

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
BEFORE THE  
ATOMIC SAFETY AND LICENSING BOARD

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IN THE MATTER OF: )  
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TEXAS UTILITIES GENERATING )  
COMPANY, ET AL. ) DOCKET NOS. 50-445-OL  
) 50-446-OL  
(COMANCHE PEAK STEAM )  
ELECTRIC STATION, UNITS 1 )  
AND 2) )

**FOIA-88-37 A/2**

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ORAL DEPOSITION OF  
JOHN HANSEL  
OCTOBER 15, 1987  
VOLUME II  
\*\*\*\*\*

ORAL DEPOSITION OF JOHN HANSEL, produced as a  
witness at the instance of the Intervenor CASE, taken  
in the above-styled and numbered cause on October 15,  
1987, at 9:15 a.m., before James M. Shaw, RPR,  
Certified Shorthand Reporter and Notary Public in and  
for the State of Texas, at the Law Offices of  
Worsham, Forsythe, Sampels & Wooldridge, 2001 Bryan  
Tower, Suite 3200, in the City of Dallas, County of  
Dallas, State of Texas, pursuant to the Federal Rules  
of Civil Procedure.

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A P P E A R A N C E S

FOR THE NUCLEAR REGULATORY COMMISSION:

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1                   JOHN HANSEL,

2   the witness hereinbefore named, being first duly  
3   cautioned and sworn to tell the truth, the whole  
4   truth, and nothing but the truth, testified under  
5   oath as follows:

6                   FURTHER EXAMINATION

7   BY MS. GARDE:

8           Q.    Mr. Hansel, we are starting the second day  
9   of your deposition. I will try to get you out of  
10  here as quickly as possible. I have a couple of  
11  areas of questions which touch on things that we  
12  started yesterday, but didn't complete.

13                   Let me first draw your attention to the  
14  external source issues that we both were discussing  
15  but not in detail. The external source issues that  
16  provide the source, if you will, of the allegations  
17  that you investigated, you referred to a list in  
18  Rev. 4, I believe it was page 15, that gave a general  
19  description of some of those and listed specifically  
20  like the MAC report and the Lobbin report that we  
21  talked about yesterday. In regard to the issues  
22  raised by or through the Nuclear Regulatory  
23  Commission, I have a couple of questions.

24                   Do you understand what I mean when I say,  
25  "by or through the Nuclear Regulatory Commission"?

1 A. Yes.

2 Q. Okay. As to the issues raised in SSER 7  
3 through 11, when the CPRT looked at those documents,  
4 did it accept the NRC's definition of the issue and  
5 goal from that point in terms of writing an issue  
6 specific action plan?

7 A. We took the report as written from the  
8 NRC and accepted it. In a number of cases where they  
9 had substantiated an issue as no problem, we still,  
10 in the drafting of our ISAPs, pursued and evaluated  
11 some of those issues.

12 Q. Do you know where in the program plan it  
13 identifies those issues that the NRC said were no  
14 problem that you pursued anyway?

15 A. It would not be in the program plan.

16 Q. Okay. How would I find that out?

17 A. The -- I believe the program plan requires  
18 us to develop a matrix of all our external source  
19 issues, and where they are being investigated.

20 Q. Did you develop that matrix?

21 A. Yes.

22 Q. Do you recall whether that matrix was  
23 provided to the board as Appendix B in response to a  
24 board order?

25 A. That matrix has I don't believe been

1 Q. Did the CPRT review the transcripts of  
2 interviews between employees and former employees of  
3 the site and the TRT in which allegations were raised  
4 to TRT members?

5 A. Not in their totality. I reviewed a few  
6 of those.

7 Q. Of the ones that you reviewed personally,  
8 do you recall if they were transcripts that were  
9 taken during the summer of 1984, or had they been  
10 taken earlier than the summer of 1984 by the NRC?

11 A. I don't recall.

12 Q. Is it a correct understanding of your  
13 testimony that, by and large, the CPRT took the  
14 NRC's work and used that as a base in terms of those  
15 source issues that come from the TRT?

16 MR. EGGELING: Can I have that back?

17 (Record read back.

18 Q. (BY MS. GARDE) Do you want me to repeat  
19 the question?

20 MR. EGGELING: Yes, and let me list  
21 the four ambiguities that bother me. The first,  
22 "by and large," and "used that as a base" produce a  
23 level of generality that I'm not sure helps much,  
24 particularly when the question starts out with;  
25 "Is it a correct understanding," which is necessarily

1 subjective.

2 And the last point, you have let this slip  
3 into a couple of questions, but I think the witness  
4 and you have been understanding one another. You  
5 phrased them, "Did the CPRT," "Did the CPRT" where,  
6 in fact, of course, this witness can answer what he  
7 knows and particularly what he knows about those  
8 ISAPs in which he was in charge of, not necessarily  
9 what the CPRT as a collective effort did.

10 MS. GARDE: All right. I understand  
11 his testimony to mean that.

12 MR. EGDELING: That is what I figured,  
13 but I just thought if you are going to rephrase the  
14 question, you ought to try to get all of those out.

15 Q. (BY MS. GARDE) Yesterday I thought I  
16 understood your testimony on some things. When I  
17 went back, it was obvious that I did not, so I want  
18 to make sure that I understand your testimony  
19 correctly.

20 What I am trying to determine is if the  
21 testimony you have just given regarding what extent  
22 you looked at the TRT's reports as the SSER's and to  
23 what extent you went back and looked at the raw data.  
24 My understanding is that you, except in a few  
25 instances that you have described, you used the SSERs

1 as the source documents; is that correct?

2 A. Yes. I would say in all instances.

3 Q. Okay. In all instances, you used the TRT.

4 Okay. On what occasions, then, did you go back and  
5 look at the raw data?

6 A. In those cases where the ISAP requirements  
7 or instructions led us to go back and look at those,  
8 and it varies from ISAP to ISAP.

9 Q. All right. So I will be able to tell in  
10 the ISAPs or the results reports if you went back and  
11 looked at the raw data?

12 A. And the working file, yes.

13 Q. Now, following the issuance of the SSERs,  
14 the NRC has continued to write inspection reports  
15 based on their own work and based on allegations that  
16 they have received. For the NRC reports, inspection  
17 reports subsequent to the TRT, has the CPRT reviewed  
18 those and looked for new issues?

19 A. Yes.

20 Q. Have they found any new issues?

21 A. Yes.

22 Q. Are the new issues identified through NRC  
23 inspection reports subsequent to the SSERs, included  
24 in the work of the CPRT?

