

ORIGINAL

UNITED STATES OF AMERICA

RELATED CORRESPONDENCE

1

NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

BEFORE THE ATOMIC SAFETY & LICENSING BOARD

JUL -7 P2:26

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

- - - - -x

In the matter of:

: Docket Nos. 50-456

COMMONWEALTH EDISON COMPANY

:

50-457

[Braidwood Nuclear Power Station, :

Units 1 and 2]

:

- - - - -x

Isham, Lincoln & Beale

Three First National Plaza

51st Floor

Chicago, Illinois

March 3, 1986

Deposition of: LARRY A. PERRYMAN

called for examination by Counsel for Licensee, Commonwealth

Edison, pursuant to notice, taken before Garrett J. Walsh,

a Notary Public in and for the Commonwealth of Virginia, when

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ANN RILEY & ASSOCIATES, LTD.

1625 I Street, N.W.

293-3950

Washington, D.C.

8607090319 860303
PDR ADOCK 05000456
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1 were present on behalf of the respective parties:

2

3 APPEARANCES:

4 For the Licensee Commonwealth Edison Company:

5 ELENA KEZELIS

6 ATTORNEY-AT-LAW

7 Isham, Lincoln & Beale

8 Three First National Plaza

9 Chicago, Illinois 60602

10

11 For the Intervenors BPI, et al:

12 TIMOTHY WRIGHT, III, ESQ.

13 109 North Dearborn, Suite 1300

14 Chicago, Illinois 60602

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C O N T E N T S

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Witness:

Examination by:

Page:

4

LARRY A. PERRYMAN

Ms. Kezelis

4, 138

5

Mr. Wright

113, 141

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7

8

E X H I B I T S

Page:

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Exhibit No. 1:

9

10

Copy of subpoena served

11

on Mr. Perryman.

12

13

Exhibit No. 2:

27

14

Mr. Perryman's request of

15

5/85 for a transfer out of the

16

walkdown role.

17

18

Exhibit No. 3:

63

19

A copy of the Intervenor's

20

QC Inspection Harassment Contention.

21

22

P R O C E E D I N G S

[10:05 a.m.]

Whereupon,

LAWRENCE A. PERRYMAN

was called as a witness and, having been first duly sworn by the Notary Public, was examined and testified as follows:

EXAMINATION

BY MS. KEZELIS:

Q Please state your full name, sir, and spell your last name for the record.

A Lawrence A. Perryman, P-E-double R-Y-M-A-N.

Q What is your residence address, sir.

A 229 Karen, Romeoville, Illinois.

Q Mr. Perryman, my name is Elena Z. Kezelis. I'm one of the attorneys who represents Commonwealth Edison Company, the Applicant, before the Nuclear Regulatory Commission and the ASLB in Commonwealth Edison Company's application for an operating license for the Braidwood Station in Illinois.

Mr. Perryman, have you ever given a deposition before?

A Not to my knowledge. I may have.

Q Do you recall ever having been in a setting such as

1 this with a court reporter taking down all your statements and
2 with attorneys present asking you questions?

3 A In personal problems, I have.

4 Q Okay. Do you understand, then, that any question I
5 ask you has to be answered verbally. You can't use a nod or a
6 shake of a head, because the court reporter can only take down
7 verbal answers from you?

8 A Yes, I do.

9 Q Okay. If at any time you don't understand a
10 question I ask you, or if you didn't hear it, please tell me,
11 and I will either speak up more loudly, or else I'll attempt
12 to rephrase it, so that you can understand it.

13 Is that understood?

14 A Yes, it is.

15 Q Okay. Mr. Perryman, by whom are you currently
16 employed?

17 A BESTCO.

18 Q When did you become first employed with BESTCO?

19 A BESTCO took over from Comstock on July 27th -- I
20 believe it was July 27th.

21 Q Of 1985?

22 A 1985.

1 Q Okay. Would you accept somewhere around July 23rd
2 of 1985?

3 A That's fine.

4 Q Okay. By whom were you employed prior to that time,
5 sir?

6 A Comstock Electric.

7 Q Was that L.K. Comstock or Comstock Engineering or --

8 A L.K. Comstock.

9 Q When did you first become employed with
10 L.K. Comstock?

11 A November 28, 1984.

12 Q And from November 28, 1984 through the present, you
13 have been employed at the Braidwood site; is that correct?

14 A Now let me think for a second. I might have made a
15 mistake there. Was it '83? What year is this, '86?

16 Q This is '86.

17 A It would be '83, I'm sorry. November of '83.

18 Q But in any event, between November of 1983 and the
19 present, you have been employed at the Braidwood site; is that
20 correct?

21 A Yes, ma'am.

22 Q By whom were you employed prior to November of 1983?

1 A I was employed with a boilermaker shop, Universal
2 Lockport Corporation, Joliet, Illinois.

3 Q And how long were you employed there?

4 A Off and on, for eight years.

5 Q Okay. Mr. Perryman, in what capacity were you
6 employed by Comstock in November of 1983?

7 A As a welding inspector.

8 Q At what level?

9 A Level 2.

10 Q Is the area of welding the only area in which you
11 have received a certification from Comstock at Braidwood since
12 1983?

13 A No, ma'am.

14 Q In what other areas have you attained certification?

15 A Cable pulling.

16 Q Do you recall when you received that certification?

17 A No, the dates, I don't.

18 Q Do you recall roughly the year?

19 A It was just renewed, so it had to be about a year
20 ago, maybe a month back. So it would be about 13 months ago.

21 Q Okay. Sometime in January or so of 1985, perhaps?

22 A Somewhere in that area, right.

1 Q Okay. Have you received certifications in any areas
2 other than those you've just identified?

3 A I've got terminations, CEAs, calibrations, weld
4 configuration. That's part of welding. That's about it.

5 Q Okay. Do you recall when you became certified in
6 terminations?

7 A No, ma'am.

8 Q All right. Roughly, do you recall what year it
9 would have been?

10 A It would have all been last year sometime.

11 Q Sometime in 1985.

12 A Yes, ma'am.

13 Q Okay. And are all of these certifications that you
14 have identified to us -- calibrations, concrete expansion
15 anchors, terminations, cable pulling, and welding -- effective
16 certifications today? They're all still active?

