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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
OFFICE OF INVESTIGATIONS
REGION IV

CONFIDENTIAL INTERVIEW

OF [REDACTED]

Friday, April 6, 1984
Cleburne, Texas

The interview was commenced at 6:55 p.m.

PRESENT:

H. BROOKS GRIFFIN, Investigator, Office of
Investigations, U. S. Nuclear Regulatory
Commission, Region IV, Arlington, Texas

THOMAS IPPOLITO, Engineer, NRR, U. S. Nuclear
Regulatory Commission, Washington, D. C.

THOMAS CARPENTER, Legal Intern, Government
Accountability Project, 1901 Q Street, N. W.,
Washington, D. C. 20009

[REDACTED] Interviewee

C O N T E N T S

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WITNESS

EXAMINATION



3

P R O C E E D I N G S

1
2 MR. GRIFFIN: We're going to go on the record now.

3 This is an interview of [REDACTED] who is
4 employed by Brown & Root at Comanche Peak Steam Electric
5 Station.

6 The location of this interview is Cleburne,
7 Texas, and this is April 6, 1984.

8 Present at this interview are [REDACTED]
9 Tom Carpenter, Representative for the GAP, the Government
10 Accountability Project; Tom Ippolito, NRC, NRR; and H. Brooks
11 Griffin with the NRC OI; and Mr. Burns, the Court Reporter.

12 [REDACTED] I need to swear you to the contents of your
13 statement, would you rise and raise your right hand, please?
14 Whereupon,

15 [REDACTED]
16 having first been duly sworn by Investigator Griffin, was
17 examined and testified as follows:

EXAMINATION

18 BY MR. GRIFFIN:

19 Q The first subject we need to discuss is the
20 confidentiality agreement. I'm going to read this to you,
21 and I'm going to read it into the record; and it's important
22 that we both have a clear understanding of what the terms
23 of this agreement are.

24 So, I'm going to be asking you as we go along if
25

1 you understand; and I am sure you do.

2 "Confidentiality Agreement. I have information
3 that I wish to provide in confidence to the Nuclear
4 Regulatory Commission. I request an express pledge of
5 confidentiality as a condition for providing this information
6 to the NRC. I will not provide this information voluntarily
7 to the NRC without this confidentiality being extended."

8 Do you understand that?

9 A Yes, I do.

10 Q Okay.

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

14 These first three conditions are what the government
15 is agreeing to. This is what binds us; this is what we
16 must follow.

17 "No. 1. The NRC will not identify me by name or
18 personal identifier in any NRC initiated document, conversation
19 or communication released to the public which relates directly
20 to the information provided by me."

21 Do you understand?

22 A Yes, I do.

23 Q We will not use your name in our reports; we will
24 not use your title or some description in there that would
25 allow the reader to identify you?

1 A Right.

2 Q "I understand the term 'public release' to
3 encompass any distribution outside of the NRC, with the excep-
4 tion of other public agencies which may require this infor-
5 mation in furtherance of their responsibilities under law
6 or public trust."

7 This means that the NRC will not release
8 documents that bear your name or any other identifier to
9 anybody outside the NRC, with the exception of other
10 responsible public agencies.

11 An example might be that at some point in future,
12 say, [REDACTED],
13 just as an example. If you did, it might be that the
14 NRC would receive [REDACTED]
15 [REDACTED] as to your activities as an inspector, our
16 knowledge of you.

17 This is an agreement between the NRC [REDACTED]
18 [REDACTED] that consistent with the law and it
19 would be possible the NRC [REDACTED]

20 A I see.

21 Q But that would not be released outside the public
22 agencies that have such need under law.

23 A Okay.

24 Q That is the exception.

25 "No. 2. The NRC will disclose my identity within

1 the NRC only to the extent required for the conduct of
2 NRC-related activities."

3 In other words, they don't go back and say, "hey,
4 last night I met [REDACTED]." It will be only those
5 people that need to know who will be told what your name is.

6 If your name appears on a document and an inspector
7 is assigned to go look at a document and to determine whether
8 something is wrong with that document, he's going to need to
9 know your name so he can identify the document.

10 A Right.

11 Q But that doesn't mean he needs to tell five other
12 guys that are NRC inspectors. It would be kept as restricted
13 as possible to maintain and ensure confidentiality. The
14 government agrees to do that as part of its contract.

15 "No. 3. During the course of the inquiry or
16 investigation the NRC will also make every effort consistent
17 with the investigative needs of the Commission to avoid
18 actions which would clearly be expected to result in the
19 disclosure of my identity to persons subsequently contact by
20 the NRC."

21 In other words, I am interviewing tonight: Let's
22 say next week I'm on-site and I am interviewing somebody in
23 DCC.

24 And I say, Now, listen, I talked to some people
25 off-site, and I use some description that would tend to tell

1 that person that I was subsequently interviewing, that would
2 lead them to say, hey, I know who he was talking to; he
3 was interviewing [REDACTED]

4 Well, we take precautions to avoid identifying you
5 in that manner.

6 "At a later stand I understand that even though the
7 NRC will make every reasonable effort to protect my identity,
8 my identification could be compelled by orders or subpoenas
9 issued by courts of law or hearing boards or similar legal
10 entitles. In such cases the basis for the granting of this
11 promise of confidentiality and any other relevant facts will
12 be communicated to the authority ordering the disclosure in
13 an effort to maintain my confidentiality."

14 What this means is, a court of law legally has the
15 right to compel the NRC to give up your name, or it's
16 possible that they could have a legal basis for compelling
17 your name.

18 If such an unusual occurrence were to occur, the
19 NRC would resist divulging your name in every way possible.

20 And if everything else failed, the NRC would
21 even ask that the court, if we were compelled as an Agency
22 to give up your name -- which is highly unlikely -- but if
23 we were compelled to do so, we would still as a last gasp,
24 request it be given just to the Judge, to satisfy his needs.

25 And the last thing in this paragraph says:

1 "If this effort proves unsuccessful, a representative
2 of the NRC will attempt to inform me of any such action before
3 disclosing my identity."

4 Now, I've only been in NRC for about a year and a
5 half, but I do not know of any instances where the NRC has
6 been compelled to divulge a confidential source's identity.
7 And I don't anticipate any such instances. We hope this will
8 never come up. And I think we can state here in full
9 confidence that it will not in this case.

10 Okay, now, the next paragraph involves your part
11 of the agreement, what you must abide by for this contract
12 to continue to exist:

13 "I also understand that the NRC will consider me
14 to have waived my rights" -- which means 'give up' -- "to
15 have waived my right to confidentiality if I take any action
16 that may reasonably be expected to disclose my identity."

17 In other words, if you go back where you live and
18 you call up some of your friends and you say, "I was just over
19 Friday night talking to the NRC, and I told them about all
20 the stuff I found." If you do that, obviously, you are not
21 trying to keep it confidential.

22 A And that's a fact.

23 Q Okay.

24 Well, what we're saying is you shouldn't do that.
25 But if you do it, confidentiality --

1 A I wouldn't dare do it.

2 Q Right.

3 So what we're saying is, if you do this, the NRC
4 will no longer be compelled. If you aren't keeping it
5 confidential, we will no longer be compelled to do so, also.

6 "I further understand that the NRC will consider
7 me to have waived my right to confidentiality if I provide
8 or have previously provided information to any other party
9 that contradicts any information that I have provided the
10 NRC, or if circumstances indicate that I am intentionally
11 providing false information to the NRC."

12 Do you understand that?

13 A Yes, I do.

14 Q Okay.

15 Now, Tom has some conditions that he wishes to
16 read into the record that -- in support of maintaining
17 this confidentiality.

18 Tom?

19 MR. CARPENTER: Okay.

20 I'm a representative of the Government Accountability
21 Project, a legal intern there, representing [REDACTED] here
22 today.

23 GAP would like to add-in as a condition to the
24 confidentiality statement that, we expect the Office of
25 Investigation and the authorities in this investigation,

1 to provide a copy of the investigation report that results
2 from this investigation when it is made public, and when it
3 is available to the public -- that portion that is available
4 to the public -- when that time is reached.

5 And, secondly, we also expect the Office of
6 Investigation and the NRC to follow the normal OI policy
7 regarding retention of all material developed during the
8 course of your investigation as relates to [REDACTED]
9 and not to destroy any notes or memorandum as relates to
10 [REDACTED]

11 And, finally, we would like to note on the record
12 that we would prefer not to have any Region IV personnel
13 in possession of [REDACTED] name or files, if it can be
14 avoided.

15 And we would like to state on the record that
16 is our wish; and we would hope you would avoid that.

17 We realize you cannot promise that, but we'd like
18 to have it on the record that this is what we would like to
19 have.

20 MR. GRIFFIN: Okay.

21 BY MR. GRIFFIN:

22 Q [REDACTED] in response to what he has said, the NRC
23 is prepared to send you a copy of that portion of the
24 NRC report that might result from your concerns; when it is
25 released to the public, we would be willing to give that.

1 We will also send you a copy of the transcript
2 of whatever se say here today, and a copy of the confidenciatia-
3 lity agreement.

4 I will adhere to the policy that we have which
5 includes the preservation of notes and documents that we
6 receive and we use in preparation of our investigative reports.
7 And as Tom has already said, GAP has reservations about
8 using Region IV personnel:

9 This is not a condition that the NRC can agree to.
10 He is merely expressing a concern about the use of Region
11 IV personnel and a desire that they not be used.

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

14 Is that true, [REDACTED]

15 A Yes.

16 Q Okay.

17 What I need you to do is sign your name, right
18 here (indicating document); you can do it on this copy that
19 you have, right here.

20 A (Witness signing document.)

21 MR. GRIFFIN: Tom, would you witness?

22 (Mr. Carpenter signing document.)

23 (Mr. Griffin signing document.)

24 MR. GRIFFIN: In that we've signed this, [REDACTED]
25 we have an agreement; and the government will abide by it;

1 and we expect you to, also.

2 As I said a few minutes before, a transcript of
3 the proceedings this evening, along with a copy of this
4 agreement will be mailed to you personally when we receive
5 it; so you'll have -- you're entitled to copies of this;
6 and we will be sending them to you.

7 BY MR. GRIFFIN:

8 Q Okay, [REDACTED], now, I want to start into your
9 initial or your original affidavit; and I'm going to be
10 following the affidavit. And probably the primary purpose for
11 our meeting this evening is to provide the NRC an opportunity
12 to go through your affidavit, assure that we understand
13 what you have to say; and also to try to get more specifics
14 that would help us to look into these problems.

15 So I hope we can -- the affidavit lays out pretty
16 clearly what your concerns are; and this gives the NRC an
17 opportunity to get a little bit more if we can; and we'll be
18 moving from one issue to another.

19 Okay, your name is [REDACTED] How are you
20 currently employed at Comanche Peak?

21 A I am a [REDACTED]

22 Q You work in DCC or the satellites?

23 A I work in QA office, in the QC building.

24 Q Oh, okay.

25 And who is your immediate supervisor?

1 A My immediate supervisor, the time sheet I'm on,
2 is [REDACTED]

3 Q And what are your duties, daily duties?

4 A At the present I control the flow of documentation
5 from the craft to the QC, to ANI, and eventually into the
6 vault.

7 Q Okay.

8 When did you first begin your employment at
9 Comanche Peak?

10 A [REDACTED]

11 Q Okay.

12 And what was your position when you were hired?

13 A I was hired in as a document controller to draw
14 isolation drawings for the installation of insulation.

15 When a hydro was performed, after the hydro was
16 performed they would insulate it. The walkdown was made,
17 the hydro was made; then I provided a drawing that they used
18 to insulate the areas that had been included within that
19 hydro limits.

20 Q Did you then transfer to the position you presently
21 hold?

22 A I went from the -- that position, to the task
23 force in the reactor building, handling hanger packages.
24 This was on the hanger push, to get the hangers through.

25 The job there was basically a clerk. The QC

1 inspectors would walkdown the hangers and work to be done in
2 the reactor building; and I would -- I kept -- I provided
3 them with the ISOs --

4 Q What does "ISO" stand for?

5 A That's an isometric drawing. It gives you the
6 location by following that ISO of the hangers, the welds,
7 or anything in the plant you can find the location of in
8 this ISO drawing.

9 Q Okay.

10 A Also, the WDCs; they have certified copies,
11 certified vendors' copies of drawings of hangers, parts of
12 hangers -- they call them VCDs -- vendors' certified copies
13 -- to see that they were in the packages, to see that they
14 were used when the walkdown was made.

15 Basically, what I was doing was keeping, sort of
16 interfacing between craft when we would get the hanger
17 package, get it to the proper QC inspector, get it walked-
18 down, and get it back up the hill to QA for review.

19 Q You're interfacing with craft and you're interfacing
20 with document review --


21 A Not with document review.

22 I was interfacing with the QC inspectors, them-
23 selves, making the walkdown.

24 Q Okay.

25 You actually worked with QC.

1 A Yes, I was with QC. At that time I was under

2 
3 Q Okay.

4 MR. IPPOLITO: How did the satellites or document
5 control fit into your scheme?

6 THE WITNESS: Document control, I have -- I was --
7 you'd have to have a certification to pick up control
8 documents from document control. Not everybody could get
9 them.

10 My number was, starts out as 083. I could get
11 packages under the number of 083, control number.

12 Then it switched to control number 005. But I
13 was the only one who could go to DCC and take control copies
14 out for anybody. My supervisor couldn't do it. No one was
15 supposed to be able to do it but myself.