25 A. Yes.

1 Q. Okay. When the collective evaluation  
2 reports and the collective significance reports come  
3 out, will they also address those issues?

4 A. You will find those addressed in  
5 individual ISAP results reports. And in VII.c., I  
6 don't know that you will see them flagged out again  
7 in the collective evaluation report.

8 Q. Are you familiar with the issues raised by  
9 a Department of Labor complainant, Joe Macktal?

10 A. No.

11 Q. Do you have any knowledge of allegations  
12 raised by that individual being factored into the  
13 CPRT?

14 A. No.

15 Q. Are you familiar with a Department of  
16 Labor complainant, Mr. Hasan?

17 A. No.

18 Q. Are you aware of whether or not the  
19 allegations raised by Mr. Hasan were factored into  
20 the CPRT?

21 A. No.

22 Q. Are you familiar with the NRC's report of  
23 the office of inspector and auditor 8610?

24 A. Not by just that number.

25 Q. Okay. Are you familiar with the report of



1 the office of inspector and auditor prepared by  
2 George Malley and released publicly in December of  
3 1986?

4 A No.

5 Q. Was any review done by the CPRT into any  
6 OIA report released by the NRC since December of 1986?

7 A. I don't know.

8 Q. You didn't do any?

9 A. No. Well, let me clarify that. I'm  
10 not -- I don't recall any right now. Unless I had a  
11 specific reference to it, I couldn't give you a  
12 "yes" or a "no."

13 Q. Are you personally familiar with the  
14 allegations raised by Shannon Phillips regarding  
15 incomplete inspection reports?

16 A. Only in general terms.

17 Q. Okay. To the extent that you are familiar  
18 with them, have you included those concerns in any of  
19 the work of the CPRT?

20 A. No.

21 Q. Are you familiar with the site's safe team  
22 program?

23 A. Yes.

24 Q. Have you, in the work that you have done  
25 with the CPRT, reviewed the safe team files

1 and -- Well, let me stop at that point.

2 Have you reviewed the safe team files?

3 A. Personally?

4 Q. Yes.

5 A. No.

6 Q. Has the CPRT effort that you are involved  
7 with reviewed the safe team files?

8 A. Yes.

9 Q. And have the safe team files produced  
10 other issues other than originally included in the  
11 CPRT?

12 A. I believe so, but I'm not positive.

13 Q. Mr. Hansel, are you familiar with the term  
14 "inaccessible" or "hidden" attribute?

15 A. Familiar with the term "inaccessible."

16 Q. And what does that term mean in terms of  
17 the CPRT program plan?

18 A. It is defined in ISAP VII.c.

19 Q. As what? Did you bring the ISAP with you  
20 today?

21 A. No, but I think it is also in the program  
22 plan.

23 (Witness perusing document.

24 MS. GARDE: Off the record.

25 (Off-the-record discussion.

1           A.    It is not defined specifically in the  
2 program plan.

3           Q.    Could you define what you understand it to  
4 mean?

5           A.    I would prefer not to. I would again  
6 refer you to ISAP VII.c.

7           Q.    Okay. Is the reason that you would prefer  
8 not to because it is a very specific definition and  
9 you are afraid you can't recite it?

10          A.    Yes.

11          Q.    With that clarification, I would like to  
12 understand how the hidden -- hidden, inaccessible  
13 attribute fits into your work. And I will stipulate  
14 that the definition of the CPRT is what the program  
15 plan says it is. Am I correct in assuming that is  
16 the working definition that you have followed?

17          A.    Yes.

18          Q.    All right. In regards to inaccessible  
19 attributes, is the collective evaluation process  
20 discussing implications of your findings on hidden  
21 attributes, inaccessible attributes?

22          A.    I don't know.

23          Q.    Okay. Why, why don't you know?

24          A.    It is discussed in ISAP's VII series  
25 results report, but I'm not certain if it is repeated

1 if it will be repeated in the collective evaluation  
2 report.

3 Q. But VII.c.'s result report will include  
4 that?

5 A. Yes.

6 Q. For each of the populations?

7 A. I believe so.

8 Q. We spent some time yesterday talking about  
9 the safety significance evaluation group's work. Do  
10 you recall that testimony?

11 A. Yes.

12 Q. Okay. I would like to ask you some  
13 questions regarding how the SSEG group does its work.  
14 And I have with me and we can mark, but it is my only  
15 copy at this time, Revision 6 of CPP-016, which is  
16 safety significance evaluations of deviation reports.  
17 And I believe the change sheet -- the only change  
18 sheet that is subsequent to that on CPP-016. If I'm  
19 wrong -- If this is wrong, that hasn't come yet. I  
20 will stand corrected, but let me mark them.

21 (Hansel Exhibits 10 and 11

22 (marked for identification.

23 Q. Mr. Hansel, I'm going to show you what has  
24 been marked as 10 and 11, and draw your attention to  
25 pages 5 and 6.

1 MR. EGGELING: Thank you.

2 (Witness perusing document.

3 Q. (BY MS. GARDE) Is that your signature on  
4 the first page of Hansel 10?

5 A. Yes.

6 Q. What does your signature mean on that page?

7 A. As indicated, that I approved it.

8 Q. All right. Your counsel has handed you  
9 Exhibit 11. Is that your signature on Exhibit 11?

10 A. Yes.

11 Q. Okay. Is that a subsequent change to  
12 Exhibit 10?

13 A. Yes.

14 Q. Are there any other changes to CPP-016  
15 that you are aware of?

16 (Witness perusing document.

17 A. Not that I'm aware of.

18 Q. All right. I draw your attention to page  
19 5 of Revision 6, Section 5.2, safety significance  
20 evaluation. Do you see that?

21 A. Yes.

22 Q. Okay. Because it is my only copy, I'm  
23 going to have to stand up to ask you my questions.  
24 If that bothers you, let me know.

25 Drawing your attention to 5.2.2 regarding

1 what the discipline engineers do in their evaluation  
2 of the performed conditions, there are six lettered  
3 paragraphs that follow 5.2.2. Do you see that?

4 A. Yes.

5 Q. Okay. Is that process described in those  
6 numbered -- I'm sorry, lettered paragraphs the  
7 process that is followed in conducting the safety  
8 significance evaluation?

9 (Witness perusing document.

10 A. Yes.

11 Q. Okay. In small lettered paragraph (a), it  
12 refers to a discipline engineer becoming familiar  
13 with the physical arrangement of the referenced item.  
14 Do you see that paragraph?