17 A All but cable pull.

18 Q Okay. And when did your certification in cable
19 pulling lapse?

20 A About a month ago. I missed it by one day, so I've
21 got to retest.

22 Q Okay. So you went through the entire training and

1 practical exams and so on in order to be recertified in cable
2 pulling?

3 A I will have to. I will have to take a written,
4 40-question test again sometime this week.

5 Q I see. Mr. Perryman, let me show you what is a
6 partial copy of a subpoena directed to you at your residence.
7 Unfortunately, I don't have the portion of the page which
8 would reflect when you were served with a subpoena in this
9 case.

10 MS. KEZELIS: I would like to have that copy, at
11 this point, marked as Perryman Deposition Exhibit No. 1. Just
12 for the record, the server of the subpoena has not yet
13 returned to us the original copies reflecting the service.

14 [Perryman Deposition Exhibit No. 1
15 was marked for identification.]

16 THE WITNESS: I have my original, if you want it.

17 MS. KEZELIS: Okay. That's fine. You can hold on
18 to that, sir.

19 BY MS. KEZELIS:

20 Q Do you recall approximately when you were served
21 with a copy of that subpoena, Mr. Perryman?

22 A My wife got it. It was about 6:30 at night. I

1 believe it was Thursday night, last Thursday night.

2 Q This past week.

3 A Yes.

4 Q Okay. And do you recall seeing a copy of a schedule
5 of documents to be produced at your deposition as well?

6 A Yes, ma'am.

7 Q Do you have any documents responsive to that
8 schedule in your possession?

9 A No, ma'am.

10 Q All right. Have you at any time had any documents
11 responsive to that schedule in your possession? And please
12 feel free to look at this to refresh your recollection.

13 A Documents, all I had was maybe a memo.

14 Q And what kind of memo would that have been?

15 A When I got -- when I told them I didn't like their
16 management.

17 Q Do you recall the circumstances surrounding -- was
18 that your memo that you issued?

19 A Yes, ma'am.

20 Q Okay. Do you recall the circumstances surrounding
21 your memo?

22 A I didn't like the way they were handling a certain

1 project, which was called a walkdown, and I didn't like the
2 way we were supposed to sign off what we call Configuration
3 Form 7. We were trying to get them to change the way they
4 were setting that up, so that I would not be responsible for
5 something that was not what I considered to be right.

6 Q Okay. And you issued a memo. Do you recall to
7 whom?

8 A Irv DeWald and Tony Simile.

9 Q Okay. We'll return to that.

10 Have you received any materials that would be
11 responsive to that schedule from BPI, Business and
12 Professional People for the Public Interest?

13 A I received some stuff from BPI. I really don't know
14 what most of it was. That memo was in there.

15 Q Okay. The memo you've just been describing
16 regarding walkdowns?

17 A Yes, ma'am.

18 Q Did you keep the materials that BPI sent you, or did
19 you discard them?

20 A I still have them.

21 Q Okay. You didn't bring those with you today?

22 A No, ma'am.

1 Q Okay. Do you recall what other materials BPI sent
2 to you?

3 A It was mainly that this was going on. They were
4 investigating this, and they wanted us to give some kind of
5 deposition or something or anything we had to give to
6 somebody, but I don't know those people, so I ain't going to
7 give them nothing.

8 Q Okay. What I will do, Mr. Perryman, if it's
9 acceptable to you and to Mr. Tim Wright, is give you a
10 self-addressed, stamped envelope at the end of the day to day,
11 and I will ask you to send the materials that you do have in
12 your possession to me, and I'll photocopy them and distribute
13 them to all the parties, and then I'll return the originals to
14 you, if that's all right.

15 A Yes, ma'am.

16 Q Okay. Have you ever spoken to a man by the name of
17 Doug Cassel from BPI, if you recall?

18 A I don't remember. I thought one man had called me
19 and wanted me to do something, and I just brushed it off. I
20 didn't --

21 Q Okay. Would he have been Bob Guild from BPI?

22 A The name would really be slipping me. It's been a

1 long time.

2 Q Okay. Do you recall whether you did speak to
3 somebody from BPI?

4 A I believe somebody had called me one time and asked
5 me something about, they were trying not to divulge our names
6 or something, and that's basically all I really remember about
7 it.

8 Q Was this a discussion of confidential treatment
9 regarding the inspectors who visited the NRC in March of 1985?

10 A Yes, ma'am.

11 Q Okay. Do you recall the substance of any other
12 conversation or any other subject matter of the conversations
13 that you had?

14 A No, ma'am.

15 Q Or the conversation that you had with BPI?

16 A No, ma'am.

17 Q Okay. Was it just one telephone conversation?

18 A Yes, ma'am.

19 Q Okay. Mr. Perryman, you were one of the QC
20 inspectors employed by Comstock who visited the NRC in March
21 of 1985; is that correct?

22 A Yes, ma'am.

1 Q All right. Do you recall, were you one of the
2 individuals who went over in the morning with five other
3 inspectors?

4 A No, ma'am.

5 Q All right. You were one of the group of 24 or so
6 who went over during the lunch hour?

7 A Yes, ma'am.

8 Q What was the purpose of your own -- what was your
9 own reason for going to the NRC on that date?

10 A On that date, it was a matter of handling Richard
11 Saklak, how we wanted him handled, and not the way Com Ed or
12 CEC Co -- I mean, Comstock -- would handle him, which we knew
13 what they had intended to do, and we figured if they didn't
14 want this man off the site, then we would leave the site.

15 Q Okay. And was the incentive for visiting the NRC on
16 March 29, 1985 the Saklak-Snyder incident?

17 A That was part of it; yes, ma'am.

18 Q Okay. What other parts were there to the visit?

19 A The other part was that cable pan walkdown that I
20 had mentioned.

21 Q Okay. Were you personally a witness to the
22 Saklak-Snyder incident?

1 A No, ma'am.

2 Q Okay. Did you have any other allegation that you
3 wished to make to the NRC on March 29, 1985, other than the
4 question of the treatment of Mr. Saklak and the cable pan
5 walkdown, which we'll get to shortly?

