

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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In the matter of: Investigative Interview of  
Heyward A. Hutchinson, Jr.

Docket No.

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Location: Arlington, Texas

Pages: 1 through 79

Date: Monday, February 27, 1984

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UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

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In the matter of:                   :  
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Investigative Interview of       :  
HEYWARD A. HUTCHINSON, JR.       :  
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Suite 835  
611 Ryan Plaza Drive  
Arlington, Texas

Monday, February 27, 1984

The above-entitled interview commenced at  
1:35 p.m., pursuant to notice.

BEFORE:

H. BROOKS GRIFFIN, Investigator  
DONALD D. DRISKILL, Investigator  
Office of Investigations  
U.S. Nuclear Regulatory Commission  
Region IV  
Suite 1000  
611 Ryan Plaza Drive  
Arlington, Texas 76011

P R O C E E D I N G S

1  
2 MR. GRIFFIN: For the record, this is an inter-  
3 view of Heyward Hutchinson, Jr., who is employed by Brown  
4 and Root, Incorporated --

5 MR. HUTCHINSON: That's correct.

6 MR. GRIFFIN: -- at Comanche Peak Steam and Elec-  
7 tric Station. The location of this interview is the NRC  
8 Region IV Office of Investigations in Arlington, Texas.

9 Present at this interview are Heyward Hutchinson,  
10 Mr. Charnoff and Mr. Jordan, both attorneys for Mr.  
11 Hutchinson in this matter, --

12 MR. CHARNOFF: Yes, that's right.

13 MR. GRIFFIN: -- Don Driskill and Brooks Griffin  
14 for the NRC; and, of course, the court reporter, Judith  
15 Toberman.

16 This interview is being transcribed by a court  
17 reporter. The subject of this interview concerns, among  
18 other things, the Cygna report and Mr. Hutchinson's knowledge  
19 of the incident surrounding the contract and on-site audit  
20 conducted by Cygna.

21 Before we go into the interview, Mr. Hutchinson,  
22 I want to ask you some questions about your attorneys.

23 Are you represented here today?

24 MR. HUTCHINSON: Yes, sir, I am.

25 MR. GRIFFIN: Who is your representative?

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1 MR. HUTCHINSON: My representative?

2 MR. CHARNOFF: Can he answer that in the plural?

3 MR. GRIFFIN: Yes.

4 MR. HUTCHINSON: Both of these gentlemen, Mr.  
5 Jordan and Gerry.

6 MR. GRIFFIN: Mr. Charnoff, do you agree with  
7 Mr. Hutchinson that you are representing him as an individual  
8 in this proceeding?

9 MR. CHARNOFF: That's right; absolutely.

10 MR. GRIFFIN: Are you also retained as counsel to  
11 Brown and Root?

12 MR. CHARNOFF: Yes, from time to time.

13 MR. GRIFFIN: Are you presently, at this time, re-  
14 tained?

15 MR. CHARNOFF: Yes, on matters not related to  
16 Comanche Peak I am, yes.

17 MR. GRIFFIN: Mr. Jordan, do you personally repre-  
18 sent Mr. Hutchinson individually in this matter?

19 MR. JORDAN: Yes, I do.

20 MR. GRIFFIN: Do you also have a continuing  
21 business relationship as counsel to Brown and Root?

22 MR. JORDAN: Yes, I do.

23 MR. GRIFFIN: Mr. Hutchinson, do Mr. Charnoff and  
24 Mr. Jordan -- is it your understanding that they represent  
25 you individually?



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MR. HUTCHINSON: Yes, it is.

MR. GRIFFIN: Has anybody told you or instructed you to have Mr. Jordan and Mr. Charnoff as your personal representative?

MR. HUTCHINSON: No; not by name, no.

MR. GRIFFIN: What instructions did you receive regarding counsel?

MR. HUTCHINSON: As best I recall, it was last Thursday John Merritt told me that I needed to get my own counsel; that the TUGCO lawyers would no longer be involved. I think that was Thursday.

MR. GRIFFIN: How did you select your counsel?

MR. HUTCHINSON: Through an appeal to our Project Manager, through Doug Frankum.

MR. GRIFFIN: You asked Mr. Frankum what?

MR. HUTCHINSON: I said I needed some legal counsel.

MR. GRIFFIN: Did he recommend Mr. Charnoff?

MR. HUTCHINSON: No, he didn't; he didn't recommend anybody.

MR. GRIFFIN: Then could you expand on that a little bit; how did you go about picking your counsel?

MR. HUTCHINSON: Then I got a call from Bill Bedman, who is a Brown and Root attorney. He said that Mr. Jordan would be giving me a call.

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1 MR. GRIFFIN: So Brown and Root arranged for your  
2 counsel.

3 MR. HUTCHINSON: Mr. Bedman did, I assume; yes.

4 MR. GRIFFIN: Obviously, you are aware of Brown  
5 and Root's position or commitment regarding construction and  
6 licensing proceedings at Comanche Peak. As this interview  
7 proceeds, do you believe that the advice that you will re-  
8 ceive from Mr. Charnoff or Mr. Jordan would be representing  
9 Brown and Root or representing you? What is your  
10 understanding?

11 MR. HUTCHINSON: They will be representing me.

12 MR. GRIFFIN: If a conflict of interest or a  
13 potential conflict of interest were to arise between Brown  
14 and Root policy or what is good for Brown and Root versus  
15 what is good for you, what is your understanding with your  
16 attorneys?

17 MR. HUTCHINSON: If there was a conflict of  
18 interest, they would be obligated to report that conflict.

19 MR. GRIFFIN: To whom?

20 MR. HUTCHINSON: To Brown and Root, if something  
21 I did was in conflict with Brown and Root.

22 MR. GRIFFIN: I'm sorry; you've misunderstood  
23 what I said. If there is a conflict between their repre-  
24 senting Brown and Root and representing you, what have they  
25 told you will be their advice to you?

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1 MR. HUTCHINSON: I don't know that we've discussed  
2 that. The only conflict of interest that I'm aware of is if  
3 I did something that was not in the best interest of Brown  
4 and Root, then they would be obligated to inform Brown and  
5 Root about it.

6 MR. GRIFFIN: So they are representing Brown and  
7 Root here today?

8 MR. HUTCHINSON: They're representing me today.

9 MR. GRIFFIN: But you just said that they would  
10 be informing Brown and Root of the conflict. Now, are they  
11 representing you, or are they representing Brown and Root  
12 today?

13 MR. HUTCHINSON: They are representing me.

14 MR. GRIFFIN: And you think if a conflict should  
15 arise that their advice will be in behalf of Brown and Root  
16 or in your behalf?

17 MR. HUTCHINSON: It should be in my behalf.

18 MR. GRIFFIN: Mr. Charnoff, what is your under-  
19 standing; should a conflict arise, what would be your course  
20 of action as relates to Mr. Hutchinson?

21 MR. CHARNOFF: Let me answer that but also tell  
22 you what I told Mr. Hutchinson this morning. One is I did  
23 advise Mr. Hutchinson that he was free to come to see you  
24 with his own attorney, that is, not anybody furnished by  
25 Brown and Root; he is free not to see you if he elects not to

1 see you; he is free to use us and we would be his attorneys  
 2 furnished by Brown and Root; that we are also counsel to  
 3 Brown and Root and if there were a conflict of interest that  
 4 we would see, we would have to withdraw from the case, and  
 5 we would so tell him at that point.

6 One of the purposes of the preliminary interview  
 7 this morning was to determine if there is or is not a con-  
 8 flict. We have determined so far that there is no conflict.

9 I think that answers your question.

10 MR. GRIFFIN: Mr. Jordan, what is your under-  
 11 standing of potential conflict of interest between inquiries  
 12 we might make of Mr. Hutchinson versus your position as a  
 13 Brown and Root attorney?

14 MR. JORDAN: My position and understanding is the  
 15 same as stated by Mr. Charnoff.

16 MR. GRIFFIN: What would you do if you perceived  
 17 a conflict of interest in the course of this interview?  
 18 What would you individually do?

19 MR. JORDAN: In the course of this interview?

20 MR. GRIFFIN: Yes.

21 MR. JORDAN: I would ask for a recess and I would  
 22 advise Mr. Hutchinson at that moment that I had just learned  
 23 of a possible conflict. I would explain to him what his  
 24 legal rights were with respect to this interview and go for-  
 25 ward from there based on what he desired to do.

1 MR. GRIFFIN: So, Mr. Hutchinson, these two gentle-  
2 men represent you in this matter, but you also realize that  
3 they are retained by Brown and Root?

4 MR. HUTCHINSON: Yes, sir.

5 MR. GRIFFIN: Who is going to pay for their ser-  
6 vices as relates to their work here today? Are you going to  
7 pay for their services?

8 MR. HUTCHINSON: That hasn't been discussed.

9 MR. GRIFFIN: And these two gentlemen were selected  
10 as your counsel by Mr. --

11 MR. HUTCHINSON: Mr. Bedman.

12 MR. CHARNOFF: Let me make it clear, I hope Brown  
13 and Root will pay us for our services.

14 MR. HUTCHINSON: That hasn't been discussed.

15 MR. CHARNOFF: Let's be clear. Brown and Root is  
16 paying us to provide the services to Mr. Hutchinson so long  
17 as he wants our services to represent him.

18 MR. GRIFFIN: Mr. Hutchinson, would you please  
19 rise and raise your right hand? We're going to swear you to  
20 the contents of your testimony.

21 Whereupon,

22 HEYWARD ASGELL HUTCHINSON, JR.

23 was called for examination and, having been first duly sworn,

24 was examined and testified as follows:

25



E X A M I N A T I O N

BY MR. GRIFFIN:

Q I would like to begin my questions for you, Mr. Hutchinson, by asking you how you are currently employed?

A I am currently Project Control Manager for Brown and Root.

Q Mr. Hutchinson, you say you are the Project Control Manager?

A That's correct.

Q What duties are involved in your work? What are your duties?

A I'm directly responsible for three groups, one being Cost and Estimating, another one is Procurement and, lastly, Document Control.

Q Who is your immediate subordinate in Document Control?

A Frank Strand.

Q What is his title?

A He is Supervisor of DCC, Document Control Center.

Q Who is your immediate supervisor?

A Presently, it's Carroll Graves.

Q What is his title?

A Procurement and Controls Manager for TUSI, or TUGCO.

Q And that is Texas Utility Service, Incorporated?



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A. Yes.

Q Mr. Hutchinson, do you have direct supervision over the employees of the Document Control Center?