15 A. Yes.

16 Q. Okay. How does he do that?

17 A. Well, that very paragraph says, "This may  
18 be accomplished by reviewing the Verification Package,  
19 project documents, and/or performing a plant  
20 inspection."

21 Q. Is that an informal nonproceduralized  
22 action; does the engineer himself decide what area to  
23 become familiar with?

24 A. You have a component that you have a  
25 deviation against, and you are going to look at the

1 physical arrangement of where that component is  
2 installed.

3 Q. Okay.

4 A. Whatever it may be.

5 Q. Okay. What I'm asking you: Is there  
6 another procedure that the discipline engineer  
7 follows when he puts together those things that he is  
8 going to become familiar with? Is there a numbered  
9 procedure?

10 A. No.

11 Q. Okay. So each discipline engineer is  
12 using his own judgment in terms of what things to do  
13 or things to look at to become familiar with physical  
14 arrangement; is that correct?

15 A. That is correct.

16 Q. All right. How many different discipline  
17 engineers are there?

18 A. I don't know how many there are on board  
19 today.

20 Q. Okay. At the height of the work that you  
21 were doing, how many were there?

22 A. Approximately 30.

23 Q. Now, are there any written instructions to  
24 the discipline engineer regarding how he is to become  
25 familiar with a physical arrangement?

1           A.     Just this procedure, plus instructions  
2 from his lead engineer.

3           Q.     Okay. And those are oral instructions?

4           A.     Yes.

5           Q.     How many lead engineers are there that  
6 were giving those instructions?

7           A.     Four.

8           Q.     Okay. Who were they?

9           A.     I would have to go back and check. They  
10 varied from time to time, and I would have to know  
11 upon what date, who you were -- you know, who you  
12 wanted to know.

13          Q.     Was there one lead engineer for each of  
14 the four areas: civil, mechanical, electrical --

15          A.     Yes.

16          Q.     -- and structural?

17                 All right. In item (b), it talks about  
18 the intended safety function of the referenced item  
19 is determined. How was that done?

20          A.     By reviewing drawings and specifications.

21          Q.     All right. Was there a procedure which  
22 set forth what documents that conclusion should have  
23 been drawn from?

24          A.     No.

25          Q.     Okay. Did the discipline engineer get



1 that information from the lead engineer?

2 A. The discipline engineer did the job, and  
3 then reviewed it with the lead engineer.

4 Q. Okay. And there was no procedure setting  
5 forth how to do that?

6 A. No.

7 Q. Just oral instructions?

8 A. Yes.

9 Q. Okay.

10 A. It is not a very complicated process.

11 Q. All right. In determining the safety  
12 function for each of the physical arrangements or  
13 components that were being reviewed, did that go  
14 through Texas Utilities' design engineers?

15 A. No.

16 Q. So this was within ERC?

17 A. Yes.

18 Q. Okay. Was it checked against the current  
19 design of the plant?

20 A. No.

21 Q. The then current design of the plant?

22 MS. GARDE: He already answered  
23 "no."

24 MR. EGGELING: Do you understand what  
25 she means?

1 MS. GARDE: Yes.

2 A. It was checked against the drawings and  
3 specifications that were in effect at the time that  
4 the hardware was inspected.

5 Q. (BY MS. GARDE) All right. Now --

6 A. Finalized and inspected.

7 Q. Not at the time that the component was  
8 installed or the work was done?

9 A. I think we have a communications problem.  
10 If the hardware was installed in 1984 --

11 Q. Yes.

12 A. -- October of '84, and accepted by project  
13 QC at that time, we used the drawings and the  
14 specifications that were in effect on that date when  
15 that acceptance was made, and that is what we  
16 evaluated against.

17 Q. All right. And you evaluated against  
18 those documents and reached the conclusion about the  
19 intended safety function at that time?

20 A. Yes.

21 Q. All right. That is what I understood your  
22 testimony to be.

23 Now, when you made the determination -- or  
24 not you personally, but the discipline engineers made  
25 the determinations regarding the intended safety

1 function, was there any communication with the  
2 project on whether or not the -- using the example  
3 you gave -- the 1984 design was still current?

4 A. No.

5 Q. All right. Looking at subparagraph (c),  
6 it makes reference to the types of documents that  
7 were to be reviewed; licensing regulations, licensing  
8 commitments, and engineering documents which  
9 substantiate. Do you see that?

10 A. Yes.

11 Q. Okay. Were those documents the documents  
12 that were current at the time that the work was  
13 originally done, or current today?

14 A. When the work was originally done.

15 Q. So again, with (c), it is a snapshot of  
16 time in the past?

17 A. Yes.

18 Q. Okay. Item (d), where it talks about the  
19 required level of performance to meet the intended  
20 safety function, is that in the present, or was that  
21 in the past?

22 A. In the past, at the time that the hardware  
23 was accepted.

24 Q. All right. Item (e) talks about the  
25 likely performance of the referenced item considering

1 its deviating attribute. Do you see that?

2 A. Yes.

3 Q. Is that also a snapshot in the past?

4 A. Yes.

5 Q. Okay. It makes no reference to the  
6 current state of the plant?

7 A. Correct.

8 Q. Item (f), is that -- Is the information  
9 included in Item (f) also a snapshot in time in the  
10 past?

11 A. Yes.

12 Q. All right. Now, I draw your attention in  
13 this same exhibit, Hansel 10, to paragraph 5.2.5.2,  
14 which is the top of page 9.

15 There is a change bar in the right-hand  
16 margin, which adds a sentence. Would you please read  
17 as much of that section as you need for me to ask you  
18 a question regarding that sentence?

19 MR. EGGELING: What is the question?  
20 How could he know how much of it to read?

21 MS. GARDE: Well, that's right. I'm  
22 going to ask him whether or not that statement is  
23 also a snapshot in time in the past, and a few other  
24 questions following that.

25 MR. EGGELING: Okay.

1 (Witness perusing document.

2 Q. (BY MS. GARDE) Have you reviewed that  
3 section?

4 A. Yes.

5 Q. Making reference to the sentence with the  
6 change bar, which says, "No conclusion shall be made  
7 on the ability of the affected item to performance  
8 its intended safety-related function without taking  
9 into account the referenced corrective action."

10 Is that referring to corrective action  
11 that has been -- Strike that.

12 Let me just ask you: What corrective  
13 action does that refer to? I think I understand, but  
14 I don't want to say that.

