



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

APR 23 1985

MEMORANDUM FOR: V. Noonan, Project Manager
Comanche Peak Project

FROM: H. Livermore, QA/QC Group Leader
Comanche Peak Project

SUBJECT: ALLEGER FEEDBACK ACTION ITEMS

REFERENCES: Attachment I, letter H. Livermore to V. Noonan, 3/22/85,
Subject: Staff Commitments.

Attachment II, letter V. Noonan to H. Livermore, 4/3/85,
Subject: Allegor Feedback Action Items (Reply to attach-
ment I).

Action items listed in Attachment II have been assigned numbers 1 through 11. Resolution of these items by the QA/QC Group is as follows:

1. The allegor stated that additional Document Control Center stamps were being used by other groups.

The TRT QA/QC Group does not find it necessary to track down other stamps. We have already determined that TUEC used the stamps in an uncontrolled manner without benefit of procedural direction (AQ-19). Additional examples of stamps being used will not change our findings.

No action required.

2. Allegor asked for a total number of documents examined and in what time frame.

The TRT QA/QC Group feels that SSER AQ-19 will address the subject adequately and will stand on its own. A separate total count and time frame is not necessary.

No action required.

3. In regards to QC training and qualification, the Allegor requested the NRC talk to two specific people. The Allegor stated he/she would locate the people. The Allegor has not located the people or contacted the QA/QC Group. When onsite, the QA/QC Group attempted to contact one of the subject people. The TRT was informed by staff that the person was not available.

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The QA/QC Group has determined that any additional findings from these two people would not change our findings. Enough other QC inspectors were sampled to conclude our findings on the training/qualification area.

No action required.

4. Alleger requested information on safety classification of fuel pool liner.

TRT staff action required.

No action required by QA/QC Group.

5. Alleger was to send NUREG information to Mr. Noonan.

TRT staff action required.

No action required of QA/QC Group.

- 6. Original allegation was that material was illegally upgraded from Q to non-Q material by use of interoffice memo. The alleger stated that concern was misinterpreted and real concern was with trending of the upgrading of material.

The QA/QC Group notes that the original concern was not misinterpreted. Trending was never mentioned in any of the Alleger's previous testimony. The QA/QC Group notes that only problems and discrepancies are trended in order to obtain correction action. Normal activities of upgrading material, per procedure, would not require trending.

The QA/QC Group feels that SSER AQ-5 addresses the matter of upgrading material adequately, and that trending in general will be adequately addressed in Executive Summary.

No action required.

7. The Alleger asked the TRT if the NCRs in regard to tubing traceability and color coding were reviewed.

The QA/QC Group has determined that SSER AQ-40 addresses the subject of tubing color coding and traceability adequately. The QA/QC Group notes that CMC was issued that solved TUEC's tubing traceability problems (not NCRs).

The Alleger also requested who the TRT talked with onsite in regard to tubing traceability. The QA/QC Group considers this information as private.

The QA/QC Group does not consider it necessary to chase down any more information on tubing color coding traceability as SSER AQ-40 stands alone and is adequate.

No action required.

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8. The Allegor asked the question if it was necessary to maintain traceability on weld filler material on non-ASME welds - specifically the fuel pool liner welds.

The QA/QC Group notes that this question has been addressed by the Piping/Mechanical Group SSERs.

The QA/QC Group notes that 10 CFR 50, Appendix B, Criterion VIII, requires traceability of all safety-related material, not just AMSE.

Action required: Piping/Mechanical Group owes the Allegor an answer.

9. Original allegation was that safety-related eye bolts were fabricated without any instructions or documentation. QA/QC SSER AQ-77 addressed this allegation in its entirety. No specific examples were found, although the TRT did conclude that the fabrication shop was manufacturing parts without drawings and instructions. The Allegor now states he/she can point out a specific example if allowed onsite. The QA/QC Group feels that the Allegor may be confused with the use of non-safety threaded rod installed in the plant.

The QA/QC Group position is that a specific example is not needed at this time since the SSER did find a generic problem with the fabrication shop. The QA/QC Group feels the SSER may be released as is, but that a phase 2 followup with the Allegor is required. Any noteworthy additional information will be added in an SSER Supplement.

No action required at this time. Future Allegor contact recommended.

