



UNITED STATES
NUCLEAR REGULATORY COMMISSION
OFFICE OF INVESTIGATIONS FIELD OFFICE, REGION IV
611 RYAN PLAZA DRIVE, SUITE 1000
ARLINGTON, TEXAS 76011

DATE: JUL 24 1984

REPORT OF INVESTIGATION

TITLE: COMANCHE PEAK STEAM ELECTRIC STATION:
SUSPECTED FALSIFICATION OF QUALITY CONTROL RECORDS

SUPPLEMENTAL NO. DN 50-445/50-446

CASE NUMBER: 4-83-011

CONTROL OFFICE: CI FIELD OFFICE: REGION IV STATUS: CLOSED

PERIOD OF INVESTIGATION: June 29, 1983 - January 18, 1984

REPORTING INVESTIGATOR: H. Brooks Griffin
H. Brooks Griffin, Investigator
Office of Investigations Field Office, Region IV

PARTICIPATING PERSONNEL: Donald D. Driskill, Investigator
Office of Investigations Field Office, Region IV

Wendel E. Frost, Investigator
Office of Investigations Field Office, Region IV

REVIEWED BY: Richard K. Herr
Richard K. Herr, Director
Office of Investigations Field Office, Region IV

Roger Fortuna
Roger Fortuna, Deputy Director
Office of Investigations

APPROVED BY: Ben B. Hayes
Ben B. Hayes, Director
Office of Investigations

8410310113 840724
PDR ADDCK 05000445
Q PDR

SUMMARY

In June 1983, a Brown & Root, Inc. coatings quality control (QC) inspector at the Comanche Peak Steam Electric Station (CPSES) alleged that Brown & Root QC supervisors, while conducting a document review for coatings records made prior to April 1981, altered and falsified coatings records to make them adequate. These records were excluded from a coatings backfit program initiated as a result of an NRC Notice of Violation for inadequate coatings inspection documentation.

An NRC review of these coatings inspection records in the Brown & Root vault revealed that many of the coatings inspection records were xeroxed copies and contained additional penned entries. This review identified several inspection packages on liner plate which contained inspection documentation that had been incorporated into the packages that obviously was not a part of the inspections; i.e., paint mix sheets dated weeks before the paint was applied.

Four individuals who had worked as Brown & Root coatings QC inspectors in 1977 and 1978 when these inspection records were made, were shown copies of the suspect records. All four individuals testified that at the time these inspections were conducted, it was an accepted practice in the coatings inspection crew to xerox copies of inspection checklists for many items painted at the same time under the same conditions.

One of the above four individuals stated he believed the records had been falsified based on additional entries made on the xerox copies of his checklists which were not in his handwriting. This individual also indicated he suspected these records were falsified by the reviewing supervisors based on his conversations with other coatings inspectors. Two of the other three individuals interviewed explained that this particular inspector had been deficient in completing his reports. One of these individuals stated that he heard rumors that other inspection personnel regularly helped this inspector by completing his paperwork.

Two individuals who had worked as coatings QC clerks during a portion of the time these coatings inspections were performed, testified they did not know of any additions or falsification related to the inspection checklists. One of the former clerks identified the inspector, who believed his checklists may have been altered, as being chronically deficient in preparing and completing his paperwork.

Three QC supervisors responsible for conducting the review of coatings inspection documentation denied falsifying the inspection records in question. One of the supervisors stated that he, in a few instances, made additional copies of certain inspections records and incorporated them into the inspection packages if the dates and locations were corresponding. The other two supervisors testified their reviews were limited to cataloguing and mapping the inspections as "satisfactory" or "unsatisfactory."

The immediate supervisor of the QC coatings inspection crew, the QC supervisor for Reactor Building I, the Non-ASME QC Supervisor, and the Texas Utilities Generating Company (TUGCO) Site Quality Assurance (QA) Supervisor all denied knowledge of the alteration or falsification of coatings records.

The TUGCO Non-ASME QC Manager, who worked under the supervision of the TUGCO Site QA Supervisor and who supervised the coatings QC inspection crew at the time the inspection records were created, denied ever having been told by his subordinates that the inspection records were not being completed or were inadequate. This supervisor stated the coatings inspection program was created and implemented by the TUGCO Site QA Supervisor.

The TUGCO QA Manager (corporate) related that the TUGCO Site QA Supervisor had mentioned a problem involving the xeroxed inspection records to him during a telephone conversation in the latter part of 1983. The TUGCO QA Manager, after recontacting the Site QA Supervisor, concluded that their earlier conversation had pertained to xeroxing original inspection records rather than any xeroxed copies made during reviews conducted by Brown & Root supervisors. A reinterview of the Site QA Supervisor indicated that he concurred with the TUGCO QA Manager's explanation of the conversation.

Following the completion of interviews with the four coatings QC inspectors who had participated in the inspections made prior to April 1981, the alleged was reinterviewed. The alleged said that at the time he made his allegation, he had not been aware of the earlier inspection practice of making xeroxed copies when many items were painted at the same time under the same conditions. The alleged indicated the basis of his contention was his assumption that the reviewing supervisors must have made the copies, since xeroxed copies were now a violation of existing coatings procedure.

Technical concerns identified during the course of this investigation were forwarded to the NRC Region IV for evaluation and review.