16 MR. IPPOLITO: In other words, you got your
17 packages from document control?

18 THE WITNESS: I got my drawings, added them to the
19 packages that I had gotten from craft.

20 I had to see that there was a current revision
21 of all of the drawings in that package; that, say, they
22 brought me a hanger package from the welding, sent a hanger
23 package from craft that had gone through their reviews up to
24 that point.

25 Then I would get the latest rev of the ISO; I

1 would put it in the filing cabinet. When the QC inspector
2 came in, I would give him the entire package. He would take
3 it out and make his walkdown, his visual inspection, of
4 whatever he was -- whatever it was that he was -- and then
5 he would bring it back; and then I would transmit it up the
6 hill to QA for QA review.

7 This was before I got into QA review.

8 MR. IPPOLITO: Where did the craft get it?

9 In other words, the crafts had to have a package
10 of something to build a hanger or --

11 THE WITNESS: They got it from welding engineering.

12 MR. IPPOLITO: And welding engineering got it
13 from whom?

14 THE WITNESS: The welding engineering were the
15 ones who drew the packages up. They were the ones who
16 made the -- in other words, I guess the best thing to do is
17 to explain the path of one of these documents.

18 MR. IPPOLITO: All right, that would surely help
19 me because I am confused.

20 THE WITNESS: All right.

21 They -- the welding engineers are supposed to
22 determine what particular thing, hanger, et cetera, is to
23 be located for having its welding and everything --

24 MR. IPPOLITO: Yuh.

25 THE WITNESS: -- and that is supposed to be done by

1 welding engineering; not always, but it's supposed to.

2 MR. IPPOLITO: Right.

3 THE WITNESS: Then they fix up a weld data card.

4 MR. IPPOLITO: Okay.

5 THE WITNESS: For hangers and for piping.

6 And they send these to the field, to the craft.
7 The craftsmen do whatever is called for on this weld data
8 card, class traveller, or whatever it is. They perform the
9 work.

10 If they have any problems -- and these task forces,
11 the way they had it set up, you had a welding engineer,
12 you had your QC, you had your ANI, you had your QA, all in
13 this one area. I wouldn't say it was an office; it wasn't.

14 And they all interfaced together, right there,
15 to expedite the -- whatever they were doing to the hangers,
16 which, most the time was rework while I was there, modifica-
17 tions that had come out.

18 And this was supposed to make them accessible to
19 each other so that you wouldn't have to spend hours and days
20 to find them, run them down. The task force was set up
21 specifically for a certain area, and for a certain project;
22 and they were all working on that one project so they weren't
23 distracted with something else.

24 I don't know if I'm making it clear or not?
25

1 BY MR. GRIFFIN:

2 Q [REDACTED] is this what you are currently doing now?

3 A No.

4 Q Okay. I think that's where I'm confused.

5 A No.

6 Q You did this, this carrying the weld data cards
7 through the system; and this was your job --

8 A Now, that's my job now.

9 Q Okay.

10 Then after July, I went on vacation; when I came
11 back off of vacation and reported to the task force, it
12 was no longer there.

13 MR. IPPOLITO: This was July?

14 THE WITNESS: I was the only one. There was nobody
15 there.

16 They hadn't told me that they were doing away with
17 the night shift. See, I worked nights, see.

18 So I called [REDACTED] and I told him, what am
19 I supposed to do? There's nobody here.

20 He said, "Well, [REDACTED] I forgot to get withk you."
21 He says, "Go some place and hide and wait till morning and
22 I'll see about bringing you on the day shift." You know.

23 So this is when, it was right after I got back off
24 vacation, that I went on days. When I went days, they first
25 put me in the hanger department working on hanger

1 transmitters and things, to the ANI.

2 Then about a week after this, they put me in this
3 job that I am in now, which is controlling the flow of
4 documents.

5 BY MR. GRIFFIN:

6 Q For QC?

7 A For QC. I'm in QA. It's called QES.

8 Q Well, maybe I could clarify by saying: during
9 most of your concerns that we're going to go through here,
10 in this first affidavit which was made, you were employed
11 as -- or you were responsible for transmitting weld data
12 cards; is that correct?

13 A Now, during the first part of the document
14 that we're going through here, it was -- my first concern
15 came up at night, when I was on the night crew.

16 Q And that was your job then, to transmit the --

17 A Well, I started out, like I said, working on
18 insulation packages; and this is up in the QA building.
19 And then I had concerns there.

20 And then they transferred me down to the task
21 force. I had concerns there.

22 Q Okay.

23 A I traveled carrying, expediting -- is what they
24 call it -- the different --

25 Q Well, as we go into each one of these issues, [REDACTED]

1 we'll try to achieve an understanding what your job was?

2 A Right, okay.

3 Q Because if I try to hold them all at once --

4 (Laughter)

5 -- I probably won't be able to.

6 Following the affidavit here, you indicate that
7 in the first paragraph here, that you said you had a great
8 deal of experience with documentation; and you explain in
9 here how a weld data card went through the system; and that
10 was your job in transmitting?

11 A Right.

12 Q The weld data cards, and the engineering review,
13 and quality control, ANI; and then you gave us an explanation
14 of how the system worked?

15 A Right. That is my present -- that's what I do
16 now.

17 Q What you do now? Okay.

18 A Right.

19 Q Okay.

20 That's pretty clearly stated here.

21 Then you say one of the first problems that you had
22 was how documentation was stored. You said you had a couple
23 of fires?

24 A No, we didn't. We would have if I hadn't been
25 there.

1 See, I worked nights, and at times I was the only
2 one in the QC building.

3 Q Okay.

4 A And there's been many nights out there that I have
5 been the only one up there working in the QC building.

6 Q Um-huh.

7 A This is when I was working on my insulation
8 drawings.

9 Q Um-huh.

10 A It was easier, I guess, to have me doing that then
11 than it was during the day time. I started in on the night
12 crew.

13 Q Um-huh.

14 A And I had gone into the main DC room to get a drink
15 of water, and I smelled the smoke, And at that particular
16 time there was a boy that had stayed over reviewing at nights;
17 he was way at the other end of the trailer.

18 And, of course, first thing I thought was to go
19 down and see if he smelled it.

20 Q Um-huh.

21 Let me stop you for a minute,

22 It just occurred to me, in consideration of
23 confidentiality, mainly I am interested in finding out some
24 information about these fires; I want to know that as it
25 relates to one of your potential concerns -- fire hazards

Start of
Allegation
AQ-45

1 out there.

2 But, rather than going into detail as to what
3 exactly occurred, which would probably tend to identify you
4 as the person responsible and they are not actual ongoing
5 actual safety issues --

6 A There's a much better way of identifying it than
7 that; okay?

8 There are six temporary trailers that are -- have
9 no fire protection whatsoever. They don't have sprinklers
10 or anything.

11 Q Um-huh.

12 A Joined together in one long line. They're a
13 potential fire hazard, and if it ever caught on fire, they
14 would be gone instantly.

15 Q Okay.

16 What trailers are these?

17 A These are the QC trailers.

18 Q Okay.

19 A QC building is just, it's right in front of the
20 weld, welding engineering.

21 Q Okay.

22 A There are six trailers joined together there,
23 temporary trailers; they are poorly-wired; the airconditioners
24 are shot; there are many electrical potentials for fire.

25 Q Okay. Tell me, [REDACTED] are there any records

1 stored in those trailers?

2 A All permanent.

3 Q They are all permanent records?

4 A You bet they are!

5 Q Okay.

6 A Hanger packages.

7 Q Okay. We'll have a look at that.

8 A But my concern over that is, if that building
9 burned --

10 Q The records are destroyed?

11 A You have destroyed a large part of Comanche Peak
12 piping out there.

13 Q Now, do you happen to know the procedure, if they
14 have a procedure or requirement as to storage of records?

15 A This I will not say I have actual knowledge; I've
16 heard that there is. I've heard it discussed. I haven't
17 actually read them, I haven't actually seen them.

18 But surely to goodness there are procedures that
19 will protect those documents. They are not supposed to be --
20 my understanding is -- I haven't seen a procedure on it, now;
21 you understand that?

22 Q Um-huh.

23 A But my understanding is they are not to be outside
24 of a fireproof area.

25 Q Okay. We can check that out.

1 A When they store them in the vault, they don't
2 even allow smoking back there.

3 Q Yuh.

4 MR. IPPOLITO: Is the vault in a separate building?

5 THE WITNESS: The vault is in a separate building.
6 It's in the administrative building down the hill.

7 BY MR. GRIFFIN:

8 Q Okay. You indicate, [REDACTED], in your statement here
9 in May, about May of '83, they lost a lot of documents,
10 packages?

11 A They did.

12 Q They were changing their system; they tried to go
13 to a system where there could be packages in the field; is that
14 right?

15 A Yes.

16 What had happened was they had come up with a task
17 force idea.

18 Q Um-huh.

19 A They had a regular hanger vault, they called it,
20 in welding engineering where all of the hangers were kept and
21 stored.

22 When they set up their three task forces, reactor,
23 auxiliary and safeguards, they broke the documentation up into
24 those areas; and carried them down to the particular place
25 inside; ours was inside the reactor. One one in the aux

Start of
Allegation
AQ-74

1 building.

2 And they carried it right directly to the area
3 that was being worked on, supposedly. They didn't carry them
4 all -- they had the files down there; they didn't transmit
5 them all at once. They came down in bunches. They carried
6 them down there in boxes.

7 Yes, there was 1,500 hanger packages lost down
8 there. I don't know how many they've been able to find.

9 Q Okay, who is responsible for trying to recover them;
10 do you know?

11 A Whoever the last person that had them in their
12 possession.

13 Q But, I mean, is there one group or one person
14 on site that's been tasked for trying to locate these lost
15 documents?

16 A No.

17 They did have, now, I don't know what group they
18 were called; there were two men that came looking for some of
19 these lost hanger packages.

20 Q Do you remember their names?

21 A No, I don't even know their names.

22 Nobody had the time to help them, the only thing of
23 it is.

24 Q Did they issue some kind of a memo out there saying,
25 everybody bring in all documents?

1 A No; but they did at one time start to come in and
2 go through everybody's desk; they thought they had been lost.

II

3 Q Well, keep in mine; I've got your affidavit here,
4 and what I'm trying to do is get more specific; and if there
5 are no more specifics here, we're going to move right on --

6 A I did have a list; I did have a list of hanger
7 packages I was trying to find, to help them find. I even have
8 the transmittal slips.

9 Q You think these are lost hanger packages?

10 A They were. I do not want to say they have been;
11 but they have either been found or replaced, so far as I
12 know.

13 Q How do you replace them?

14 A I wish I knew how you replace them.

15 Q Do you still have this list?

16 A It's a -- about this big (indicating) and -- oh,
17 I don't have the list.

18 I looked for it the other day. When they made us
19 move last time, a lot of stuff I had was lost.

20 Maybe it'd be a lot easier to explain, if I could
21 tell you what happened on one of these moves: somebody
22 is not at work that day. They go in and they take everything
23 out and they throw it in boxes -- even their personal stuff
24 there; because those boxes are shuffled and shuttled. It's
25 a haphazard -- they have put them somewhere and lose them.

1 Right now under my desk I've got two boxes that
2 belong to [REDACTED] and I don't know
3 what in the world they've got in them.

4 We got hanger boxes out in the -- in the halls
5 that belong to somebody; but we don't know who they belong
6 to.

7 Q Just to clarify here: when you're saying "hanger
8 packages," are these packages copies of the same ones in
9 DCC?

10 A No, sir, no, sir. They are original copies.
11 They do not have these in DCC. These are the original
12 cards that are made by welding engineering. They are
13 the original walkdowns made by QC inspectors; they're VCDs;
14 they're inspections, they're PT inspections.

15 Q They are not duplicates?

16 A They're originals. Some of the weld data cards.
17 They are the originals of everything that's been done on
18 that.

19 Q If I went on-site and I wanted to ask the most
20 responsible person about this issue: what are you doing in
21 trying to locate these things? -- who would be the person I
22 should talk to?

23 A I would suggest the person who would give you the
24 most accurate description on how they are going about locating
25 it would be [REDACTED]

1 Q Okay.

2 Let's move on to the next issue --

3 MR. IPPOLITO: I'm sorry.

4 MR. GRIFFIN: Okay.

5 MR. IPPOLITO: The way the system was described to
6 me -- and I'm having troubles --

7 THE WITNESS: Um-huh.

8 MR. IPPOLITO: -- the way the system was described
9 to me was, engineering, whether it's weld engineering or
10 electrical, whatever-have-you, puts together either a weld
11 design drawing or electrical ISO, or whatever; and when they
12 do that, they send it down and have it reproduced.

13 Then it goes and gets a number on it, and then it's
14 distributed to the satellites.

15 Now -- all right? -- and from the statellites,
16 people like the craft, welding craft, or the whatever, the
17 electrical craft, they get a work authorization: put up
18 that hanger, or install that cable.

19 They go to--with that authorization card, they
20 go to their satellite and they say, "I want this package."

21 And then are given the package that contains
22 supposedly all the right information in it, all of the design
23 changes and the revs and all that.

24 When they get through putting it together, they take
25 that package -- the package is supposed to be turned in every

1 night, as I understand.

2 Anyway, they return the package back to document --
3 the satellite; and it gets filed there.

4 But one thing they told me is that when they make
5 distribution of the original engineering drawing and any
6 change thereof, the original goes into the vault. That
7 is what I have been told.

8 So, you know, I'm here wondering?

9 THE WITNESS: Yes, you're right, the original goes
10 into the vault -- after it has passed through this
11 document path.

12 It doesn't go immediately into the vault.

13 And when they give you a package down in DCC,
14 they give you DCAs, CMCs, NCRs; but what about the VC reports
15 and the PT reports that the inspectors have made?