10. Allegor requested the numbers of 14 procedures that the Licensee had revised. The TRT QA/QC Group does not have a record of these procedure numbers as 13 had nothing to do with the original allegation of changes required of ASME documentation review. SSER AQ-116 adequately addresses the original allegation in regards to Procedure CP-QAP-12.1.

No action required. The QA/QC Group cannot support the Allegor's request.

- 11A. Allegor stated he/she had an IR with a forged signature that he/she would provide to the NRC. Mr. Zudans of NRC stated he would pick it up the following day.

TRT staff action required.

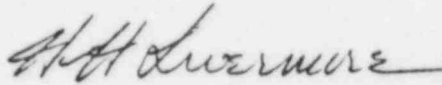
No input to QA/QC Group has been performed as of this date.

- 11B. Allegor requested the effectivity date of the current IR procedure requiring trending of IRs. The requested information is CP-QP-18.0, Rev. 19, dated 7/10/84.

TRT staff action required to forward information.

APR 23 1985

In summary, no QA/QC Group action is required. TRT staff action is required for action items 4, 5, 9, 11A, and 11B. TRT Piping/Mechanical Group action is required on action item 8.



H. H. Livermore
TRT QA/QC Group Leader
Comanche Peak Project

cc: C. Poslusny
A. Vietti
L. Shao
J. Calvo

APR 23 1985

FOIA-85-59

V/47

MEMORANDUM FOR: V. Noonan, Project Manager
Comanche Peak Project

FROM: H. Livermore, QA/QC Group Leader
Comanche Peak Project

SUBJECT: ALLEGER FEEDBACK ACTION ITEMS

REFERENCES: Attachment I, letter H. Livermore to V. Noonan, 3/22/85,
Subject: Staff Commitments.

Attachment II, letter V. Noonan to H. Livermore, 4/3/85,
Subject: Allegor Feedback Action Items (Reply to attach-
ment I).

Action items listed in Attachment II have been assigned numbers 1 through 11. Resolution of these items by the QA/QC Group is as follows:

1. The allegor stated that additional Document Control Center stamps were being used by other groups.

The TRT QA/QC Group does not find it necessary to track down other stamps. We have already determined that TUEC used the stamps in an uncontrolled manner without benefit of procedural direction (AQ-19). Additional examples of stamps being used will not change our findings.

No action required.

2. Allegor asked for a total number of documents examined and in what time frame.

The TRT QA/QC Group feels that SSER AQ-19 will address the subject adequately and will stand on its own. A separate total count and time frame is not necessary.

No action required.

3. In regards to QC training and qualification, the Allegor requested the NRC talk to two specific people. The Allegor stated he/she would locate the people. The Allegor has not located the people or contacted the QA/QC Group. When onsite, the QA/QC Group attempted to contact one of the subject people. The TRT was informed by staff that the person was not available.

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DATE							

The QA/QC Group has determined that any additional findings from these two people would not change our findings. Enough other QC inspectors were sampled to conclude our findings on the training/qualification area.

No action required.

4. Allegor requested information on safety classification of fuel pool liner.

TRT staff action required.

No action required by QA/QC Group.

5. Allegor was to send NUREG information to Mr. Noonan.

TRT staff action required.

No action required of QA/QC Group.

6. Original allegation was that material was illegally upgraded from Q to non-Q material by use of interoffice memo. The allegor stated that ~~concern~~ concern was misinterpreted and ~~real~~ real concern was with trending of the upgrading of material.

The QA/QC Group notes that the original concern was not misinterpreted. Trending was never mentioned in any of the Allegor's previous testimony. The QA/QC Group notes that only problems and discrepancies are trended in order to obtain correction action. Normal activities of upgrading material, per procedure, would not require trending.

The QA/QC Group feels that SSER AQ-5 addresses the matter of upgrading material adequately, and that trending in general will be adequately addressed in Executive Summary.

No action required.

7. The Allegor asked the TRT if the NCRs in regard to tubing traceability and color coding were reviewed.

The QA/QC Group has determined that SSER AQ-40 addresses the subject of tubing color coding and traceability adequately. The QA/QC Group notes that CMC was issued that solved TUEC's tubing traceability problems (not NCRs).

The Allegor also requested who the TRT talked with onsite in regard to tubing traceability. The QA/QC Group considers this information as private.

The QA/QC Group does not consider it necessary to chase down any more information on tubing color coding traceability as SSER AQ-40 stands alone and is adequate.