6 A No, ma'am.

7 Q Was that the only time that you had visited the NRC
8 with any allegations regarding your employment at Comstock?

9 A Yes, ma'am.

10 Q Okay. Mr. Perryman, you testified a few moments ago
11 that you had seen a memo to Irv DeWald regarding the handling
12 of the cable pan walkdown; is that correct?

13 A Yes, ma'am.

14 Q Okay. And you also testified, I believe, that you
15 didn't agree with the manner in which that was being handled
16 or words to that effect; is that correct?

17 A Yes, ma'am.

18 Q And tell me specifically what you did not find to
19 your satisfaction in the handling of that walkdown.

20 A In the original start of the walkdown, there was, I
21 believe, either five or six Comstock personnel, QC inspectors,
22 certified in configuration that were to work along with

1 "Killer" Kalanowski, we call him, his name is Kalanowski from
2 S&L, and from CECo that was in charge of it was Larry Tapella.

3 The basic way that was supposed to start is we were
4 to go out and configure all the cable pan hangers,
5 safety-related, to see if there were any errors in their
6 building or structure, the way they were put together, to the
7 design drawings and to document this information on what we
8 call a Rev. O print.

9 Q That's Revision O?

10 A Revision O, yes, ma'am.

11 Q A print?

12 A Yes, ma'am.

13 Q Okay. We were to fill out a checklist, a Form 7,
14 which is a Comstock checklist, and they wanted us to sign it,
15 and by me signing that form, whether it was right or wrong, we
16 could not reject it. We had to accept it, because it was
17 going to be reevaluated through S&L in Chicago here and
18 redesigned, and they built an "as-built" drawing.

19 By my signature accepting a hanger on a Form 7, and
20 I know that hanger is not right and saying "acceptable" on all
21 the Form 7s bothered me for the fact that they decided -- I
22 should say Comstock decided; I can't say CECo did or who else

1 did -- but Comstock decided, well, we will use this as a final
2 inspection, and that was not the intent of the walkdown. The
3 intent of the walkdown was to use it as a -- verify an
4 "as-built" condition in that plant.

5 So by me signing it and saying it's acceptable, and
6 I knew it was not acceptable, I sent in a memo trying to get
7 pulled off of this walkdown, because they wouldn't change it.
8 They wouldn't change it, and those of us that were in it
9 formed together to talk to our immediate supervisor.

10 Q Who was your immediate supervisor?

11 A Tony Simile.

12 Q Okay. Go ahead.

13 A To get it changed so that we would review the final
14 print as it came out. The inspectors themselves wanted to
15 review each document I drew up. And they said that would be
16 too time-consuming, and they just weren't willing to do it and
17 leave us let that signature of the inspector off until the
18 Rev. O came through.

19 They finally came out with a procedure. I believe
20 they revised it three times that I was in there, to where that
21 my signature on the Form 7 indicated that I did the walkdown,
22 and that a Level 2 review at the end of it was the man that

1 went and looked through this print and said that all the
2 information that we put down on the Rev. O drawing was
3 incorporated on the Rev. A drawing.

4 Even now, they have Rev. B, and it wasn't supposed
5 to go that far at the time, but it seems it went further than
6 it should have.

7 Q What was your understanding of the purpose of the
8 Rev. O print?

9 A The Rev. O was to put down anything that myself and
10 an S&L -- I don't want to exactly call him an engineer -- he
11 was like a draftsman or a field engineer -- we would go out
12 and work on each hanger, individual hanger, ourselves. He
13 would draw what I found up there, plate sizes, diagonal
14 bracing, your elevations, whatever, and he would put it on the
15 Rev. O print. We both would sign the Rev. O print, stating
16 this is the information that I found and he found.

17 This would go down to S&L in Chicago for structural
18 analysis, stating that if that is what's up in the air, that
19 this is satisfactory or safe structurally.

20 Q Whether it is?

21 A Whether it is; yes, ma'am.

22 Q Okay. Go on.

1 A When they came back, they would incorporate the
2 changes that were obvious to us, like plate sizes or if
3 something were wrong, as to what a design detail had called
4 for. They would incorporate them into this new Rev. A print.

5 Another Level 2 --

6 Q Just a moment. Is it Rev. A or Rev. 8?

7 A A.

8 Q A, okay. Go ahead.

9 A Another Level 2 would sit down and look at the
10 Rev. O print and the Rev. A print and see if the information
11 we had installed on the Rev. O was put on to the Rev. A. If
12 it was, he would take my checklist and sign it off, Level 2
13 review, which is the final closing of an installation report.

14 If it was not, they write up an ICR or an NCR.

15 Q Okay. And let's backtrack a moment. What aspect of
16 this process did you object to?

17 A The signing of my name before --

18 Q On the Rev. O?

19 A No, not on the print itself, but on my Form 7 that
20 was put into a vault.

21 Q Okay. And what was the purpose of the Form 7?

22 A To verify that this item was correct.

1 Q Is that what the general purpose of a Form 7 was?

2 A I buy that hanger or accept that hanger.

3 Q And because the final engineering analysis to be
4 accomplished by Sargent & Lundy and the comparison of the
5 Rev. A print to the Rev. O would not be finalized at the time
6 that you signed the Form 7 checklist, that is why you felt
7 that the manner in which the walkdown was unacceptable, and
8 you didn't want to sign the Form 7s; is that correct?

9 A Partially; yes, ma'am.

10 Q Okay. What am I missing?

11 A Well, the other part was, we wanted to review our
12 own Rev. A/Rev. O's, each individual inspector.

13 Q Meaning the Level 2 who compares the Rev. A's and
14 the Rev. O's should be the Level 2 --

15 A Who inspected it.

16 Q -- who inspected it on the Form 7 during the Rev. O
17 walkdown with the Sargent & Lundy person.

18 A Yes, ma'am.

19 Q So those were the two concerns. One is that when
20 you executed your Form 7 checklist, the final analysis of the
21 as-built condition of these cable pan hangers and their
22 configurations would not be finally analyzed from an

1 engineering/structural point of view. And secondly, that when
2 the Level 2 was looking at the Rev. A and the Rev. O documents
3 for conformity, you felt that it should be the Level 2
4 individual who had executed the Form 7 checklist for that
5 hanger; is that correct?