16 What you've got on these original packages that
17 makes it a catastrophe if you lost them is you've got -- you
18 don't have copies; you've got the original signatures of
19 the QC inspectors, the weld engineers, of the ANI; you've
20 got the original, signed-off copies.

21 You don't have duplicates. See, that's what makes
22 it --

23 BY MR. GRIFFIN:

24 Q Did the loss of these packages occur before the
25 satellite system was set up?

1 A No. What had happened was they were transmitting
2 them down there in boxes in the backs of open trucks.

3 Q To the satellites?

4 A To -- not to the satellites, but down to the task
5 forces.

6 Some of them might have gotten lost. Some of them
7 might have been set in a box here, and nobody knew who it
8 belonged to.

9 Q But you came up with a specific -- you came up with
10 a number, here; did you have an indication from somebody that
11 1,400 packages were lost?

12 A Yes, they talked about it down there for about
13 two weeks.

14 Q So they never made it to the task forces?

15 A Apparently, if they had, they don't know what
16 happened to them. They kept saying that there were 15 --
17 and they kept going through these printouts that they got
18 from the computer; and they kept checking them off.

19 And eventually, what we did to help locate some
20 of them, we went to all of QC, everybody at QC, went into
21 the vault and they gave them those to work on; and they went
22 through individually every document that was in there. And
23 we found some of them misfiled in the vault.

24 Q I thought the computer -- you're talking about
25 "George"?

1 I don't think George came on line until about
2 January of '83; and these documents we're talking about
3 were lost in May of '83?

4 A George was in -- George-1, I guess it was, George-1,
5 or George-2; I forget what it was. But when they came up
6 there, they came in computer printout. And what they was
7 supposed to be was ISO numbers, line numbers, painter numbers;
8 you were supposed to be able to go to one and be able to
9 tell -- they was in hanger order. Another was in --

10 Q Well, for a brief time here the idea was that they
11 would send these packages to various task forces?

12 A Right.

13 Q And they would have the documents there for their
14 use?

15 A Yes.

16 Q And then they decided they were not going to use
17 that system; bring them back in; and when they brought them
18 back in to a central document area, they discovered that they
19 had lost many, many, packages?

20 A They found that out while they were still down in
21 the field; and we were getting feed-ins from George-1 saying
22 this hanger package and that hanger package -- and we didn't
23 have those hanger packages.

24 I would get the hanger packages back from the QC
25 and I would be supposed to make out a transmittal to send

1 up the hill to QA for review, and there was just no order;
2 there was no way you could keep up with it.

3 Q So you think this guy, [REDACTED] could give us --

4 A He could tell you --

5 Q He could tell how it started and when --

6 A And what it was supposed to do, and I don't know
7 if he'll tell you what it did or not; but there is a man
8 named [REDACTED] -- who, [REDACTED] and
9 [REDACTED], were the ones who were in charge of transmitting
10 them down to our task force.

11 They came down there, they set up their file
12 cabinets, and they came in one weekend and they went through
13 all the hanger packages in there; everything was working
14 rather smoothly.

15 Then it started going astray somewhere. I don't
16 know where it went astray. But that's when we started
17 -- they started calling for hanger packages that we didn't
18 have. And we would send up the hill for those hanger packages,
19 and they would send those back down to us, that they had
20 already been transmitted down there.

21 This is when the system started breaking down.
22 This is when they started realizing that the hanger packages
23 were missing, when they would come in for the package, and
24 we wouldn't have it; and we would send the transmittal up the
25 hill -- send word up there to bring that package down -- and

1 they would say: we can't bring it down, we brought it down
2 last week.

3 You see what I'm saying?

4 Now, this has nothing to do with document control
5 at all, or the document control people.

6 MR. IPPOLITO: I don't understand. Do you under-
7 stand it? I want to pursue it. I'm fuzzy.

8 MR. GRIFFIN: What's fuzzy, I think, is -- I may
9 be wrong -- I think we're looking a brief window in time
10 when they tried to use a system; started to assemble documents,
11 moved them out; and then they decided they didn't want that
12 system and they brought them back to go to another system;
13 and then they found out that they'd lost a lot of stuff;
14 because they did not maintain control over those packages.

15 MR. IPPOLITO: I think what I'm hearing now is
16 that they started off with a central place where all the
17 documents were. They decided that, you know, they'd improve
18 efficiency; and they created three task forces.

19 They said: let's move the stuff down to the task
20 forces so that it'll be close to them.

21 Then they found a short while, I guess within a
22 few months or something like that --

23 THE WITNESS: Within a few weeks.

24 MR. IPPOLITO: Within a few weeks they found that
25 to be unsuccessful. I think at that time they may have

1 created the satellites.

2 THE WITNESS: This was prior to the -- this would
3 be before -- maybe that's what I'm missing about.

4 MR. IPPOLITO: Yes?

5 THE WITNESS: This was before the satellites were
6 created.

7 MR. IPPOLITO: That's it.

8 THE WITNESS: See, the satellites didn't come
9 into existence until after the task force had been moved
10 back up the hill.

11 BY MR. GRIFFIN:

12 Q And they'd already tried to draw packages back in?

13 A Right.

14 And what was happening was, we were going into
15 the same DCC for our control copies. I would go in there and
16 I would order CMCs, one CMC; I could go in and maybe order
17 the ISO; we'd have to have the latest rev.

18 I was supposed to be responsible for these. I
19 would not throw a control copy away; I was to take it back
20 and trade it on a new one. You just do not throw control
21 copies away.

22 At this time, now, I want you to understand: we
23 had a single room up the hill where they had all the isometric
24 packadges, all the DCAs, VCDs, everything, filed in this.

25 And at one time it had been maintained by ANI but then Brown

1 & Root had taken it over.

2 In another building, we had all the hanger packages.
3 One was piping and one was hangers. And everything was working
4 smoothly. They had the girls in there, they were tracking
5 all the packages; they knew exactly where everything was.

6 Then when this task force thing come into being,
7 they started breaking those up; and I mean, utter chaos
8 broke loose!

9 They tried to bring all the hangers down to where
10 they had this work 24 hours a day, a QA, a man for the NCRs.
11 They had the ANI. They had the welding engineer -- all right
12 there.

13 It would have been wonderful, if it had worked,
14 you know.

15 But their method of getting it down there was
16 so haphazard, that's where we fell apart.

17 Q Do you have any knowledge, is there anybody who
18 has been tasked with trying to identify and recover all these
19 lost packages?

20 A Yes, but I cannot give you their names.

21 Q Could [REDACTED] give it? Would he know them?

22 A I really don't believe he would, because I really
23 don't know.

24 Q Who could I ask?

25 A The two men that came up to my office had been

1 assigned to locating these lost documents.

2 Q Do you know who they worked for?

3 A That's what I was trying to think. The only reason
4 I'm really aware of them is I was the only one that tried
5 to help them find them. Everybody else had their own job
6 and they didn't want to.

7 I'll look and see if I can find the list they
8 brought, because I wrote their extension number on there.

9 Q Okay. We can go right to the heart of this
10 particular matter, if we can find out who's been tasked
11 with trying to locate the lost documents.

12 Q It seems to me like these gentlemen came in there
13 were -- they weren't up from the task force; they weren't
14 a part of QA. They wore white hats. That's your engineers.

15 Q Okay.

16 A So maybe they came out of engineering department.

17 Q All right, we'll see if we can find out; if we
18 can't, we may ask you to try to help us find out who has
19 that job. I'm sure it's not a secret out there.

20 Is it?

21 A I really don't believe it is.

22 Q Okay.

23 A The men who set i. up, the task forces, they're
24 all gone. [REDACTED]

25 [REDACTED] he threw

1 up his hands and said, I can't take it any more; and he quit.

2 [REDACTED] inherited the job.

3 Q Who is [REDACTED]

4 A [REDACTED]

5 Q Okay.

6 A So I really don't know --

7 Q Okay, we've got a lot of issues here, and I think
8 we've gone as far as we can on that one.

9 Let's go into this concern here on the instance
10 where you know about the issuance of a control stamp. Can
11 you tell me about that?

12 A You bet I can.

13 As I said, I was the only one authorized to sign
14 for control documents. I would go down there, I would get
15 it; it would be a round circle and it would have an 83
16 in the middle of it. And I was in DCC one night looking at
17 some drawings and they were stamping them with a control
18 stamp that had an 83 printed in the middle of it.

19 And I said, "What's happened? You know, it's
20 printed in there now, instead of writing it in with a pencil
21 like they been doing?"

22 And [REDACTED] told me that somebody had stolen
23 a control stamp. And that they were using it on things
24 that shouldn't be stamped.

25 Q Okay, which one was the official one, the one you

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1 had to write it in, or the one that had it printed.

2 Q Well, up until the printed one came out, it was
3 the one that you wrote in.

4 Q Go ahead?

5 A So I didn't think any more about it. And I was
6 up the hill, I had gone up the hill -- this was at night, now;
7 and [REDACTED] I can't remember her last name. I can
8 find out what her name is.

9 Q Okay.

10 A And a young boy working with her, whose name was
11 -- golly, when you try to pull people's names out of your
12 head, it's hard to do -- anyway, I know his name as well as
13 I do mine -- well, I'm going to skip the name.

14 Q Are these DCC people?

15 A Yes.

16 Q Clerks?

17 A She was a reviewer and he was just, I guess you'd
18 call it clerk.

19 I had gotten up there because I had an office, my
20 office had been up there; and I had a lot of stuff up there.
21 And I had gone up there that night for something; I hadn't
22 moved everything I had down to the task force yet.

23 And when I walked in, of course, being nice and
24 her being a woman -- we had met each other down in DCC; and
25 we were standing there talking. And I looked over on the

1 table and there sets the control stamp.

2 Q Okay.

3 And is this back, like, in mid-1983?

4 A This was while I was in the task force, so it was
5 prior to July; I'd say it was in about February or March,
6 sometime in there. It was cold. It was prior to the time
7 that XI went days, while I was nights.

8 Q Okay.

9 And you asked her about where she obtained the
10 stamp?

11 A I said, "Where in the world did you get that?"

12 And before I even had a chance to ask her, I said,
13 "It's illegal for you to have that."

14 And she said, "No, DCC gave it to me."

15 And I said, "Well, they told me, you know, that
16 one had been stolen down there."

17 And she got real angry. She got real upset at me.
18 She said, "No, DCC had given it to them."

19 Well, I remembered what [REDACTED] had told me. So
20 I didn't say any more about it right then. But I got back
21 down the hill and I got to thinking about it.

22 And at that time [REDACTED] had just taken over the
23 job. [REDACTED] and them had -- [REDACTED] had quit; [REDACTED]
24 had taken over. And my concern was -- I liked [REDACTED] and
25 they had a tendency out there every once in a while

1 to, if somebody doesn't fit in with their clan and they want
2 to get rid of them, they drop something on them.

3 I actually believed that he was being set up.

4 Q With the stamps?

5 A With the stamps.

6 The stamp at that time.

7 Q One stamp?

8 A Yes.

9 So, I even expressed my concern to [REDACTED].
10 He was the QA down there that I was working with.
11 And I told him I was afraid [REDACTED] was going to be caught with
12 the stamp, because he had taken over that office; and he was
13 going to be the one to get burned by it.

14 Q Okay, when you say you were concerned about
15 [REDACTED] being set-up -- you say here in your affidavit that
16 you sent him a letter concerning the stamp?

17 A Yes.

18 Q And then after the next day, you saw each other,
19 and he said, it's all right, [REDACTED], we've got two of
20 these stamps.

21 A Right.

22 Q So [REDACTED] knew that the stamps were with QC
23 in the field, is that right?

24 A Yes. What is, the way it actually occurred, [REDACTED]
25 [REDACTED] said, well, [REDACTED], if you're so worried about it,

1 why don't you talk to [REDACTED]

2 Well, I didn't get to talk to [REDACTED] because I left
3 before he came. I was gone when he got there. And so I
4 went up to my old office and I sat down and I wrote a letter.
5 And I said, [REDACTED] I was across the hall and I saw a
6 document control stamp over there; and [REDACTED] has told me that
7 one disappeared out in the field; and that they're using it
8 out in the field. I said, now, if it is illegal for them to
9 have this stamp -- that I wanted him to know they had the
10 stamp. Because if it was illegal for them to have it, then
11 he should know they had it.

12 If it wasn't illegal for them to have it, then,
13 I wouldn't be concerned with it; but that I thought that he
14 should know that it was there; and it was being used.

15 And I told her then, I said, "You had best get
16 that in the drawer because if ANI comes in here, they're
17 going to raise trouble."

18 And this is mainly what the letter was. And I told
19 him that it was of no concern to me at the particular time,
20 other than I valued him in his job; and I did not want
21 him having to take -- like I said, I didn't think he knew
22 they were there.

23 Q He later indicated to you he did know?

24 A It wasn't the next day, it was the day after that.
25 I hadn't gotten any response, and I stayed over, deliverately,

1 to talk to him.

2 Q And he said [REDACTED] had given QC two?

3 A He laughed, and he said, [REDACTED]" he said, "don't
4 worry about it." He said, "[REDACTED] gave them to us
5 himself; and he didn't give us just one; he gave us two of
6 them."

7 Q Okay.

8 A But that is exactly the way it happened. I just
9 happened to be up there; I happened to see it; and [REDACTED] had
10 misunderstood. She had thought it had been stolen.