15 A. If we are aware of corrective actions that  
16 the project is already taking that would correct that  
17 type of deviation, then we would do nothing further  
18 on it in terms of -- of doing an evaluation. The  
19 majority of those kinds of corrective actions have  
20 been as a result of CPRT efforts.

21 Q. All right. That answer doesn't completely  
22 answer my question to my ability to understand it,  
23 not because it wasn't a complete answer.

24 The corrective action process, in which we  
25 discussed yesterday that the project engages in, is

1 not something that you have oversight on; is that  
2 correct?

3 A. Let me straighten it out. For every  
4 deviation that we write, there is an NCR written by  
5 the project. They can go fix that individual piece  
6 of equipment or item. Coming out of our program, we  
7 also have findings that result in corrective --  
8 larger, more comprehensive corrective action programs.  
9 Some of those require reinspections, some require  
10 rework. They will all be identified in the records  
11 that you would receive. This paragraph is referring  
12 to the latter.

13 Q. To the findings?

14 A. Where it may have corrective action  
15 programs in response to our findings, for those kinds  
16 of conditions identified in Appendix E.

17 Q. All right. But the corrective actions  
18 that this refers to are current actions?

19 A. Correct.

20 Q. All right. The safety significance  
21 evaluation group reached historical snapshot in time  
22 conclusions; correct?

23 A. Yes.

24 Q. Okay. Between -- And you used a 1984  
25 hypothetical. Between 1984 and the corrective

1 actions that resulted from your findings, a lot has  
2 happened on the site, hasn't it?

3 A. Yes.

4 Q. Okay. In writing up your reports on the  
5 safety significance evaluation of each deviation, do  
6 you jump from the past conclusion into the present  
7 corrective action?

8 A. The present corrective action in most  
9 cases was a result of our findings based on earlier  
10 inspections, and those corrective actions are both  
11 retrospective and prospective.

12 Q. When the safety significance evaluation  
13 group does its work, it goes through the screen set  
14 up in Appendix E, and it reaches a conclusion on a  
15 specific deviation that is capsulized in time by and  
16 bounded by what were the procedures and the  
17 requirements and licensing commitments at that time;  
18 is that correct?

19 A. Correct.

20 Q. All right. In some cases, those  
21 conclusions that -- using those documents vindicate  
22 the action done in 1984; isn't that correct?

23 A. What do you mean? You don't understand  
24 what I'm saying. What do you mean by "vindicate"?

25 Q. In 1984, certain procedures were written

1 that were supposed to have been followed?

2 A. Yes.

3 Q. Okay. You do the safety significance  
4 evaluation --

5 A. Yes.

6 Q. -- using those documents?

7 A. Yes.

8 Q. And you reached the conclusion that it was  
9 all done by the numbers in 1984?

10 MR. EGGELING: What was?

11 MS. GARDE: Whatever he is reviewing,  
12 whatever deviation he is looking at.

13 MR. EGGELING: How can he have gotten  
14 there? You don't attribute the safety significance  
15 evaluation until you find something wrong. You have  
16 lost me.

17 MS. GARDE: I'm starting with  
18 deviations.

19 MR. EGGELING: Then I don't -- Do you  
20 understand it?

21 THE WITNESS: Well, it is a bit  
22 confusing. She started with the premise that we had  
23 deviation, and then we are evaluating that deviation  
24 against the procedures, the drawings, the  
25 specifications --



1 MS. GARDE: Right.

2 THE WITNESS: -- in effect at that  
3 date.

4 MS. GARDE: Right.

5 MR. EGGELING: For its safety  
6 significance?

7 THE WITNESS: For its safety  
8 significance.

9 MR. EGGELING: That is where I have a  
10 disconnection with how it has something to do with  
11 whether or not all the procedures were followed,  
12 because then you go back into another loop. You are  
13 testing it for its safety significance, or for  
14 whether the procedures are followed.

15 MS. GARDE: Okay. Let me take that  
16 out -- that loop out.

17 Q. (BY MS. GARDE) You are in the safety  
18 significance evaluation?

19 A. Yes.

20 Q. All right. You are using the then current  
21 criteria to reach your conclusions --

22 A. Yes.

23 Q. -- on whether it was safety significant?

24 A. Yes.

25 Q. All right. In order to be classified

1 using the Appendix E criteria, is there any look at  
2 the current efforts of the site regarding that  
3 component or function? Is it all historical?

4 MR. EGGELING: Do you understand what  
5 she means by "classified"? Make sure you include it  
6 in your answer.

7 A. I think we got two cases again. If we  
8 were evaluating that condition under the earlier  
9 paragraphs referenced, which were 5.2.2, we would use  
10 the information in effect at the time that the  
11 hardware was accepted by TU Electric and using the  
12 documents that were in effect on that date.

13 Paragraph 5.5.2 says that if we  
14 have -- if we have knowledge of corrective action  
15 programs that the project already has in place that  
16 would detect and fix that same type of deviating  
17 condition, then we can merely stop, not perform the  
18 safety significance evaluation, but reference that TU  
19 corrective action program.

20 Q. (BY MS. GARDE) All right. I understand  
21 that to mean that there is a way to avoid safety  
22 significance evaluations, even kicking in, if there  
23 is already corrective action going on; is that  
24 correct?

25 A. If you mean by "kicking in," that we would

1 not do it, we would not go through the process of  
2 performing the evaluation, but it would still be  
3 counted as a -- as a deficiency in accordance with  
4 Appendix E.

5 Q. All right. How does that happen?

6 A. In the documentation on that particular  
7 deviation, as we do the evaluation.

8 Q. So the documentation exists, but its  
9 resolution references the corrective action?

10 A. Yes. That is in the second paragraph  
11 under 5.5.2.

12 Q. So when the final report that you prepare  
13 on the collective evaluation of all of the deviations  
14 and deficiencies and findings is prepared, it is  
15 going to incorporate those things that did not go  
16 through the safety significance evaluation group?

17 A. It will incorporate all findings, and  
18 these still go through the safety significance  
19 evaluation group. The data will be included in the  
20 VII.c. results report and possibly repeated again in  
21 collective evaluation, but I'm not sure. This  
22 procedure requires the safety significance evaluation  
23 group to make those determinations in accordance with  
24 the second paragraph of 5.2.5.2, and it is documented  
25 and in the files.

1 Q. All right. And so those files will be  
2 made available and those items that you have just  
3 discussed that 5.2.5.2 apply to are going to be  
4 identified?