6 A Yes, ma'am.

7 Q Okay. Those were the two specific concerns
8 regarding this walkdown that you had?

9 A Yes, ma'am.

10 Q Did you have any other concerns regarding the manner
11 in which this walkdown was being handled?

12 A No, ma'am.

13 Q Okay. You didn't have any engineering concerns, for
14 example?

15 A No, ma'am. I'm not an engineer, so --

16 Q Okay. Did you have any question in your mind
17 regarding the Sargent & Lundy evaluations of the as-built
18 conditions of those hangers?

19 A No, ma'am.

20 Q Okay. Why did you feel that it should be the same
21 Level 2 who compared the Rev. A and the Rev. O for conformity
22 as the -- strike that.

1 Why did you feel that the Level 2 who would compare
2 the Rev. A and the Rev. O should be the same Level 2 inspector
3 who had executed the Form 7 checklist?

4 A The main reason is, I knew that hanger, each
5 individual hanger, and you can remember it. There are things
6 that you can put on a print that somebody else would miss. We
7 had notes put on each print, small things, which is why you
8 have a Rev. B now. They did make mistakes in going back
9 through and reviewing these on Level 2.

10 The man wasn't, being modest, not as good as I am
11 when it comes to that particular discipline. And we felt at
12 the time that we had five of the best inspectors that we could
13 put on that particular walkdown. We had five of the best.

14 Q Who were the other inspectors, if you recall, who
15 were certified in configurations and were participating in
16 this walkdown as well?

17 A Bruce Brown, Larry Bossong, Mickey Gerrish, myself,
18 Paul Schiltz, and I think there was somebody else, and I can't
19 remember.

20 Q Well, that's five right there. There may have been
21 one other?

22 A There may have been. Offhand, I can't remember.

1 Q Okay. You also mentioned a change in the procedures
2 over time, so that now there is a Revision B as well; is that
3 correct?

4 A There is a Revision B, not on the procedures so
5 much, as there is on the prints.

6 Q Okay. What is the purpose of the Revision B?

7 A All right. When they get a Rev. A print back, a
8 Level 2 had gone and says, "Okay, they incorporated all the
9 information from this Rev. O onto a Rev. A." We may go out
10 and inspect the hanger again, and we find that it was not
11 incorporated all the way. They missed something.

12 Q Onto the Rev. A?

13 A Onto the Rev. A. So they had to come out and
14 redesign it again, and that's where you come down with the
15 Rev. B print.

16 Q You mentioned Mr. Kalanowski from Sargent & Lundy,
17 and you indicated that you nicknamed him Killer. Can you tell
18 me why?

19 A No, that's just a nickname everybody gives him,
20 Killer Kalanowski. I can't even remember his real name.

21 Q Do you recall any particular reason why he was
22 nicknamed Killer?

1 A He gets the job done.

2 Q Okay. So he's strict with his --

3 A He's professional.

4 Q Okay. Who gave the five or six of you the
5 assignment in connection with this walkdown?

6 A Tony Simile.

7 Q You indicated you had spoken to Mr. Simile about
8 your concerns on the walkdown; is that correct?

9 A Yes, ma'am.

10 Q Okay. Was that before you went to the NRC, do you
11 recall?

12 A Yes, ma'am.

13 Q Okay. And what did Mr. Simile say to you?

14 A Well, we had a lot of meetings on that, Bruce Brown
15 and myself and Larry Bossong, especially, has gone in, and he
16 felt we were reading into something that wasn't there.

17 Q What did you understand him to mean by that?

18 A Like we were reading too deep into a procedure. You
19 can overread a procedure, if you want. It's a war of words,
20 if you want to put it that way.

21 Q Okay. In your opinion, was he referring to what the
22 effectiveness would be of the Form 7?

1 A Yes, ma'am.

2 Q In your opinion, that was a final indication that
3 you were accepting that hanger, whereas Mr. Simile was
4 explaining, or Mr. Simile's position was that that Form 7 in
5 connection with this walkdown was not a final acceptance of
6 the hanger?

7 A That is the way the program started. It was not
8 supposed to be.

9 Q Okay.

10 A And after we had done some 150 to 200 hangers, we
11 inspectors started looking at this and saying, "Well, we're
12 signing this off, and they're putting them in a vault. This
13 man that Rev.As it, okay" -- this is where our concern came in
14 -- the man that Rev.As it, he's never been out to that
15 hanger. So he's just going to sign his name to this form that
16 it was incorporated. And we started getting worried that we
17 were signing something that was not complete and correct at
18 the time of installation.

19 Q Can you give me an example of that with respect to a
20 hanger?

21 A Yes, ma'am. You have what we call a Z elevation for
22 a cable pan hanger. You have a tolerance of half an inch. I

1 could come up, and this hanger might have an elevation being
2 wrong of, say, four inches. I would reject that hanger
3 normally. I would write an ICR on it. The ICR would be
4 reevaluated through our Engineering and S&L, and they would
5 say how to fix this hanger, either lower it to the proper
6 elevation, or if there was a field problem where they could
7 not, due to interference of something, they would leave the
8 elevation or "as-built" it to this elevation.

9 That would be a minor one.

10 Q Okay. And how would this type of an example fit in
11 with the concern you had about the Form 7?

12 A I didn't reject them.

13 Q I see. When you executed the Form 7, to you that
14 meant that you were accepting that hanger as conforming with
15 design, even though it would be, say, four inches?

16 A Per our procedure today, which is 4.⁸~~A~~.12, our
17 procedure is, if I go out to inspect a hanger for
18 configuration, if I accept that hanger, I sign that Form 7 as
19 a Level 2.

20 Q Okay. Now the Rev. O's that were being drawn up by
21 the S&L person during the course of one of your examinations
22 --

1 A Yes, ma'am.

2 Q -- during this walkdown would reflect that the
3 elevation of this hanger, for example, would be off by four
4 inches; is that right?