A. I have that supervision through Frank Strand, yes.

Q In the course of your daily activities, do you ever give instructions to individuals in the Document Control Center?

A. Not as a rule, no; but it does happen, yes.

Q Are you familiar with the daily activities of the Document Control Center?

A. Generically, from the 30,000-foot level I am. I'm a manager. I've got a lot of people to look after, a lot of different groups, and I know essentially what goes on; not to the nuts and bolts level, no.

Q Are you aware of the contract by TUGCO -- that is Texas Utilities Generating Company -- their contract with Cygna? Are you familiar with this contract?

A. No; I know that one exists.

Q No, but you know one exists?

A. I'm not familiar with the nuts and the bolts of the contract.

Q I'm not asking you about the nuts and the bolts. Are you familiar, are you aware that there is a contract between TUGCO and an audit group called Cygna?

A. Yes, I am.

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1 Q As relates to the Document Control Center, do you  
2 know what the contract entailed, generally speaking?

3 A I knew that that was part of the verification  
4 effort they were going to do when they came down the first  
5 time. They were going to look at the Document Control  
6 Center. Beyond that, I don't know.

7 Q So one of the functions of the Cygna review was  
8 to, can I use the word, audit the Document Control Center, is  
9 that correct?

10 A Correct.

11 Q What was your knowledge of the origins of the  
12 Cygna contract? Were you aware that they were going to be  
13 retained before the contract was given?

14 A No.

15 Q Were you consulted by anybody in TUGCO?

16 A No.

17 Q When did you become aware that Cygna was going to  
18 do an audit of the Document Control Center?

19 A Probably, just a few days before they came. They  
20 came in July.

21 Q Are you aware of what the Cygna representatives  
22 did during their July visit as relates to Document Control?

23 A I know generally what they did, yes.

24 Q Could you tell me what that is, briefly?

25 A As I recall, they looked at design change logs

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1 and verified or tried to verify that the master logs in DCC  
2 matched other logs that were kept up by the file custodians.

3 Q Are you aware of the satellite concept implemented  
4 in the spin-offs from the Document Control Center?

5 A Yes.

6 Q Did Cygna's review in July involve auditing the  
7 capacity or capability of the satellites and their function?  
8 Do you understand what I'm saying?

9 A Yes. When Cygna was there in July the satellites  
10 were in the infancy stage; they weren't set up yet.

11 Q Did Cygna make any inquiries or did they attempt  
12 to evaluate that system?

13 A As I recall, they may have asked some questions,  
14 but I don't know about any evaluation, you know, "Where are  
15 you going with it?"

16 Q Document Control was, I believe, in a state of  
17 change from the centralized system Document Control Center to  
18 this satellite concept at that time; is that right?

19 A That's right.

20 Q If their audit involved reviewing Document Control  
21 then they would necessarily have to evaluate the system that  
22 was being prepared. I'm asking you: were they tasked with  
23 evaluating the satellite concept and its implementation?

24 A Not that I'm aware of, no.

25 Q As relates to Document Control, did the Cygna

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1 review involve evaluation of the computer system?

2 MR. CHARNOFF: Again, we're in July 1983?

3 MR. GRIFFIN: Yes.

4 THE WITNESS: The only computer system they could  
5 have looked at then would have been the one that had the  
6 drawings on it.

7 BY MR. GRIFFIN:

8 Q Was that part of their review?

9 A I don't recall.

10 Q Cygna also returned in November; is that correct?

11 Are you aware of that?

12 A In November?

13 Q Yes.

14 A They were back in October.

15 Q What was the purpose of their October visit then?

16 A As I understood it, they were there to re-verify  
17 some of the findings they had in July, to make sure that we  
18 had the satellites in position and set up and that we had  
19 merged the design change logs into a computer base.

20 Q So they were evaluating the satellite system and  
21 the use of the computer for keeping up with --

22 A -- design changes.

23 Q Design changes only, or did the computer system  
24 also contain the design drawings?

25 A The computer system for the drawings is already in

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1 place. It's been in place for several years.

2 Q So the system contained the ongoing changes re-  
3 lated to these drawings that were already in the computer?

4 A Say that one more time.

5 Q So their audit or evaluation had to do with the  
6 design changes of the existing drawings?

7 A The computerized portion of the design changes,  
8 yes.

9 Q Do you happen to know if Cygna's review also in-  
10 cluded design verification?

11 A I'm almost sure that it did, but beyond that I  
12 don't know what -- I know they went up and I think they  
13 talked to the DCTG Group.

14 Q Was it during this second visit that we're speak-  
15 ing of right now that you were given the list of drawing  
16 numbers that Cygna wanted to review? I think you were  
17 allegedly given this list on October 24, 1983; is that  
18 correct?

19 A That's correct.

20 Q Who gave you this list?

21 A Nancy Williams.

22 Q Who is Nancy Williams?

23 A She is with Cygna.

24 Q Do you know what her capacity with Cygna is?

25 A She was in charge of the audit.



1 Q The whole audit or just the part that pertained  
2 to Document Control?

3 A I think she had the whole thing.

4 Q Where were you when Ms. Williams gave you this  
5 list?

6 A I was in my office.

7 Q On-site; is that correct?

8 A That's right.

9 Q Do you remember what time of day it was on the 24th

10 A Some time in the afternoon.

11 Q Prior to Ms. Williams giving you this list, had  
12 you received any information or any notification from anyone  
13 that this list was going to be provided?

14 A No, none that I recall.

15 Q Had you discussed with any of the Cygna repre-  
16 sentatives the need to receive this list?

17 A I don't recall having discussed it, no.

18 Q Did you know in advance of her providing you the  
19 list of print-outs that they wanted to look at it? Did any-  
20 body in any manner -- what I'm asking you to do is to tell  
21 me whether you had any knowledge whatsoever that you were  
22 going to be provided with a list of drawings that Cygna  
23 wanted to look at.

24 A I don't recall anybody discussing it at all.

25 Q So when Ms. Williams came in and provided you



1 with this list, this was unplanned as far as you knew?

2 A. As far as I knew, yes.

3 Q. What was Ms. Williams' explanation regarding this  
4 list?

5 A. As I recall, she gave me the list and said, "This  
6 is what we need to see. We'll be back tomorrow," or some-  
7 thing to that effect.

8 Q. Had you on any occasion prior to that time re-  
9 ceived any such pre-notification from Cygna representatives  
10 as to what they wished to review?

11 A. No, not me.

12 Q. In their previous on-site audits, had they ever  
13 provided you with similar requests for documentation?

14 A. I don't recall any list in the July audit. I  
15 think they provided one in August when they were back for  
16 some sort of effort in August. But not to me; I was gone  
17 that week.

18 Q. But you heard from some third party that they  
19 provided a list in that instance?

20 A. Yes.

21 Q. Do you know, from your information that you re-  
22 ceived after you returned from vacation, what the contents of  
23 this earlier list were or what it requested?

24 A. No, I don't.

25 Q. But you just heard from somebody that there had

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1       been a previous request?

2           A.       Yes.

3           Q.       Who did you hear this from?

4           A.       I don't know.

5           Q.       Do you have any information or any notes, third  
6 parties that you can talk to who might jog your memory as to  
7 who told you that they had previously requested a list?

8           MR. CHARNOFF: That they previously requested a  
9 list?

10          MR. GRIFFIN: I'm asking him if there is anything,  
11 any place he can go, anybody he can talk to, who could --

12          THE WITNESS: I could talk to some of the people  
13 that would be in DCC, Frank and some of his people, and ask  
14 them about the list.

15          BY MR. GRIFFIN:

16          Q.       So they might be able to fill in the name?

17          A.       Yes.

18          Q.       On the day that you received the list from Nancy  
19 Williams, did she give you any explanation as to what the  
20 list was when she handed it to you?

21          A.       Nothing more than telling me that: this is what  
22 we want to look at the next day.

23          Q.       Describe the piece of paper she gave to you.

24          A.       It was a handwritten list.

25          Q.       What did it contain?

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1           A        As I recall, it said she needed the computer.  
2 print-outs for the distribution of the drawing and for the  
3 change made.

4           Q        Just the computer print-outs?

5           A        That's all it said, as I recall. Then it listed,  
6 you know, a series of drawings.

7           Q        Were the drawings categorized in any manner? Were  
8 they grouped by the various disciplines? Did they have any  
9 kind of divisions? Or was it simply a list of numbers?

10          A        To me it's just a list of numbers. I'm not close  
11 enough to it to recognize drawing numbers. A list of drawings  
12 is a list of drawings.

13          Q        Did it have any headings above the list of numbers  
14 like "Electrical"?

15          A        Not that I recall, no.

16          Q        Just drawing numbers?

17          A        Just a list of drawings.

18          Q        Was there any other writing on the page other than  
19 the drawing numbers?

20          A        I don't recall any, no.

21          Q        And you say it was handwritten, this list?

22          A        Yes.

23          Q        What did you do with this list?

24          A        As I recall, I picked it up and I started down the  
25 hall with it. I had some meetings to go to. You mean what

j18

1 did I do with it ultimately? I gave it to Ms. Hatley.

2 Q When was that?

3 A It was some time in the afternoon.

4 Q What were your instructions to Ms. Hatley when you  
5 gave her the list?

6 A I gave her the list and I said, you know, "Make  
7 sure we're all right; make sure everything is running; make  
8 sure that we're okay," that Cygna will be in tomorrow.

9 Q Did you tell her that this was a list provided by  
10 Cygna for what was to be reviewed on the following day?

11 A I don't recall anything significant about the con-  
12 versation at all, no more than passing her in the hall.

13 Q Did you instruct Ms. Hatley that this was a list  
14 provided by Cygna?

15 A I don't recall. I really don't.

16 Q Did you characterize the list in any manner? In  
17 that you said it was just a series of numbers, did you give  
18 her any explanation as to what the list was?

19 A Nothing more than: this is what Cygna wants to  
20 look at tomorrow.

21 Q And then you instructed her to make sure that  
22 these were available and in order and what else?

23 A I don't think the instructions went that far.

24 Q Where were you when you talked to Ms. Hatley?

25 A Somewhere in the hall.

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1 Q Was Mr. Strand present when you provided Ms.  
2 Hatley with the list?

3 A No, not then.

4 Q Was Mr. Strand made aware during that afternoon  
5 of your instructions to Ms. Hatley?

6 A I don't recall talking to Frank at all about it  
7 that day.

8 Q So if I go ask Frank about the list being trans-  
9 ferred between you to Ms. Hatley, you don't think he will  
10 have any recollection of having witnessed the transfer or the  
11 instructions you gave?