5 A. Yes.

6 Q. All right. Now, the change to this  
7 Exhibit 10 goes to Section 5.2.4. The change is  
8 recorded in Hansel 11. As I read it, it essentially  
9 is the addition of some words regarding construction;  
10 is that correct?

11 MR. EGGELING: Do you want him to  
12 read what the words are? I don't understand the  
13 point.

14 MS. GARDE: I want to know what the  
15 significance of the change is and what change it  
16 resulted in.

17 MR. EGGELING: I still don't  
18 understand. We have a document in front of us for  
19 the record, Exhibit 11, which consists of the  
20 insertion of a series of between five and seven  
21 common English words in the sentences. I don't  
22 understand what you want the witness to do with that  
23 fact.

24 MS. GARDE: I want him to become  
25 familiar with what the change is that was made to the

1 program as a result of that change to CPP-016.

2 MR. EGGELING: You want him to read  
3 the sentence with the amendment; correct?

4 MS. GARDE: That is what he is doing.

5 MR. EGGELING: I don't know what he  
6 is doing. I'm asking you what you want him to do.

7 MS. GARDE: He is doing what I want  
8 him to do. He is reading the changes.

9 THE WITNESS: Shall I proceed?

10 MR. EGGELING: Read the steps with  
11 the change in it and then stop. Wait and find out  
12 what she wants you to do.

13 (Witness perusing document.

14 A. All right. I have finished reading it.

15 Q. (BY MS. GARDE) All right. What effect  
16 did the changes as contained in Exhibit 11 have on  
17 the safety significance evaluation program itself?

18 A. None.

19 Q. It just clarified the words about and  
20 said -- Strike that.

21 It just described more accurately what you  
22 were already doing?

23 A. Yes.

24 Q. Okay. Thank you.

25 Where in the CPRT program is there a

1 determination made on whether a QA/QC commitment was  
2 not met in the historical implementation of the  
3 QA/QC program?

4 A. What do you mean by "commitment"?

5 Q. If there was a QA/QC requirement for an  
6 inspection, hypothetically, an inspection was  
7 supposed to be conducted which had certain hold  
8 points. Those hold points were not followed. At  
9 where in the program plan do you identify where  
10 original commitments were not met?

11 MR. EGGELING: Program plan?

12 MS. GARDE: In the whole CPRT program  
13 plan, wherever it may exist.

14 MR. EGGELING: But you are asking the  
15 question about a result, aren't you?

16 MS. GARDE: Well, it may be in the  
17 results report, I don't know. That is what I want to  
18 know.

19 MR. EGGELING: What is it that you  
20 are asking about the program plan as opposed to the  
21 output -- the results report?

22 MS. GARDE: No, I think he  
23 understands what my question is, but I will restate  
24 it.

25 Q. (BY MS. GARDE) I want to know where the

1 program plan provides for that determination to take  
2 place. Do you understand my question?

3 A. Not really.

4 Q. Okay. There was original commitments,  
5 FSAR commitments, licensing commitments, QA/QC  
6 requirements, procedures, specific quality control  
7 checklist procedures that should have been followed  
8 that the project was committed to following; is that  
9 correct?

10 A. Yes.

11 Q. Okay. Does the CPRT intend to reach a  
12 conclusion on whether those commitments were followed  
13 in each and every actual inspection that you  
14 performed? It is a "yes" or "no" question.

15 A. I can answer it. Any time that we found a  
16 deviation from a procedure requirement in any of our  
17 inspections or reviews, it is documented on a  
18 deviation report.

19 Q. And then we start the path that we have  
20 been discussing regarding what happens to deviations?

21 A. Yes.

22 Q. The review that produced the deviation  
23 report is done in the context of the 32 populations;  
24 is that correct?

25 A. Also all the other ISAPs:

1 Q. Okay. For purposes of these questions,  
2 let me just limit it to the quality of construction  
3 program and the 32 populations. Okay. Does that  
4 change your previous answer?

5 A. Would you restate it?

6 Q. Just looking at the quality construction  
7 in the VII.c. program and reviewing the 32  
8 populations, is your answer the same as to -- that  
9 all identified deviations from commitments will be  
10 recorded on deviation forms?

11 A. Yes, but I would like to work on the  
12 semantics.

13 Q. Okay.

14 A. I would prefer to call it requirements,  
15 procedural requirements or inspection requirements,  
16 rather than commitments.

17 Q. That is okay. I understand what you are  
18 saying. Those are still recorded on deviations?

19 A. Yes.

20 Q. Okay. And within those 32 populations,  
21 which you are approaching through a sampling basis,  
22 are the deviations from the original procedural  
23 requirements the trigger to expand the population?

24 A. No.

25 Q. Okay. Is the trigger after another



1 evaluation is done of the failure to meet the  
2 procedural requirements?

3 A. Yes.

4 Q. Okay. What is that evaluation?

5 A. It is the evaluation in accordance with  
6 Appendix E.

7 Q. Okay. That is the safety significance  
8 evaluation?

9 A. Yes, and trend analysis.

10 Q. Okay. The trend analysis that you just  
11 referred to, is it population specific?

12 A. Yes.

13 Q. Does the trend analysis go beyond any of  
14 the populations at any point?

15 A. Yes.

16 Q. Is that at the end of the process?

17 A. I don't know about what you mean by "at  
18 the end of the process."

19 Q. Okay. Triggering an expansion of the  
20 population size is based on a trend analysis within  
21 each population of the identified deviations from  
22 procedural requirements; is that correct?

23 A. Yes.

24 Q. All right. And where there is a root  
25 cause or potential root cause identified as a result

1 of a trend in another population, at what point in  
2 the process is that evaluated for each  
3 population?

4 A. When we tour the generic implication.

5 Q. When is that in the process?

6 A. At the point in time we think we have the  
7 root cause identified.

8 Q. Has that been completed or is it largely  
9 completed?

10 A. Largely completed.

11 Q. Is there any evaluation done between the  
12 identification of the initial deviation to meet a  
13 procedural requirement and the safety significance  
14 evaluation regarding individual deviations  
15 identified?

16 MR. EGGELING: Could I hear that back?

17 (Record read back.