5 A Yes, ma'am.

6 Q Let me show you what has been previously produced to
7 Intervenor, and it is a --

8 A That's the memo.

9 Q -- a five-page document.

10 MS. KEZELIS: I'd like to have this marked as
11 Perryman Deposition Exhibit No. 2.

12 [Perryman Deposition Exhibit No. 2
13 was marked for identification.]

14 It doesn't have Bates stamps on it, but it is the
15 collection of memos regarding Mr. Perryman's request in May of
16 1985 to be transferred out of the walkdown role, I believe.

17 BY MS. KEZELIS:

18 Q Please take a moment and review those memos,
19 Mr. Perryman.

20 MR. WRIGHT: Are they dated?

21 THE WITNESS: Yes.

22 MS. KEZELIS: Yes.

1 BY MS. KEZELIS:

2 Q Would you read the dates on them?

3 A One of them is 5/17/85. One is 5/13/85, 5/7/85, AND
4 5/8/85.

5 [Witness reviewing documents.]

6 Yes, ma'am?

7 Q Do you recall those Speedy-Memos?

8 A Yes, ma'am.

9 Q Okay. And do they all deal with what you've just
10 been describing to us regarding the walkdown and your concerns
11 about the procedures?

12 A Yes, ma'am.

13 Q Okay. Let me have those back for a moment.

14 [Witness tendering documents to Counsel Kezelis.]

15 At the bottom of the 5/17/85 memo that you had sent
16 to Mr. DeWald and others, you indicated that, quote: "At this
17 time, I wish to make corrections to my Form 7s in accordance
18 to Procedure 4.13.1 to reflect this," and I can't read that
19 word right there [indicating].

20 A Right now, I can't either. Form 7s.

21 Q Okay. So you requested to make revisions to Form 7s
22 that you had executed so far?

1 A Yes, ma'am.

2 Q In connection with this walkdown; is that correct?

3 A Yes, ma'am.

4 Q Okay. And at this time, Mr. DeWald granted your
5 request to be transferred from the walkdown; is that correct?

6 A Mr. Tony Simile granted my request, not Mr. DeWald.

7 Q I'm sorry. Mr. Simile did.

8 A Well, it says DeWald, but it wasn't DeWald.

9 Q Okay. Mr. Simile granted your request. Did you
10 speak to Mr. Simile about this?

11 A About the?

12 Q About granting your request.

13 A No, ma'am.

14 Q Okay. So it's your own personal belief that it was
15 Mr. Simile who made that transfer?

16 A No, ma'am. He came in and transferred me.

17 Q Okay. But Mr. DeWald signed the transfer?

18 A He's Manager, QC. He would sign it.

19 Q Okay. Now there is also a statement which states
20 below: "Supplement has been revised to include your
21 concerns."

22 What did you understand that to mean?

1 A That is -- the day I was taken out of the cable pan
2 walkdown, they did revise the procedure to what we had asked
3 for.

4 Q Okay. And in what respect did they revise the
5 procedure, if you recall?

6 A Let me think for a second. They revised it to where
7 they put in a phrase in there that this Form 7 was not
8 accepting the configuration of this hanger until after the
9 Rev. A's, Rev. O's -- I mean -- yeah, Rev. A/Rev. O review had
10 been completed.

11 Q Okay.

12 A Something to that effect. Not word for word.

13 Q Okay. Was this change made in the Comstock
14 procedures themselves?

15 A They had -- no, ma'am. That was strictly to --

16 Q Form 7?

17 A -- the cable pan walkdown procedure. We had a
18 procedure all our own for that.

19 Q Okay. For that walkdown?

20 A For the walkdown.

21 Q Okay. So this was a revision that was made to the
22 cable pan walkdown procedures.

1 A Yes, ma'am.

2 Q Okay. Did that change satisfy the concerns that you
3 had had?

4 A Yes, ma'am.

5 Q Okay. The other concern that you indicated that you
6 had dealt with the identity of the Level 2s that would be
7 reviewing the Rev. A's and Rev. O's; is that correct?

8 A Yes, ma'am.

9 Q During the time of this walkdown, while you were
10 involved in it, who was handling the review of the Rev. A's
11 and the Rev. O's?

12 A They had two people handling it. Both were new to
13 our site. They had worked at other plants, evidently. That
14 would be Ron Lamb.

15 Q L-A-M-B?

16 A Yes, ma'am.

17 Q Okay.

18 A And a Brian Schreimer. Don't ask me how to spell
19 it.

20 Q Are either of those two gentlemen still employed at
21 the Braidwood site?

22 A Yes, ma'am.

1 Q Are they both, with BESTCO?

2 A Just the one -- one is still employed there, which
3 is Brian Schreimer. The other one has since left the job.

4 Q Okay. So he's no longer at Braidwood.

5 A No, ma'am.

6 Q Was the reason for performing the Rev. A, Rev. O
7 comparisons for the walk-down something other than the mere
8 fact that they were relatively new to the Braidwood site?

9 A Basically, it was because they were new; yes. I
10 personally didn't feel and don't today that if you don't know
11 how to do something, you can't check me.

12 Q In other words -- would you expand upon that? I'm
13 not sure what you mean.

14 A If I go out and do an inspection and then they say
15 that you are going to do my Rev. A, Rev. O, you don't know the
16 first thing about my Rev. A's or my inspection. You are only
17 going to read something off a piece of paper.

18 Q In your opinion, it does not add an extra degree of
19 accuracy to have somebody unfamiliar with those documents
20 review them for their completion?

21 A Yes, ma'am.

22 Q In other words, you feel the person who executed one

1 of those documents originally should then also be the person
2 who reviews the documentation afterwards?

3 A Yes, ma'am.

4 Q Was this aspect of the procedure changed in response
5 to your concerns?

6 A No, ma'am.

7 Q At the walk-down -- with respect to the comparison
8 of Rev. A's and Rev. O's, the walk-down project continued to
9 be handled in the manner you had objected to; is that correct?