No action required.

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8. The Allegor asked the question if it was necessary to maintain traceability on weld filler material on non-ASME welds - specifically the fuel pool liner welds.

The QA/QC Group notes that this question has been addressed by the Piping/Mechanical Group SSERs.

The QA/QC Group notes that 10 CFR 50, Appendix B, Criterion VIII, requires traceability of all safety-related material, not just AMSE.

Action required: Piping/Mechanical Group owes the Allegor an answer.

9. Original allegation was that safety-related eye bolts were fabricated without any instructions or documentation. QA/QC SSER AQ-77 addressed this allegation in its entirety. No specific examples were found, although the TRC did conclude that the fabrication shop was manufacturing parts without drawings and instructions. The Allegor now states he/she can point out a specific example if allowed onsite. The QA/QC Group feels that the Allegor may be confused with the use of non-safety threaded rod installed in the plant.

The QA/QC Group position is that a specific example is not needed at this time since the SSER did find a generic problem with the fabrication shop. The QA/QC Group feels the SSER may be released as is, but that a phase 2 followup with the Allegor is required. Any noteworthy additional information will be added in an SSER Supplement.

No action required at this time. Future Allegor contact recommended.

10. Allegor requested the numbers of 14 procedures that the Licensee had revised. The TRT QA/QC Group does not have a record of these procedure numbers as 13 had nothing to do with the original allegation of changes required of ASME documentation review. SSER AQ-116 adequately addresses the original allegation in regards to Procedure CP-QAP-12.1.

No action required. The QA/QC Group cannot support the Allegor's request.

- 11A. Allegor stated he/she had an IR with a forged signature that he/she would provide to the NRC. Mr. Zudans of NRC stated he would pick it up the following day.

TRT staff action required.

No input to QA/QC Group has been performed as of this date.

- 11B. Allegor requested the effectivity date of the current IR procedure requiring trending of IRs. The requested information is CP-QP-18.0, Rev. 19, dated 7/10/84.

TRT staff action required to forward information.

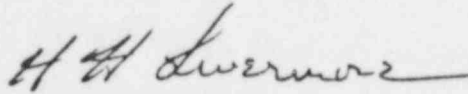
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V. Noonan

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In summary, no QA/QC Group action is required. TRT staff action is required for action items 4, 5, 9, 11A, and 11B. TRT Piping/Mechanical Group action is required on action item 8.

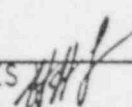


H. H. Livermore
TRT QA/QC Group Leader
Comanche Peak Project

cc: C. Poslusny
A. Vietti
L. Shao
J. Calvo

DISTRIBUTION:

RMinogue
LShao
HLivermore
TRT/subj
TRT/rdg

OFFICE ▶	DET: RES 					
SURNAME ▶	HLivermore					
DATE ▶	4/ /85					

FOIA-85-50

V/51

MEMORANDUM FOR: V. Noonan, Project Manager
Comanche Peak Project

FROM: H. Livermore, QA/QC Group Leader
Comanche Peak Project

SUBJECT: ALLEGER FEEDBACK ACTION ITEMS

REFERENCES: Attachment I, letter H. Livermore to V. Noonan, 3/22/85,
Subject: Staff Commitments.

Attachment II, letter V. Noonan to H. Livermore, 4/3/85,
Subject: Allegor Feedback Action Items (Reply to attachment I).

Action items listed in Attachment II have been assigned numbers 1 through 11. Resolution of these items by the QA/QC Group is as follows:

1. The allegor stated that additional Document Control Center stamps were being used by other groups.

The TRT QA/QC Group does not find it necessary to track down other stamps. We have already determined that TUEC used the stamps in an uncontrolled manner without benefit of procedural direction (AQ-19). Additional examples of stamps being used will not change our findings.

No action required.

2. Allegor asked for a total number of documents examined and in what time frame.

The TRT QA/QC Group feels that SSER ^{AQ}AK-19 will address the subject adequately and will stand on its own. A separate total count and time frame is not necessary.

No action required.

3. In regards to QC training and qualification, the Allegor requested the NRC talk to two specific people. The Allegor stated he/she would locate the people. The Allegor has not located the people or contacted the QA/QC Group.

When onsite, the QA/QC Group attempted to contact one of the subject people. The TRT was informed by staff that the person was not available.