DETAILS

TABLE OF CONTENTS

<u>Page Title</u>	<u>Page Number</u>
Purpose of Investigation	1
Background	2
Interview of ██████████ (Confidentiality Requested)	3
Interview of ██████████ (Confidentiality Requested)	5
Interview of Houston Floyd GUNN	8
Interview of Harvey Daniel WASH, Jr.	10
Telephonic Interview of Cordella HAMILTON	12
Telephonic Interview of Sheila BROWN	13
Interview of Robert HAMILTON	14
Interview of Michael FOOTE	17
Telephonic Interview of Richard CUMMINGS	19
Interview of Neill BRITTON	21
Interview of Harry WILLIAMS	23
Interview of James HAWKINS	25
Interview of Myron G. KRISHER	27
Interview of Thomas BRANDT	28
Interview of Ronald TOLSON	29
Interview of David N. CHAPMAN	31
Exhibits	33

Purpose of Investigation

The purpose of this investigation was to determine if controls (Quality Control (QC) inspection records generated at the Comanche Peak Steam Electric Station (CPSES) before April 1981 were altered and falsified by Brown & Root, Inc. QC supervisors during subsequent document reviews to make the records acceptable to the American National Standards Institute (ANSI) standards.

Background

During April 1981, Claude JOHNSON, a U.S. Nuclear Regulatory Commission (NRC) Inspector in Region IV, conducted an inspection at the CPSES of the coatings QC inspection program. In October 1981, a Notice of Violation was issued by the NRC against the Texas Utilities Generating Company (TUGCO) for failure to meet the ANSI standards in implementing and maintaining acceptable QC inspection records. The TUGCO QC managers responded by ordering nonconformance reports (NCRs) written against all coatings QC inspection records made prior to April 1981 and by instituting a document review of the inspection records to determine if any were adequate as Quality records. Coatings document reviews by CPSES began in November 1981, and maps were prepared identifying areas having adequate coatings QC inspection documentation. A coatings backfit program for all areas containing painted surfaces was implemented in conjunction with the review.

On June 29, 1983, [REDACTED] (Confidentiality Requested), a Brown & Root, Inc. [REDACTED] CPSES, made an allegation to the NRC Office of Investigations concerning possible falsification of coatings QC inspection documentation by the QC supervisors responsible for the document review of the old coatings inspection records referenced by the NCRs.

Interview of Houston Floyd GUNN

On November 20, 1983, Houston Floyd GUNN, a Brown & Root, Inc. coatings QC inspector at the Comanche Peak Steam Electric Station, was interviewed by NRC Investigator H. Brooks GRIFFIN. GUNN's testimony was recorded in the form of a signed, sworn statement and is included with this report as Exhibit (3). GUNN stated he had been employed in his present position since October 1977.

When GUNN was shown coatings Inspection Record PC03212, Exhibit (3-1), a xeroxed inspection checklist bearing his signature, GUNN confirmed having made the entries on this xerox copy, with the exception of the "PC" number and the vault number.

GUNN was shown coatings Inspection Record Nos. Exhibits (2-14), (2-15) and (3-2) through (3-21), which were xeroxed copies of PC03212, Exhibit (3-1). GUNN explained that in 1977 and 1978 there were only three coatings QC inspectors on site, and they were FAZI, Daniel HASH, and himself. GUNN stated that all three inspectors regularly made xeroxed copies of inspector checklists which contained the same information, such as ambient conditions or seal coat information. GUNN stated that when the seal coat inspection was completed, the inspector filled in the location and thickness values.

GUNN was also shown Inspection Record No. PC03237, Exhibit (3-22), and PCC1397 through PCC1402, Exhibits (3-23) through (3-28), which were xeroxed copies. GUNN stated these inspection reports represented a number of items which were painted at the same time, and that he recognized his handwriting on the checklists. GUNN stated his signature and the date were xeroxed to save time. GUNN confirmed these copies represented actual inspections he performed on the date indicated.

GUNN stated he remembered being interviewed in 1981 by NRC Inspector Claude JOHNSON regarding coatings records. GUNN said that after JOHNSON wrote a Notice of Violation for inadequate coatings records, the QC inspectors were instructed to locate all existing coatings documents and bring them to the

vault. GUNN said that prior to the violation, coatings records were in an office file cabinet. GUNN also said that after the violation, xeroxed copies were not allowed. GUNN indicated he was aware that part of JOHNSON's Notice of Violation cited an absence of records. GUNN stated that when the coatings QC inspectors located additional records, they were not provided to the NRC as mitigating evidence. GUNN said he believed that a former QC supervisor, James HAWKINS, may have lost his job because the records were stored improperly.

Although not contained in his statement, GUNN confided that although FAZI was thorough in his inspections, he often failed to complete his inspection reports. GUNN said he heard rumors from various co-workers that other inspection personnel regularly completed FAZI's reports if they had the proper information that FAZI failed to record. GUNN was unable to identify specific records or individuals who had made entries on FAZI's reports.

INVESTIGATOR'S NOTE: The technically related portions of GUNN's responses to inquiries regarding the use of the coatings records which were unrelated to falsification were provided to the Region IV staff for evaluation in conjunction with an ongoing inspection effort. This technical information is included in Exhibit (3).

Interview of Harvey Daniel HASH, Jr.

On December 8, 1983, Daniel HASH, Jr., a former Brown & Root, Inc. coatings QC inspector at the Comanche Peak Steam Electric Station, was interviewed by NRC Investigators H. Brooks GRIFFIN and Wendel E. FROST in ██████████. HASH's testimony was recorded in the form of a signed, sworn statement which is included with this report as Exhibit (4). HASH said he was hired on a drill crew at CPSES in October 1974, then was transferred to coatings QC about two years later. HASH said he became the coatings area coordinator (supervisor) in about April 1977.