11 And at the time I didn't realize that --what it
12 could be used for. I didn't analyze.

13 Q So the implication is that QC was misusing these
14 stamps? Do you still believe that?

15 A Yes, because they were told -- now, let me get
16 something straight here, now: You've got a drawing here,
17 and they print it; and it's got the black reduction, because
18 the ISOs are reduced; the original ISO has got the stamp
19 on it, open in the middle, with no control number.

20 They would reduce it, then, you've got a black
21 stamp. They were going in there and they were writing "83"
22 or "005" in there or whatever they wanted in there, without
23 stamping it. And all of a sudden I said: anybody could
24 print a stamp and write in the middle of it. We want
25 original stamp. So they sent a letter out sayi

1 back all of the documents that had been fixed like that and
2 they were going to restamp them.

3 Well, we've got an office up here with thousands
4 and thousands of ISOs in it, with this method of stamping it.
5 Apparently what they had decided was this was a big project,
6 to try to replace all the control copies.

7 And they gave them a stamp where it was written
8 in red with the 83; they stamped over it; I know they did
9 because I've used the stamp.

10 Now, they could also, when you think about it now,
11 they had a copy come in there for anything else, they could
12 have stamped it and written any number in the world in there.
13 But we used it more for 83 than anything else.

14 Q Okay.

15 You are saying the potential was there to misuse
16 these stamps?

17 A You bet it was there!

18 Q Did the possession of these control stamps by
19 QC violate procedures that existed at that time?

20 A Yes, it did.

21 Because ANI was turning them back.

22 Q Okay.

23 Did -- does QC still have these stamps? Do they
24 still have them?

25 A They don't have to use them any more, because

1 all the documents, apparently, have been replaced.

2 Q Well, what system is --

3 A Now they get it straight from DCC with the 83
4 printed inside it.

5 Q Okay, so QC no longer has stamps that they can
6 use for this purpose: is that right?

7 A So far as I know, they don't.

8 Q Okay.

9 Is there any way that you can come up with the name
10 of that QC clerk whom you saw back in '83 with the stamp?

11 A Yes, there is. I can find out what her last name
12 is. Her first name is [REDACTED]

13 Q Okay.

14 A And her little boy's name is [REDACTED]

15 Q Well, let's not go any further --

16 (Laughter)

17 You are saying that the ANI through the change that
18 he instituted as relates to these documents caused the
19 stamp that they were using back then to be discontinued?

20 A No, it wasn't, they weren't stamping it; they
21 were just putting it in there.

22 ANI determined that anybody --

23 Q So they required a change?

24 A So they said they weren't going to approve any
25 more that did not have the stamp in red ink on it.

1 And this is when they did this other. And they told me,
2 I would take the drawings up to [REDACTED] if I found one that had
3 the old black thing on it with the number written in it;
4 I'd carry it up to [REDACTED] and she would stamp it with the red
5 stamp.

6 Q Now, these stamps -- just to make sure I understand
7 -- the stamps that the QC clerk had, the renegade stamps,
8 were they black or red?

9 A They were just a stamp and they'd stamp it in red.

10 Q Okay.

11 And they since changed the stamp?

12 A No, it's just that they have finally, eventually,
13 got all of the documents stamped that they wanted stamped.

14 Now, at that time I knew watching them work down
15 in DCC that they were writing the number in there. So as
16 far as those documents were concerned, I didn't have any
17 guilt feeling about using the stamp; because I was certain
18 in my own mind that that had originally been a control
19 drawing.

20 But then as I have gotten into document control
21 I can see there are many other things seals could be used
22 for.

23 They could be used on a -- if they lost a package,
24 and they wanted to replace that drawing, they could transfer
25 that stamp.

1 Q Okay, the problem then relates to misuse of the
2 stamps; it's over now; is it not?

3 A Yes, I think it is.

4 Q Okay.

5 Who would be our best source of information to
6 find out, besides [REDACTED] and [REDACTED] who are some other
7 people that would know about these stamps?

8 A [REDACTED] -- now, these are peopel you can't
9 find at Brown & Root any more.

10 Q [REDACTED] you say is now at TEDCO?

11 A He just started the first of April.

12 Q Okay.

13 A And [REDACTED] gone. And [REDACTED] definitely
14 knows about them.

15 Q Okay.

16 If I asked him about it, do you think he'll tell me
17 about it?

18 A I am sure he would. I don't really believe that
19 [REDACTED] -- well, I can't say that because -- I think the world
20 of [REDACTED], but I just don't know.

21 Now, the boy, [REDACTED], is working in welding engineering
22 now. And he was in there the night I had the tiff with her
23 over the stamp.

24 Now, [REDACTED] --

25 Q A QC clerk?

1 A Yes. And [REDACTED]

2 Q Okay.

3 A They can verify that, because in fact [REDACTED]
4 wouldn't use them.

5 Q She wouldn't?

6 A No, sir.

7 Q Now, in your affidavit here you say, you indicate
8 a problem in the field relating to the hydro task force
9 in preparing for hydro tests. How did this relate to the
10 misuse of the stamps?

11 A Well, now, that -- you're talking about the drawing
12 where they used the out of rev drawing? -- to -- where they
13 took out a small piece of pipe?

14 Q Yes, right.

15 A Okay, now, what had happened was, the girl that
16 handled hydro was working in the same office I was; and
17 we had a laugh over this.

18 We had a CMC come in there taking out a piece of
19 pipe because it interfered with the hydro. But before they
20 could do the hydro, they had come in with another CMC and
21 had added the pipe, because they thought it had been left off.
22 So they had to call up the hydro again and go back and take
23 the pipe out.

24 Now, what I would like to show in that is that when
25 you don't work with the latest rev of a drawing, you don't

Handwritten scribble

1 go to DCC --

2 A You just stamp it yourself?

3 A Stamp it yourself --

4 Q You don't know --

5 A If you don't check DCC's book -- this is the,
6 actually, doesn't have anything to do with the stamp; it's
7 just that if you don't get a complete package. If you don't
8 go down there and you don't get the full package out of
9 DCC --

10 Q Um-huh.

11 A -- for your drawings, and your CMCs and your DCAs
12 and everything, showing that thing, what the latest revs
13 are; then you don't know -- if you just go down there and
14 get one and it lays in the office six months, and somebody
15 comes along and picks it up, you don't know if you're
16 working with the latest rev.

17 That's why they had to set up the satellites, was
18 to eliminate some of this.

19 Q Okay, tell me about the upgrading and downgrading
20 if piping spools?

21 A We've had piping spools come in there, particularly
22 spools and flanges, that started out as a Class-3, and
23 they've changed them to Class-2.

24 Q How did they do this?

25 A They just put on there -- they just changed it;

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1 the QC inspector changed it from a Class-2 to a Class-3.

2 Now, there are people who can tell you more about
3 this than I can; but if you're running along a line and
4 you got a Class-2 and it connects into a Class-5, there's a
5 point there where it changes from a safety-related to
6 nonsafety-related. Now, there's one Class-2 has to be
7 continuous from end to the other; eventually, that flange --
8 you'll get a pipe coming out the middle of this; that's a
9 Class-2.

10 The reasons for changing it, I am assuming they've
11 got a reason for changing it. It starts out as safety-
12 related, then they downgrade it to a nonsafety-related;
13 non-ASME, it does not have to be reviewed by ANI, then.

14 Q I see.

15 Well, do you know of any particular systems,
16 piping systems, that are quality or safety system that you
17 personally know have been downgraded so that they would
18 miss that ANI review?

19 A I would guess a flange now and then. Or we had a
20 system go through here last month; I don't remember the
21 number on it; it would be easy to trace; because we got three
22 flanges on a spool; two of them are downgraded to non-ASME
23 and put in the vault, and one is sent to ANI.

24 I've had several instances of that. Now, they
25 would be easy to trace, because on the transmittal that is

1 sent to the vault because each flange has --

2 Q I understand how it works, [REDACTED]. And in an
3 instance like this and in this type of concern, what we
4 would need to do is to try to isolate one of them so we
5 could go have a look at it.

6 A Okay, that I will have to do; I can do. I can go
7 to my books, my transmittals; I can get those numbers.

8 Q Okay. If you can give us an example of one or
9 a couple that have been upgraded or downgraded, we can look
10 at them and see if what they're doing has engineering
11 approval and whether it's a legitimate thing they're doing,
12 or if they are just trying to bypass the ANI.

13 A Like I said in the last month we've had several
14 come through like that.

15 Q Okay.

16 A I wish [REDACTED] would talk to you.

17 Q Well, I tell you, when we kick off an interview,
18 we're liable to talk to anybody on site.

19 A Because she has got information on all of this.

20 Q A lot of times investigations or inspections start
21 out with people who are willing to take the risk of coming
22 forward and telling us of their concerns. Once we have
23 a starting point, then we normally go on site, wherever we
24 need to go -- whether it's vendors or on-site -- and then we
25 start interviewing large numbers of people; anybody that

1 might have information. We usually are able to resolve these
2 issues.

3 But if the people we talk to won't talk to us,
4 they won't tell us the truth, then we've got problems.
5 But we've found in general if we talk to enough people,
6 and the people that we're talking to realize we're not just
7 going to be talking to them, but we're talking to all their
8 people who work with them; usually people will shoot
9 straight with us. They will tell us the truth -- not always,
10 but a lot of times.

11 And we usually end up getting our answers if we
12 talk to enough people.

13 A Well, I'm sure she'd talk to you if she were
14 approached; but she will not come forward.

15 Q Okay.

16 A But she's been in document review now for three
17 years. And she's very thorough.

18 Q Okay. We'll keep her in mind.

19 A She can give you numbers, everything. She can
20 give you everything -- everything I can't furnish you, she
21 can give you.

22 Q You make reference in your affidavit here to
23 a document, weld data card, you believe was outrightly
24 falsified by a QC inspector named ██████████

25 A Right.

Start of
Allegation
AQ-7

1 Q You say an NCR was written against -- was written
2 by a reviewer against this entry he made, and you say -- is
3 it the weld data card that passed through your hands?

4 A My desk is here. Right here beside me was [REDACTED]
5 [REDACTED] desk. Right back over here facing the wall was
6 [REDACTED] desk. They were discussing this card. They
7 had discovered that the PT report on it, the dates did not
8 coincide with that inspection date.

9 So [REDACTED] wrote up an NCR, okay, her and
10 [REDACTED] together wrote up an NCR.

11 Q I'm already somewhat aware of this issue, and what
12 I need to do is figure out what you know about it.

13 You saw it?

14 A I saw them sitting there when he came in and
15 argued with her about it.

16 Q Okay. You say that [REDACTED] had written on the
17 data card that it was signed in error; is that correct?

18 A When he came back, after he went into [REDACTED]
19 office, when he came back, he came back with a notation
20 "signed in error".

21 Q And this had been signed by [REDACTED]?

22 A Yes, it had.

23 Q Okay.

24 And the NRC was voided by [REDACTED]

25 A Yes, I saw the document when it came through.

1 Q Okay.

2 A I had seen it before and I saw it after.

3 Q Okay. And it's your belief that this was falsifi-
4 cation?

5 A Yes, it was.

6 That the man had either falsified the documentation
7 or he had signed and not gone back down and looked at it.
8 They're supposed to inspect that every time.

9 But [REDACTED] did basically the same thing that
10 [REDACTED] did there, and they fired [REDACTED] for
11 falsification of documentation.

12 Q When did that occur?

13 A That occurred --

14 Q Hold it. I think we're going to get to that later
15 on.

16 A Yes.

17 Q Okay.

18 You said in your affidavit here that you remember
19 an instance in which craft bootlegged a rework without
20 documentation at all? And where craft switched about service
21 water system from Unit 2 into Unit 1; they just used the old
22 documentation?

23 A That's right.

24 Q How did you find out about this?

25 A Well, they came in and with a document that had

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Allegation
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1 been reviewed prior to the time that -- we had, well, we had,
2 you know, we had Unit 1 and Unit 2. And it was a Unit 2
3 package.

4 And [REDACTED] said, "Change it to a Unit 1 package."
5 -- that they had transferred it from Unit 2 to Unit 1.

6 So instead of doing anything else, they just
7 changed it on the cover sheet, see. And this made me wonder:
8 here we got a spool, we got a valve in the middle of that
9 spool; they were going to transfer it using the old
10 documentation and the old signatures that was installed
11 at Unit 2, how could they move it to Unit 1?

12 Q Okay. Is there any way we can identify where this
13 is now? Is there any you can tell us to help us find this?

14 Or is this just something you heard about?

15 A No. No. No. It came right through my hands there.

16 Q This was back in '79, right?

17 A Oh, no, hon, this was -- this is where I am right
18 now.

19 Q Oh, is that right?

20 A It's been several months ago.

21 Q Can you think of any way we can identify that?

22 A Yes, I can ask [REDACTED] if she'll give me the number.

23 Q Now, I don't want you -- keep in mind confiden-
24 tiality. I don't want to send you back over there with a
25 whole bunch of tasks to perform.

1 And they'll say, "What's [REDACTED] doing? She's
2 looking into every problem we've had."

3 You understand?

4 A Yuh.

5 Q I don't want to task you too hard.

6 A Well, I'll put it like this: if you really want
7 to check into it and you want to know the ISO number and
8 the whole business --

9 Q I want to find --

10 A To find that particular system --

11 Q -- that valve and spool; I want to find all the
12 paper that goes with it.

13 A Okay, well, [REDACTED] can give you that informa-
14 tion.

15 Q Okay.

16 A So I asked them, I said, "Why? How can you do this?"
17 And somebody had said now -- I heard this myself -- I won't
18 say who right now I heard it from because now it's vague --
19 but, they said, "Well, you cut it on both sides of the
20 valve and move the whole thing over and weld it."