The QA/QC Group has determined that any additional findings ^{from} ~~these~~ these two people ~~would~~ would not change our findings. Enough other QC inspectors were sampled to conclude our findings on the training/qualification area.

No action required.

4. Allegor requested information on safety classification of fuel pool liner.
TRT staff action required.

No action required by QA/QC Group.

5. Allegor was to send NUREG information to Mr. Noonan.

TRT staff action required.

No action required of QA/QC Group.

6. Original allegation was that material was illegally upgraded from 0 to 1 non-Q material by use of interoffice memo. The allegor stated that ~~the~~ concern was misinterpreted and ~~the~~ real concern was with trending of the upgrading of material.

The QA/QC Group notes that the original concern was not misinterpreted. Trending was never mentioned in any of the Allegor's previous testimony. The QA/QC Group notes that only problems and discrepancies are trended in order to obtain correction action. Normal activities of upgrading material, per procedure, would not require trending.

The QA/QC Group feels that SSER AQ-5 addresses the matter of upgrading material adequately, and that trending in general will be adequately addressed in Executive Summary.

No action required.

7. The Allegor asked the TRT if the NCRs in regard to tubing traceability and color coding were reviewed.

The QA/QC Group has determined that SSER AQ-40 addresses the subject of tubing color coding and traceability adequately. The QA/QC Group notes that CMC was issued that solved TUEC's tubing traceability problems (not NCRs).

The Allegor also requested who the TRT talked with onsite in regard to tubing traceability. The QA/QC Group considers this information as private.

The QA/QC Group does not consider it necessary to chase down any more information on tubing color coding traceability as SSER QA-40 stands alone and is adequate.

No action required.

AQ

8. The Allegor asked the question if it was necessary to maintain traceability on weld filler material on non-ASME welds - specifically the fuel pool liner welds.

The QA/QC Group notes that this question has been addressed by the Piping/Mechanical Group SSERs.

The QA/QC Group notes that 10 CFR 50, Appendix B, Criterion VIII, requires traceability of all safety-related material, not just AMSE.

Action required: Piping/Mechanical Group owes the Allegor an answer.

9. Original allegation was that safety-related eye bolts were fabricated without any instructions or documentation. QA/QC SSER ^{AQ 2}AW-77 addressed this allegation in its entirety. No specific examples were found, although the TRC did conclude that the fabrication shop was manufacturing parts without drawings and instructions. The Allegor now states he/she can point out a specific example if allowed onsite. The QA/QC Group feels that the Allegor may be confused with the use of non-safety threaded rod installed in the plant.

The QA/QC Group position is that a specific example is not needed at this time since the SSER did find a generic problem with the fabrication shop. The QA/QC Group feels the SSER may be released as is, but that a phase 2 followup with the Allegor is required. Any noteworthy additional information will be added in an SSER Supplement.

No action required at this time. Future Allegor contact recommended.

10. Allegor requested the numbers of 14 procedures that the Licensee had revised. The TRT QA/QC Group does not have a record of these procedure numbers as 13 had nothing to do with the original allegation of changes required of ASME documentation review. SSER AQ-116 adequately addresses the original allegation in regards to Procedure CP-QAP-12.1.

No action required. The QA/QC Group cannot support the Allegor's request.

- 11A. Allegor stated he/she had an IR with a forged signature that he/she would provide to the NRC. Mr. Zudans of NRC stated he would pick it up the following day.

TRT staff action required.

No input to QA/QC Group has been performed as of this date.

- 11B. Allegor requested the effectivity date of the current IR procedure requiring trending of IRs. The requested information is CP-QP-18.0, Rev. 19, dated 7/10/84.

TRT staff action required to forward information.

In summary, no QA/QC Group action is required. TRT staff action is required for action items 4, 5, ⁹11A, and 11B. TRT Piping/Mechanical Group action is required on action item 8.