12 A I don't know what Frank would say.

13 Q But you have no recollection of him having been  
14 there?

15 A No.

16 Q Did you tell Ms. Hatley that the list contained  
17 the packages that Cygna was going to be reviewing  
18 specifically?

19 A No. I don't recall saying anything about  
20 packages. I really don't know what Cygna wanted to look at.  
21 I didn't know whether they wanted to look at packages or  
22 design changes.

23 Q Or print-outs.

24 A Print-outs is the only thing that registers with  
25 me.

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1 Q So the numbers represented print-outs?

2 A To me, yes, print-outs.

3 Q Did you ask Ms. Hatley to make copies of the list?

4 A I don't recall asking her that, no.

5 Q Did you instruct Ms. Hatley to provide copies of  
6 this list to the various satellites?

7 A No.

8 Q Did Ms. Hatley ever return this list to you?

9 A I don't recall ever getting it back.

10 Q Do you presently have a copy of this list?

11 A Yes, I do.

12 Q Is it the original copy, or is it a Xerox?

13 A It's a Xerox copy.

14 Q Who did you receive this from? Who gave you this  
15 list back?

16 A I honestly can't answer that.

17 Q Do you remember when you received it?

18 A As I recall, there was one other meeting that took  
19 place that Tuesday morning.

20 MR. CHARNOFF: Is that the day after you met with  
21 Ms. Williams?

22 THE WITNESS: The day after. I was down in Dan  
23 Hicks' office --

24 BY MR. GRIFFIN:

25 Q Who is Dan Hicks?



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1           A.     At that time he was the Procurement Control  
2     Manager.

3           Q.     Okay; go ahead.

4           A.     He was also in charge of the computers and some  
5     other groups. I remember he and I talking about that list.  
6     At some point during that discussion Nancy and Dave walked in

7           MR. CHARNOFF: Dave who?

8           THE WITNESS: David Wade, who was with TUSI.

9           As I recall, Nancy said she had to leave and if  
10    we had any problems with it, we could reach her at the Lake  
11    Granbury Motor Inn.

12          BY MR. GRIFFIN:

13          Q     You say this is the following day, this being  
14    the day that Cygna did their audit of these print-outs?

15          A.     This would have been Tuesday morning, the 25th.

16          Q     That was the day that Cygna was to do the audit; is  
17    that right?

18          A.     That's the day they were to come in, right.

19          Q     Had they already completed the audit when you had  
20    this conversation with her, with Hicks and --

21          A.     I don't think they had even started yet.

22          Q     Okay; go ahead.

23          A.     That's about all I remember from that meeting. It  
24    was very brief. That's all I recall.

25          Q     Did you have any conversation with Mr. Hicks or

1 Ms. Williams or Dave regarding the list that you had been  
2 provided?

3 A I don't recall anything significant. I was down  
4 to talk to Hicks primarily about computers, the computer  
5 problems.

6 Q What was your understanding on October 24 of the  
7 nature of that particular audit that Cygna was requesting -  
8 let me rephrase that. What was your understanding of areas  
9 that Cygna would be auditing in their review the following  
10 day?

11 A As it relates to DCC?

12 Q Yes.

13 A To make sure that we had the satellites set up,  
14 but the biggest thing was to make sure the discrepancy of  
15 the manual logs had been removed; you know, the things they  
16 found in July, that those no longer existed.

17 Q Are you saying that you had been informed by Cygna  
18 representatives in July that you had deficiencies in the  
19 packages or on the computer, which?

20 A The deficiencies they identified in July were the  
21 ones of the manual logs not matching what was in DCC.

22 Q This is the manual logs that were in the satellites

23 A We didn't have the satellites set up then. The  
24 manual logs in DCC list all the design changes. What they  
25 did, I think, was get that copy and go to one of the five

j23

1 custodians and say, "Let me see your design change log," and  
2 they didn't match.

3 Q They didn't match what was in the computer?

4 A No, it wasn't on the computer yet.

5 Q At all?

6 A No.

7 Q Just to make sure I have an understanding of what  
8 you're comparing here, you're comparing logs with packages;  
9 is that what --

10 A It was manual log against manual log.

11 Do you understand how the concept was set up back  
12 then, --

13 Q I thought I did.

14 A -- before the satellites?

15 Q I thought I did. You're comparing one manual log  
16 against another?

17 A Yes.

18 Q Can you tell me the difference between the two  
19 manual logs?

20 A If they're kept properly, there shouldn't be any  
21 difference.

22 Q So you had duplicate records?

23 A No. We've got a manual log in DCC that's supposed  
24 to be the holy document. If all these file custodians out in  
25 the field are doing their job properly, if they're logging

1 the design changes in against that drawing properly, then  
2 you should be able to pick up this log and look at this one,  
3 and they would be the same.

4 Q The ones in DCC and the ones in the field should  
5 be exactly the same?

6 A They should.

7 Q Basically the same; contain the same design  
8 changes?

9 A Yes.

10 Q I think I do understand.

11 A That's what the satellite thing was supposed to  
12 have done; it was to remove the file custodians out of it  
13 and limit the number of people that could handle the  
14 drawings.

15 Q Who was tasked with implementing or incorporating  
16 the design changes into the drawing?

17 A Whose responsibility was that? I guess ultimately  
18 it is under a group called TNE, TUSI Nuclear Engineering.

19 Q So it's an engineering group, actually?

20 A Yes.

21 Q By this October meeting with the Cygna represen-  
22 tatives, was the system in place by then, the computerization  
23 of the design changes?

24 A I think, as I recall, our target date was to have  
25 it up and running by the 15th of October.

j25

1 Q So it was in effect at that time?

2 A Yes; we may have beaten that a little bit.

3 Q The print-outs that Cygna was requesting involved  
4 retrieving this information from the computers; is that right

5 A Yes.

6 Q So was a purpose in the October visit to receive  
7 examples or samples of what the computer contained for each  
8 package -- what is now no longer a package but a computer  
9 read-out -- regarding drawings and changes against those  
10 drawings?

11 A What I understood they wanted to look at was, if we  
12 gave them a print-out that says "these are the changes that  
13 occurred and here's this drawing," then he was going to take  
14 that and go somewhere within the satellite system and verify  
15 that they had that same piece of paper out there, or that it  
16 could be at least pulled up on the screen.

17 Q Would it be fair then to characterize their re-  
18 view or their audit as a Document Control audit then, if it's  
19 supposed to be in DCC and it's supposed to be in a corre-  
20 sponding satellite?

21 A Is that a Document Control audit? Well, you  
22 should be able to exhibit that you've got the same set of  
23 records in both places, yes. It would be a form of control,  
24 yes.

25 Q Did part of their audit, to your knowledge, involv



j26

1 design verification, meaning that the design changes had been  
2 incorporated on the drawing?

3 A That wouldn't have had anything to do with me. I  
4 don't know what they did up in DCTG.

5 Q So your only part of it had to do with comparing  
6 DCC documentation with satellite documentation?

7 A Yes.

8 Q That's what they were reviewing.

9 A Yes.

10 Q When you received the list of packages -- packages,  
11 I suppose, is the wrong word -- print-outs is it?

12 A The list of drawings.

13 Q The list of drawing numbers that Cygna wanted to  
14 review the following day, did it occur to you that this was  
15 -- and I use this word in quotes -- pre-notification?

16 A No.

17 Q That didn't occur to you?

18 A I didn't treat that list any different than any  
19 other list. A drawing list is a drawing list.

20 Q Based on your knowledge as a supervisor, if I gave  
21 you a drawing number right now and said I was going to come  
22 look at it tomorrow, do you have the facilities to review  
23 what is computerized against that drawing, the changes and  
24 the revisions to the changes; what should be there versus  
25 what is there? Do you have that capacity?



j27

1 I'm asking you: could you audit yourself if I  
2 gave you a particular drawing number?

3 A. Me, personally?

4 Q. Yes.

5 A. No.

6 Q. Do your subordinates have that capability?

7 A. Yes, they could do it.

8 Q. So if you gave one of your subordinates that's in  
9 this area a drawing number, could they pull up that drawing  
10 number, the contents of that drawing number, on the screen of  
11 the computer from DCC and show what should be the proper re-  
12 visions for the various design changes that are supposed to  
13 be contained under that number?

14 A. Yes.

15 Q. Are your subordinates capable of spotting deficiencies  
16 or missing documentation if they had a read-out of what  
17 was contained in DCC versus what was contained in the  
18 satellite?

19 A. You couldn't do it by looking at the screen.

20 Q. How would you do it?

21 A. As part of the normal procedure, before design  
22 drawings are issued from satellites, you know, they'll punch  
23 the button and get the print-out that lists all those design  
24 changes on it. Then they start building a package. They  
25 take the drawing and take each one of these design changes

j28

1 and put with it.

2 Part of what they're supposed to do is look at the  
3 design change and make sure that it is, in fact, against that  
4 drawing. If it's not against that drawing, then they've got  
5 a number to call up in DCTG to say that "I've got C and C  
6 so-and-so and it's not against this drawing. What do I do  
7 with it?"

8 Q That's in the case of a clear-cut error. But if  
9 you provided your satellite with a drawing number that per-  
10 tained to their area that they're responsible for, they could  
11 pull up on the screen, from DCC, what is supposed to be con-  
12 tained in that package; is that right? Then they could pull  
13 the package that the craft uses in its day-to-day and they  
14 could check to see that all those documents, all those  
15 changes, were contained in that package; is that right?

16 A They could do that, yes.

17 Q Is it fair to say that by Cygna providing you with  
18 a list of the drawing numbers that they were going to be  
19 looking at on the following day, you could be able to, if you  
20 wanted to, require your people to conduct an advanced audit  
21 to make sure that all those packages contained all the re-  
22 visions on design changes they were supposed to contain? Is  
23 that correct?

24 A That could be done, yes, but that's against my  
25 nature.

j29

1 Q Did you tell anybody to do just that? Did you  
2 tell anybody to make sure -- well, I'll stop for a minute.

3 In your earlier comments regarding your instruc-  
4 tions to Dobie Hatley I think you said that when you gave her  
5 the list you instructed her to make sure all these were avail-  
6 able and in order or something to that effect.

7 A To make sure that we were all right, yes.

8 Q Could a person interpret "all right" to mean that  
9 they were proper and correct and complete?

10 A I suppose you could.

11 Q Do you think she could have interpreted it that  
12 way?

13 A Yes.

14 Q To pass the audit what the computer showed should  
15 be contained in the packages would have to be contained in  
16 the packages or deficiencies would be found; is that correct?