18 MR. EGGELING: Do you understand that?

19 THE WITNESS: Yes.

20 A. Yes.

21 Q. (BY MS. GARDE) What is that?

22 A. To assure ourselves that the deviating  
23 condition as identified by the inspector is a valid  
24 condition.

25 Q. Who performs that validation?

1           A.    The engineer responsible for the  
2 population.

3           Q.    Is that an ERC employee or a site employee?

4           A.    ERC or a subcontractor.

5           Q.    On what form is that evaluation recorded?

6           A.    It is done on the deviation report.

7           Q.    Is that the blank that is for a reviewer?

8           A.    Yes.  It is at the very bottom of the form.

9           Q.    Okay.  If a failure to meet a procedural  
10 requirement is not considered safety significant  
11 using the Appendix B criteria, is it considered in  
12 terms of expanding the scope in that population?

13          A.    First off, it is Appendix E.

14          Q.    What did I say?

15          A.    "B".

16          Q.    Oh, I'm sorry.

17          A.    And as we discussed yesterday, they are  
18 all considered for trending analysis and then to  
19 determine if they fit the screen in Appendix E.

20          Q.    Were any potential root causes considered  
21 other than those that came up through the inspection  
22 process?

23          A.    I guess I don't understand your question.

24          Q.    Okay.  Let me -- Let me ask it another way.  
25                You said yesterday that you reviewed the

1 information provided to you by the attorneys  
2 regarding the harassment and intimidation issue. Do  
3 you recall that testimony?

4 A. Yes.

5 Q. Okay. Did you consider the harassment and  
6 intimidation allegations as a potential root cause  
7 without regard to deviations identified?

8 A. No.

9 Q. Okay. There was an allegation in the TRT  
10 report that dealt with quality control inspector  
11 certifications. We talked about that a little  
12 yesterday. Do you recall that?

13 A. Yes.

14 Q. Did you look at that issue as potentially  
15 affecting all areas of quality control inspections at  
16 the plant?

17 A. Only in the context of the requirements of  
18 ISAP I.d.l.

19 Q. Does the CPRT program plan have any  
20 definition of a root cause that would describe the  
21 types of root causes that you are looking for?

22 A. No.

23 Q. Does the CPRT program plan intend to make  
24 a conclusion about whether harassment and  
25 intimidation of quality control inspectors was a root

1 cause?

2 MR. EGGELING: Of?

3 MS. GARDE: Of deviations?

4 A. It will be the subject of harassment, and  
5 intimidation will be addressed.

6 Q. (BY MS. GARDE) Where?

7 A. In the VII.c. results report.

8 Q. There is no ISAP that I'm familiar with  
9 that sets forth the work that the CPRT is doing to  
10 evaluate the harassment and the intimidation issue.  
11 Did I miss something?

12 A. No.

13 Q. Okay. Would you please explain what the  
14 CPRT is going to do or is doing about the harassment  
15 and intimidation issue?

16 A. I believe that that is addressed in the  
17 program plan.

18 Q. Okay. I would like to take just a short  
19 break and let you find where that is.

20 MR. EGGELING: How much longer are  
21 you going to go with him?

22 MS. GARDE: I'm just about done.

23 MR. EGGELING: Ten minutes?

24 MS. GARDE: Well, I don't know what  
25 his answer is going to be. I have about three more

1 little areas of questions; 10, 15 minutes.

2 MR. EGCELING: Okay.

3 (Recess.

4 Q. (BY MS. GARDE) Mr. Hansel, we had a short  
5 break, and you were going to look where in the CPRT  
6 it talks about the consideration of the harassment  
7 and intimidation issues. Did you find that?

8 A. Yes.

9 Q. Okay. Where is that?

10 A. Page 8 of 17 of Appendix B, top paragraph.

11 Q. This is the Revision 4 you are looking at?

12 A. Yes. It is also addressed in the ISAP

13 VII.c.

14 Q. Do you mind if I look at your copy? I see  
15 it is yellow lined. Save me some time. Okay.

16 Under B, subpart B, potential occurrence  
17 of harassment or intimidation of QC inspectors, do  
18 you have a specific CPP or QI that is providing you  
19 guidance as to how to make those evaluations?

20 A. No.

21 Q. Okay. How are you doing it then?

22 A. Through root cause analysis.

23 Q. So you are not doing any independent look  
24 at the evidence of harassment and intimidation, you  
25 are not reviewing the testimony, reaching conclusions

1 regarding independent incidents of harassments and  
2 intimidation of inspectors?

3 MR. EGGELING: What do you mean by  
4 "independent"?

5 MS. GARDE: Separate incidents would  
6 be a better word. He is not looking at the  
7 evidence -- Off the record.

8 (Off-the-record discussion.

9 Q. (BY MS. GARDE) I apologize. Let me redo  
10 the question. Do your efforts regarding the  
11 harassment and intimidation as a potential cause  
12 include reviewing all of the testimony -- I  
13 apologize.

14 (Off-the-record discussion.

15 (Recess.

16 Q. (BY MS. GARDE) Back on the record. I  
17 apologize for the interruption, Mr. Hansel. We are  
18 talking about the harassment and intimidation issue  
19 you are looking at in the CPRT. Is the CPRT going to  
20 reach a determination on whether or not specific  
21 incidents of harassments and intimidation occurred?

22 A. No.

23 Q. What type of work --

24 A. I'm answering that in the context of your  
25 use of the word "specific."

1 Q. All right. Are you going to reach a  
2 determination on whether or not there was an  
3 atmosphere of harassment and intimidation at the site?

4 A. Only if we are led to that through root  
5 cause analysis.

6 Q. Is the root cause analysis that you are  
7 performing the same as the process you have described  
8 through all your deposition and that is contained in  
9 the CPRT? It is not a different root cause analysis  
10 you are talking about?

11 A. No.

12 Q. How would that root cause analysis that  
13 you are performing lead you to conclusions regarding  
14 harassment and intimidation of inspectors?

15 A. I cannot answer that specifically.

16 Q. Okay. I want to understand in the process  
17 how the process would lead to harassment and  
18 intimidation.

19 (Off-the-record discussion  
20 (between Mr. Eggeling and  
21 (Mr. Hansel.

22 MS. GARDE: I heard you saying words  
23 to implementation. This isn't an implementation  
24 problem.

25 MR. EGGELING: I appreciate that.



1 MS. GARDE: It is a process question.

2 MR. EGGELING: I think what she is  
3 trying to get to is for you to redescribe the root  
4 cause analysis. And as far as I know, you have to  
5 give the accurate answers. If the root cause appears  
6 to be harassment and intimidation, that is what you  
7 are going to declare.

8 But I'm not sure I -- I know what you are  
9 trying to do, and I think I know the answer, but  
10 obviously I'm not the witness. But I'm not sure  
11 there is anyone to answer any more than what I just  
12 said.