HASH recalled that when coatings inspections began on liner plates, the plate numbers were located on the concrete side of the plates. HASH said James HAWKINS, his supervisor, told him liner plate prints would identify the locations of plates to correspond with the QC inspections. HASH also recalled that HAWKINS told him not to worry about the lack of traceability of inspections on miscellaneous steel.

HASH said he remembered an instance in which HAWKINS wanted an inspector named Houston GUNN to sign off on some questionable inspections. HASH said GUNN refused unless HAWKINS gave him a memorandum authorizing the sign off. HASH said HAWKINS wrote the memorandum, and GUNN attached a copy of the memorandum to each checklist.

HASH said that when he was promoted to area coordinator, he had trouble with HAWKINS and Harry WILLIAMS (supra) pressuring him to sign off on inspections, or they disagreed with NCRs written by the inspectors. HASH said HAWKINS systematically arranged to have inspectors removed from their positions if they were too thorough in their inspections. HASH said he believed HAWKINS' predecessor, Pat CLARK, may have been demoted in that manner.

INVESTIGATOR'S NOTE: CLARK was not interviewed because the testimony received from other witnesses indicated he was not employed at CPSES when the records were created which were allegedly later falsified.

HASH said he left his employment with Brown & Root in October 1979 because of his disagreements with HAWKINS and WILLIAMS. HASH said that Robert HAMILTON, a former Brown & Root coatings QC supervisor at CPSES, took his place when he left, and he had heard that HAMILTON had the same type of trouble with WILLIAMS and HAWKINS.

HASH said the early coatings inspections were an attempt to "sell" Texas Utilities Services, Inc. final paint inspections in inaccessible areas. HASH said the paint on the liner plate and equipment was damaged over and over again, and did not constitute final inspections.

HASH said that while he was an inspector, the location identification written on the inspection checklists was usually limited to "Unit I." HASH said he did not know of anyone adding tag or location numbers to the inspectors' checklists. HASH said he did not know of any falsification related to the inspection checklists, although he was aware the NRC later determined that the records were incomplete and inadequate.

INVESTIGATOR'S NOTE: The technically related portions of HASH's responses to inquiries regarding the use of the coatings records which were unrelated to falsification were provided to the Region IV staff for evaluation in conjunction with an ongoing inspection effort. This technical information is included in Exhibit (4).

Telephonic Interview of Cordella HAMILTON

On January 18, 1984, Cordella HAMILTON, a former Brown & Root, Inc. QC mix inspector and clerk, was telephonically interviewed by NRC Investigator H. Brooks GRIFFIN. HAMILTON stated she had been hired as a laborer at CPSES in the Summer of 1980 under her maiden name, BIRDWELL. HAMILTON said she was promoted to the coatings QC crew as a mix inspector in the Fall of 1980. HAMILTON said she worked in this position until she quit in March 1982.

When asked if she ever had occasion to make additional entries on coatings inspectors' checklists, HAMILTON said she sometimes added paint mix times to checklists but never made any additions related to inspection locations. HAMILTON said her work at the paint shop was limited to witnessing paint mixes.

When HAMILTON was asked if she recalled anyone making any additions to the inspection records of Joseph FAZI (supra), she said she recalled that Sheila BROWN, a coatings inspector, helped FAZI with his paperwork. HAMILTON said that FAZI was very bad about completing his inspection documentation, and she recalled that FAZI sometimes complained to Harry WILLIAMS, the supervisor, about the QC clerks "nitpicking" him about his record keeping.

HAMILTON stated she did not know of any falsification related to the coatings inspection records, although she remembered that many of the inspection checklists were not completed because of the large number of inspections that had to be handled by the limited number of inspectors.

Telephonic Interview of Sheila BROWN

On January 18, 1984, Sheila BROWN, a former Brown & Root, Inc. QC clerk, was telephonically interviewed by NRC Investigator H. Brooks GRIFFIN. BROWN stated she was first employed by Brown & Root at CPSES in July 1979 as a laborer. BROWN said she was transferred to a position as the coatings QC clerk about four months later. BROWN said she was reassigned as the field engineer secretary about eight months later, then was transferred to a clerk's position in pipe hangers, then back as the coatings QC clerk. BROWN said she was fired by Brown & Root for excessive absenteeism in August 1982.

When BROWN was questioned as to her duties as the QC clerk, she stated she did not recall making any additions to inspectors' checklists, including those of Joseph FAZI. BROWN said that if she identified a deficiency on a checklist, she either gave it to Robert HAMILTON, the supervisor, or returned it to the inspector. BROWN said she did not know of any additions or falsification related to the coatings inspection records, although she remembered the concern over the incompleteness of the records when the order was given to bring all of the coatings records to the vault.

Interview of Robert HAMILTON

On December 7, 1983, Robert HAMILTON, a former Brown & Root, Inc. coatings QC supervisor at the Comanche Peak Steam Electric Station, was interviewed by NRC Investigator H. Brooks GRIFFIN. HAMILTON's testimony was recorded in the form of a signed, sworn statement and is included with this report as Exhibit (5). HAMILTON said he was originally hired as a QC cadweld inspector in November 1976, was transferred to coatings QC two years later, and then promoted to coatings QC supervisor in 1979. HAMILTON said Daniel HASH preceded him as supervisor. HAMILTON stated his supervisor was Harry WILLIAMS, and his superintendent was JAMES HAWKINS.

HAMILTON said he remembered that HASH had many disagreements with WILLIAMS and HAWKINS over procedures. HAMILTON said that prior to WILLIAMS' arrival on site, the coatings inspectors did not have much contact or trouble with HAWKINS. HAMILTON said HAWKINS indicated he (HAWKINS) did not know much about coatings and would rely on the inspectors to do the job properly. HAMILTON said he believed HASH left his position with Brown & Root because HAWKINS and WILLIAMS continually sided with the craft against HASH (QC).

