the near future.
- Q As related to the old coatings inspection records that were generated back in '77 through '79 or 1980, that are in your vault, it is my understanding that the basis for the Notice of Violation that Johnson wrote, are those records,

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

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

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

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

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

A That's correct.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

he has -- I forget the number, but 3,700 or somewhere around.

He mapped these areas and also mapped them in his log as

"sat" or "unsat."

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

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

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

Q And in consideration of Britton's efforts

previously, in his log that identified various documents as

"sat" or "unsat," are those that he identified as "sat"

going to be used or do you anticipate their use as quality

documents?

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

1

2

3

4

7 8

9

10

11 12

13

14

15

16

17

18

19

20

21

22

23

24

25

documentation was adequate and therefore shouldn't be incorporated into a record system.

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

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

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

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

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

Okay, then what would you rely on to determine wheth a document was satisfactory for the purposes of possibly

using it attest the paint in consideration of your on-going program?

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

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

A Did you pull the NCR?

Q No.

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

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

A Then those records are of no value to you.

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

A Possibly.

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

A Yes.

21.

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

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

Q Let me touch on another subject.

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

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

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

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

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

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

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

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

- Q Along with the phrasing "Corrective Action Report" used in this sense, are your instructions or is the understanding that you hoped to communicate to the inspectors to do what you say or you'll be fired?
 - A Never.

- Q Even jokingly?
- A Not even jokingly.
- Q And this is not what has been put to your immediate subordinates in supervision?

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

That has never been intended for anything other than that. It is no different than what is expected of me.

All I am trying to do is develop that reason, logic, competence that people had to have to be senior, and do the

job right the first time.

1

2

4

5

6

8

10

11

13

14

15

16

17

18

19

20

21

22

23

24

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

BY MR. DRISKILL:

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

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

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

That's correct.

I would like to ask you, who is responisible for doing this?

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

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

need additional people because you are currently concentrating 1 your efforts on Unit 1; is that correct? A Yes. 3 I want to ask you, is there any coatings work going on in Unit 2? 5 Yes, there is. Q There is. And are there coatings inspections going on? A Yes, there are. 9 10 Okay. Another area. One of the responses you gave to a question -- and I don't recall specifically what 11 the question was -- you made the statement that an 12 indeterminate condition typically gets an NCR written. 13 That's correct. 14 That goes back to the first question. Whose 15 responsibility is it to see that an NCR gets written with 16 respect to these indeterminate conditions? 17 The same answer, I think, applies, that I am 18 ultimately responsible, but my senior people typically take 19 20 the lead and see that it gets done. 21 Q And do the inspectors have the right to write an inspection report when they identify a condition which is 22 23 considered indeterminate?

A Did you mean inspection report or NCR?

25 Q I am talking about an NCR.

A Yes, they certainly have that authority.

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

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

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

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

- Q Would you describe how that test is performed?
- A I have never run one, but I will do my best. It is some kind of a small -- I would presume -- device where you can scratch the coatings down to the base metal and a lighted boroscope or micrometer-type device where you can distinguish primer thickness from top coat thickness, and measure to a certain degree of precision both.
- Q Well, I will say that I may have misunderstood what a scratch test was. I was going back and thinking about an explanation somebody was giving me about taking like a

```
pocket knife and cutting an "x" in a coat of paint.
1
         A That sounds like willful damage to coatings.
2
              (Laughter.)
3
              THE WITNESS: It could be that a picket knife is
4
     used to get the scratch. I don't know, I am not that
5
     familiar with the technique.
7
              MR. DRISKILL: I have no further questions.
              BY MR. GRIFFIN:
8
              Mr. Tolson, have I or any other NRC representative
9
10
    here threatened you in any manner, offered you any rewards
    in return for this statement?
11
12
        A No, sir.
              Have you given this statement freely and
13
     voluntarily?
14
15
              I was asked to appear, and I am here.
16
              Okay. For the purposes of this phase of the
17
     inquiry, is there anything further that you would care to add
     to the record?
18
19
             Not at this time, no, sir.
20
              MR. GRIFFIN: Thank you.
21
              (Whereupon, at 11:50 a.m., the interview in the
     above-entitled matter was closed.)
22
23
24
```

CERTIFICATE OF PROCEEDINGS

This is to certify that the attached proceedings of the

2

1

3

+

5 6

-

8

9

10

11

12

13

14

15

16

1.

18

19

20

21

23

24

25

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 Priday, December 2, 1983, commencing at 10:20 a.m., was neld as herein appears, and that this is the original transcript for the files of the Office of Investigations, Region IV.

Mary C. Simons

Official Reporter - Typec

May Comm

Official Reporter - Signature

TAYLOE ASSOCIATES 1625 | STREET, N.W. - SUITE 1004 WASHINGTON, D.C. 20006 (202) 293-3950