21 That's reasonable, but still -- but the documentation
22 on that was originally bought-off in Unit 2 some time ago.

23 Q Okay.

24 A Out of our old backlog files down the hill.

25 MR. IPPOLITO: You said this paperwork went through

1 you?

2 THE WITNESS: Yes.

3 MR. IPPOLITO: Did they actually line out the
4 "2" -- they lined through "2"? -- in Unit 2, which was
5 changed to read "Unit 1"?

6 THE WITNESS: Yes. On the front of every drawing
7 is a list of documents inside that package; they marked out
8 the "2" and put a "1".

9 Now, on the document, itself, on the -- they had to
10 mark out on that document and initialed it and dated it,
11 when it was marked through and changed.

12 In other words, looking at it, you would think,
13 well, somebody put "Unit 2" down there instead of "Unit 1".

14 BY MR. GRIFFIN:

15 Q Just a typographical error?

16 A Just a typographical error; that's what it would
17 appear to be.

18 Q But you feel certain that this whole thing actually
19 got picked up --

20 A I know it did. I know it did.

21 MR. IPPOLITO: And this marking-out should still be
22 there?

23 THE WITNESS: It's there.

24 MR. IPPOLITO: Okay.

25 THE WITNESS: It's still there. It'll be there as

1 long as the document exists, because it's got, you know,
2 signature on it. It's got the original signatures on it.

3 BY MR. GRIFFIN:

4 Q The next part of your affidavit goes into conversa-
5 tions you've heard between craft and engineers that relate
6 to craft making hardware fit; and then they just have the
7 engineers come along and sign off on it.

8 A Yes, what had happened, between the craft -- this
9 is what it all boils down to: they go out and they will start
10 to do a job, and maybe it won't exactly fit like they think
11 it should, or they might put something right there, never
12 considering the fact that that spot was left open for
13 something else to go there.

14 Q Um-huh.

15 They'd make it fit and then they'd call the
16 engineers to approve?

17 A They would come down and they would look at it,
18 and then they would say, as-built, and as stamped on the
19 drawings, as-built.

20 Q Yuh.

21 Well, I know the asbuilt is -- it's my understanding
22 that asbuilt also gets on some of these drawings by other
23 means for legitimate reasons?

24 A Yes, they do.

25 Q So, can you think of any instances, any specific
•

Start of
Allegation
AQ-44

1 instances, where you've seen -- I know you've heard the talk--
2 but do you know of any specific instances where this was
3 done; where it was constructed first by craft and then
4 the engineers were asked to come in and approve it later
5 on?

6 A I've just seen it go through my hands. I can't
7 give you any documents, I can't give you any specifics, other
8 than -- I wasn't thinking in terms of numbers or anything
9 else -- I was just saying -- in many instances after it has
10 been put on there asbuilt, it created a nonconforming
11 condition, and they had to move it again.

12 Q Right.

13 A Now, let me give you just a -- not a specific --
14 but this is something that was discussed on the bus going
15 home.

16 This guy come up there and he says, "Boy, I nearly
17 got myself in trouble the other day." He was the driver.
18 He says, "We were just drilling away on this wall, and all
19 of a sudden I noticed that it said -- that there was
20 'electrical embedded in the wall'" -- so he goes to his
21 supervisor and confesses what he's done and the supervisor
22 kind of gave him kind of a hard look, you know, like he was
23 really going to get tough with him.

24 And then all of a sudden he started grinning and
25 said, "well, you lucked out this time. We put that up there

1 to keep them from putting anything else up there." Because
2 they had a specific thing they had to go there and they had
3 put that on there. There was no electrical embedment at all
4 in that wall.

5 Q They just wanted to make sure --

6 A That nobody put something up there.

7 (Laughter)

8 These are things that if you do go out there
9 and ask, and you do have the people with the knowledge,
10 they will clarify that for you.

11 Q Okay, [REDACTED] I don't want to mislead you or
12 them or anybody else: a lot of people that talk to NRC,
13 they say, you know, they point out and say: "bad pipes."

14 Now, the NRC can keep this information in mind,
15 and that there's this as-built thing is a good example,
16 and we can alert our inspectors to it. And when they're
17 doing their routine inspections, if they see something that
18 looks suspicious. Having the information that this improper
19 procedure is sometimes employed by craft, it can be a tip-off
20 to them.

21 But there's no way we can go out there and search
22 through all the records, and search through all the hardware
23 out there and --

24 A Oh, lands, I know that!

25 Q So I appreciate your alerting us to it; and if you

1 come across where you know somebody, somebody's name that
2 you can give us that can direct us to the specific particular
3 instance where this has occurred; and we can go talk to the
4 person, and get those papers, or we can go to the hardware;
5 we'll do something about it.

6 A Right.

7 Q I just don't want to mislead you into thinking
8 that we're going to send 500 inspectors down there and
9 they're going to somehow come out --

10 A No, I'm thinking more or less in terms of
11 talking to some of the engineers who are concerned. I've
12 heard them voice this.

13 Q Okay.

14 A I am not talking about going down and looking at
15 the pipe. Ask: Has this ever happened? They'll tell you
16 if it's happened or not; and they'll tell you where it's
17 happened.

18 Q They will?

19 A Yes. There's some of them out there that will;
20 you bet they will.

21 Q Well, why would they be telling on themselves?

22 A Because they're not going to go forward and offer
23 you information, but they're pretty concerned.

24 Q Is that right?

25 A They are concerned.

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Q Okay.

Well, we'll keep that in mind.

A And I really believe if you ask them that they will not try to cover up anything and they will tell the truth.

Q Okay.

MR. IPPOLITO: The engineer is the only one authorized to stamp "as-built"?

THE WITNESS: The as-built is stamped on after the engineer has approved it in the condition that it's in.

My main concern is: they've got a set of drawings out there sent to them by Gibbs & Hill (phonetic).

MR. IPPOLITO: Right?

THE WITNESS: Okay, and a craftsman does not know how much stress or --

MR. IPPOLITO: I appreciate that.

BY MR. GRIFFIN:

Q [redacted] sometimes an engineer can void an NCR but just saying "as-built"? That's one of the possibilities, is it not?

A I know one got voided; [redacted] voided it. [redacted] wrote it. And reworded it and revised it and revised it, until it's no longer what she wrote.

MR. IPPOLITO: I was just trying to get clear in my mind: what you said is an engineer is called down to look

1 at this thing; and he'll say: Okay, as-built. That means
2 that he goes back and writes out something that says
3 "as-built"?

4 THE WITNESS: He will sign, he will sign the weld
5 data card.

6 MR. IPPOLITO: Okay. As-built?

7 THE WITNESS: Yes.

8 MR. IPPOLITO: The engineer has to do that?

9 THE WITNESS: Yes, he does.

10 MR. IPPOLITO: Okay.

11 THE WITNESS: Now, actually, I guess maybe I should
12 clarify myself on this point.

13 They used to take all of those changes in
14 procedures and send them to Gibbs & Hill, who would then look
15 at the overall picture and determine: yes, this was a safe
16 place to put this.

17 Now -- it would take 2 or 3 days to have to come
18 back -- they have gone around that now; and everybody's right
19 there on site; they are revised by an engineer who is not
20 looking at an entire, overall, picture.

21 MR. IPPOLITO: I gotcha.

22 THE WITNESS: That'sd what I was trying to bring
23 out.

24 BY MR. GRIFFIN:

25 Q Okay.

Start of
Allegation
AQ-24

1 [REDACTED], in your affidavit you have a -- you describe
2 the work of a particular QC inspector named [REDACTED] who had
3 not been trained --

4 A [REDACTED]

5 Q Yes.

6 He had not been trained and you use him as an
7 example of somebody who had been given the test and the
8 answers to the test --

9 A Yes.

10 Q Did he tell you this?

11 A Yes, he did.

12 Q Okay.

13 A He most assuredly did. And you won't find him
14 now unless you go looking for him; because they picked him
15 up yesterday and put him out in the field.

16 Q Okay.

17 But, let me ask you this: we've got your under-
18 standing of the situation, and I don't think we need to
19 explore it thoroughly; but I need your opinion on this:

20 If we go talk to [REDACTED], will he --

21 A He certainly will.

22 Q So far as his training to read drawings or his
23 qualifications --

24 A He certainly will.

25 Now, this is the thing: they started firing him.

1 And he's quite verbal with them. I mean, he doesn't -- and
2 he told them, you know, his first hydro he performed alone;
3 you can't perform a hydro by yourself.

4 And they asked him, [REDACTED] asked him, "Well, how
5 in the world did you make a good grade on this test, if
6 you hadn't been trained?"

7 He said, "It's easy to do if you're given the
8 answers beforehand."

9 He had gone out there and had put hold tags and
10 referenced them to CMCs that didn't even pertain to that
11 system. In other words, he did not know what he was doing.

12 And they had two men working full-time for about
13 six months backfitting and going back and reinspecting
14 everything that he had ever touched.

15 And they set him up there in our office, supposed
16 to be helping this girl with the hydros; and he sets there
17 all day long and he draws pictures because he's got
18 nothing to do. Once in a while he might have a little
19 project that he can do. He is -- they won't fire him.
20 They don't fire him.

21 Anybody else is out the gate that does what he
22 does; and he sets there and he actually laughs at them.

23 And [REDACTED] come through yesterday. Friday
24 he was in jail. Monday he didn't come to work, or didn't
25 call and say why he wasn't. And [REDACTED] came through

1 and one of the guys said, [REDACTED] why don't you fire him?"

2 He says, "I can't."

3 They sent out a notation around, it says, "Do not
4 illegally park in the parking lot, or you're going to get
5 terminated."

6 So they called us there the next day, he had
7 deliberately parked crossways in the parking lot, seeing if
8 they were going to fire him.

9 Q Okay.

10 A His father has one of the Olympic --

11 Q Is that right?

12 Now, in your affidavit here, you make some
13 characterizations that -- of some of the managers, [REDACTED]
14 and [REDACTED] up there; and we already have your testimony
15 adequately preserved in here.

16 There is one question I would like to ask you:
17 You indicate that [REDACTED] had put a freeze on anybody sending
18 records out of the vault or reviewing records in the vault.

19 A Yes, sir.

20 Q They must just stand there and look at them and
21 then get a note from [REDACTED] first?

22 A They got a bunch of things like this laying on the
23 counter --

24 Q You have to sign --

25 A You have to carry it in and give it to him and get

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1 him to sign giving you authorization to go pull that out.

2 Q Okay, now, is that to take it out of the vault?

3 A That's just to look at it. You can't take it
4 out of the vault.

5 Q Can you make a copy?

6 A That's just to look at it.

7 Q Just to look at it? At the counter?

8 A At the counter, stand there at the window.

9 Q Now, [REDACTED] has been put in another position; is
10 this thing still in effect?

11 A Yes, it is.

12 It's in effect and now they've got it so that
13 only a few out of each office can go down there and pull.

14 And you've got to have those documents. [REDACTED]
15 said, "I've exceeded the amount by 10 people" -- he has 10
16 more people on there than they wanted.

17 They only want one person authorized to go down there
18 and look at that stuff.

19 Now, what it is, is, when you're reviewing a
20 document, you have to know that you got the right serial
21 number on there, and got the right valve number on there,
22 and everything.

23 And if there's any question, if anything doesn't
24 coincide, when you have your procedures and you can see
25 what certain kind of pipe was to be used, then you can go down

1 there and look and see if information that had been left off
2 that thing.

3 But only a few people can do that now.

4 I was down the day before yesterday when one of the
5 QC inspectors come down there to check something and found
6 out -- you're going to have to take that and get some
7 signatures on it -- and he said, all I want to do is look
8 at it.

9 And the guy from Cygna was standing there behind
10 us.

11 And he stood and argued with them a little bit,
12 and then he got real mad and reached over and crumpled it,
13 like that, and says, here's what you can do with this!

14 (Laughter)

15 And threw it in the wastebasket.

16 And the guy from Cygna just cracked up.

17 Q Let me read here for a minute. You write of the
18 framing and firing of [REDACTED]

19 (Pause)

20 A I knew Alan very well. I worked with him on nights
21 for a long time.

22 Q Do you know if he filed any grievance with the
23 Labor Department?

24 A No, he didn't. And he has not been able to find
25 a job. He's working on a chicken farm. He cut his finger off

Wrong
Doing
QI

1 the other night.

2 Q Oh, he's the guy.

3 Do you know what the official reason for firing him
4 was?

5 A Yes, sir.

6 Q Falsifying documentation?

7 A They said he was.

8 He was, like I said, [REDACTED] did exactly what
9 [REDACTED] did; only they had set him up.

10 He had gone down and looked at a flange and he
11 had written a nonconforming condition on it, and assigned it
12 an NCR number.

13 They came along and they reworked the flange and
14 the nonconformance that he had shown no longer existed;
15 because the flange was reworked. But it created another
16 nonconforming condition, and another NCR was written on it.

17 In fact, two other NCRs were written on it.
18 So they came to [REDACTED] -- and I talked to [REDACTED] -- and they came
19 to [REDACTED] and they said, well, this is no longer an existence;
20 we've got to get this NCR signed-off. And there were two
21 other NCRs on it.

22 So he wrote, he referenced down at the bottom,
23 "reference per NCR," and give an NCR number; and then he
24 signed.

25 And they fired him for falsification of documentation

1 saying that he had signed off all of the hold points that
2 were on that flange; when, in reality, he had only signed
3 off that one NCR.