HAMILTON said that as soon as he became the supervisor, he began having the same problems HASH had experienced with HAWKINS and WILLIAMS. HAMILTON recalled that within 30 days after he became supervisor, he made HAWKINS aware of the fact that the coatings inspection records were incomplete and that he was not able to make the inspectors complete the records. HAMILTON said HAWKINS told him not to worry about the records, that WILLIAMS was aware of the problem but did not appear concerned until he developed the "IR" (Inspection Report) system.

HAMILTON said he told NRC Inspector Claude JOHNSON, during his 1981 inspection, that the volume of rework resulted in incomplete paperwork. HAMILTON said JOHNSON cited the condition of the inspection reports in his Notice of Violation.

HAMILTON said that before JOHNSON's inspection, the coatings records were

stored in a file cabinet in the QC trailer. HAMILTON said he did not believe WILLIAMS was aware of the location of the records.

HAMILTON said that following the Notice of Violation, Ronald TOLSON, supra, and Thomas BRANDT, a supervisor at CPSES, called him to a meeting and told him the records were "a mess." HAMILTON recalled that TOLSON said he should fire him. HAMILTON said he explained to TOLSON that the volume of rework had resulted in the incomplete records, and that he had already made HAWKINS aware of the condition of the records. HAMILTON stated that TOLSON told him to "get the records straight."

HAMILTON stated that because of the large amount of rework conducted to repair damage to the painted surfaces during ongoing construction, he decided to start a log identifying the inspections conducted in lieu of inspection reports. HAMILTON stated the log system was cited as improper in the NRC's Notice of Violation. HAMILTON said HAWKINS approved the log system before he started using it.

HAMILTON stated that when he was first transferred to coatings, Cathy GILBREATH was the coatings QC file clerk.

INVESTIGATOR'S NOTE: Attempts to locate GILBREATH through Brown & Root records, telephone records, and postal checks were unsuccessful. Information was received that GILBREATH married after she left CPSES and moved away.

HAMILTON said GILBREATH's duties were to check and sign paint mixes and to monitor painter qualification records. HAMILTON said that GILBREATH and Cordella HAMILTON also reviewed coating records for completeness, and they returned inspection records to the inspectors if they were not complete.

HAMILTON explained that many of these inspection records were not complete because the procedure at that time did not call for final acceptance sign off because of continual damage and rework to the painted surfaces. HAMILTON said

he did not know of any instances wherein the clerks made additions to the inspectors' reports.

HAMILTON said he remembered that inspectors FAZI, supra, and DENDY, a coatings QC inspector, were particularly bad about completing their reports.

INVESTIGATOR'S NOTE: DENDY was not interviewed as part of this investigation because inquiries disclosed that the suspect coatings records which are the subject of this investigation did not include inspections conducted by DENDY.

HAMILTON said he recalled that many of the mix sheets and repair records were xeroxed to save time. HAMILTON said he did not know of any falsification related to these inspection records. HAMILTON said that coatings was of such a low priority at that time that nobody cared about the condition of the coatings records.

INVESTIGATOR'S NOTE: The technically related portions of HAMILTON's responses to inquiries regarding the use of the coatings records which were unrelated to falsification were provided to the Region IV staff for evaluation in conjunction with an ongoing inspection effort. This technical information is included in Exhibit (5).

Interview of Michael FOOTE

On November 9, 1983, Michael FOOTE, an Ebasco Services Incorporated night shift QC supervisor at the Comanche Peak Steam Electric Station, was interviewed by NRC Investigator H. Brooks GRIFFIN. FOOTE's testimony was recorded in the form of a signed, sworn statement and is included with this report as Exhibit (6). FOOTE said he had been transferred to CPSES in January 1982 under Thomas BRANDT (supra) to conduct a coatings document review with Richard CUMMINGS, an Ebasco supervisor, following an NRC Notice of Violation. FOOTE said he reviewed and mapped coatings documents for about six weeks and was then promoted to supervisor about the same time CUMMINGS was promoted to a job at the South Texas Project, located in Bay City, Texas.

FOOTE stated that when he began his review, the coatings records were stored in the vault, but were not officially logged into the vault. FOOTE said that during the review, the records were transferred to his office. FOOTE said he started the review by dividing the records into the areas of liner plate, concrete, miscellaneous steel, and equipment. FOOTE said he began mapping the liner plate for acceptable documentation, and entered a control number in the upper right hand corner of the inspection reports. FOOTE said many of the inspection reports were already together in packages for the various steps in the inspections conducted during the application of paint. FOOTE said that in some instances he assembled packages together if they had sufficient location identification.

FOOTE said that after he was promoted, Neill BRITTON (supra) reviewed these same documents and occasionally asked him questions about his review. FOOTE said he was not involved in subsequent reviews, dispositioning of the NCRs, or sampling during the backfit. FOOTE said he did not know how these old inspection records were to be used in respect to the coatings program.

FOOTE said he had not made any additions to these coatings records other than control numbers, nor had he made xeroxed copies and added them to the records. FOOTE said he also did not know of anyone else altering or adding to these records. FOOTE said he did not know of any falsification related to these coatings records.

INVESTIGATOR'S NOTE: The technically related portions of FOOTE's responses to inquiries regarding the use of the coatings records which were unrelated to falsification were provided to the Region IV staff for evaluation in conjunction with an ongoing inspection effort. This technical information is included in Exhibit (6).