17 A Those packages are supposed to be checked before  
18 they go out, checked and --

19 MR. CHARNOFF: To the craft.

20 THE WITNESS: Yes.

21 BY MR. GRIFFIN:

22 Q Are you saying they audit the packages each day?

23 A Yes.

24 Q So they pull the contents of the packages up on  
25 their screens, they check that the contents listed for that

j30

1 drawing number -- that all those documents are contained in  
2 the package?

3 A. Yes.

4 Q. Every day for every package?

5 A. That's procedure, yes.

6 Q. Even if the package is several inches thick?

7 A. It doesn't matter.

8 MR. CHARNOFF: That's every day that a craft re-  
9 quests a drawing; not all the drawings in inventory. You  
10 understand that?

11 BY MR. GRIFFIN:

12 Q. If a craft person requests a drawing number, if  
13 he provides the satellite with a drawing number, he gets a  
14 package; and the package is supposed to contain all the design  
15 changes that have ever been made against that drawing?

16 A. Not all of them against the drawing, no. There  
17 are two different sets of design changes or two different  
18 screen readings. One of them is what we call the Open and  
19 Current, which tells you all the design changes that are  
20 currently against that drawing. Then there is another list-  
21 ing that tells you the history of that drawing, every design  
22 change that has ever been written against it.

23 Q. Let me state it back to you and you can tell me if  
24 I'm correct or not. A package contains the drawing and all  
25 its correct revisions, and it also contains the design

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1 changes against that drawing and all those revisions.

2 A. The design changes and the current rev. would be  
3 in there.

4 Q. So you have revisions of the drawing itself and  
5 revisions of the changes.

6 A. The current revision of the drawing and the current  
7 revision of the design change, the latest revisions.

8 Q. And that's what the package contains that craft  
9 gets?

10 A. Yes.

11 Q. And they receive the whole package to go out into  
12 the field; is that right?

13 A. Correct.

14 Q. Let me ask you this: in that Cygna, in that  
15 Ms. Williams provided you a copy of those design drawing  
16 numbers that they were to review the following day, it did  
17 provide you with an opportunity, if you chose to do so, to  
18 request an audit prior to their looking at it. You had that  
19 option, didn't you?

20 A. Yes, the option is there.

21 Q. You may have already answered this question, but  
22 is it possible that Ms. Hatley interpreted your instructions  
23 to her to do just that, to conduct an in-house audit to make  
24 sure that those packages were true, complete and correct and  
25 that they would be 100 percent accurate when Cygna looked at



j32

1       them the next day?

2           A.       I don't know whether she did or not, but that was  
3       not my intent.

4           Q       Did you ever get any feedback from Ms. Hatley or  
5       any of your subordinates to indicate that that is what they  
6       had done or that that's the way they interpreted your in-  
7       structions to Ms. Hatley?

8           A.       Since then I've been made aware that that could  
9       have happened.

10          Q       You have received information from somebody to  
11       indicate that that did happen; is that what you're saying?

12          A.       That's what they told me, yes.

13               MR. CHARNOFF: Can you put a time frame on that?

14               THE WITNESS: That was last Saturday.

15               BY MR. GRIFFIN:

16          Q       This is somebody that has made inquiries since  
17       this has become an issue?

18          A.       Yes.

19          Q       During your October 24 discussion with Nancy  
20       Williams or any subsequent discussions that you personally  
21       had with Ms. Williams, did you discuss the implications of  
22       this, what I will term, "pre-notification"? Did you ever  
23       ask her anything about it, or did she ever make any comment  
24       as to why they provided you this list?

25                       I'm asking you to be expansive here. I'm asking



1 you to tell me if you know anything.

2 A I recall -- I was at the hearings last week,  
3 Monday and Tuesday. I heard Ms. Williams say that she gave  
4 us the list because she understood it took an inordinate  
5 amount of time to prepare this list, so she gave us some  
6 advance notice to get the computer print-outs ready.

7 Q I'm not asking you what you heard in hearings.

8 A Me personally?

9 Q I'm asking you during this time frame, the 24th  
10 or 25th --

11 MR. CHARNOFF: October.

12 BY MR. GRIFFIN:

13 Q Yes, thereabouts; did you and Ms. Williams ever  
14 discuss --

15 A Not that I recall, no.

16 Q When Ms. Williams provided you with this list, did  
17 it occur to you that you had the option of conducting your  
18 own audit?

19 A No. I don't do business that way.

20 Q So her providing it to you, you took it that you  
21 were a party to the audit in that you were going to be able  
22 to evaluate what your subordinates there -- whether they had  
23 been complete in their duties?

24 A As a manager I need to know that. If I've got  
25 something screwed up, I need to know it.

1 Q In that same light or that same sense, did you  
2 view your comments to Ms. Hatley as being a manager reviewing  
3 the output or work or status of her employees under her?

4 A I don't know if I know what you mean.

5 Q I mean if Cygna cut you in on what they were going  
6 be looking at and you cut Ms. Hatley in on what was going to  
7 be reviewed -- at the time that you gave Ms. Hatley the list  
8 you say you didn't give it to her as pre-notification; you  
9 said that was not on your mind.

10 Were you presuming that Ms. Hatley was going to  
11 pass this on?

12 A I didn't expect her to do anything. I hope that  
13 I promoted that attitude, I think; you know, one of being  
14 honest. There is nothing to be gained by -- it is just com-  
15 pletely out of character.

16 Q What did you expect Ms. Hatley to do with this  
17 list?

18 A I didn't expect her to do anything with it. If  
19 I would have wanted her to do something, I would have given  
20 her some specific instructions.

21 Q I thought you told her to make sure everything was  
22 okay and was available?

23 A By that I mean the computers. That's the only  
24 part of the whole thing that concerned me.

25 Q What do you mean by computers?

j35

1 A That they are working.

2 Q If you give her a list of drawing numbers, what  
3 does that have to do with computers operating?

4 A If she's got a problem with the computers, it's  
5 up to her to tell Frank or myself.

6 Q I understand that. I've read your testimony at  
7 the hearings. I don't want to confuse this transcript we're  
8 making today with that type of testimony. The reason is, I  
9 know how to turn on a computer, and that's got nothing to do  
10 with drawing numbers. You don't need a list of drawing  
11 numbers to turn on a computer. A computer either is working  
12 or it's not. You don't need a list of drawing numbers to  
13 know whether a computer is working. So let's not confuse  
14 that too much.

15 Why then, if you gave Ms. Hatley this list and  
16 you told her to make sure everything was okay or in order or  
17 whatever terms you used to her, what did you expect her to do  
18 with this list?

19 A I didn't expect her to do anything with it.

20 Q Then why did you give it to her?

21 A I thought about this a hundred times -- unless it  
22 was to keep her informed as to what was going on.

23 Q That's a little too general. Surely, you had  
24 something on your mind when you provided it to her. Cygna  
25 gave it to you, you passed it to Ms. Hatley; you must have

j36

1 had some purpose in mind.

2 A. (No response.)

3 Q. And you say subsequently somebody gave you the  
4 list back. Do you know why they gave it back to you?

5 A. No. The only other time I remember that list is  
6 that Tuesday afternoon when the guy from Cygna came into  
7 Frank's office and we sat down and talked about the list  
8 again.

9 Q. In what sense?

10 A. What was on the computer and what was on the  
11 manual logs, for one thing, and how he intended to go about  
12 doing his audit.

13 Q. Which day was this?

14 A. Tuesday afternoon; the next day.

15 Q. So that was the day after you received the list?

16 A. Yes.

17 Q. Had they already completed their audit at that  
18 time?

19 A. As I recall, I don't think he had even started it.

20 Q. When did they conduct their audit?

21 A. I think it was that Wednesday.

22 Q. Did anybody other than Nancy Williams, who was  
23 part of the Cygna review team -- did any of them ever make  
24 any allusions or statements regarding you having been pro-  
25 vided the list in advance?

1 A Not that I'm aware of, no.

2 Q The reason I ask these questions in so many ways  
3 is because all the parties that are going to be interested in  
4 this matter are going to expect some kind of explanation as  
5 to why this list was provided in advance.

6 Is there any way I can phrase my questioning that  
7 will open up an avenue for you to answer this question in a  
8 way that everybody concerned will understand why you had this  
9 list given to you in advance of the audit and why you passed  
10 it to your subordinates? Is there anything that you have not  
11 told me; is there any more information that I have failed to  
12 ask you that would shed light on this matter?

13 A No. Believe me, I've thought about this thing  
14 hard and I just can't -- I'm telling you everything I can  
15 remember.

16 Q How many meetings did you have with Cygna repre-  
17 sentatives on the 25th, which I think you said was Tuesday?

18 A As I recall, that one that morning with Nancy and  
19 then the one that afternoon with Steve Bibo.

20 Q Could you spell Bibo?

21 A B-i-b-o, I think.

22 Q Could you briefly give me a narrative on the con-  
23 tents of each of the meetings, starting with the morning  
24 meeting?

25 A The one in the morning -- like I say, I was in



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1 Dan Hicks' office and Nancy and, I think, David Wade had  
2 stopped in just briefly and said, you know, Nancy had to leave  
3 and if I had any problems that she could be reached at  
4 Granbury Motor Inn. Very brief; just two or three minutes.

5 Then the one in the afternoon with Steve, I was  
6 in Frank Strand's office and Mike Strange was in there.

7 Q Let me understand the characters. You're saying  
8 Frank Strand --

9 A Strand.

10 Q S-t-r-a-n-d?

11 A Yes. He's a supervisor.

12 Q And who is this other fella?

13 A Mike Strange. He's the guy that's, I guess, ulti-  
14 mately in charge of the data base as it relates to design  
15 changes.

16 Q Is that with the Engineering Group?

17 A The Engineering Group.

18 Q Okay. Go ahead.

19 A As I recall, Steve walked in and gave us -- he had  
20 the list. I don't remember what he did with it, but he had  
21 the list.

22 We sat down and we had some discussion as to  
23 which one of these were manuals and which ones were on com-  
24 puter logs. That meeting, too, was very brief.