H. H. Livermore ^G
TRT QA/QC Group Leader
Comanche Peak Project

cc

C. Poslusny
A. Viatti
L. Shao
J. Calvo

MEMORANDUM FOR: V. Noonan, Director
Comanche Peak Project

FROM: H H Livermore, QA/QC Group Leader

SUBJECT: ALLEGED FEEDBACK ACTION ITEMS

REFERENCES: ATTACHMENT I, LETTER H. LIVERMORE
to V. Noonan, 3/22/5, SUBJECT: STAFF
COMMITMENTS

ATTACHMENT II, LETTER V. Noonan
to H. LIVERMORE, 4/3/5, SUBJECT: ALLEGED
FEEDBACK ACTION ITEMS (REPLY TO ATTACHMENT
I)

Action Items listed in Attachment II
have been assigned numbers 1
through 11. Resolution of these
items by the QA/QC Group was
follows:

- ① The alleged stated that additional
Document Control Center stamps were
being used by other groups.
The TET QA/QC Group does not
find it necessary to track
down other stamps. We
have already determined that

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TUEC used the stamps in an uncontrolled manner without benefit of procedural direction (AQ-19). Additional examples of stamps being used will not change our findings.
No Action Required.

- ② Allegor asked for a total number of documents examined and in what time frame.

The TRT QA/QC Group feels that SSQR AQ 19 will address the subject adequately and will stand on its own. A separate total count and time frame is not necessary.

No Action Required.

- ③ In regards to QC training and qualification, the Allegor requested the WEC talk to two specific people. The Allegor stated he/she would locate the people.

The Allegor has not located the people or contacted the QA/QC Group.
When on site, the QA/QC Group attempted to contact one of the

subject people. The TRT was informed by Staff that the person was not available.

The QA/QC group has determined that any additional findings that these two people could have would not change our findings. Enough other QC Inspectors were sampled to conclude our findings in the training/qualification area.
No Action Required.

- ④ Allegor requested information on safety classification of fuel pool liner.
 - TRT Staff Action ~~Not~~ Required.
 - No Action Required by QA/QC Groups.
- ⑤ Allegor was to send NUREG information to Mr Noonan.
 - TRT Staff Action Required.
 - No Action Required of QA/QC Group.
- ⑥ Original allegation was that material was illegally upgraded from Q to non Q material by use of Steroffice Memo. The allegor stated that her concern was

6 (Cont.)

misinterpreted and her real concern was with trending of the upgrading of material. The QA/QC Group notes that the original concern was not misinterpreted. Trending was never mentioned in any of the Allegers previous testimony. The QA/QC Group notes that only problems and discrepancies are trended in order to ~~obtain~~ obtain correction action. Normal activities of upgrading material, per procedure, would not require trending. The QA/QC Group feels that SSER AQ 5 addresses the matter of upgrading material adequately and that trending in general will be adequately addressed in Executive Summary. No Action Required.

- ⑦ The Allegor asked the TRT if the NCR's in regard to tubing traceability and color coding were reviewed. The QA/QC Group has determined

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that SSER AQ40 addresses the subject of tubing color coding and traceability adequately.

~~There were no WCRs used to solve the problem.~~ The QA/QC Group notes that a CMC was issued that solved TUECs ~~not~~ tubing traceability problems (not WCRs).

The Allegor also requested who the TRET talked with on site in regard to tubing traceability. The QA/QC Group considers this information as private.

The QA/QC Group does not consider it necessary to chase down any more information on tubing color coding traceability as AQ40 SSER stamps alone are adequate.

No Action Required.

- ⑤ The Allegor asked the question if it was necessary to maintain traceability on weld filler material on non ASME Welds — specifically the fuel pool liner welds. The QA/QC Group notes that

8 cont.

this question has been addressed by the Piping/Mechanical Group SSERs.

- The QA/QC Group notes that 10CFR 50, Appendix B, Criterion VIII requires traceability of all Safety Related Material, not just ASME.
- Action Required: Piping Mechanical Groups owes the Allegor an answer.

⑨ Original allegation was that safety-related eye bolts were ~~for~~ fabricated without any instructions or documentation. QA/QC SSER AQ77 addressed this allegation in its entirety. No specific examples were found, although the TREC did conclude that the fabrication shop was manufacturing parts without drawings and instructions. The Allegor now states ~~he~~ he/she can point out a specific example if allowed on site. The QA/QC Group feels that the allegor may be confused with ^{the use} non safety threaded rod installed in the plant. The QA/QC Group position is that

a specific example is not needed at this time since the SSER did find a generic problem with the ~~manufacture~~ fabrication shop. The QA/QC Group feels the SSER may be released as is, but that a phase 2 followup with the Allegor is required. Any noteworthy additional information will be added in an SSER Supplement.