10 A Partially; yes. What it had eliminated was my
11 signature saying that was the final inspection.

12 Q The finality of Form 7?

13 A The finality of Form 7; yes, ma'am.

14 Q You indicated there had been a number of meetings
15 between you and I believe you identified Mr. Bosson and
16 possibly Mr. Simile, regarding the manner in which the
17 walk-down was being handled; is that correct?

18 A Yes, ma'am.

19 Q Do you recall anybody else who might have been
20 present at any of those meetings?

21 A One time I believe they did bring in Mr. Kalanowski
22 from S&L, the rest of us inspectors and Irv DeWald.

1 Q Do you recall how many meetings you had?

2 A I would say at least five.

3 Q Other than what you have testified to so far
4 regarding the manner in which this walk-down was being
5 handled, did you have any reason to believe that the manner in
6 which it was being handled would affect the quality of safety
7 of the plant or of the cable pans themselves?

8 A No, ma'am.

9 Q I just realized that my question may be a little
10 confusing. Did you have reason to feel that the manner in
11 which the walk-down was being handled affected the quality or
12 safety of the plant, or the cable pans themselves?

13 A No, ma'am.

14 Q Would it be fair to say this was a problem in your
15 mind regarding the interpretation of the procedures and the
16 finality or effectiveness of the Form 7 documentation?

17 A Yes, ma'am.

18 Q Did you have any other concerns that you wished to
19 or did express to the NRC on March 29, 1985, other than what
20 you have testified to so far?

21 A Fair pay.

22 Q When you refer to "fair pay," are you perhaps

1 referring to the April, 1984 pay scale change, and the \$0.50
2 per hour salary increase for additional certifications?

3 A That's part of it; yes, ma'am.

4 Q What else would be included in your reference to
5 "fair pay?"

6 A In my own opinion?

7 Q Yes, sir.

8 A My opinion, when they started this plant and
9 probably the others, Commonwealth Edison didn't want and still
10 does not want to consider me a craftsman or any other QC
11 personnel as a craftsman. Yet, I have been a boilermaker,
12 which is a craftsman. Most of the guys I work with today have
13 been fitters, which are all craftsmen. We have put in our
14 time. I have five years inspection experience just to become
15 a CWI.

16 Q What is a "CWI?"

17 A Certified welding inspector through AWS. I accept
18 crafts people's work. I tell them that it is right or it is
19 wrong. Yet, CECO started out, when I first arrived, they were
20 paying guys like \$8.50, and a craftsman made \$19.00. If I am
21 going to buy that hanger and I know more about welding than
22 this guy ever will, why aren't I getting paid for it?

1 Q What was your salary when you first became an
2 employee of Comstock at Braidwood?

3 A \$12.00.

4 Q That would have been in November, 1983; is that
5 correct?

6 A Yes, ma'am.

7 Q Did you receive any salary increases after you
8 became employed by Comstock at Braidwood?

9 A \$0.50.

10 Q That would be \$0.50 per hour?

11 A Yes, ma'am.

12 Q Do you recall when you received that increase?

13 A I believe it was when I got my cable pulling.

14 Q Is the next salary change what you had in April,
15 1984?

16 A With the Union; yes, ma'am.

17 Q Your salary remained at \$12.50 an hour until the
18 Union contract was finalized?

19 A Yes, ma'am.

20 Q When was that, if you recall?

21 A Actually, if you want, I can get into that but it
22 would take a month. It would have been July 23rd.

1 Q When BESTCO became your employer?

2 A Yes, ma'am.

3 Q I assume your salary increased when BESTCO became
4 your employer; is that correct?

5 A Yes, ma'am.

6 Q That is Local 306 that you became a member of?

7 A Yes, ma'am.

8 Q Did you have any concern other than the fact that
9 craftsmen were being paid more per hour than QC inspectors,
10 with respect to your statement referring to fair pay?

11 A It's hard to get a qualified person.

12 Q At a lower salary?

13 A At a lower salary.

14 Q Did you feel that any of the Comstock QC inspectors
15 that you worked with were not qualified?

16 A Yes, ma'am.

17 Q Can you tell me who?

18 A There's a lot of them. As to qualifications, you
19 have to look at their background. From what I know of some of
20 their backgrounds, I could mention the name of three or four
21 right off the top of my head.

22 Q In terms of their qualifications, are you referring

1 perhaps to individuals who do not have backgrounds as craft
2 people?

3 A Yes, ma'am.

4 Q In your opinion, in order to be qualified as a QC
5 inspector, one should have some background experience in craft
6 first?

7 A In the area that you are qualified or certified in;
8 yes.

9 Q Is that a requirement under Comstock's certification
10 procedures?

11 A No, ma'am.

12 Q Is it a requirement of NRC regulations in any
13 respect that a QC inspector have experience as a crafts person
14 in the area in which he or she is subsequently conducting
15 inspections?

16 A No, ma'am.

17 Q This is your personal belief, that QC inspectors
18 should have background experience as crafts personnel before
19 they become QC inspectors in the area in which they conduct
20 inspections; is that correct?

21 A Not entirely. Your standards for welding
22 inspection is different than any other standard you have on

1 the site. That is the one that you have to have the
2 background or the experience in time.

3 Q Is that under AWS?

4 A That's under ASNTC 1(a).

5 Q What does "ASNTC" stand for?

6 A I couldn't tell you. What it is is a procedural
7 requirement for inspection, to be a welding inspector.

8 Q That is ASN?

9 A ASNTC 1(a). I believe that is it.

10 Q Is the requirement for one to have welding
11 experience as a crafts person before one becomes a welding QC
12 inspector a requirement of Comstock at Braidwood?

13 A No' ma'am. It is not under there either. What it
14 has given you is a time you have to have in inspection of
15 welding or a college background, which is added into that. It
16 amounts to so much of your time, if you have a college degree
17 or background.

18 Q You mentioned earlier there were a few QC inspectors
19 that you could think of that you felt were not qualified in
20 welding; is that correct?

21 A Yes, ma'am.

22 Q Can you tell me who you had in mind when you made

1 that statement?