25 Q So you're saying this is Steve Hicks that had --



j39

1 A. Steve Bibo.

2 Q. Steve Bibo.

3 A. He's with Cygna.

4 Q. So he had exactly the same list that you received  
5 from Williams?

6 A. Yes.

7 Q. Was it a copy of the same list?

8 A. A copy of the list.

9 Q. But you had actually been given the original,  
10 handwritten, is that right?

11 A. I think I had a copy of it. I don't recall having  
12 the original.

13 Q. Okay. You think the copy you gave to Hatley was  
14 a Xerox or was it a handwritten original, pen and ink,  
15 pencil or --

16 A. It was a Xerox copy. I'm almost sure it was.

17 Q. Okay; go ahead with that meeting.

18 A. Like I said, that meeting was very brief. I  
19 don't remember that much more about it.

20 Q. What were Bibo's comments related to the contents  
21 of the list? What questions did he put to you?

22 A. I don't think he quizzed us that much about the  
23 list.

24 Q. What information did he give you regarding it?

25 A. As I recall, most of our conversation centered

j40

1 around satellites. I understand he'd been on a tour that day.  
 2 You know, go out and look where they were, find them and make  
 3 sure he could find his way back the next day.

4 Q So they didn't begin the audit that day; they were  
 5 just walking around looking where the locations were?

6 A That's what I recall.

7 Q So you received the list from Ms. Williams on  
 8 Monday and they conducted their audit on Wednesday?

9 A As best I recall, yes.

10 MR. CHARNOFF: Could you tell Brooks everybody who  
 11 was in that meeting room with Strand and Strange? Was there  
 12 anybody else there with Bibo?

13 THE WITNESS: I think Ms. Hatley was there too.  
 14 I think she came in later.

15 BY MR. GRIFFIN:

16 Q Do you remember any comments made by Ms. Hatley  
 17 during that meeting?

18 A No, I don't.

19 Q You don't remember any participation --

20 A I remember her coming in. Like I said, the thing  
 21 didn't last very long.

22 Q Let me go back a little bit into the meeting --  
 23 let's go back to the time where you gave Hatley the list in  
 24 the first place.

25 Did you tell Dobie Hatley to destroy the one copy

j41

1 or copies of the list that you gave her after she had done  
2 whatever she was going to do with it?

3 A. No, I don't recall that.

4 Q. No instructions to destroy the list?

5 A. No.

6 Q. Would you remember that if you had said something  
7 like that?

8 A. I'm sure I would.

9 Q. I think I've already asked you this several times.  
10 Let me ask you one more time: do you know what Hatley did  
11 with the list that you gave her?

12 A. I've learned some things last Friday or Saturday.

13 MR. CHARNOFF: A week ago Saturday? Today is  
14 Monday.

15 THE WITNESS: The 18th.

16 BY MR. GRIFFIN:

17 Q. But nobody told you anything--say within a week or  
18 two after you gave Hatley the list, did anybody give you any  
19 feedback as to what she did with the list?

20 A. No.

21 Q. Nobody?

22 A. Nobody.

23 Q. What did you learn a week ago, briefly? What were  
24 you told?

25 A. That perhaps some of those manual logs had been

j42

1 copied or some of the logs that were in the satellites had  
2 been thrown away and new ones put in.

3 Q I'm a bit confused on that. You say logs.

4 A Manual logs. You see, there are certain of the  
5 drawings that are kept on the computer, the design changes,  
6 and certain of them are kept --

7 Q Still logs?

8 A Yes.

9 Q So you retrieve the packages either through the  
10 computer or through the log, depending on whether -- the ones  
11 that are in the log have not been computerized yet; is that  
12 right?

13 A You can build the packages either off the manual  
14 logs or those drawings that the logs exist for, or you could  
15 build them off the computer logs. All the drawings are not  
16 in the computer. All the design changes against the drawings

17 Q Now, to rephrase what you were telling me you  
18 heard; that some of the logs had been removed?

19 A Some of the manual logs, yes. Some of those draw-  
20 ings that are still -- the design changes.

21 Q In what context did you hear this; that the ones  
22 that had been removed were now contained in the computer, or  
23 once removed, gone forever?

24 A The exact statement -- or not the exact, but what  
25 I remember was one of the girls that worked in a satellite

1 told me that, "Dobie had us throw all these logs away and  
2 put new ones in."

3 Q Containing the same information? Was that the  
4 implication?

5 A Well, what they led me to believe was that, you  
6 know, the manual logs that were in that particular satellite  
7 or maybe all satellites were not correct. So if a guy came  
8 in to look at the manual logs in the satellite it wouldn't  
9 look like the ones in DCC.

10 Q Did this person telling you this indicate that the  
11 throwing away of the logs had occurred during the time Cygna  
12 was conducting its audit?

13 A Yes.

14 Q Did this person tell you the reason?

15 A She said something to the effect, you know, "I  
16 don't know why we did it because there was nothing wrong with  
17 them. Just because Dobie's house is screwed up doesn't mean  
18 ours is," or something close to that.

19 That bothered me. That scared me.

20 Q So you think that based on some of the feedback  
21 you have received recently, that there might be either missing  
22 documentation or alteration of documentation in some of the  
23 satellites?

24 A I feel like that may have occurred right before  
25 Cygna got there; yes.



J44

1 Q But you had no knowledge of any such thing?

2 A I found out about it Saturday.

3 Q Has anybody indicated to you in this information  
4 you recently received that Mr. Strand had any knowledge of  
5 any alteration of the logs?

6 A I think Frank found out about it about the same  
7 time I did.

8 Q I'm aware that either there has been or there is  
9 an ongoing internal investigation by TUGCO or TUSI into this  
10 matter.

11 Does this information that you have received re-  
12 cently fall out from that ongoing investigation?

13 A Well, the investigation first started in a matter  
14 not even related to Cygna. It was when I terminated Ms.  
15 Hatley.

16 Then I had reason to suspect that maybe her par-  
17 ticular satellite was, you know, a little bit screwed up in  
18 terms of documents.

19 Q Which satellite was that?

20 A 306.

21 Q What division was that? Was it Electrical or one  
22 of the --

23 A It was primarily the Mechanical satellite; mechani-  
24 cal and structural drawings.

25 Q What was your knowledge of the problems in that



j45

1 satellite?

2 A We have what we call a DCC monitoring team. They  
3 are two people who do nothing but just go from satellite to  
4 satellite and do internal audits for Frank and myself.

5 Some of the things they were finding kind of con-  
6 cerned me.

7 Q What were they finding?

8 A I had drawings in the field that I didn't know I  
9 had out there.

10 MR. CHARNOFF: What time frame was this?

11 THE WITNESS: This was -- I guess it got started  
12 probably the last week in January; the last week in January  
13 or first week in February.

14 BY MR. GRIFFIN:

15 Q And this preceded her termination, right?

16 A Yes.

17 Q All right. Go ahead.

18 A You know, I just didn't like what I found. Then  
19 I found out we had a lot of design changes that were out of  
20 revision in that satellite, a lot of the packages hadn't  
21 been updated the way they should have been.

22 Q Have you conducted a similar review in the other  
23 satellites?

24 A Since that time, yes. I know we've hit the two  
25 craft satellites; those would be 307.

1           Q       Did Ms. Hatley or any of your other subordinates  
2 ever -- prior to the time Cygna conducted its audit or, say,  
3 the October meeting or prior to January, do you ever remember  
4 any of your subordinates ever telling you that this was an  
5 ongoing problem in the satellites, the fact that the packages  
6 that the satellites had did not contain all those revisions  
7 and design change revisions that DCC said they were supposed  
8 to have?

9           A       The only time I recall it being a problem were  
10 the packages that came out of 306. I didn't seem to have  
11 that problem with the rest of them. At that time that was  
12 the only one that was in doubt.

13          Q       Was Ms. Hatley responsible in part for setting up  
14 the satellite system?

15          A       She had a large hand in setting them all up, yes.

16          Q       Was there anybody on site more familiar than Ms.  
17 Hatley about the creation and the implementation of this  
18 system?

19          A       Frank Strand probably had better knowledge.

20          Q       Since you first received this information, have  
21 you ever received an explanation, or do you have an explana-  
22 tion for how this particular woman, talking about Hatley --  
23 why her satellite would be in any worse shape than any of  
24 the other satellites?

25          A       It was very puzzling. I can't answer that because,

1 you know, 307 has got at least as many documents as 306, may-  
2 be even more, and it has more traffic than 306.

3 Q Was Ms. Hatley a supervisor over all the satellite

4 A When we first put them in place she was supervisor  
5 of all of them, but I guess as time went on she just slowly  
6 digressed into 306.

7 Q She was reassigned?

8 A No.

9 Q In January when your suspicions were aroused about  
10 Ms. Hatley's performance, was she still supervisor over all  
11 the satellites?

12 A By title, yes.

13 MR. CHARNOFF: But not in practice?

14 THE WITNESS: But not in practice. I guess she  
15 had resigned herself to 306 almost exclusively.

16 BY MR. GRIFFIN:

17 Q Was this something she did on her own or was she  
18 assigned to do so by either Strand or yourself?

19 A I didn't assign her to do it and I don't think  
20 Frank did either. I don't know.

21 Q Is this information you received later, what you  
22 are repeating to us now about her conduct of business or her  
23 assignments?

24 A About her slowly going into 306? No, I noticed  
25 that myself.

1 Q At this time, was Ms. Hatley still responsible for  
2 review, evaluation or overseeing all the satellites?

3 A I think Frank had probably taken a more active  
4 role in it than he had in the past. We were also in the  
5 process of setting up another one.

6 Q Another what?

7 A Another satellite.

8 Q I think you may get the gist of where I'm going.  
9 You said that Ms. Hatley had the title. She had the authority  
10 apparently. Did she have the responsibility to still review  
11 these other satellites other than 306?

12 A I don't think that had been taken away from her,  
13 no.

14 Q How were you, or whoever provided you this infor-  
15 mation, how were they able to -- how was a decision arrived  
16 at that Ms. Hatley was responsible for the lack of documenta-  
17 tion in 306? How was this decision made? What evidence  
18 supported the decision that she, herself, was responsible?  
19 How was she singled out?

20 A Well, to begin with, like I said, on paper she  
21 was at least still the supervisor for all of them. Since she  
22 had slowly resigned herself to 306, I felt like it was her  
23 responsibility.

24 Q When I go out on the site and I interview all  
25 these Document Control people, are they going to -- I'm

j49

1 asking just your opinion, your speculation, at this point --  
2 are they going to tell me that the deficiencies of records  
3 contained in these many packages that craft handled on a  
4 daily basis was Ms. Hatley's shortcoming; it was her fault  
5 that they were in the condition they were in?

6 I'm just asking your opinion.

7 A It's probably going to depend who you talk to. If  
8 you talk to an electrician, he won't know how to answer that  
9 because --

10 Q I'm talking about people in the satellite offices.  
11 The people that work in the offices, the satellite offices,  
12 where these documents are contained, are they going to tell  
13 me that Ms. Hatley is responsible for the lack of documenta-  
14 tion in all those packages?