No Action Required at this Time.
Future Allegor contact ~~required~~ recommended.

- ⑩ Allegor requested the numbers of fourteen procedures that the Licensee had revised. TRT QA/QC Group does not have ~~the~~ a record of these procedure numbers as thirteen had nothing to do with the original allegation of changes required of ASMR documentation review. SSER-AQ116 adequately addresses the original allegation in regard to Procedure CP-QAP-12.1.

No Action Required. The QA/QC

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group cannot support the ~~request~~ ^{allegers} request.

(11A) Allegor stated he/she had an IR with a forged signature that [redacted] would provide to the NRC. Mr Zudam of ^{NRC} Staff stated he would pick it up the following day.

- TRT Staff Action Required.
- No input to QA/QC Groups has been performed as of this date

(11B) QA/QC Group advised they would provide the dates the IR procedure came into effect. The

(11B) Allegor requested the effectivity date of the current IR procedure requiring trending of IRs. The requested information is CP-QP-18.0 Rev. 19 dated 7-10-84.

- TRT Staff Action Required to forward information.

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In Summary, no QA/QC Group
 Action is required. TRT Staff
 Action is Required for Action
 Items 4, 5, 11A & 11B. TRT
 Piping/Mechanical Groups Action
 is required on Action Item 8.

H H Livermore
 TRT QA/QC Group Leader.

To Rudy Bonnerbury
Nicholson Lane, Rm 160

7c

Items from Luke's Group
needing review ASAP.

FOIA-85-59
V/53

~~Handwritten scribbles and crossed-out text~~

NRC, but not TRT -
Taylor, Smith, & Gilbert,
NRC inspectors spent insufficient
time on each danger inspection.

TOM

? who NRC ; us?

Room 10310

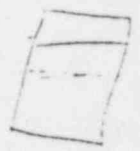
Call Haughney
Mon morning
TRT?

Read source mtl. Bachmann
Para-Led Mike Harrison
2-8666

② Sht 1 of 5 # 2 -

EXCPT

ASME rejected B & R stamp^N
Same as our SSER by Louie
Jackson.



Read source mtl. - insure
no disconnects with us.

③ Sht 2 of 5 # 9

- NRC not finding problems
- NRC not investigating all allegations
- NRC not monitoring construction.

Read mtl. Are they talking
about TRT?

Hub Turner

mqx 17-2

1 there's a set of tables that show you how much porosity is
2 acceptable to the length of weld, how this porosity must
3 be distributed, what's the difference between the pores.
4 There shouldn't be a line, these types of things.

5 Q Okay. Now, you, I guess, just recited the various
6 text indications that are used for inspection these welds.

7 Do either of these codes, the ASME Code or the
8 AWS Code, specify a particular method for testing, i.e. just
9 a visual method versus a --

10 A Well, there are several methods. You have to go to
11 different sections of the code for different classes of
12 structures. Class I, of course, if you are in the piping or
13 systems of that type, the general acceptance criteria is a
14 volumetric examination by radiography. If you go to some of
15 the other structural members, they may apply a mag particle
16 or a liquid penetrant test, depending on the material involved.

17 But the visual inspection is one of the easiest ones
18 to do and gives you a tremendous amount of information about
19 the quality of the weld. It's the prime leader in looking at
20 all these welds themselves, how they're made.

21 A [REDACTED] AWS is all visual, except where it
22 specifically adds on by design, by the designer, so it relies
23 strictly on visual.

24 Q Mr. Taylor, have you had an opportunity at any time
25 while you were at Comanche Peak as a Senior Resident Inspector

17-31 to review the QC/QA procedures for inspection of welds?

2 A [REDACTED] Yes, I have.

3 Q And generally, did the inspection criteria and the
4 type of inspection that was used comply with the requirements
5 of the AWS Code and/or the ASME Code?

6 A They match or exceed.

7 MR. MIZUNO: No further questions.

8 JUDGE BLOCH: Recross?

9 EXAMINATION

10 [REDACTED]
11 Q In regard to the total number of supports looked
12 at in the north yard cable room and the south yard tunnel,
13 how long did you spend on your inspections on each of those?

14 A (Witness Gilbert) About a half a day in the south
15 yard tunnel, and about twelve hours in the north cable
16 spreading room.

17 (Pause.)