13 She only wants you to stay at the  
14 conceptual intention through the analysis set forth  
15 in the program.

16 Q. (BY MS. GARDE) Do you want me to phrase  
17 it as a hypothetical?

18 A. No. Let me go ahead and address your  
19 question.

20 We take all the information that we can  
21 gather concerning a particular deviating condition.  
22 And then through an analysis, we determine what, if  
23 anything, in the process was flawed that led to the  
24 deviating condition, such as -- An example might be  
25 an ambiguous procedure or an improper tool used or

1 unqualified inspector or whatever.

2           And we will continue that process down  
3 until we feel that we have identified all of the  
4 primary causes and even contributing causes to where,  
5 if those causes are corrected, then the problem would  
6 be bounded. If in that process we see anything at  
7 all that leads us to harassment or intimidation, then  
8 we would try to pursue that to determine if we in  
9 fact felt that it was a root cause.

10           Q. When you say "if we see anything at all,"  
11 are you looking at the testimony given in the  
12 harassment and intimidation docket by witnesses who  
13 were also the source of an external source issue  
14 which is the subject of an ISAP?

15           A. We are looking at the external source  
16 issue.

17           Q. All right. That isn't the answer to my  
18 question.

19           A. We are not going to go beyond the external  
20 source issue, unless we're led there in our  
21 evaluation.

22           Q. Okay. How would you be led back to the  
23 harassment and intimidation testimony of a source of  
24 an external source issue, by what process?

25           A. I doubt if we would be.

1 Q. All right. Then how does the process that  
2 you have described enable to you to reach conclusions  
3 about whether or not harassment and intimidation was  
4 a root cause?

5 A. If we cannot find any other root causes,  
6 it may have to be through interviews and reviewing  
7 other records. Maybe reviewing other work done by  
8 the individuals involved, possibly by reviewing other  
9 work accomplished by the same draft in the same time  
10 period.

11 Q. But that would be only after you had  
12 eliminated all other reasons?

13 A. Yes.

14 Q. I want to give you a hypothetical. If  
15 there was an inspector who testified in the  
16 harassment and intimidation proceedings about an  
17 incident which he refused to sign off a document  
18 because he believed it was wrong and was ordered to  
19 do so, and in your work you conclude that the  
20 procedure which dictated what was actually supposed  
21 to have been signed off was flawed, the procedure was  
22 flawed, do you go beyond that conclusion to determine  
23 or reach any determinations about harassment and  
24 intimidation of the inspector?

25 A. Not if we think that the flawed procedure

1 bounds the issue.

2 Q. Would you even know that the testimony  
3 hypothetically that I just gave you existed, based on  
4 the documents that you are reviewing?

5 A. Probably not.

6 Q. Are all of your personal notes regarding  
7 the work you have done on the CPRT going to be made  
8 available when your work is finished?

9 A. I don't know what you mean by "personal  
10 notes."

11 Q. Are you keeping written records above and  
12 beyond the documentation that is contained in the  
13 CPRT working files?

14 A. No.

15 Q. Do you have any personal logs, calendars?

16 A. I have a calendar that keeps track of  
17 where I was on a certain day and how many hours I  
18 worked, and that is about the extent of it.

19 Q. Okay. You don't have any other log that  
20 discusses meetings or notes of meetings, handwritten  
21 notes of discussions with Texas Utilities' officials?

22 A. No.

23 Q. Everything is on some document?

24 A. Yes.

25 Q. Okay. So when we review the working files

1 on any individual ISAP, including VII.c., we will  
2 have access to all of the written materials that you  
3 personally prepared regarding implementation; is that  
4 correct?

5 A. Yes.

6 Q. Do you do any work on DSAPs?

7 A. No.

8 Q. Do the quality control and quality  
9 assurance implications of DSAP findings get factored  
10 into your work?

11 A. I don't understand your question.

12 Q. Okay. When the design review is done  
13 under -- the DSAPs are completed, will those reports  
14 produce information which is then considered by you  
15 in VII.c.?

16 A. There is a requirement in the program plan  
17 for the DSAP personnel. As they find anything that  
18 might have an impact on our inspections in the field,  
19 they are obligated to provide that information to us.  
20 In terms of their end product, the answer is no.

21 Q. Okay. Is VII.c. going to reach  
22 conclusions on the adequacy of the quality assurance,  
23 quality control program as to the design aspects of  
24 the plant?

25 A. No. I probably need to clarify that.

1 Q. All right.

2 A. Only where we found a root cause that  
3 indicated that the engineering requirements were  
4 confusing or ambiguous.

5 Q. And then you identified that as a root  
6 cause?

7 A. Yes.

8 Q. But where on the design side a deviation  
9 from an original procedural requirement is identified,  
10 you don't process that; is that true?

11 A. I'm not sure I understand your question.

12 MS. GARDE: I will withdraw the  
13 question.

14 I didn't want to invade implementation,  
15 but the latest date I heard, Counsel, on the release  
16 of the collective evaluation report was October 1st,  
17 1987. Is this a new date?

18 MR. EGGELING: I know of no specific  
19 date.

20 MS. GARDE: Okay. I think I'm  
21 finished, Mr. Hansel. I just want to review my notes.

22 (Pause.

23 Q. (BY MS. GARDE) I have one other question.  
24 In the spring of 1987, is it true that some of the  
25 work being done by the CPRT was stopped by your

1 organization as a result of the PCHVP program?

2 A. Would you restate your question or read it  
3 back, either one?

4 Q. Let me restate it. In the spring of 1987,  
5 I don't have a date specific, did some of the work by  
6 the CPRT stop as a result of a memorandum or  
7 agreement to the review team leaders -- Strike that.  
8 Let me start again.

9 Were the review team leaders instructed in  
10 the spring of '87 to stop any of the work that they  
11 were doing by Texas Utilities?

12 A. No.

13 Q. You have no recollection of a document  
14 directing work to be stopped because of a superseding  
15 program? And I identified the PCHVP.

16 A. No.

17 Q. If a memorandum was sent to the review  
18 team leaders asking them to stop work or shut down  
19 some of their operations, would you know about that?

20 A. Yes.

21 Q. Do you review the progress reports that  
22 the applicant sends in to the licensing board on a  
23 regular basis?

24 A. Can you be more specific?

25 Q. Do you read them after they are sent to

1 the licensing board?

2 A. You said "progress reports"?

3 Q. Progress reports sent by the applicant's  
4 attorneys to the licensing board.

5 A. I read most of that material. If you are  
6 talking about the periodic status reports, I don't  
7 know if that is what they are called, but status of  
8 various ISAPs and -- Yes, I do, if that is what you  
9 are referring to.