15 A You mean if it's not in there before it goes out  
16 to the field? I don't know what they'll say.

17 Q Go ahead and tell me how you decided that Ms.  
18 Hatley was responsible for the lack of documentation in these  
19 packages.

20 You say you fired her. How did you arrive at the  
21 decision that she was responsible?

22 A A lot of it was based on what Frank had discovered  
23 through conversations with some of these girls. I guess the  
24 overriding factor was some of those audit reports we had  
25 that showed us just how bad it was.



j50

1 Q Internal audit reports?

2 A Yes.

3 Q Did these audit reports point to Ms. Hatley as  
4 being directly responsible for the missing documentation?

5 A No, they didn't come right out and say "Dobie  
6 misplaced this; Dobie misplaced that," but, to me, if she  
7 was in charge of that satellite and it was screwed up, then  
8 it was her fault, her responsibility.

9 Q So it was your decision that she was terminated?

10 A It was a decision that was reached jointly by  
11 Frank and myself. Then I discussed it with Frankum.

12 Q Who made the ultimate decision to terminate Hatley?

13 A Bottom line, it had to be me. If somebody said  
14 "Let's do it," then it was me.

15 Q Were you encouraged to do it by any of your  
16 superiors?

17 A No.

18 Q Did Mr. Tolson ever have any input into Hatley's  
19 termination?

20 A No.

21 Q You never discussed her situation with him?

22 A No; Tolson never had anything to do with her that I  
23 know of.

24 Q Were there any other reasons, besides those, the  
25 lack of documentation in 306, that led you to believe that



j51

1 Ms. Hatley's services were no longer needed?

2 A. Well, based on some of the things that Frank had  
3 discovered from talking to some of those girls, it appeared  
4 to me that the system was being undermined; that she was  
5 making an attempt not to follow procedure, not to do things a  
6 certain way.

7 Q Do you have any evidence that has specifically  
8 come to your attention that would support this contention?

9 A. Some of the things Frank told me about Dobie in-  
10 structing the girls not to call the 611 number if they found  
11 an error on the screen or a design change that didn't look  
12 like it belonged there; that bothered me.

13 Q Did he give you any explanation for her having  
14 given these instructions to her subordinates?

15 A. Did Frank give me any explanation?

16 Q Yes.

17 A. I don't know why she did it.

18 Q Are you convinced yourself that she did?

19 A. Yes.

20 Q Based on?

21 A. Based on talking to Frank. I've also talked to  
22 some of the people in the DCTG.

23 Q Do you happen to know if this particular series of  
24 events that led up to her termination, is that also included  
25 in the ongoing TUSI investigation?

j52

1 A I don't think so. I don't know.

2 Q I know TUSI is committed to informing NRC of its  
3 findings, and I was just wondering if this was going to be  
4 included.

5 A I don't know. The investigation I set in motion  
6 had nothing to do with Cygna. It was already set in place  
7 before Dobie was even fired.

8 Q I agree. We're talking about a different issue  
9 here.

10 Did Ms. Hatley ever, prior to January 1984, voice  
11 any concerns to you, personally, of deficiencies in work  
12 packages contained in the satellites?

13 A I honestly can't answer that.

14 Q You don't recall any such --

15 A I'm sure there were occasions, but I don't recall  
16 any.

17 Q What I'm getting at here is the NRC is not com-  
18 pletely -- this is not our absolute first inquiry into this  
19 matter. We have other testimony and we will be gathering a  
20 lot more in the future.

21 What I'm driving at is, I want to know if you have  
22 any knowledge of Ms. Hatley having brought this problem re-  
23 garding deficiencies in the packages to your attention or to  
24 Frank's attention or to anybody else in the line of authority  
25 over Document Control or over the satellites or over DCC.

j53

1           A.       I can recall her, you know, complaining about the  
2 task forces. And at some time, I don't remember when, I  
3 had some of the TUGCO site auditors or a surveillance team,  
4 I think, is what they call them, I had those people go in and  
5 look at the task forces to find out what kind of shape they  
6 were in; but I don't remember when that was. I really don't.

7           Q.       Have you received any feedback, prior to January  
8 1984, from any of either your subordinates or members of  
9 these audit teams in which they told you that Ms. Hatley indi-  
10 cated to them that there were deficiencies in these packages?

11          A.       Like I said, I'm sure I've gotten it. I just  
12 don't remember whether it was prior to January or not.

13          Q.       What I'm driving at, Mr. Hutchinson, is: Ms.  
14 Hatley was eventually terminated for these deficiencies. I'm  
15 trying to determine from you whether she, through anybody,  
16 through any source that might be available to you either  
17 directly or otherwise, informed you or had given you a con-  
18 tinuing series of updates as to the deficiencies contained in  
19 these packages. Because I think there is going to be a  
20 mountain -- I'm just guessing, you understand, but I think  
21 there is going to be a mountain of testimony to indicate that  
22 everybody was aware of these deficiencies and that numerous  
23 complaints were made; that everybody in the sections knew  
24 that the packages contained deficiencies and that it was an  
25 ongoing, continuing problem.

1           A.       As it relates to design changes in the computer,  
2           yes. I know that. I don't think we'll ever get all that  
3           cleaned up.

4           Q        What was Ms. Hatley terminated for?

5           A.       Her termination had nothing to do with the computer  
6           design change base. That is something that is beyond my con-  
7           trol and hers.

8           Q        That's in DCC, right?

9           A.       DCTG.

10          Q        They do the input.

11          A.       At that point in time.

12          Q        What they show on the computer is supposed to be  
13          contained in the packages; is that right?

14          A.       Yes.

15          Q        And you fired Ms. Hatley for deficiencies of change  
16          contained in the packages; is that right?

17          A.       That was part of the reason; for something not  
18          being in the package that should have been in the package.  
19          I wouldn't call it a deficiency.

20          Q        How many instances, or how many packages and how  
21          many instances in those packages were you able to document as  
22          a basis for the termination of Ms. Hatley?

23          A.       I can't answer that.

24          Q        Was it hundreds, thousands, one?

25          A.       You'll have to look at some of those audit reports



j55

1 I can't answer that. I don't know. There were quite a few.

2 Q What would I have to do when I go on site this  
3 next week to get those audit reports that contain a listing  
4 of all these deficiencies Ms. Hatley is responsible for  
5 being deficient in those packages?

6 A. Just ask for them.

7 Q Who do I go to?

8 A. You can see me or Frank Strand, either one.

9 Q And you can provide them?

10 A. Yes. If I can't find them, I can make sure that  
11 you get them.

12 Q You said you went to Frankum, or Frankum had in-  
13 put, did you say, regarding Hatley's termination?

14 A. Well, it's part of Brown and Root procedure that  
15 if we terminate people for certain reasons then we have to  
16 have the Project Manager's approval to do that.

17 Q Did you have extensive discussions with Frankum as  
18 to the reason for your decision to terminate Hatley?

19 A. I wouldn't say extensive. I outlined to him what  
20 my problems were, what I found and what I felt needed to be  
21 done.

22 Q Did he agree with your --

23 A. Yes, he did.

24 Q He agreed that she should be terminated?

25 A. Yes.



1 Q I don't know if you have this information; I want  
2 you to tell me if you do. Is the ongoing investigation  
3 being conducted by TUSI into the Cygna matter going to incor-  
4 porate the deficiencies identified in these audits, or --

5 A I don't know.

6 Q -- is it separate?

7 A I don't know.

8 Q Back to the Cygna list for a moment. The list  
9 that Williams provided to you, is that the same list that the  
10 Cygna auditors -- are the drawing numbers contained on that  
11 list the same ones they reviewed on that Wednesday?

12 A I don't have any way of knowing that.

13 Q Has anybody ever told you that?

14 A No.

15 Q So the list that you provided to Hatley, you don't  
16 know if that's what Cygna looked at?

17 A I have no way of knowing.

18 Q Back to your termination of Hatley. When you  
19 fired Hatley, did you give her an explanation for why she was  
20 being terminated?

21 A Yes.

22 Q Did you cite specific examples of deficient  
23 records or deficient records that were supposed to be in  
24 packages?

25 A I don't think I got specific with it, no. I told

j57

1 her generally why I had some problems with her.

2 Q Can you state in your own words what you told her?

3 A I told her that Frank and I had a lot of work in  
4 getting those satellites set up; that, you know, I had some  
5 problems with her and what was going on in 306; and that week  
6 that she was gone on vacation that I put the monitoring team  
7 into 306 to find out, you know, how bad it was; that I wasn't  
8 very pleased with what I found; that right now it was in a  
9 position where I didn't know what drawings were in the field  
10 or who had them; that there were some procedures and specs  
11 that were up in some of the departments that hadn't been up-  
12 dated, some of them as far back as August.

13 I also asked her about some absentee records,  
14 which she had made a comment about earlier that week or the  
15 week before about how valuable those absentee records would  
16 be in somebody's hands. I asked her about that and she --

17 Q What are absentee records?

18 A We've got a departmental log that shows every day  
19 that everybody's here or there, how many hours they work and  
20 that sort of thing.

21 I've got another suit pending now for a girl I  
22 terminated for excessive absenteeism about a year ago.

23 I explained those thoughts to her, what my prob-  
24 lem was, and she automatically went on the defensive. I  
25 said, "Dobie, this is not very pleasant. It's not something

1 that I really like to do, but based on the facts that I've  
2 got in hand, I've got to terminate you."

3 She said, "Well, I'm going to the NRC. I'm going  
4 to the Labor Board. I'm going to the newspapers. I'm going  
5 to Brown and Root in Houston. I'm going to Texas Utilities"

6 Q Then you went ahead and terminated her?

7 A Yes.

8 Q Based on information that you have received  
9 recently as fall-out from this investigation or whatever your  
10 source, are you saying that you have received information  
11 that records have been altered, changed or disposed of?

12 A Through hearsay, yes, I've heard that.

13 Q Do you recall who told you that?

14 A A girl named Judy Dickey.

15 Q What is her title or job? Who does she work for?

16 A She works for Brown and Root. She's in charge  
17 of satellite 300, 301.

18 Q Did she indicate what the source of her informa-  
19 tion was; personal?

20 A Personal, yes.

21 Q She knew of it through satellite 301?

22 A It's a combination; 300, 301 and 302 are all  
23 together: Service Start-up, Civil Engineering and INC.

24 Q Mr. Hutchinson, are you familiar with the results  
25 of the Cygna report? Have you ever read it?

j59

1           A.       I've read the DCC portion.

2           Q        Are you aware, then, that as a result of the Cygna  
3 review, that they found a number of deficiencies, six or  
4 seven, I think? Does that sound familiar?