Telephonic Interview of Richard CUMMINGS

On November 15, 1983, Richard CUMMINGS, an Ebasco Services Incorporated supervisor, was telephonically interviewed by NRC Investigator H. Brooks GRIFFIN. CUMMINGS stated he had been employed as a level III Civil Quality Engineer working for Thomas BRANDT on the Non-ASME side of construction at the Comanche Peak Steam Electric Station from November 1981 until February 1982. CUMMINGS said he left CPSES for a promotion as the Quality Assurance (QA) Site Supervisor at the South Texas Project, located in Bay City, Texas.

CUMMINGS stated he was originally sent to CPSES to conduct document reviews, civil structural reviews and to rewrite procedures. CUMMINGS said that among his duties, he participated in a document review of coatings records to determine the acceptability of the records. CUMMINGS said Michael FOOTE was also involved in the document review with him and that as they reviewed the documents, they mapped the various inspections represented as either acceptable or unacceptable. CUMMINGS said that when he began his review, the coatings records were stored in the Brown & Root vault but were not official vault documents. CUMMINGS said that FOOTE and he sometimes worked on the documents in the vault, and sometimes they checked out the coatings records and took them to their office.

CUMMINGS said his review showed many of the records to be incomplete. CUMMINGS also said many of the documents were separated and that FOOTE and he attached together records for the same location. CUMMINGS said that in other cases, the records were complete and had been assembled together with surface preparation, primer coat, mix sheet, and seal coat inspection checklists. CUMMINGS said he remembered from his review that the steel supports had not been identified according to location which he believed called for a complete backfit. CUMMINGS said that about 50 to 60 percent of the liner plate records were acceptable.

CUMMINGS stated that when he began his review, a backfit program had not been started. CUMMINGS said that FOOTE and he started with the liner plate records because, as construction continued, areas of liner plate would be covered by duct work. CUMMINGS said that if the azimuths on the various inspection

reports were corresponding they would "marry" the documents together on the liner plate. CUMMINGS said that in some cases (not further identified) he made xeroxed copies of corresponding inspection records on the liner plate documentation. CUMMINGS said he added these copies to the inspection packages if he was confident the information on the copies matched the locations and/or dates of the other inspection records. CUMMINGS stated that normally document packages that did not contain all required documents were listed "unsatisfactory" and included in the backfit program.

CUMMINGS said he believed a former coatings supervisor, Robert HAMILTON, had in some cases recorded the tag numbers (location numbers) on the inspection records after they had been submitted by the coatings inspectors. CUMMINGS said he also believed that HAMILTON had already been mapping areas prior to his (CUMMINGS) arrival on site. CUMMINGS said he did not keep a log for his review, and he remembered that NCRs (nonconformance reports) had already been written for coatings records made prior to the NRC's Notice of Violation in 1981.

CUMMINGS said he did not believe that areas mapped as having adequate documentation were to be included in the backfit program. CUMMINGS stated he recommended to his supervisors that these old records be attached to the new inspection records created during the backfit program, but said he did not know if his suggestion had been followed after he left CPSES. CUMMINGS stated he did not falsify any of the coatings records, nor did he know of anyone else falsifying these records. CUMMINGS stated he did not complete the document review because he was reassigned following his promotion.

INVESTIGATOR'S NOTE: The technically related portions of CUMMINGS' responses to inquiries regarding the use of the coatings records which were unrelated to falsification were provided to the Region IV staff for evaluation in conjunction with an ongoing inspection effort.

Interview of Neill BRITTON

On October 27, 1983, Neill BRITTON, a Brown & Root, Inc. coatings QC lead inspector, was interviewed by NRC Investigator H. Brooks GRIFFIN. BRITTON's testimony was recorded in the form of a signed, sworn statement which is included in this report as Exhibit (7). BRITTON stated he had previously worked as a coatings documentation review coordinator for coatings records made prior to 1981. BRITTON said he conducted this review from February to July 1983. BRITTON said he had prepared a log to record the new coatings "PC" numbers he issued to the old inspection records, and to reference NCR numbers on each inspection package. BRITTON said the NCR numbers referenced were written on coatings inspection documentation generated prior to April 1981 which was found to be incomplete or inadequate as described in an NRC Notice of Violation on the coatings records in 1981.

BRITTON said he was requested to perform this review by Thomas BRANDT (supra), and that the coatings were stored in BRANDT's office. BRITTON said he learned that Michael FOOTE and Richard CUMMINGS had previously conducted a partial review of these coatings records for liner plate in the reactor containment in Unit I. BRITTON said that during his review, he separated the various inspection records including surface preparations, primer applications, and seal coat checklists because each was covered by a different procedure. BRITTON said he also mapped locations for each of the inspection records as "satisfactory" or "unsatisfactory." BRITTON said his log started with "PC" number 00001 and continued through 03700. BRITTON stated he divided the records into the various groups identified by the NCRs such as liner plate, concrete, cable tray hangers, conduit supports, and miscellaneous steel.

BRITTON said the reason for his review was to ensure the records were complete and ready for the vault rather than reviewing them for sufficiency or adequacy. BRITTON said he did not make any additional entries other than the "PC" numbers and NCR numbers, nor did he create any new documentation added to these records. BRITTON stated he did not falsify any of these records, nor did he know of any falsification of coatings records.

BRITTON stated it was his understanding that NCRs for liner plate and concrete required total backfit inspections to be dispositioned. BRITTON said the other NCRs were to be partially backfitted and had been accepted based on a representative sampling. BRITTON said this was accomplished through a revision of the backfit procedures.