4 And he had no chance for defense or anything else.

5 Now, if they go in there, I'm sure they're going
6 to find this exactly the way it happened; but, he was out the
7 gate, fired, and put on his termination papers "fired for
8 falsification of documentation." And it is there on his
9 records, I know, because I work in the time office on
10 weekends, and I pulled them out and I looked at it, seeing
11 what they had written on there.

12 And I've been concerned ever since he got fired.

13 Q And he told you the details that you related in
14 your affidavit? Is that right?

15 A Yes.

16 Q Okay.

17 A And I've got the number of the NCR.

18 Q Okay, can you provide us with that number?

19 A [REDACTED] has it.

20 Q Now the last thing in your affidavit here relates
21 to about how [REDACTED] was stashed; they checked him when
22 he was going out for official documents?

23 A Well, [REDACTED] had told me about that.

24 Q Did [REDACTED] see, know, or have personal knowledge
25 of them putting the documents on him?

1 Or was he just speculating?

2 A He may have been speculating. After he told me
3 what he did, I went in and pulled [REDACTED]
4 termination papers. And it basically occurred as he said.
5 It didn't have in there that [REDACTED] had carried it out
6 for them.

7 Q Okay.

8 A But, I'm going to tell you what the termination
9 paperes said: that [REDACTED] had gone to safety, had went
10 to safety, and told them that he had been seen putting
11 documents in his personal belongings when he left; and asked
12 for a search of the car.

13 And when they went up and searched the car, they
14 found them in the trunk of the car; and they fired him for
15 theft.

16 Q Have you talked to [REDACTED] about this?

17 A No, I haven't; he's not here.

18 Q But you think he got set up?

19 A I know he did.

20 Q Do you know anybody that saw, heard or was there
21 when [REDACTED] stashed on him?

22 A [REDACTED] was there. No.

23 (Laughter)

24 Q I am trying to find out --

25 A They had told him -- during the questioning out there

1 you question [REDACTED]; and he may tell you where he heard
2 it.

3 Q Okay.

4 A That would be the only way that I would know to
5 trace it back to its source.

6 Q Okay.

7 Well, I think that's as far as we need to go with
8 that one now. The affidavit pretty well explains the
9 situation as you know it to be third-hand.

10 Let's go into the other affidavit here, this is
11 dated April 6, right?

12 You all completed it today?

13 A Yes.

14 Q All right.

15 (Pause)

16 Now, you said when we got together today, these
17 are things that have occurred since you made your original
18 affidavit?

19 A Yes.

20 Q Okay.

21 Let me read for a second here.

22 (Pause)

23 I've been reading your second affidavit, here, and
24 it's well-written and it seems thorough. The bulk of the
25 affidavit appears to indicate a change in procedures.

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1 A Yes.

2 Q And you believe that this change is going to
3 result in a bypass of certain reviews that relate to
4 worker qualifications, material traceability, material
5 numbers; and this review bypass, in your estimation, is not
6 -- this means the packages would not be checked in accordance
7 with procedure?

8 A That's right.

9 I mean, they won't be.

10 Q Okay.

11 And you say that, in this affidavit, that piping
12 packages have not been sent to ANI since September of '83?

13 A They had not up until I started checking -- when
14 they released them, I started going in and pulling my ISOs
15 and found they had been in file without documentation; and
16 I began with February and they've been taking piping packages
17 over there. They were backlogged in my file. That's when
18 they started taking them over there and that's when they
19 found they had been filing them without all the documentation
20 being closed.

21 Q Under this new concept they bypass N5?

22 A QES review, we're going to bypass; then it's going
23 to go --

24 Q Straight to ANI?

25 A It's going to go into the file for the N5 group to

1 N5, as a full package concept; and all of this, when everything
2 is completed like that, then it's all to be sent to them;
3 they're combining two jobs into one.

4 Q They go to ANI --

5 A And then to the vault.

6 Q And then to the vault.

7 They don't have any training, you understand, of
8 the N5 group telling them what to look for when they
9 review --

10 Q Okay. Let me tell you, [REDACTED] it's laid out
11 very clearly, the points you're trying to say here in the
12 affidavit.

13 And what I'm going to have to do or Mr. Ippolito
14 is going to have to do, is we're going to have to find
15 somebody who is already familiar with the Comanche Peak system
16 for document review.

17 . And if the NRC has not already been appraised of
18 this change --

19 A Okay.

20 -- they will be appraised of it now. And NRC will
21 have to evaluate whether this is a reasonable concept that
22 meets the needs or the requirements that they've already
23 committed to do.

24 Q Now, let me say this: we didn't have time to put
25 this in the affidavit -- but they started their procedural

1 change, in fact, today.

2 Q Okay.

3 A They were going to start the other day but the
4 NRC they said moved into the conference room --

5 (Laughter)

6 MR. GRIFFIN: Is that right?

7 MR. IPPOLITO: That's where we're located.

8 BY MR. GRIFFIN:

9 Q Well, I don't see any real need for us to go into
10 this; you've explained it very well.

11 A Right.

12 Q And we have the information and we will evaluate
13 it.

14 Now, whether it constitutes a problem, if they're
15 entitled to do that -- all this, you know, the NRC will
16 examine --

17 A Right.

18 Q -- and a decision will have to be made.

19 A Right.

20 Q Now, in an instance like this, I'm not sure it
21 will result in a report being issued. Usually these are
22 handled rather informally -- if this is a change of procedure;
23 I'm sure you're right: they probably are going to the
24 whole package concept.

25 But whether it complies with the requirements the

1 NRC makes, we'll evaluate.

2 A Right. That's good.

3 Q You also indicate in here [REDACTED] came to
4 the office and removed the manuals for the QES final review.

5 A Yes.

6 Q Okay, now, that is in conjunction with this
7 procedural change?

8 A Up until today they had been reviewing out of
9 procedure. After today and the new procedures are installed,
10 they will be in procedure; but up until this time we've
11 been reviewing out of procedures.

12 Q The affidavit does state are affected here; I
13 noticed that; that will make it easy for us to evaluate that.

14 And you say, as of today there are no longer
15 any procedures for final review, but they will be along?

16 A I don't know they'll be available -- I don't know
17 what procedures are going to be changed, whether it's going
18 to be all the procedures, or just the method for doing it.
19 Because they have shut us out.

20 In other words, [REDACTED] and
21 myself are -- we haven't been included in the new procedure? --

22 Q And this whole package concept will extend to
23 hanger packages, too?

24 A Yes.

25 Q Do you expect they would extend it to other things?

1 A No, just hangers and piping.

2 Q And no procedures have been written to --

3 A They've been written, I suppose; I don't know what
4 they are about; but they have not been made known.

5 Q And you indicate also in the affidavit there's
6 been a change on-site where packages were lost, they apparently
7 found some of them; and they are looking --

8 A Yes. I have a list of those.

9 Q If that develops into a problem, in other words,--

10 A I'll have to find them or --

11 Q Okay, that's not really something that we're
12 ready to get into right now. If you've lost documentation
13 temporarily, hopefully, it will be found.

14 You don't have any reason to believe somebody
15 threw them away?

16 A No, I don't.

17 I just think that -- well, I can't say that;
18 because they were in the file. I put them in the file.
19 And whenever they switched them, the evening that I left,
20 and they switched them from my files into that entire
21 package system.

22 Q Okay.

23 Another thing here that concerns me, you say in
24 the affidavit here, that following ANI review of certain
25 items, they are removed from packages and placed in a large

1 manilla envelope and it's marked "historical".

2 Are these voided documents?

3 A Yes, sir.

4 Q Are they documents that no longer have any
5 relationship to that package?

6 A No, everything has a relationship to the package.
7 The end result is, what you will be looking at, if you don't
8 look inside of these voided packages, what you're looking at
9 would be the latest --

10 Q Okay. Are we talking about a lot of the documents
11 that are going into the voided -- being voided?

12 A Yes, everything but the latest, everything but
13 the current --

14 Q Okay.

15 Now, when they're marked "historical" does that
16 mean they are going to be placed in permanent storage?

17 A I don't know what happens to them.

18 Q Well, that's the question I have.

19 A They're supposed to -- that's supposed to happen.

20 Q Okay, well, let's assume that it is, unless we
21 develop --

22 A Well, let's assume that they're left in the
23 packages; and somebody goes in there and they pull things,
24 they will see the current documentation; everything is
25 copesthetic and fine; they don't see any need to look in that

1 historical, because everything is there.

2 Q I understand the concept of having the whole
3 package.

4 A Right.

5 Q As long as all the documents and all the historical
6 documents related are available -- and it's been our
7 experience, it's been my personal experience -- that they
8 are available.

9 A Well, they have to be.

10 Q From what you tell me here, I have no reason to
11 believe there's anything suspicious about it.

12 Do you think there's something suspicious about it?

13 A Only when [REDACTED] asked them why, you know, they
14 were doing this, they just said they didn't want anybody
15 looking at the old documentation.

16 Q Who told [REDACTED] this, do you know? .

17 A She may have asked [REDACTED]

18 Q [REDACTED]

19 A That's [REDACTED]

20 And I'm being evasive here, but she said that she
21 was told that that was the reason for doing it.

22 Now, my particular opinion is not worth anything,
23 but -- I know for a fact that some of those hangers have
24 beenn worked and worked and worked and reworked and worked
25 until you would think they didn't have a spot left on them

1 that they could rework.

2 Q Um-huh.

3 A And it's just more or less that it wouldn't appear
4 that that much effort had gone into that one particular
5 hanger. You've got thousands of hangers out there. This is
6 one thing that has escalated the cost of that plant, is
7 the number of revisions.

8 Q And rework?

9 A That's right. And it would just appear that there
10 wasn't as much rework as there was.

11 Q Okay, also in your affidavit here, you mention
12 a recent incident in which you and ██████ were taking hanger
13 packages to the records vault, and you were talking to
14 some other people --

15 A Yes.

16 Q -- and they showed you a package or ISO that
17 contained no weld?

18 A Well, he had a film package, you know for this
19 weld; and he started laughing and said, "you know, the funny
20 part about this: there is no weld 9-1 on this ISO."

21 And ██████ says, "Well, where does it belong, then?"

22 And he says, "How can we find out? How do we
23 know?"

24 Q Okay, we've got the ISO number here.

25 A Yuh, you sure do.

Start of
Allegation
AQW-72

1 Q Yes.

2 A The film package is what you want on that, and
3 then check it with the ISO.

4 Q Okay.

5 MR. IPPOLITO: That's all part of the package,
6 though?

7 THE WITNESS: No. He had that in his hand by
8 itself. I don't know if he put it with the package; I don't
9 know.

10 BY MR. GRIFFIN:

11 Q For the record, that's ISO 16-2-AB-3, and it
12 refers to Weld No. 9-1.

13 A And then he said -- they asked me how would we
14 check this out to see that it was a good film; he says,
15 "well, I can pull it out like this, and they can say, well,
16 that looks like a pretty good weight; looks like it's pretty
17 good plastic."

18 (Laughter)

Start of Allegation
AQ-117

19 Q Okay, and then you give an example in here of
20 -- a classic example -- of people not knowing -- you talk
21 about flange?

22 A Yes.

23 Q And you've given that as an example of how work is
24 being duplicated, and people do not know -- okay; that will
25 help our inspectors out. They can be on the look-out for that.

Stacy Allegation
AQ 118

1 Okay, now we get to the point in here where they
2 had the meeting for your whole document package concept,
3 which you were not a party to?

4 A That's right.

5 Q But you give us a list of people that were avail-
6 able for that.

7 Now, coming out of that meeting, you were told
8 that [REDACTED] had told the people that attended that meeting
9 that if they were interviewed by NRC they were not to divulge
10 or give them information except per procedure.

11 Is it your understanding all these people that
12 attended that meeting were given these same instructions?

13 A That's what has me concerned now.

14 Q Okay, who's [REDACTED] supervisor?

15 A He's accountable to [REDACTED]

16 Q If we just asked him would he say he's passing
17 on [REDACTED] instructions in this?

18 A He is.

19 Q There's a list here in your affidavit of people
20 who attended that meeting; and are there any on there that
21 you think would shoot straight with me if I asked them if
22 that is, in fact, what Mr. Beneszten told them?

23 A I don't know of a one of them that wouldn't.

24 Q They would not?

25 A They would not. I think every one of them would tell

1 because every one of them is setting in there training their
2 own replacements.

3 Q Okay.

4 That's what I need to know.

5 (Laughter)

6 [REDACTED] I think that's got us covered.

7 A Now, let me explain something that's happened
8 today that we didn't have time to get in the --

9 Q Okay?

10 A -- something that happened later than this, that
11 we haven't had time to get in the record.

12 They started this new procedure and we've been
13 frozen out of it as far as I can tell.

14 [REDACTED] came through the office. One of the girls
15 was leaving, several people are standing in there talking,
16 and they got to talking -- I don't know what brought it on;
17 but he said -- and he looked right at [REDACTED] -- and he said:
18 "People who are not loyal to the company will be the first
19 ones to hit the gate." And he said, "Anybody with excess
20 absenteeism, early outs, will be the first ones out the
21 gate."

22 They were talking about the layoffs, that's what
23 it was.

24 But it was the "loyalty to the company" that really
25 got me, you know; and I couldn't believe hearing it.

1 Q So you think they already suspect her and you?

2 A Yes, I do. I believe they suspect certain
3 individuals.

4 Now, another reason why I think they suspect
5 [redacted] is because she was the butt-end of their jokes yesterday.
6 And she's getting very unhappy. And she's going to turn
7 her resignation in Monday.