18 Q Are some of these supports a good ways away from
19 one another?

20 A Yes. -

21 Q Are some of them elevated?

22 A Yes, they are.

23 Q Are some of them difficult to get to?

24 A Yes.

25 Q So you looked at roughly one every fifteen, twenty

mgc 17-4

minutes, something like that, would you say, on an average?

A It probably didn't take me that long.

Q When you were looking at the area which had been welded, could you give us an idea of the range of sizes that you had to look at, the amount of area that you had to look at?

A The amount of area depended on supports, how long it was, and these were I-beam type supports, and I looked on both sides of the support.

I don't know how else to answer your question.

Q Do you have an estimate of about how long and how wide the individual supports were?

MR. MIZUNO: Objection. This goes beyond the scope of redirect, and in any case, could have been asked on original cross-examination.

[REDACTED] This was a follow-up to a question raised earlier.

MR. MIZUNO: Chairman Bloch?

MR. BLOCH: It's a follow-up to the Board's question. How far are we going to go with this?

[REDACTED] I just want to find out how large they were. Our concern goes to the amount of time spent on this and whether or not it is actually possible that he might have overlooked some of the particular ones, because of the amount of time that was spent on them.

1 the intervenors to have the opportunity to present further
2 evidence on these matters before we conclude our
3 proceeding.

4 -- : Please continue, [REDACTED]

5 [REDACTED] All right. Another possibility which
6 [REDACTED] is that the
7 conditions of the license would reflect whatever the Board
8 decides finally needs to be addressed. We would urge, as we
9 have in our [REDACTED] that this not be done
10 because we do not feel that the NRC Region IV office has
11 properly monitored the construction in the past and we see
12 no indications that they will do a better job in the
13 future.

14 These are some of the primary things that we had
15 thought of as possible ways for the Board to address this
16 matter.

17 Now I would like to address specifically a few
18 of the things that Mr. Reynolds noted. We have covered some
19 of them already.

20 I think that one of the things that should be
21 emphasized is the importance of the Licensing Board. If one
22 were to buy the applicants' assessment, really there is no
23 reason for the Licensing Board to exist or to be monitoring
24 any of this. As pointed out by former Judge Miller in the
25 September hearings to the staff, it is necessary for the

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everybody identify themselves and passed around the sheet of paper, but I'm not positive about that.

Q. What was the basis for your feeling that the NRC was not doing its job?

A. Because I felt that Mr. Taylor, the NRC Resident Inspector at Comanche Peak, was not catching the problems I knew were occurring at the plant all the time. As a matter of fact, the whole time I worked there, I only recall seeing him one time. And [REDACTED] said that [REDACTED] only remembered seeing him twice in the years [REDACTED] has worked there.

Q. Did you tell the NRC investigators how you felt about this?

A. Yes. And I told them that that was another allegation I wanted to make to them -- that they should investigate the NRC itself. I specifically told them that I did not want the NRC Resident Inspector out there told about my allegations before they actually checked out the allegations themselves.

Q. And was Mr. Taylor told about your allegations before the investigators checked out your allegations?

A. Yes. When Mr. Driskill [REDACTED] later to check into further allegations, I asked him if he told anybody in advance that he was coming to the plant. He stated that he had to tell Mr. Taylor that he was coming. I asked him if he told Mr. Taylor anything that I had told him (Mr. Driskill). He said that he had to tell Mr. Taylor kind of what was going on.

Q. You stated earlier that you were not supplied with a copy of I&E Report 81-12 (Staff Exhibit 178) until CASE supplied you with a copy July 26. When were you supplied with a copy of the back-up "sanitized" statements and notes taken by the NRC investigators regarding your allegations?

1
[REDACTED]
2 Q. Is a "sanitized" copy of the statement you signed 9/8/81 included
as an Attachment to your testimony?

4 A. Yes, it's CASE Exhibit 666C-1 through 666C-5.

5 Q. Is the handwriting of that statement your handwriting?

6 A. No. I assume that it's Mr. Driskill's.

7 Q. Is the wording of that statement your own wording?

8 A. No, it is not. It is the wording of Mr. Driskill. I asked him about
9 it and asked him if that was going to be the basis for his investigation. I
10 was concerned because it didn't contain all of the allegations and wasn't
11 really worded exactly the way I meant it. He explained that it was more
12 or less just a formality necessary for them to get the investigation started --
13 that they had to have something in writing signed by me in order to begin
14 the investigation.