5           A.       Six or seven in DCC?

6           Q        Yes -- well,

7           MR. CHARNOFF: What is the date of the Cygna  
8 report?

9           THE WITNESS: I don't think it has been published  
10 yet. I think it's still in draft form.

11          MR. GRIFFIN: The last date I see on here is  
12 11/5/83.

13          MR. CHARNOFF: So it's following the October visit

14          THE WITNESS: Yes.

15          BY MR. GRIFFIN:

16          Q        Is it your understanding that they did find de-  
17 ficiencies in the review, in their October review?

18          A.       The DCC? As I read the report, they didn't find  
19 anything.

20          Q        I'm not going to go into this because this is a  
21 little beyond -- I'm not familiar with either the original  
22 contract or the results. Just let me read a sentence here  
23 and see if this jogs your memory.

24                   "The CPS Document Control Center does not maintain  
25 an accurate listing of design changes generated against

1 drawings and specifications. This was substantiated by re-  
2 view of 18 drawings, seven specifications and approximately  
3 100 associated designs. The discrepancies are as follows" --  
4 and it looks like there is about eight.

5 Is that the same thing that you reviewed?

6 MR. CHARNOFF: Could you show it to him?

7 MR. GRIFFIN: I would rather not.

8 THE WITNESS: Is that 605; is that number on there  
9 somewhere, specification? That's the July report.

10 MR. GRIFFIN: The reason I'm reluctant to give  
11 this to him is I'm not sure it is for public release yet.

12 THE WITNESS: That should have been the July one.

13 BY MR. GRIFFIN:

14 Q Are you saying that based on Cygna's review which  
15 occurred that Wednesday, you don't think they found any  
16 deficiencies?

17 A I think they verified that the systems were in  
18 place and working. As to what Bibo did, I don't know.

19 Q Would you normally have been a recipient of the  
20 results of the review on DCC?

21 A I don't know if I would have normally been or not.  
22 I saw the report. I saw the Cygna report when it came down.

23 Q Then did it basically conclude that the system  
24 was in place and in good working order?

25 A As I remember reading the thing, you know, he



j61

1 verified that what he came to look for was there; the  
2 satellites were up, the computer thing was working.

3 Q So that is October. In October of '83 Cygna did  
4 its review of what is contained in the logs versus what is  
5 contained in the packages, and you --

6 A I don't know whether they did that review or not.

7 Q Well, they gave you what, 32 drawing numbers on a  
8 list handed to you by Nancy Williams; is that right?

9 A Yes.

10 Q And you say you have no knowledge of this, but it  
11 is my understanding that Cygna then came in on Wednesday and  
12 reviewed those same 32 drawing numbers and all their revis-  
13 ions. And you said the results of the Cygna report for that  
14 review was that everything was in good shape.

15 A That's essentially it, yes.

16 Q Then what, two months later you fired Dobie Hatley  
17 because these packages, of which those 32 drawings were to be  
18 a representative sampling, had numerous deficiencies for  
19 which you ultimately held her responsible; is that a fair  
20 assumption?

21 A It's not, not really.

22 Q Where have I missed? What's wrong with my  
23 reasoning?

24 A Her termination was primarily based on what I  
25 found in satellite 306 more than anything else.

j62

1 Q Well, I presume 306 was included in the Cygna re-  
2 view, was it not? Were any of the satellites omitted from  
3 their --

4 A I don't know where he went. I don't know what  
5 path he took.

6 Q Why is it that the Cygna representative review is  
7 proper, perfect, no problems, so to speak, and such a short  
8 time later you have mass deficiencies that lead to the termin-  
9 ation of the person who set up the system in the first place?

10 Can you offer any explanation for that?

11 A I can't. I wish I could, but I can't.

12 Q Do you have any reason to believe that between the  
13 time that Cygna's review took place and the time she was  
14 terminated, that somebody systematically destroyed or in-  
15 vaded the system and made it grossly deficient?

16 A I think I can state that something was wrong in  
17 306, yes.

18 Q Did it go wrong between October 26 and January  
19 whenever it was that you terminated Ms. Hatley?

20 A It went wrong before I terminated Ms. Hatley. Now  
21 when it went wrong, I don't know. I would have to go back  
22 and look at all the audit reports. I'm sure we've got some  
23 that go back that far.

24 Q Did you have internal audit reports before the  
25 Cygna report?

j63

1           A.     As I remember, the audit reports started probably  
2 in September of '83, August or September. The team was in  
3 place by then. There was some form of auditing going on  
4 then.

5           Q.     These same people?

6           A.     Yes.

7           Q.     So you say you can give the NRC access to those  
8 audit reports?

9           A.     Yes. I have no problem with that.

10          Q.     Based on the fact that you did so well in the Cygna  
11 review, do you happen to know whether these earlier audit  
12 reports are going to show the system as being in good shape  
13 in September?

14          A.     I'll just have to look at them and see. I don't  
15 know. I don't recall that many problems.

16          Q.     Do you happen to know where Ms. Hatley was for  
17 three weeks prior to her termination?

18          A.     She was on vacation one week.

19          Q.     I don't want to belabor this point, but between  
20 the October Cygna review which found everything okay and  
21 January when she was terminated, she spent three weeks on  
22 vacation; is that right?

23          A.     She spent one week on vacation.

24          Q.     One? Just one?

25          A.     Yes. I don't remember which week that was either.

j64

1 I think it was the week beginning January 29.

2 Q Let me ask you again: did anybody -- not directly,  
3 necessarily, in the chain of command of Brown and Root, but  
4 did anybody above you in TUGCO or Brown and Root direct you  
5 to terminate Ms. Hatley?

6 A No.

7 Q Was it a decision that you arrived at on your own?

8 A Yes. I don't think anybody in TUGCO even knew  
9 about it, or TUSI, until after it was over with. I don't re-  
10 call having discussed that with anybody in TUGCO.

11 Q Let me jump back one more time to the day that you  
12 gave Hatley the list. When you provided her the list, did  
13 you tell her specifically that Cygna was coming to look at  
14 these documents the following day?

15 A I don't recall making that statement, no.

16 Q And you don't recall why you gave her the list?

17 A No.

18 Q You just gave it to her?

19 A Yes. And I thought about it, believe me.

20 MR. GRIFFIN: Mr. Charnoff, I don't know if I'm  
21 going to repeat Judge Bloch's request. I doubt if I can re-  
22 peat it accurately since I was not at the hearings, I did not  
23 hear it, nor do I have a copy of his statements made during  
24 the hearings over there. But it's my understanding that  
25 Judge Bloch requested that any contact between applicant or

1 representatives of the applicant -- and I don't know exactly  
2 what that entails -- with Mr. Hutchinson, that any such con-  
3 tacts regarding Cygna be documented either through tape or  
4 through written statement.

5 Do you know if this is being done? Are you aware  
6 of this?

7 MR. CHARNOFF: I'm not aware of that; but I think  
8 you can correct me on this, Carl. It is my impression that  
9 they are not talking to Hutchinson at all; indeed, that is  
10 really why we are involved, because following that order, as  
11 I understand it, it is understood that the lawyers for TUGCO  
12 and others who are involved in that other investigation were  
13 not going to talk to Heyward at all.

14 But I can't answer your specific question.

15 Do you know? Have there been any contacts with  
16 them at all since, I think it was, Wednesday --

17 THE WITNESS: They instructed me not to talk to any  
18 body that worked for TUGCO, TUSI or talk to any of the girls  
19 in DCC or any of that stuff.

20 BY MR. GRIFFIN:

21 Q The only reason I mentioned it is because prior to  
22 our interview today the Judge talked to Trebe, an NRC repre-  
23 sentative, and asked that we remind you, as his representa-  
24 tives -- I cannot characterize what his original intentions  
25 were, but if you're sure that you're in compliance, then --



j66

1           A.       I'm absolutely sure. In fact, Frankum told me last  
2 week to leave and not come back. I don't know if I can do  
3 that or not.

4           MR. CHARNOFF: I don't think the order excluded  
5 you from doing your business. As I read the transcript, I  
6 think it, in effect --

7           THE WITNESS: The conversations I've had with any-  
8 body at the site have been very, very few and very, very  
9 limited.

10          MR. CHARNOFF: On this matter I don't think you  
11 should talk to anybody, but I think you are entitled to do  
12 the work.

13          MR. GRIFFIN: If there is any question I would  
14 encourage you to call Judge Bloch, because it is important to  
15 him.

16          BY MR. GRIFFIN:

17          Q       Mr. Hutchinson, our interview today so far has  
18 raised as many questions as it has answered in my mind.  
19 Obviously, all you can do is say what you know to be the  
20 truth.

21                   This interview is conducted at this time because  
22 your testimony before the hearings was suspended, leaving a  
23 lot of questions unanswered.

24          A.       I understand that.

25          Q       The Office of Investigations will probably be

1 actively involved in the investigation of this whole affair  
2 in the coming weeks. I want to put this in the record; that  
3 I am almost positive that we will need to interview you  
4 again because normally we don't start in the middle; we start  
5 at the beginning, and we haven't started at the beginning yet.

6 A. Okay.

7 MR. GRIFFIN: Don, do you have any questions that  
8 you would like to ask Mr. Hutchinson in this matter?

9 MR. DRISKILL: Yes, if you don't mind there are  
10 just a couple of questions I would like to ask.

11 BY MR. DRISKILL:

12 Q Going back to earlier in the interview, you said  
13 that on the 24th of October this Ms. Williams presented you  
14 with a list of drawing numbers; is that correct?

15 A. Correct.

16 Q What did she tell you about those numbers when she  
17 gave you the list?

18 A. About the list?

19 Q Yes; what did she tell you it was?

20 A. She said, "These are the documents we need to see,"  
21 or "These are the drawings we need to see;" something to that  
22 effect.

23 Q Tomorrow?

24 A. Tomorrow. "We'll be in tomorrow."

25 Q And she handed you a handwritten list?

j68

1 A. Yes.

2 Q. Which contained 32 numbers?

3 A. Yes.

4 MR. CHARNOFF: Have you fellas seen the list?

5 MR. DRISKILL: I haven't.

6 MR. GRIFFIN: No.

7 BY MR. DRISKILL:

8 Q. You were in your office when you received this?

9 A. That's correct.

10 Q. And then she left?

11 A. Yes.

12 Q. Then what did you do?

13 A. I picked up the list, I started down the hall. I  
14 had to go to a meeting. I was trying to get some clerks some  
15 wage adjustments. I had a session with John Merritt and  
16 Frankum.