BRITTON said he reviewed all of the documents referenced in his log, and because they referenced an NCR and had been found to be inadequate or discrepant, they were not to be used as final coatings documentation. BRITTON said these records did not meet the ANSI standards for adequacy. BRITTON said these inspection checklists were in some cases incomplete, xeroxed, and contained unidentified entries and white-out. BRITTON said these inspection records were logged into the vault for historical purposes and were not to be represented as satisfactory Quality records.

BRITTON said that coatings records made since 1981 and those created up until the time of room turnover were the only acceptable Quality coatings records. BRITTON said the records made prior to 1981 had not been closed and will not be closed until the backfit program is completed.

INVESTIGATOR'S NOTE: The technically related portions of BRITTON's responses to inquiries regarding the use of the coatings records which were unrelated to falsification were provided to the Region IV staff for evaluation in conjunction with an ongoing inspection effort. This technical information is included in Exhibit (7).

Interview of Harry WILLIAMS

On November 7, 1983, Harry WILLIAMS, a Dravo Constructors, Inc. (Dravo) employee and former Dravo supervisor at the Comanche Peak Steam Electric Station, was interviewed by NRC Investigators H. Brooks GRIFFIN and Donald D. DRISKILL in Pittsburgh, Pennsylvania. This interview was recorded by an NRC contract court reporting service, and a transcript is included with this report as Exhibit (8). WILLIAMS was represented for the purposes of this interview by John KINZEY, a Dravo attorney. WILLIAMS stated he supervised Brown & Root QC inspectors in coatings and concrete at CPSES for about four and one-half years beginning in 1979. WILLIAMS said he was promoted to supervisor over coatings in June 1982 and worked in that capacity until September 1983.

WILLIAMS stated he was aware of coatings document reviews and mapping conducted by Michael FOOTE and Richard CUMMINGS, and subsequently by Neill BRITTON. WILLIAMS said he did not participate in these reviews. WILLIAMS recalled he had been responsible for assembling the coatings records prior to these reviews and having them taken to the Brown & Root vault. WILLIAMS said that prior to that time, the coatings records were stored in Robert HAMILTON's QC shack. WILLIAMS said the review conducted by FOOTE and CUMMINGS resulted in the backfit program ordered by Ronald TOLSON on coatings and the NCRs written on the existing records. WILLIAMS said BRITTON was in charge of the coatings backfit program for inspections conducted prior to April 1981.

WILLIAMS said some of the old inspection documentation was determined to be adequate, and coatings maps reflected the areas that had adequate documentation. WILLIAMS indicated that areas with adequate documentation were not included in the backfit, and that QC inspectors performing the backfit had access to the old inspection records. WILLIAMS guessed that about 98 percent of the coatings inspections performed prior to April 1981 had to be backfitted. WILLIAMS recalled that FOOTE and CUMMINGS had characterized most of the inspection records included in their review as inadequate records. WILLIAMS said he did not know of any additions or entries made on these old records during the reviews, nor did he know of any falsification of the old inspection records. WILLIAMS said he believed the old coatings inspection records were still in the same form and condition as they were when they were created.

INVESTIGATOR'S NOTE: The technically related portion of WILLIAMS' responses to inquiries regarding the use of the coatings records which were unrelated to falsification were provided to the Region IV staff for evaluation in conjunction with an ongoing inspection effort. This technical information is included in Exhibit (8).

Interview of James HAWKINS

On January 10, 1984, James HAWKINS, the Assistant QA Manager for Baldwin Associates at the Clinton Power Station, was interviewed by DPC Investigators H. Brooks GRIFFIN and Wenzel E. FROST in Clinton, Illinois. HAWKINS' testimony was recorded in the form of a signed, sworn statement which is included with this report as Exhibit (9). HAWKINS stated he worked at CPSES as the Texas Utilities Generating Company QA representative on contract from Gibbs & Hill. HAWKINS said his duties included surveillance of Brown & Root QC inspectors. HAWKINS said he began his work at CPSES in January 1975 and worked there until November 1981.

HAWKINS recalled that when Ronald TOLSON was appointed the Non-ASME QC Supervisor (subsequently, the TUGCO site QA supervisor) at CPSES, TOLSON appointed him the Non-ASME QC manager. HAWKINS said he supervised coatings QC inspectors as part of his duties. HAWKINS recalled that Daniel HASH worked as the first line supervisor over the coatings QC inspection crew for about six months, and Harry WILLIAMS was brought in as HASH's supervisor. HAWKINS said HASH left his employment with Brown & Root for a better job, and was replaced by Robert HAMILTON. HAWKINS stated that although he remembered disagreements between WILLIAMS and the two supervisors, HASH and HAMILTON, he did not believe that WILLIAMS and he supported the craft over the QC inspectors.

When questioned about the conditions of the coatings QC records, HAWKINS stated the coatings program at CPSES was the creation of TOLSON, and he indicated the state of the records was TOLSON's responsibility. HAWKINS said he later tried to institute a log system for painted items rather than continue the rework inspections because of the continued damage to the equipment during ongoing construction. HAWKINS stated his log system was suspended by the NRC's 1981 inspection.

HAWKINS stated he did not recall HAMILTON telling him about the incompleteness of the coating records after HAMILTON was made supervisor. HAWKINS said that HAMILTON would have known about the state of the records before he made supervisor because HAMILTON was an inspector before he was a supervisor.

HAWKINS said that following the MRC 1981 Notice of Violation, item numbers and location identification were incorporated into the inspection records. HAWKINS said he did not know of any falsification related to the inspection checklists made prior to April 1981.