15 Q. Did Mr. Driskill or Mr. Herr explain to you what was meant by the
16 statement at the end of the statement, on CASE Exhibit page 666C-5, "I certify,
17 under penalty of perjury, that the foregoing is true and correct." -- did
18 they tell you what the penalty for perjury is?

19 A. No, they did not.

20 Q. Was any written statement taken from [REDACTED]
21 [REDACTED]

22 A. Not that I recall. I don't remember [REDACTED]
23 has stated to me that [REDACTED] doesn't recall signing anything. Since there was
24 not a copy supplied with the "sanitized" notes on I&E Report 81-12, I assume
25 there was not.

Q. Are the statements contained in your 9/8/81 statement true and correct?

A. Yes, they seem to be as far as I can tell from the "sanitized" copy of the statement. I'm not sure that it's clear from the statement what I meant about the hole in the floor. I can't read some portions of the statement because they've been blacked out. My primary concern is that many of the allegations made by [REDACTED] are not even contained in it.

Q. Please tell us specific details about your concerns with the I&E Report (81-12, Staff Exhibit 178). Please refer to CASE Exhibit 666D page numbers so it will be easier to follow.

A. On CASE Exhibit 666D-2, under "Areas Investigated," not all of the allegations are listed.

Q. All right. Let's save those until last and go through each allegation first.

A. On CASE Exhibit 666D-6, under Item 2, "Investigation of Allegation, Allegation No. 1," it states "Numerous pipe supports were fabricated utilizing weave welds which are prohibited by procedure." There is one item referred to in the "sanitized" notes which should be clarified. Where it stated that "Weave welding violate the C-10 & A-10 welding procedures, as I know it," C-10 and A-10 are actually codes for a welding process. The welding procedures for the C-10 and A-10 welding process codes are ~~71000~~, 11065, and 10046.

The procedure that states that weave, ^{bead} welding is not to be used is CPM-6.9, 11032, 11065, and 10046.

This is also indicated on the Weld Parameter Guides issued from the rod shack to each welder when material is picked up; if you go over the maximum bead

width, you'd be weave welding. Or, if you use transverse oscillation, you'd be weave welding, otherwise known as a weave bead.

Q. Who gave you your instructions about weave welding?

1 A. I was told by my first welding instructor, [REDACTED] while I was
2 in the welding training center in [REDACTED] not to weave weld.

3 When I was given the CPM-6.9 procedure class, I was instructed by
4 the instructor that weave welding was not allowed on the jobsite; I don't
5 remember his name. This was around January 1980 or so. I don't
6 remember the exact time.

7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 This was what I was told during my training.

17 When I was in the field, [REDACTED] that
18 rather than run a bunch of little stringer beads to weave it in to build a
19 floor since it was impossible to run stringer bead root passes because of the
20 size of the fit-up gap. At that time he also told me that it didn't make any
21 difference what was under the cap -- to just put anything in there that you
22 could get in there (which sometimes consisted of breaking the flux off of the
23 rods, which he showed me how to do, and sticking a welding rod up in there
24 to run over to get your filler material in there) -- because what we can't
25 see, QC can't see. I was also instructed by him not to let QC see me doing

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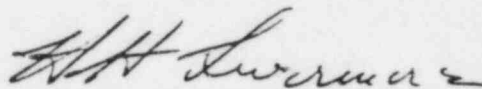
MEMORANDUM FOR: V. Noonan, Director
Comanche Peak Project

FROM: H. H. Livermore, QA/QC Group Leader

SUBJECT: OPEN TRT STAFF COMMITMENTS

In the exit meeting with allegeders conducted at the Granbury Inn on Dec. 10, 1984, you and Mr. Zudans made commitments to perform additional work of an investigatory nature. Most of the verbal commitments were made while discussing the QA/QC group allegations (AQ) and therefore may possibly delay final release of the SSERs. These items are detailed in the transcript on pages 23, 30, 81, 82, 83, 94, 98, 101, 102, 103, 107, 111-114, 121-123, 157, 158, 163-165.

Please advise as to your or Mr. Zudans' follow-up or disposition of these items.


H. H. Livermore,
TRT QA/QC Group Leader

cc: J. Zudans
C. Poslusny
A. Vietti

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