10 Q. Do you read them after they are sent to  
11 the board or before?

12 A. After.

13 Q. One other question. We went into the  
14 history of your involvement with the CPRT, and my  
15 notes say that your expansion effort came in February  
16 of '85 beyond the first two ISAPs who were contacted  
17 to work on; is that correct?

18 A. Yes.

19 Q. Prior to 1985, February 1985, there was  
20 work done by the CPRT effort, wasn't there?

21 A. Yes.

22 Q. Is your program to some extent  
23 relying -- your quality construction program relying  
24 to any extent on work done prior to your involvement  
25 with the quality of construction program?



1 A. No.

2 Q. So VII.c. is going to be completely based  
3 on your work?

4 A. Yes.

5 Q. Where ISAPs are based on work that was  
6 done prior to your expanded involvement, have you  
7 retained that work?

8 A. What do you mean, "retained"?

9 Q. Do you rely on that work?

10 A. No.

11 Q. What do you rely on where you didn't  
12 conduct the original inspection?

13 A. There were no inspections conducted prior  
14 to that time. We basically started all over again on  
15 ISAP I.d.1, I.d.2.

16 Q. Okay. You are familiar with the CASE  
17 preliminary analysis of ISAP I.a.4?

18 A. No.

19 Q. Have you ever read the ISAP preliminary  
20 analysis of ISAP I.a.4?

21 A. I don't recall. It is not an ISAP under  
22 my control, so --

23 Q. All right. I'm going to show you a  
24 document. I'm not going to mark it as an exhibit.  
25 It is the preliminary analysis of I:a.4 prepared by

1 CASE in May of last year. Have you ever seen that  
2 document?

3 (Witness perusing document.

4 A. No.

5 MS. GARDE: I don't have any other  
6 questions. Thank you, Mr. Hansel, for your patience.

7 MR. EGGELING: Thank you, Mr. Hansel.

8 (Deposition concluded at 11:15 a.m.  
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CORRECTIONS AND SIGNATURE

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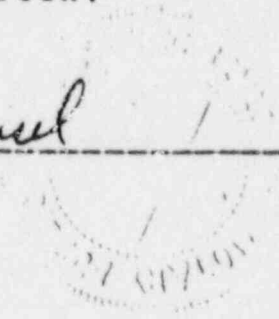
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I, JOHN HANSEL, have read the foregoing deposition and hereby affix my signature that same is true and correct, except as noted herein.

*John R. Hansel*  
\_\_\_\_\_  
JOHN HANSEL



SUBSCRIBED AND SWORN to before me by the said witness on this the 2 day of December 1987.

*Linda J. Hardie*  
\_\_\_\_\_  
NOTARY PUBLIC IN AND FOR THE STATE OF TEXAS

My commission expires: 10/24/90

ERRATA SHEET

John Hansel  
Volume II  
(October 15, 1987

<u>Page (line)</u>	<u>Correction</u>
4(5)	Correct "goal" to "go"
4(12), (15) and (17), 11(17) and (21-22), 12(2) and (14-15), 31(9), (11), (12-13) and (20), 32(1), 37(19) and (23), 38(17)	Amend "program plan" to "Program Plan"
4(21)	Clarify by changing "yes" to "ERC personnel"
12(24)	Correct to read "It is discussed in the ISAP VII.c Results Report"....
18(20)-22(5) and 23(20)-26(24)	The questioning beginning at 18(18) was ambiguous as to the meaning of "current." The consequent ambiguity in succeeding answers may be removed by replacing "No" on 18(20) with "ERC conducted physical inspections in accordance with inspection packages/checklists that ERC prepared between mid-1985 and early 1986. Inspection attributes were based on Codes, Standards, FSAR and engineering criteria applicable to CPSES at the time of release of the ERC inspection package, regardless of whether those criteria differed from those applicable to CPSES when the hardware originally was constructed and/or inspected." Similarly, answers to the line of questioning at 20(18)-21(11) and 23(20)-26(24) should indicate

Page (line)

Correction

that in conducting the safety significance evaluation ERC referred to the inspection criteria contained in the ERC inspection packages, and those inspection criteria in some cases differ from the criteria applicable to CPSES when the hardware originally was constructed and/or inspected. 20(22-23) should be amended from "at the time that the hardware was accepted" to "at the time that the ERC inspection package was released." Subsequent answers in this line of questioning are correct if it is understood that any time period referred to is the time at which the relevant ERC inspection package was released.

35(4)

Change to read "When we evaluate the root cause for generic implications"

36(4)

Clarify by changing to read "ERC or one of our subcontractors."

38(4)

Change to read "yes the subject of harassment and intimidation will be addressed"

44(9)

Change "draft" to "craft"


## C E R T I F I C A T E

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2  
3 I, James M. Shaw, RPR, Certified Shorthand  
4 Reporter in and for the State of Texas, do hereby  
5 certify that, pursuant to the agreement hereinbefore  
6 set forth, there came before me on the 15th day of  
7 October, A. D., 1987, at 9:15 o'clock a.m., at the  
8 offices of Worsham, Forsythe, Sampels & Wooldridge,  
9 2001 Bryan Tower, Suite 3200, Dallas, Texas, the  
10 following named person, to-wit: JOHN HANSEL, who was  
11 by me duly sworn to testify the truth and nothing but  
12 the truth of his knowledge touching and concerning  
13 the matters in controversy in this cause; and that he  
14 was thereupon examined upon his oath and his  
15 examination reduced to writing under my supervision;  
16 that the deposition is a true record of the testimony  
17 given by the witness, same to be sworn and subscribed  
18 to before any notary public, pursuant to the  
19 agreement of all parties.

20  
21 I further certify that I am neither attorney or  
22 counsel for, nor related to or employed by, any of  
23 the parties to the action in which this deposition is  
24 taken, and further that I am not a relative or  
25 employee of any attorney or counsel employed by the

1 parties hereto, or financially interested in the  
2 action.

3  
4 In witness whereof, I have hereunto set my hand  
5 and affixed my seal this 26th day of October, A.D.,  
6 1987.

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10 JAMES M. SHAW, RPR, CSR  
11 IN AND FOR THE STATE OF TEXAS  
12 2414 North Akard, Suite 600  
13 Dallas, Texas 75201  
14 (214) 855-5300

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My commission expires:  
December 31, 1988  
CSR No. 1694