Interview of Myron G. KRISHER

On November 28, 1983, Myron (Curley) G. KRISHER, an Ebasco Services Incorporated supervisor at the Comanche Peak Steam Electric Station, was interviewed by NRC Investigators H. Brooks GRIFFIN and Donald D. DRISKILL. KRISHER's testimony was recorded using the services of an NRC contract court reporting service. A copy of the transcript is included with this report as Exhibit (10). KRISHER stated he was presently the QC Supervisor for Reactor Building I, and he had previously held the position of Non-ASME QC Supervisor. KRISHER stated his immediate supervisor was Thomas BRANDT.

KRISHER stated he was not responsible for the supervision of QC inspectors involved in the coatings backfit program and ongoing inspections. KRISHER said he was aware of the document reviews conducted by FOOTE, CUMMINGS, and later, BRITTON, but said he (KRISHER) did not participate in the reviews. KRISHER stated the backfit program for coatings had been eliminated through a statistical analysis of completed reinspections and the establishment of different acceptance criteria. KRISHER stated he was not aware how the old coatings QC inspections records were to be used.

INVESTIGATOR'S NOTE: The technically related portions of KRISHER's responses to inquiries regarding the use of the coatings records which were unrelated to falsification were provided to the Region IV staff for evaluation in conjunction with an ongoing inspection effort. This technical information is included in Exhibit (10).

Interview of Thomas BRANDT

On December 1, 1983, Thomas BRANDT, an Ebasco Services Incorporated supervisor at CPSES, was interviewed by NRC Investigators H. Brooks GRIFFIN and Donald D. DRISKILL, and the interview was recorded by an NRC contract court reporting service. A transcript of BRANDT's testimony is included with this report as Exhibit (11). McNeill WATKINS, Attorney for Debevoise & Lieberman, was present and represented BRANDT. BRANDT indicated he worked under the supervision of the Site QA Supervisor, Ronald TOLSON.

BRANDT stated that following the NRC's Notice of Violation on coatings inspection records made prior to April 1981, a backfit program was initiated for areas determined to have inadequate inspection documentation. BRANDT said that Michael FOOTE and Richard CUMMINGS first conducted the document review and mapped the areas as having adequate or inadequate documentation. BRANDT said Neill BRITTON also conducted a review subsequent to the one conducted by FOOTE and CUMMINGS. BRANDT said separate maps were made for surface preparation, primer application, and finish coat, and he noted that all records were assigned new numbers and were made a part of plant records. BRANDT said he did not recall ever altering or making copies to these old inspection records to make them acceptable records, nor did he know of any other inspectors having done so.

BRANDT said the areas having adequate documentation were excluded from backfit. BRANDT said he believed the QC inspectors had access to the old records while they were conducting backfit inspections, although he said he suspected there were instances where inspectors included areas in the backfit inspection without checking to see if the old records were deemed adequate. BRANDT stated that originally a 100 percent backfit concept was employed, but that after thousands of destructive tests, a statistical sampling determined a 90 percent confidence level and backfit inspections were suspended.

INVESTIGATOR'S NOTE: The technically related portions of BRANDT's responses to inquiries regarding the use of the coatings records which were unrelated to falsification were provided to the Region IV staff for evaluation in conjunction with an ongoing inspection effort. This technical information is included in Exhibit (11).

Interview of Ronald TOLSON

On December 2, 1983, Ronald TOLSON, the Texas Utilities Generating Company Construction QA Supervisor for the Comanche Peak Steam Electric Station, was interviewed by NRC investigators H. Brooks GRIFFIN and Donald D. DRISKILL. The interview was recorded by an NRC contract court reporting service. A transcript of TOLSON's testimony is included with this report as Exhibit (12). McNeill WATKINS, Attorney for Debevoise & Lieberman, was present and represented TOLSON.

TOLSON stated that following the NRC's 1981 Notice of Violation on coatings documentation, NCRs were written and methods of possible corrective action were considered by the QA department and engineering. TOLSON said he made a decision to completely backfit liner plate, miscellaneous steel, and concrete. TOLSON said he later made a decision to employ a representative sampling of backfit inspections to close the NCR on miscellaneous steel.

TOLSON stated the old inspection records may have been used during the backfit inspection program to exclude areas believed to have adequate documentation. TOLSON said he believed that in many instances QC inspectors backfitted (inspected) areas rather than check to determine if adequate documentation already existed. TOLSON indicated that some of the inspection records made prior to 1981 may be used as documentation attesting to the adequacy of painted surfaces, but he was not sure if they were to be used for other than historical purposes.

INVESTIGATOR'S NOTE: Although not contained in his transcript, TOLSON repeated as he had before in a separate inquiry by this Reporting Investigator, that he did not know of any additions, deletions, or falsification of documentation related to the coatings inspection documentation. The technically related portions of TOLSON's responses to inquiries regarding the use of the coatings records which were unrelated to falsification were provided to the Region IV staff for evaluation in conjunction with an ongoing inspection effort. This technical information is included in Exhibit (12).

On January 17, 1984, TOLSON was telephonically reinterviewed by the IIRC Reporting Investigator concerning a conversation he had held in the latter part of 1983 with David CHAPMAN, the TUGCO Manager for Quality Assurance for CPSES, on the subject of xeroxed copies made of coatings inspection records (page 31 pertains to the conversation). TOLSON indicated he had been contacted by CHAPMAN and that they had discussed the contents of their earlier conversation. TOLSON said he told CHAPMAN that the xeroxed copies he had been referring to were the original coatings inspection records xeroxed by the coatings inspectors at the time the inspections were conducted. TOLSON restated he was not aware of any xeroxed copies made by the reviewing supervisors during the document reviews.