8 Q Is she?

9 A Yes, she is.

10 They were in there talking about a sexual
11 harassment suit that had been filed against [redacted].

12 Q By [redacted]?

13 A No. By [redacted] and [redacted].
14 And one of them was saying, well, last year [redacted],
15 [redacted] husband, had poked [redacted] (phonetic) in the nose
16 for sexually harassing her; and that he had gone down and
17 filed charges. And she wanted to know what was going on,
18 she had heard her name; and that's what he told her.

19 But anyway a little bit later [redacted] come in and
20 admitted that that's what they were saying. So she went in
21 there and she told [redacted] she said, [redacted] she said, "I
22 don't particularly enjoy being connected to the jokes."

23 He said, "Well, I don't blame you, baby, I wouldn't
24 want to be connected to them anyway; but I would like to be
25 connected to you."

1 In other words, they're giving her a hard time.
2 She's very susceptible. She's basically chicken, that's why
3 she hasn't come to you anyway, you know.

4 Q Well, [REDACTED] maybe we'll have an opportunity to
5 talk to her either on-site or off-site some day. You have
6 alluded to her numerous time in your affidavit and it seems
7 like she has quite a bit of information that might reflect
8 on your concerns.

9 [REDACTED] have I or Mr. Ippolito here threatened
10 you in any manner, or offered you any rewards in return for
11 this statement?

12 A No, you haven't.

13 Q Have you given this statement freely and
14 voluntarily?

15 A Yes, I have.

16 Q Is there anything further you would care to
17 add?

18 A Yes, I would like to add something to the record:
19 I need my job! -- as bad as anybody out there.
20 But I will not sell my soul for 30 pieces of
21 silver!

22 I have no axe to grind with Brown & Root or almost
23 anybody out there. I like [REDACTED] I like [REDACTED]

24 The only reason I'm in here is because I am
25 concerned with the quality of the plant, and not because I

1 have a vendetta against anybody. I don't want to see the
2 plant shut down. I'd like to see it operate safely.

3 But I do want it to be safe.

4 Q Yes.

5 A And that is my only reason for coming in here.

6 Q Well, I'd like you to know as a representative of
7 the NRC, I appreciate your coming in. We have our routine
8 inspections. And it is much easier for us to identify
9 problems on the site if the personnel who work on these sites
10 will tell us where best to look. That doesn't mean that if
11 they tell us something that turns out not to be correct --
12 because somebody else had a review or somebody else had input
13 that they're not aware of -- still and all, those persons
14 who come to the NRC and give us information about the
15 substance of their job, it makes it much easier for us.

16 A Right.

17 Q So I put you in that category, and I appreciate
18 your --

19 A The reason why I say I've done it is I may not have
20 anything to contribute but I know that if there is an
21 investigation thoroughly performed, and you say to me: this
22 is a safe plant; I will sleep better at night.

23 If I don't do anything, if I don't do what I feel
24 like I should, if I see something that's not quite right and
25 I don't report it and I leave and later something happens to


1 that plant, I would feel responsible in a way for whatever
2 it was. That's why I welcome an NRC investigation. If it's
3 safe, I want to know it. If it's not, I want something done
4 about it, even though it could practically destroy me
5 financially and every other way.

6 Q Well, the last thing I'd like to say is -- for the
7 record is that the -- we've entered into the terms of
8 confidentiality; as my part of it and those that receive the
9 information you give, will endeavor to preserve your con-
10 fidentiality; and you will, too; and I hope nothing occurs
11 in your job on-site during your day-to-day -- I hope you get
12 to keep your job, too. I see no reason why you shouldn't,
13 unless you know something that I don't.

14 A Well, I don't.

15 Q Okay, let's hope it remains this way.

16 A Like I told him today whenever he said the early
17 cuts and the absenteeism and the late would be considered
18 first in the layoff; and he said, if you're here and you're
19 not performing your work, you'll be laid off.

20 Well, I was in the other room, in the file cabinet,
21 and I was a little bit upset over everything that's been going
22 the last couple of days; and when the guy says, what did
23  say -- I said, he says that if you're not loyal to the
24 company, hit the gate.

25 He says, no I mean what did he really say?

1 I said, he says if you are not going to be loyal
2 to the company, then you're going to be the first one out
3 the gate.

4 And he kept on and I says, well, go in there and
5 ask him, I says, don't ask me. Go in and ask [REDACTED] if you
6 don't believe me.

7 And I said he also said the absenteeisms, the
8 lates and the people who were off for weeks at a time would
9 be the first ones out the gate.

10 He said, well, I can understand that. I said, well,
11 I can, too. I said, he also said, if you're in here -- by
12 this time I was beginning to feel like maybe something might
13 be amiss as far as I was concerned, you know, because of the
14 way he was doing it. And it may be; I don't know.

15 But then I said, well, I tell you one thing, if
16 they're going to get rid of anybody for absenteeism, early
17 outs, they'll have to find an excuse for that because I'm
18 never late, I'm never early out, and I'm never off. I said,
19 now, they might get me for sitting on my ass --

20 (Laughter)

21 Q Okay.

22 A And he said, no they won't get you for that, either.

23 MR. GRIFFIN: Okay.

24 Tom, have you got anything statement you would like
25 to make?

1 MR. CARPENTER: Well, as [redacted] continues to work
 2 there and information is continued to be provided, we'll
 3 be in contact with you. Her statement today does not represent
 4 an exhaustive list of concerns; she might have memories
 5 in future of other concerns that she has forgotten about;
 6 and not all concerns have necessarily been covered.

7 We want to make that clear and on the record.

8 And we just reiterate our concern about
 9 confidentiality. I don't mean to beat a dead horse at this
 10 point, but I really want to express GAPS concern as well
 11 over the issue of Region IV personnel being utilized to
 12 investigate.

Start of
 Allegation
 AQ-78

13 [redacted] There is one thing I've got to say
 14 now before I go:

15 You asked me a while ago about my knowledge of
 16 falsification of documentation. I was on the night shift,
 17 and I was in the room when [redacted] ordered [redacted]
 18 [redacted] to sign-off some documentation, some old documenta-
 19 tion. I don't know how old, but I know more than a couple
 20 of years old.

21 And she was refusing to do it. And he told her
 22 he said, "You will either do it, or you'll spend your three-
 23 day weekend here until you decide to do it."

24 MR. GRIFFIN: Okay.

25 [redacted] And I know that that documentation

1 was falsified.

2 MR. GRIFFIN: I think we already know about that
3 particular incident; and your statement will be considered
4 corroborative of that.

5 [REDACTED] The other person was [REDACTED]

6 MR. GRIFFIN: Okay.

7 [REDACTED] He signed it, too.

8 MR. GRIFFIN: Okay.

9 But we will be exploring that.

10 [REDACTED] So that's the reason why I say I
11 know that there are times when they do falsify documentation
12 because I was there and I heard it.

13 MR. GRIFFIN: Okay.

14 Tom, you got anything?

15 MR. IPPOLITO: Nothing. Thank you.

16 MR. GRIFFIN: Okay, that's it.

17 (Whereupon, at 9:20 p.m., the interview was
18 terminated.)

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

INVESTIGATIVE INTERVIEW

OF

ARVILL (J. R.) DILLINGHAM, JR.

COURTROOM 2ND FLOOR
THE COURTHOUSE
SOMERVELL COUNTY
GLEN ROSE, TEXAS

Wednesday, August 24, 1983

The interview commenced, pursuant to notice,
at 1:40 p.m.

PARTIES PRESENT:

On behalf of the NRC Office of Investigation:

RICHARD K. HERR, Investigator
H. BROOKS GRIFFIN, Investigator
Office of Investigation, Region IV
U. S. Nuclear Regulatory Commission
611 Ryan Plaza Drive
Suite 1000
Arlington, Texas 76011

On behalf of Citizens Association for Sound Energy:

SHARITA ELLIS, President
JERRY ELLIS
1426 S. POIK
DALLAS, TEXAS 75224

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TAYLOR ASSOCIATES
1625 I STREET NW - SUITE 1004
WASHINGTON DC 20004
(202) 293-3980

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P R O C E E D I N G S

1
2 whereupon,

3 ARVILL (J. R.) DILLINGHAM, JR.

4 having been first duly sworn by Investigator Herr, was
5 examined and testified as follows:

6 MR. GRIFFIN: For the record, this is an
7 interview of Arvill Dillingham, Jr.

8 You are not presently employed, are you, J.R.?

9 MR. DILLINGHAM: No.

10 MR. GRIFFIN: The location of this interview is
11 the courtroom of the Somervell County Courthouse in Glen
12 Rose, Texas.

13 Present at this interview are R. K. Herr,
14 H. Brooks Griffin, Arvill Dillingham, Mrs. Juanita Ellis
15 and Mrs. Ellis' husband, Jerry Ellis.

16 The subject of this interview concerns the
17 area of intimidation. Our questions today that we are
18 going to direct to you, J. R., will be as relates to your
19 previous employment at Comanche Peak on the subject of
20 intimidation. I know you provided affidavits to CASE and
21 everything like that and I know that some of these things
22 have already been addressed by the NRC.

23 MR. DILLINGHAM: Right, and I also want to
24 bring some other stuff up, too, that hasn't been brought
25 up.

1 MR. GRIFFIN: New stuff?

2 MR. DILLINGHAM: Oh, yes, new stuff.

3 MR. GRIFFIN: Okay. Well, we will make time for
4 that.

5 J. R., when did you start work for Brown and
6 Root?

7 MR. DILLINGHAM: It must have been somewhere in
8 the neighborhood of 1970.

9 MR. GRIFFIN: And your job title?

10 MR. DILLINGHAM: I was a boilermaker.

11 MR. GRIFFIN: Who was your supervisor?

12 MR. DILLINGHAM: Dale Owens.

13 MR. GRIFFIN: When did you leave your
14 employment with Brown and Root?

15 MR. DILLINGHAM: Well, I left once before in
16 between time. I started to work with Brown and Root at the
17 Sutton Plant in North Carolina and then as the job went on
18 down I went to work with Southport on the Midford job. I
19 just transferred right over.

20 MR. GRIFFIN: When did you come to Comanche
21 Peak?

22 MR. DILLINGHAM: '75 I think it was.

23 MR. GRIFFIN: As a boilermaker?

24 MR. DILLINGHAM: Right.

25 MR. GRIFFIN: And when did you leave Brown and

1 MR. DILLINGHAM: Mr. Tanley continuously told
2 me if I wouldn't do a certain job he would get somebody
3 that would. Like, for instance, this swipe test. You come
4 in the room and you clean the whole room. It is supposed
5 to be a certain class, like Class A, and then you get the
6 swipe test to come in there and your QC to come in there
7 and he picks out these three areas and he will check those
8 three areas and if they all check out good the whole room
9 is good, for instance.

10 well, Tanley called me in his office and he
11 said, J. K., between me and you and that wall there I have
12 learned a little trick about this swipe test. he said the
13 first thing you do is you find out what three areas they
14 are going to check and you clean those three areas and
15 don't worry about the rest of it. I said if we are going
16 to do it that damn way, why do it at all. Let's just say
17 it is good. He said if you can't handle it I will get
18 somebody else that will.

19 It is like he says, like the false
20 documentation, you know, on the liner. He told me I had
21 better have that liner by the first of the year or else
22 hit the gate if I am not through by January 1st. well,
23 here come Mickey Gerig and he says there ain't no way you
24 are going to do it. We have 850 travelers that is screwed
25 up.

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(202. 293-3950)

1 lot of times they told us to do stuff that I just wouldn't
2 even do. I would just agree along with him and go ahead
3 and do it right because they are inexperienced people and
4 they don't know what they are talking about 90 percent of
5 the time.

6 MR. HERR: Are you saying that Flowes was
7 intimidating?

8 MR. DILLINGHAM: The people under him was told
9 to do it or either hit the gate or else.

10 MR. HERR: Do you know who told the people
11 under him?

12 MR. DILLINGHAM: Lee Carnes and George Tanley
13 came through the diesel generators.

14 MR. HERR: And they told the men working
15 for ---

16 MR. DILLINGHAM: Craig Flowes, which Craig
17 worked for me, or else hit the gate. See what happened was
18 the millwrights was burning off some stuff and gouged
19 holes in the material. Well, they wanted it repaired
20 immediately before somebody seen it I guess.

21 MR. HERR: Now those men, they worked for you?

22 MR. DILLINGHAM: Right.

23 MR. HERR: Did those two guys ever threaten you
24 or intimidate you, or are you saying that that was
25 intimidating to you?

1 So I went and seen Tanley and I said Tanley,
2 we have got all these travelers messed up and we can't do
3 it. He said you get your ass out in the field with these
4 people and we will take care of this paperwork. Well, in
5 order to take care of the paperwork I had to do the rework
6 where we had hold points jump where the fitup and cleanup
7 weren't bought off and all kind of stuff weren't dia. I
8 did very little rework. In other words, the \$50 or \$60 all
9 at once became good and I just imagine it was false
10 signatures of QC because some QC personnel is no longer on
11 the job that was down there when the fitup was made and it
12 was already welded out.

13 MR. GRIFFIN: were you there when this work was
14 accepted?

15 MR. DILLINGHAM: Right.

16 MR. GRIFFIN: In other words, it has been
17 bought off finally?

18 MR. DILLINGHAM: Well, I keep going back and
19 they are not doing very much work. They are trying to
20 audit it and are trying to find paperwork that they can't
21 find. They are trying to find weld numbers and just all
22 kind of stuff.