17 At some point during that afternoon I bumped into  
18 Dobie in the hall, I think it was around the drafting area,  
19 and gave her the list.

20 Q. Would you repeat again what you told her when you  
21 gave her that list?

22 A. Something to the effect of "Make sure we're all  
23 right. Make sure everything's running. Cygna is going to be  
24 here tomorrow."

25 Q. So I would be correct in assuming that she would

1 have accepted that list with the understanding that these  
2 were documents that Cygna wanted to look at?

3 A Yes. Yes, that should be a fair assumption.

4 Q You talked to, you said, Merritt from TUSI and  
5 Frankum from Brown and Root that afternoon. Did you tell  
6 them that you had received a list of these things?

7 A I don't recall discussing the list any more that  
8 day. I left early that day.

9 Q I realize this was just an audit being conducted  
10 by an outside group of people, and I know that at Comanche  
11 Peak they have a lot of audits, or not a lot, but some audits  
12 conducted -- they have a lot of internal audits by TUSI,  
13 TUGCO, Brown and Root and so on, various auditors from those  
14 different groups.

15 But it is not all that commonplace to have an audit  
16 by someone from outside one of those three groups; would that  
17 be correct?

18 A An audit is an audit to me.

19 Q That's right. But this one had received some  
20 publicity in the newspapers; it was a known fact that NRC had  
21 required TUGCO to have this audit performed. So I'm assuming  
22 that -- were managers instructed to do whatever they could to  
23 get along with these people? Did you have any sort of meet-  
24 ings prior to Cygna coming in back in July or sometime to  
25 say, "Hey, help these people out. Try to make this thing

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1 come off as smoothly as you possibly can"?

2 A. I don't recall receiving any special instructions.

3 Q. You don't recall attending any meetings where the

4 fact that Cygna was doing this audit was discussed?

5 A. I remember at some point in time somebody saying

6 Cygna was coming in to do this review and that was about it.

7 As far as I'm concerned, nobody put that much emphasis on it.

8 Q. It wasn't any big deal.

9 A. No; no big deal.

10 Q. So you received this request from Ms. Williams on

11 the 24th. You didn't tell your boss that you had received the

12 request; you didn't tell -- did you tell, what was this guy's

13 name, Frank, your direct subordinate over at DCC?

14 A. Frank Strand.

15 Q. Frank Strand, you didn't tell him you had received

16 it?

17 A. I don't recall telling him either.

18 Q. And you received the impression that Cygna was

19 going to look at these documents the following day, on the

20 25th?

21 A. Yes.

22 Q. In fact, they didn't then until the 26th.

23 A. That's my recollection.

24 Q. Did you say anything to Dobie Hatley on the 25th

25 about "Did you look at those documents," or "Did you get those



1 documents ready for those people?"

2 A. No.

3 Q. Or "Did you have any problem finding them?"

4 A. Nothing to that effect, no.

5 Q. Let me ask you one other question. You said here  
6 later on in your conversation with Brooks that Dobie Hatley  
7 was only the supervisor or the records keeper for one of  
8 several satellites; right?

9 A. She started out as a supervisor for all of them.

10 Q. But you said here in the last couple of months  
11 she had pretty much restricted her activities to 306; is that  
12 not correct?

13 A. Yes.

14 Q. Was that true in October?

15 A. I wouldn't think that would be true in October, no.

16 Q. So in October she was pretty much in charge of all  
17 of them?

18 A. She would have still been over them.

19 Q. That was the reason you gave her the list, because  
20 she --

21 A. All I can do is assume, you know, if they were  
22 coming to look at the satellites, then she needed to be aware  
23 of it.

24 Q. Why did she need to be aware of it rather than  
25 Frank or somebody else?

1           A.       Well, TUGCO QA had been in a couple of weeks before  
2 that and there were some questions about did we have these  
3 things secure enough. "Do you have the right kind of barriers  
4 up to keep people from interfering in the files" and all that.  
5 And those girls had pretty well been instructed not to allow  
6 anybody, you know, Tom, Dick or Harry, to just wander in.

7                    I don't know. This is just assumptions now. I  
8 didn't want Dobie to be blindsighted by a bunch of people  
9 coming in and wanting to look at stuff.

10           Q.       You mean by giving that list to someone else and  
11 then having them go look for the records?

12           A.       Well, if somebody walked into a satellite and said,  
13 you know, "I want to go behind the counter and look at all  
14 this stuff," as a matter of rule they wouldn't be allowed to  
15 do that.

16           Q.       Would I be correct in assuming -- maybe I've gotten  
17 the wrong assumption here all along -- the intent Ms. Williams  
18 had when she gave you that list was that you gather these  
19 documents up and have them in a stack for her to look at or  
20 her or someone to look at the next day?

21           A.       I don't know whether that's what she meant for us  
22 to do or not. She really didn't tell me.

23           Q.       Let me ask you this then: how long would it take,  
24 if I give you a list of 32 drawing numbers right now -- I'm  
25 in your office, I give you a list and say "I want to see

1 these."

2 A You want to see the drawing and all the changes?

3 Q Isn't that what she was asking for?

4 A She was asking for the print-outs, the computer  
5 print-outs.

6 Q If I give you a list and tell you I want to see  
7 the print-outs, how long is it going to take me to get them?

8 A If everything is working, it should be inside of an  
9 hour. If the system is not loaded, you punch it up and it  
10 prints; you punch it up and it prints. It shouldn't be that  
11 big of a deal if that's all you want is just the print-outs.

12 Q Am I correct in assuming that all these numbers  
13 she gave you were not on the computer?

14 A Yes; some of them were not on the computer.

15 Q How long would it have taken me to get a list con-  
16 taining 24 that were on the computer and eight more that  
17 weren't?

18 A That still should have been able to be done in an  
19 hour.

20 Q Have you had any of these type audits before where  
21 somebody comes in and gives you a list of numbers?

22 A Yes, we get lists all the time.

23 Q Do they usually give you a day in advance to  
24 gather these things up or print them out or whatever you do  
25 with them?

j74

1           A        I can only tell you what -- not firsthand  
2           knowledge, but we get a lot of lists from the TUGCO auditors;  
3           we get a lot of lists from your people.  If they're looking  
4           into something particular, they'll leave us a list and say  
5           "How about running these for me?"  Then we get them ready and  
6           we'll take them to them.

7           Q        So it wouldn't be uncommon for them to get those a  
8           day in advance?

9           A        No, it is not uncommon.

10          Q        Is it uncommon for your people to review those be-  
11          fore they take them to the people that have requested them  
12          to make sure they are in order, contain all the information?

13          A        The only review they would probably do was to make  
14          sure that whatever is on that log is also in that package if  
15          that's what they wanted was the package.

16          Q        What if it wasn't?

17          A        Then they just punch the button and it prints a  
18          copy of the manual log.  There wouldn't be any review going  
19          on, no.

20          Q        You said that in July they found some shortcomings  
21          in the Document Control system, in the program; is that  
22          correct?

23          A        Yes.

24          Q        A lot of deficiencies?

25          A        There were quite a few, yes.

j75

1 Q How did you find out about that?

2 A I think that was through a session with some of  
3 the Cygna people and some of the DCTG people and also some of  
4 my people.

5 There was a little confusion as to, you know,  
6 which group was responsible for which.

7 Q Which deficiencies?

8 A Yes.

9 Q Did your supervisor ever talk to you about it or  
10 ask for an explanation of why these problems existed?

11 A Did my supervisor?

12 Q Yes.

13 A I recall him being part of some of those discussions  
14 But as to why these deficiencies exist, I don't recall that  
15 question.

16 Q You mean it was no big deal?

17 A No; we knew we had those problems in the file cus-  
18 todian versus the DCC; that's why we set the satellites up,  
19 one reason.

20 Q Did you expect to have some problems with those 32  
21 that you were given on October 24?

22 A No.

23 Q You didn't expect to have any problems with those?

24 A No.

25 Q Why?



j76

1           A.       I felt like the system was working. You know, we  
2 had had from whenever we started the computer base, either  
3 late-July or early-August, we had from then until October 15  
4 to get the two systems merged and get the bugs out of it.  
5 We even beat that date a little bit. I was confident.

6           MR. DRISKILL: I don't have anything further.

7           BY MR. GRIFFIN:

8           Q.       Mr. Hutchinson, as I said before, the Office of  
9 Investigations, I believe, will be getting into an investiga-  
10 tion on some of these issues. We haven't actually defined  
11 all the areas that we're going to be going into.

12           I personally consider today's interview a prelimin-  
13 ary interview with you. I think there might be areas that we  
14 have not discussed. I can't help but believe there are addi-  
15 tional points or areas of inquiry. So I think you can expect  
16 to be contacted by us again.

17           One of the things that I am going to request of  
18 you is that once the investigation begins I probably will  
19 come down and ask you for those internal audit reports that  
20 you were saying were available.

21           When the time comes that we need to interview you  
22 again on this matter, should we contact your attorney or you  
23 to set up the interview?

24           MR. CHARNOFF: I think you ought to contact Carl  
25 Jordan and set it up with him.

j77

1 MR. GRIFFIN: All right.

2 BY MR. GRIFFIN:

3 Q Mr. Hutchinson, do you have anything you would  
4 like to add to the record as an explanation for -- like I  
5 said, there are many questions left unanswered. Is there  
6 anything more that you would like to add?

7 A Yes, a couple of things; one being that the environ-  
8 ment in this kind of interview is quite a bit better than  
9 what I went through in the hearings up there. That is not  
10 very pleasant. Now, that's out of the way.

11 This whole thing is against my character. To have  
12 even been associated with having rigged anything or set up  
13 anything, that is just not my nature. In fact, if I suspected  
14 that anybody had done that sort of thing, I would have fired  
15 them without hesitation.

16 I have been out there eight years and I have put  
17 a lot of time and a lot of effort in that plant.

18 It is just not my nature to do anything like that.  
19 I hope this investigation bears that out. I'm as anxious as  
20 anybody to get to the bottom of this.

21 Q Today's inquiry and subsequent interviews of you  
22 will be just concerning the facts in the case.

23 I presume that your statements to day have been  
24 truthful. Can we count on that?

25 A They have, to the best of my knowledge.

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1 Q Mr. Hutchinson, have I or any other NRC represen-  
2 tative here threatened you in any manner or offered you any  
3 rewards in return for this statement?

4 A No, you have not.

5 Q Have you given the statement freely and voluntaril

6 A I have.

7 MR. GRIFFIN: Thank you.

8 (Witness excused.)

9 (Whereupon, at 3:35 p.m., the interview was  
10 concluded.)

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