

U.S. NUCLEAR REGULATORY COMMISSION  
Office of Inspector and Auditor

Date of transcription May 2, 1985

Report of Interview

Brooks Griffin, Investigator, Region IV Field Office, Office of Investigations (OI), NRC, was interviewed concerning his knowledge allegations that the liner plates for the spent fuel tank, refueling cavities, and two transfer canals at Comanche Peak Steam Electric Station (SES) had been improperly installed and that Texas Utilities Generating Company (TUGCO) had falsified inspection reports concerning the liner plates. During the interview, Griffin provided the following information:

On April 6, 1984, Griffin interviewed a confidential source, represented by the Government Accountability Project (GAP), concerning alleged falsification by TUGCO of liner plate inspection reports at Comanche Peak SES. The source reported that she had been instructed to sign off on inspection travelers for quality control (QC) inspections on liner plates she had not performed. This interview was the first involvement by OI in the alleged TUGCO falsification of liner plate inspection reports. On April 6, 1984, Griffin interviewed a second GAP witness who provided corroborating testimony concerning the allegations made during the first interview. During both interviews, Thomas Ippolito, Project Manager, Comanche Peak Technical Review Team (TRT), was present, and he received copies of both statements.

As a result of the information provided by both GAP witnesses, OI and the TRT worked together for about a month to review liner plate allegations/problems. After the review, OI assumed investigative jurisdiction on matters involving possible licensee wrongdoing, and Ippolito and the TRT took responsibility for reviewing the technical issues concerning whether the liner plates were properly manufactured and installed.

During the first of September 1984, Griffin and Tom Currie, EG&G, Idaho, reviewed TUGCO inspection travelers, and on September 10, 1984, Griffin began active investigation of the allegations of wrongdoing contained in the statements of both GAP witnesses. The OI investigation (4-84-039), which was in draft form at the time of this interview, consisted of interviews of 16 licensee personnel, including everyone mentioned by the GAP witness. Many of these interviews were conducted between September and October 1984. Griffin noted that the first GAP witness alleged she was told to sign inspection travelers for inspections of liner plates she did not conduct. However, the practice of "late entry sign-offs," where an inspector signs inspection documents for inspections the inspector did not perform as long as there are inspection documents to support the traveler, is common. Apparently, as far as the NRC technical staff and the nuclear industry are concerned, there is no problem with this practice. Because the GAP witness had reservations about

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by George A. Mulley Jr., Investigator, OIA Date dictated May 2, 1985

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what she was asked by TUGCO management to do, she noted on the travelers the fact the entries she made were late and she incorporated the old construction documents which bore previous QC inspector signatures for inspection steps into the traveler package by renumbering the documents. During any future review, these steps would identify that the entry was a late entry sign-off and the documents used to support the entry would be available.

Although the GAP witness was concerned with signing for inspections she did not personally conduct, the OI investigation did not focus on that allegation because the practice of late entry sign-offs was not considered improper. However, through a series of interviews, Griffin was able to determine exactly what instructions the GAP witness received from TUGCO management. It was learned that the instructions to the witness were to sign-off on the travelers whether or not construction documents (NDE chits) existed to support that inspections were actually conducted. The OI investigation into this information demonstrated that management instructions to sign-off on travelers for which no back-up documents were available were improper.

Griffin also discussed an August 24, 1983, interview of Arvil Dillingham, Jr., a former Brown and Root, Inc., boiler maker general foreman at Comanche Peak SES. This interview was conducted during the course of an OI investigation (4-84-006) into allegations of intimidation of employees at Comanche Peak SES. During the interview of Dillingham, he provided information concerning his belief that inspection travelers concerning liner plates had been falsified. The purpose of the OI interview of Dillingham was to investigate alleged intimidation at Comanche Peak. OI believed that Dillingham's allegations concerning the liner plates had previously been addressed; therefore, OI did not identify his belief that the travelers had been falsified as being an OI matter. OI referred the Dillingham statement, which contained numerous technical allegations many of which had already been addressed, to Region IV. Region IV reviewed the allegations in the statement to determine if any new allegations had been made. Region IV was to refer back to OI any new allegations of wrongdoing that it developed. OI never received any feedback from Region IV; therefore, OI believed the Dillingham statement contained no new allegations of wrongdoing. However, as a result of the information provided during the April 6, 1984, interviews of GAP witnesses, the allegations of liner plate inspection traveler falsification, originally mentioned by Dillingham then corroborated by the two GAP witnesses, were thoroughly investigated by OI.

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
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Interview  
4/6/84

agreement  
4/6/84

**CONFIDENTIAL**

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CONFIDENTIALITY AGREEMENT

I have information that I wish to provide in confidence to the U. S. Nuclear Regulatory Commission (NRC). I request an express pledge of confidentiality as a condition of providing this information to the NRC. I will not provide this information voluntarily to the NRC without such confidentiality being extended to me.

It is my understanding, consistent with its legal obligations, the NRC, by agreeing to this confidentiality, will adhere to the following conditions:

- (1) The NRC will not identify me by name or personal identifier in any NRC initiated document, conversation, or communication released to the public which relates directly to the information provided by me. I understand the term "public release" to encompass any distribution outside of the NRC with the exception of other public agencies which may require this information in furtherance of their responsibilities under law or public trust.
- (2) The NRC will disclose my identity within the NRC only to the extent required for the conduct of NRC related activities.
- (3) During the course of the inquiry or investigation the NRC will also make every effort consistent with the investigative needs of the Commission to avoid actions which would clearly be expected to result in the disclosure of my identity to persons subsequently contacted by the NRC. AT a later stage I understand that even though the NRC will make every reasonable effort to protect my identity, my identification could be compelled by orders or subpoenas issued by courts of law, hearing boards, or similar legal entities. In such cases, the basis for granting this promise of confidentiality and any other relevant facts will be communicated to the authority ordering the disclosure in an effort to maintain my confidentiality. If this effort proves unsuccessful, a representative of the NRC will attempt to inform me of any such action before disclosing my identity.

I also understand that the NRC will consider me to have waived my right to confidentiality if I take any action that may be reasonably expected to disclose my identity. I further understand that the NRC will consider me to have waived my rights to confidentiality if I provide (or have previously provided) information to any other party that contradicts the information that I provided to the NRC or if circumstances indicate that I am intentionally providing false information to the NRC.

Other Conditions: (if any)

WITH CONDITIONS NOTED ON THE RECORD

4/16/84 [Handwritten initials]

I have read and fully understand the contents of this agreement. I agree with its provisions.

4/16/84

Date

[Redacted signature and address area]

Signature of source of information  
Typed or Printed Name and Address

Agreed to on behalf of the US Nuclear Regulatory Commission

4-6-84

Date

[Handwritten signature]  
Signature  
Typed or Printed Name and Title

Revision 1.