2 A One is a supervisor, Joseph Hii.

3 Q Anybody else?

4 A Tom Zych.

5 Q Anybody else that you had in mind?

6 A Not off the top of my head right now.

7 Q Can you tell me specifically why you felt at least
8 these two people were not or are not qualified?

9 A Their prior backgrounds before they were at the
10 Braidwood site didn't show any real background in inspection.

11 Q Inspections generally or welding?

12 A Generally. I refer when I talk mainly to a welding
13 environment.

14 Q Have you had an opportunity to review or analyze any
15 inspections in the welding area that either Mr. Hii or
16 Mr. Zych have performed?

17 A No, ma'am.

18 Q Do you have any personal knowledge regarding the
19 quality of their inspections, as you have reviewed them, if
20 you have reviewed them?

21 A No, ma'am.

22 Q Is there anything else you can tell me which

1 supports your belief that they were not or are not qualified?

2 A No, ma'am.

3 Q Is there anything other than the fact that they
4 don't have any real prior background in inspections?

5 A Just word to mouth, inspector to inspector, of what
6 they found.

7 Q Can you give me any specifics of what you recall
8 having heard?

9 A Tom Zych, he has a purely electrical background,
10 wiring. They did make him a welding inspector somehow. He
11 didn't understand skewed fillets. In some of our inspections,
12 it is required. Other people have found mistakes he has made
13 in that area.

14 Q In his inspections in the welding area?

15 A Yes, ma'am.

16 Q In your opinion, have these individuals who have
17 found mistakes in his welding inspections ever brought them to
18 his attention or taken other appropriate action necessary to
19 ensure that those mistakes are caught?

20 A I wouldn't know for sure.

21 Q If you came across such a mistake, whatever it might
22 be, what action would you take, if any?

1 A I would write an ICR on the hanger.

2 Q Can you tell me specifically what kind of mistake or
3 mistakes you recall Mr. Zych had made in the area of skewed
4 fillets?

5 A When you get into a skewed fillet, you have a
6 difference in leg size, what we call leg size, or theoretical
7 throats. He would check them to a normal fillet size, which
8 is wrong. It was just something he didn't understand.

9 Q Do you recall how long ago that was?

10 A That he had made mistakes?

11 Q Yes.

12 A Probably still makes them.

13 Q Are you speculating at this point?

14 A Yes, ma'am.

15 Q Do you know if Mr. Zych is currently responsible for
16 welding inspections?

17 A No, ma'am.

18 Q Do you know what area he is conducting inspections
19 in currently?

20 A Junction box equipment now.

21 Q How about Mr. Hii?

22 A He's a supervisor.

1 Q Do you recall what specifically you heard or saw
2 that would lead you to believe Mr. Hii was not conducting his
3 inspections in an entirely appropriate fashion?

4 A No, ma'am. It's just in general to the plant,
5 reject ratings. It's nothing specific on Joe. He's a good
6 man. I just didn't feel he has a background.

7 Q What are reject ratings?

8 A For every inspection I do, I have an overview, such
9 as PTL would overview it.

10 Q That is Pittsburgh Testing Laboratory?

11 A Yes, ma'am. You get a copy back, the vault gets a
12 copy back of how many are rejected. You have to go by your
13 reject rating to feel if a man is actually qualified, in my
14 opinion.

15 Q You had heard that Mr. Hii had a high reject rating?

16 A At one time, when he was new, Level I.

17 Q I want to move back to your reference to fair pay.
18 Is it fair to say that between the time that you received a
19 certification, and I am assuming November or December of 1983,
20 when you began earning \$12.50, and July 23, 1985, that your
21 salary remained at \$12.50 an hour or did it increase at all
22 with additional certifications?

1 A I don't believe it increased in that period of
2 time. Was it fair? Is that what you are saying?

3 Q No. I am asking you if that was a correct
4 statement. You testified earlier that you received additional
5 certifications, including CEA's, cable pulling, terminations
6 and calibrations in addition to configurations; is that
7 correct?

8 A Yes, ma'am.

9 Q Did you receive an additional \$0.50 an hour for each
10 additional certification that you achieved or no?

11 A I can't remember if I ever went over the \$12.50 an
12 hour before the trade. I would have to go back and look at my
13 notes, when we changed that. They doubled certs on us and
14 stuff like that and made it hard to get what we were promised.

15 Q They grouped specific certification areas together
16 and you needed to achieve certifications in two or more areas
17 before you would receive an additional \$0.50 per hour; is that
18 correct?

19 A Yes, ma'am.

20 Q You just don't remember right now how those
21 certifications of yours were grouped for purposes of any
22 salary increase?

1 A Yes, ma'am. They had stopped paying the increases
2 once we started negotiating with the Union.

3 Q Do you recall when you started negotiating with the
4 Union? How far in advance was it, if you recall, of the
5 BESTCO change?

6 A At least six months.

7 Q Sometime at the end of 1984, early 1985?

8 A Yes, ma'am.

9 Q You were one of the negotiators with the Union; is
10 that correct?

11 A Yes, ma'am.

12 Q Mr. Perryman, did you ever receive a copy of the NRC
13 Inspection Report which reflected the NRC's investigation of
14 the March 29, 1985 concerns?

15 A Yes, ma'am.

16 Q Do you recall whether you read it once you received
17 it from the NRC?

18 A Part of it.

19 Q Were you satisfied with the NRC investigation of the
20 concerns that were addressed in the Inspection Report?

21 A No, ma'am.

22 Q In what respect were you not satisfied?

1 A From what I read, it was a shortcut.

2 Q What do you mean by that?

3 A They don't reflect what actually goes on day to day.

4 Q Do you have a specific allegation in mind, which you
5 felt the NRC took a shortcut on?

6 A Not without really reading the whole thing.

7 Q I will show you a copy of the November 4, 1985 NRC
8 Inspection Report Nos. 85-21 and 85-22. Ignore the yellow
9 stickers I have in my copy.

10 Mr. Perryman, I will ask you to take a few minutes
11 to look that over.

12 MS. KEZELIS: We can take a short break during this
13 time.

14 [Brief recess.]

15 MS. KEZELIS: Let's go back on the record.

16 BY MS. KEZELIS:

17 Q Mr. Perryman, before we get into the NRC Inspection
18 Report that you have been reviewing, I have a couple more
19 questions to ask you about other areas we have touched upon so
20 far in your deposition today.