Interview of David N. CHAPMAN

On January 16, 1983, David CHAPMAN, the Texas Utilities Generating Company (TUGCO) Manager of Quality Assurance for the Comanche Peak Steam Electric Station, was interviewed by NRC Investigators H. Brooks GRIFFIN and Donald D. DRISKILL at the TUGCO offices in Dallas, Texas. CHAPMAN stated he had worked in his present position since September 1976.

CHAPMAN stated that after the 1981 NRC Notice of Violation on coatings inspection documentation, Ronald TOLSON and Thomas BRANDT made a decision to conduct a review of the coatings records to determine if any of the records were adequate as Quality documents. CHAPMAN said that those records deemed adequate as a result of the review were excluded from the backfit program.

CHAPMAN stated he concurred with TOLSON's decision to suspend the backfit program based on a statistical analysis of completed reinspections which established a sufficient confidence level. CHAPMAN also stated he did not know if coatings QC had access to those coatings records created prior to April 1981 during their reinspections in the backfit program.

CHAPMAN was questioned regarding his knowledge of any additions or falsification involved in the document reviews of the coatings inspection records. CHAPMAN stated he recalled a recent telephone conversation with Ronald TOLSON in which he believed TOLSON referenced a problem that had recently come to his attention regarding additions made to the original inspection records during the review conducted by Brown & Root supervisors. CHAPMAN said he did not recall who TOLSON indicated was responsible for making the xeroxed copies, but agreed to discuss the information with TOLSON and arrange for TOLSON to provide the details of this information to the NRC.

On January 17, 1984, CHAPMAN was telephonically interviewed by the NRC Reporting Investigator regarding his contact with TOLSON. CHAPMAN explained that TOLSON had told him the xeroxing they had discussed previously related to the original coatings inspection records. CHAPMAN reported that TOLSON specifically stated he had not been referring to his knowledge of any xeroxed copies made by Brown & Root supervisors during the document reviews.

Status of Investigation

The status of this investigation is CLOSED.

EXHIBITS

- (1) Statement of [REDACTED]
- (1.a.) Confidentiality Agreement of [REDACTED]
- (1-1) [REDACTED] Inspection Checklist
- (1-2) [REDACTED] Inspection Checklist
- (2) Statement of [REDACTED]
- (2.a.) Confidentiality Agreement of [REDACTED]
- (2-1) [REDACTED]
- (2-2) [REDACTED] Inspection Checklist
- (2-3) [REDACTED] Inspection Checklist
- (2-4) [REDACTED] Inspection Checklist
- (2-5) [REDACTED] Inspection Checklist
- (2-6) [REDACTED] Inspection Checklist
- (2-7) [REDACTED] Inspection Checklist
- (2-8) [REDACTED] Inspection Checklist
- (2-9) [REDACTED] Inspection Checklist
- (2-10) [REDACTED] Inspection Checklist
- (2-11) [REDACTED] Inspection Checklist
- (2-12) [REDACTED] Inspection Checklist
- (2-13) [REDACTED] Inspection Checklist
- (2-14) [REDACTED] Inspection Checklist
- (2-15) [REDACTED] Inspection Checklist
- (2-16) [REDACTED] Inspection Checklist
- (3) Statement of Houston GUNN
- (3-1) PC03212 Inspection Checklist
- (3-2) PC03421 Inspection Checklist
- (3-3) PC03422 Inspection Checklist
- (3-4) PC03423 Inspection Checklist
- (3-5) PC03424 Inspection Checklist
- (3-6) PC03425 Inspection Checklist
- (3-7) PC03426 Inspection Checklist
- (3-8) PC03427 Inspection Checklist
- (3-9) PC03428 Inspection Checklist

10-20-83

(3-10)	PC03429 Inspection Checklist	
3-11)	PC03430 Inspection Checklist	
(3-12)	PC03431 Inspection Checklist	
(3-13)	PC03432 Inspection Checklist	
(3-14)	PC03433 Inspection Checklist	
(3-15)	PC03434 Inspection Checklist	
(3-16)	PC03435 Inspection Checklist	
(3-17)	PC03436 Inspection Checklist	
(3-18)	PC03437 Inspection Checklist	
(3-19)	PC03438 Inspection Checklist	
(3-20)	PC03439 Inspection Checklist	
(3-21)	PC03440 Inspection Checklist	
(3-22)	PC03237 Inspection Checklist	
(3-23)	PC01397 Inspection Checklist	
(3-24)	PC01398 Inspection Checklist	
(3-25)	PC01399 Inspection Checklist	
(3-26)	PC01400 Inspection Checklist	
(3-27)	PC01401 Inspection Checklist	
(3-28)	PC01402 Inspection Checklist	
(4)	Statement of Daniel HASH, Jr.	12-08-83
(5)	Statement of Robert HAMILTON	12-07-83
(6)	Statement of Michael FOOTE	11-05-83
(7)	Statement of Neill BRITTON	10-27-83
(8)	Transcript of Harry WILLIAMS	11-07-83
(9)	Statement of James HAWKINS	1-10-84
(10)	Transcript of Myron G. KRISHER	11-28-83
(ii)	Transcript of Thomas BRANDT	12-01-83
(12)	Transcript of Ronald TOLSON	12-02-83

EXHIBIT (1.a.)

EXHIBIT (1-1)

EXHIBIT (1-2)

EXHIBIT (2-1)

EXHIBIT (2-2)

EXHIBIT (2-3).

EXHIBIT (2-6)

EXHIBIT (2-8)

EXHIBIT (2-12)

EXHIBIT (2-13)