23 MR. GRIFFIN: You mean they have been doing
24 this since you left?

25 MR. DILLINGHAM: Yes.

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WASHINGTON, D.C. 20006
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1 MR. GRIFFIN: Did you get this information from
2 people that are still working out there?
3

4 MR. DILLINGHAM: Craig Flowes. He is my
5 foreman.

6 MR. GRIFFIN: Flowes told you this?

7 MR. DILLINGHAM: I asked him. I said are you
8 all still working on the liner and he said no, not very
9 much. We did this or we did that. There are some X-rays
10 that was not made on a certain part of the liner in the
11 transfer canal where your gate landings go in. It is under
12 concrete now, but all at once they forgot about them.

13 Ronnie Webb, he still works out there. He
14 worked for TUGCO. He was the foreman over that, the
15 general foreman. When I took over he come told me. He said
16 we have got a big mess-up down there and we have got some
17 X-rays that haven't been made and it has already been
18 poured. Well, I was going to get into it and they shut
19 down all the liner. So they moved on to a different job.
20 So there are X-rays that still have not been made. You
21 have got hollow places in the concrete behind the liner
22 walls.

23 MR. GRIFFIN: Let's go back to intimidation for
24 a minute.

25 MR. DILLINGHAM: Okay.

MR. GRIFFIN: Besides Tanley and Carnes, did

1 anybody else out there ever threaten or intimidate or
2 harass you ---

3
4 MR. DILLINGHAM: Somebody threatened me on the
5 telephone. They called me up and said I was dead, you
6 know, after I went to Houston.

7 MR. GRIFFIN: Did you know who it was?

8 MR. DILLINGHAM: No.

9 MR. GRIFFIN: Did anybody ever threaten you out
10 there into accepting defective work or performing
11 defective work besides Carnes and Tanley?

12 MR. DILLINGHAM: Well ---

13 MR. GRIFFIN: I am trying to get an idea of how
14 many people threatened you and how many people harassed
15 you or intimidated you.

16 MR. DILLINGHAM: I didn't take too much
17 threatening off of anybody. In other words, me and Tanley
18 would have it out just like me and my brother would. As a
19 matter of fact, we liked each other a lot. A lot of times
20 I would take and tell him I was doing it the way he wants
21 it and I wouldn't be doing it that way at all. I would
22 just get him off peoples' back and off my back because he
23 really don't know what he is doing. He is not experienced
24 whatsoever.

25 MR. GRIFFIN: On how many occasions did you
actually perform or accept defective work would you say?

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

1 (The reporter noticed a drawing on the back
2 side of Exhibit 5 and brought it to Mr. Dillingham's
3 attention.)

4 MR. DILLINGHAM: (Referring to Exhibit 5B) Oh,
5 this is the expansion joint I was talking about with the
6 fillet welds. It is a real small stainless steel 1/8th
7 expansion joint and it has got two small, little fillet
8 welds there.

9 MR. GRIFFIN: Okay. I think we have got that
10 down in the testimony.

11 MR. DILLINGHAM: We put several, several, I
12 think two or three hundred tons against it.

13 Okay, stainless steel liners. This is like the
14 reactor building and the fuel building. We are supposed to
15 have a gap in here on our fit-ups. This is not in there.

16 MR. GRIFFIN: This is something new?

17 MR. DILLINGHAM: Yes.

18 MR. GRIFFIN: Okay.

19 MR. DILLINGHAM: We are supposed to have a gap
20 in here no less than 3/16ths and no more than 3/8ths.

21 MR. HERR: Where is it? For the record,
22 describe what it is.

23 MR. DILLINGHAM: This is a stainless steel
24 liner. This is an embed floor plate to angle on the bottom
25 and side plate to angle. I don't know exactly where, but

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1 somewheres in there. I can tell you a person that probably
2 does know.

3 MR. HARR: Unit 1 or Unit 2?

4 MR. DILLINGHAM: Well, on the fuel building you
5 have just gone one, and for all I know it might be both
6 liners, but I can tell you the person's name that could
7 probably tell you because he is the one that did it.

8 MR. HARR: Who is that?

9 MR. DILLINGHAM: Bert Loeffling.

10 Okay, when I made general foreman he comes
11 over and I asked how is everything going and he started
12 talking. He goes man, they have us welding. Instead of
13 putting a gap in there, they had it jammed together and
14 just together and just laid a heli-arc wire over it and
15 welded it out, you know, in other words, not make a full
16 pin weld. I said who in the hell had you do that, and he
17 said Bert Everett. He was the general foreman I replaced.

18 So I went and seen Bert, and I said, Bert, I
19 said I know you all didn't do it, but that welder said you
20 all laid heli-arc wire in there and welded it over because
21 your gap wasn't big enough. He goes well, J. R., we did. I
22 see it was on the top angle and that is below the water
23 level, and he goes, no, it was on the bottom, and I go
24 goddamn. He goes, I swear it won't happen again. I promise
25 you it won't happen again. I said well, I can guarantee it

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1 won't happen again.

2 So I started to go to Tanley and then I
3 realized in North Carolina if I did I would probably have
4 gotten run off, and then I just wanted to see how far
5 these people was going. In North Carolina I thought
6 somebody would come along behind and straighten everything
7 out with little white gloves on and stuff, but that isn't
8 the way it worked. We was the ones doing it. So I just
9 wanted to see how far they would go and stuff.

10 So what you need to do is take a little UT
11 test and run along there and find the thickness of your
12 weld.

13 We also had a welder in there. He was a real
14 bac welder. He would cold lap it. He wouldn't let it
15 penetrate. Then when you weld it over, you could grind it
16 off and run your test on it and everything is great, but
17 it might not be as thick as a piece of paper. As a matter
18 of fact, I heard that Whalen Daniels went along behind us
19 and took a straight pin and stuck holes in it. He is still
20 there. I don't know whether he did or not, but his name is
21 Whalen Daniels.

22 MR. HERR: Why don't you draw an arrow where
23 the problem is on there.

24 (Dillingham Exhibit 7 follow:)
25

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1 MR. DILLINGHAM: I got one drawn out here.
2 here is the problem right here. You are
3 supposed to have a gap like this one right here. You are
4 supposed to come in here and you are supposed to weld it.
5 You tack it and then you come back and you weld it here
6 and here and eventually you weld it until you weld it all
7 the way out and make one solid weld out of it and this is
8 just as strong as the rest of it.

9 MS. ELLIS: Why don't you put a little arrow
10 with an "A" or something like that.

11 MR. GRIFFIN: This is welding done on the
12 liner, right?

13 MR. DILLINGHAM: Right, the stainless steel
14 liner.

15 This is Item A. That is where it is supposed
16 to have been, which a lot of it is, but at certain places
17 it did like that. You have got you a little butt weld
18 there and you lay a little non-arc wire along there and
19 you weld over it. Of course, when you weld over it you
20 get a little lump and then you grind it back off flush and
21 then you have got as thick as your fingernail, for
22 instance, and you can snap it.

23 That weld there you could take bulldozer and
24 hook the two together and you couldn't pull them in two.
25 This you could take and snap it with your finger, or just

1 the temperature of summer and winter will crack that.

2 MS. ELLIS: Why don't you make that "B".

3 MR. DILLINGHAM: "B", okay. Now Bert Loefling
4 can tell you where it is. Now you might want to check with
5 Whalen Daniels because after I left I checked with a guy
6 and he said Whalen come along behind us. He always carried
7 a straight pin in his cigarette and stuck holes in his
8 filter and smoked it. He said he took a little straight
9 pin after we ran all our tests on it and, the IPS and the
10 vacuum box, and he come along behind us and he stuck holes
11 in the weld with that little pin. That is called a cold
12 lap right here.

13 (Dillingham Exhibit No. 6 follows:)

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him out and they agreed that he couldn't handle it. So they was going to pull all his certification.

The superintendent told them, or the general superintendent, if that man didn't have his certification by the end of the week that their butts was gone.

MR. HERR: What is the name of the superintendent?

MR. DILLINGHAM: You would have to check with Golden or Fred Nichols, but I think the man's name was James Callicut. Now this is what they told me. You can check with Fred Nichols over at the school or the guy called Golden because they agreed that the guy couldn't weld and they was going to pull his certs.

In other words, he was certified to do construction work and that is what we did. In order for them to do pipe work they had to take a pipe test, which is a little stricter test, and it had to be X-rayed. So he couldn't even hardly do our work which was construction.

MR. HERR: So the superintendent ---

MR. DILLINGHAM: The general superintendent, according to Fred Nichols or Golden, told them if that man didn't have his certification for pipe by the end of the week that they ass was gone.

MR. HERR: And they were the training people?

MR. DILLINGHAM: They were instructors at the

1 school, yes.

2 MR. HERR: What happened?

3 MR. DILLINGHAM: They gave him his
4 certification.

5 This is just one of my welders complained
6 after the job was done to me. His name is Mike Ratliff.
7 This is a transfer tube in the canal. It goes from the
8 canal fuel building to the reactor building.

9 In that tube you have got some welds in there
10 that is full pin welds. You are supposed to purge it, and
11 the full pin weld, it supposed to dip in a little right in
12 here. That is what it is supposed to look like. "A No. 2".

13 But as they started welding it sucked in on
14 them real bad. So they end up making a partial pin weld
15 out of it.

16 MR. GRIFFIN: How can we find these?

17 MR. DILLINGHAM: They only have got two of
18 them. You have got a penetration through the reactor going
19 into the fuel building. It is just a round transfer tube
20 is all it is and that is where your fuel leaves the
21 reactor and lays down and goes through that tube. You go
22 to your stainless steel liner.

23 MS. ELLIS: Is that Unit 1?

24 MR. DILLINGHAM: Unit 1 and Unit 2.

25 MR. HERR: Is that Q?

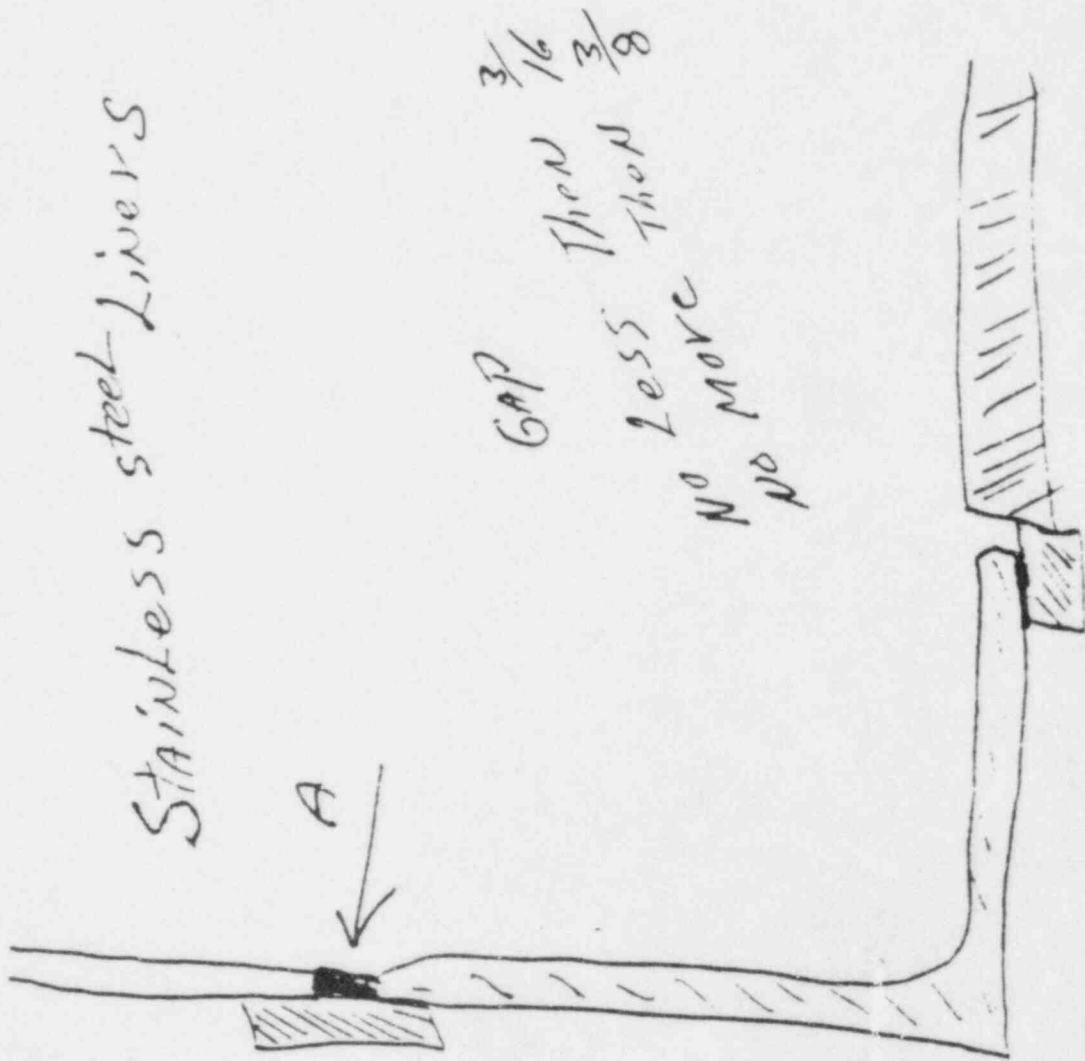
Tube Hole I.D.	Tube O.D.	Tube I.D.	Tube I.D. AFTER ROLLED
1.135	1.125	1.033	1.069

THE ROLLED WE WERE GOING FOR WHICH WAS THE HALF WAY POINT

We were About 3 to 7 WALL Reduction

MIN. 1.068 TO 1.071
MAX

CONDENSERS Tubes
A AND B
UNIT #1



Stainless steel Liners

GAP
 $\frac{3}{16}$
 $\frac{3}{8}$
Then Less
Then No more

"