21 You testified that if you personally identified or
22 found or determined there was a discrepancy on a hanger, that

1 another QC inspector, such as Mr. Hii or Mr. Zych might have
2 already inspected, that you would issue an ICR on it; is that
3 correct?

4 A Yes, ma'am.

5 Q Do you have any reason to believe that other QC
6 inspectors would not issue ICR's if they found such
7 discrepancies?

8 A No, ma'am.

9 Q I believe that you mentioned that the additional
10 \$0.50 per hour for additional areas of certification salary
11 change stopped when the negotiations began with the Union?

12 A Yes, ma'am.

13 Q Is that to the best of your knowledge because of the
14 contract was in the process of being negotiated?

15 A No, ma'am.

16 Q Or because the Union had already been voted in and
17 it was a question of what the terms would be?

18 A Yes, ma'am. The Union had been voted in. They
19 would not advance any more salaries because the Union was in,
20 even though negotiations hadn't started yet. I guess because
21 of that, they couldn't.

22 Q Because the Union had already been voted in to

1 become members of Local 306, and you understood that no salary
2 changes would take place thereafter until a contract had been
3 finalized; is that correct?

4 A Yes, ma'am.

5 Q The only other question before we get into the NRC
6 Inspection Report is the ASNTC 1(a) you referred to earlier.
7 You were just pointing to the Inspection Report. Is a
8 discussion of that contained in the Inspection Report?

9 A There is a reference. It is not TC 1(a). It is
10 45.2.6, I believe.

11 Q Why don't you locate that for me, if you can, and we
12 will talk about it now.

13 A [Perusing document.]

14 Q For the record, you are referring to a reference
15 to ANSI and 45.2.6 on page ten of the NRC November 4, 1985
16 Inspection Report; is that correct?

17 A Yes, ma'am.

18 Q Before we get into the Inspection Report, I have one
19 more question. That is with respect to the split of time of
20 your areas of responsibility in your various areas of
21 certifications since you became employed at the Braidwood
22 site, can you roughly estimate for me what the division of

1 your time has been?

2 A Ninety-five percent would be welding and
3 configuration.

4 Q The other five percent of your time?

5 A It would cover all other areas.

6 Q That has been the case pretty much since you became
7 employed at the Braidwood site as a QC Inspector?

8 A Yes, ma'am.

9 Q Have you had an opportunity to review -- I assume it
10 is pages 9 and 10, of the NRC Inspection Report, 85-21 and
11 85-22?

12 A Yes, ma'am.

13 Q Do those pages reflect the concern that you had
14 regarding qualification of welding inspectors?

15 A Yes, ma'am.

16 Q This is an allegation that you made to the NRC?

17 A Not me personally; no.

18 Q Somebody else did, on March 29th?

19 A Yes, ma'am.

20 Q Did you agree with the concern as it was made to the
21 NRC?

22 A Yes, ma'am.

1 Q Were you satisfied by the NRC review of that concern
2 and the NRC's conclusion, or no?

3 A I believe it is still open, ma'am.

4 Q Is it still open? Okay. You indicated it is still
5 open, and you are referring to the conclusion which states
6 that the allegation was partially substantiated?

7 A Yes, ma'am.

8 Q Do you know who the relative QC Inspector is that is
9 referred to?

10 A Yes, ma'am.

11 Q Can you tell me who it is?

12 A Tom Zych; I believe.

13 Q It is based on your understanding of his background?

14 A Yes, ma'am.

15 Q He is the individual you identified earlier as an
16 individual you had concerns about personally with respect to
17 his qualifications?

18 A Yes, ma'am.

19 Q Did you feel the NRC did a shortcut in any respect
20 with regard to its review of this concern?

21 A Yes, ma'am.

22 Q In what respect?

1 A If you are partially right, the man's cer should be
2 pulled.

3 Q To your knowledge, Mr. Zych's certification in
4 welding has not been pulled; is that correct?

5 A No, ma'am.

6 Q To the best of your knowledge, is he currently
7 performing welding inspections?

8 A Not that I know of, ma'am.

9 Q In that respect, you are not satisfied with any
10 action which might have been taken insofar as his welding
11 certification, to the best of your knowledge, hasn't been
12 pulled?

13 A Yes, ma'am.

14 Q Do you feel all his certifications should be pulled?

15 A No, ma'am.

16 Q Just his welding?

17 A Yes, ma'am.

18 Q Is there any other respect in which you feel the NRC
19 review of other concerns or allegations was not adequate?

20 A I am reading through part of that. I remember
21 specifically finding some forms, 19's they were called, that
22 is our weld inspection checklist, that had extraordinary

1 amounts of welds on one checklist. I believe it is stated in
2 this one something like 1,100 or 1,200 welds on an inspection
3 checklist.

4 Q That was the allegation?

5 A That was the allegation. According to this, they
6 couldn't find the documents.

7 Q Did you personally see Form 19 checklists or a
8 checklist which reflected more than 1,000 welds on that one
9 checklist?

10 A Yes, ma'am.

11 Q Do you recall who the QC Inspector was who had
12 signed that checklist?

13 A My QC Manager.

14 Q Mr. Irv DeWald; is that correct?

15 A Yes, ma'am.

16 Q Do you recall for what grid area or what part of the
17 plant those weld inspections were performed?

18 A No, ma'am.

19 Q Were the inspections that you believe you saw which
20 reflected more than 1,000 welds on one inspection document,
21 inspections that Mr. DeWald would have performed, to the best
22 of your understanding or knowledge, while he was a Level 2 QC

1 Inspector at Braidwood?

2 A Yes, ma'am.

3 Q Back in 1981?

4 A Somewhere in that time.

5 Q Do you recall where you saw those documents?

6 A I had them in my hands. They were in the vault; let
7 me put it that way.

8 Q You specifically recall that the number of welds
9 inspected or documented on that one Form 19 checklist would
10 have been in parenthesis; is that correct?

11 A Yes, ma'am.

12 Q They would have been a number greater than 1,000 or
13 so in parenthesis?

14 A Yes, ma'am. 1,039 welds.

15 Q Did you ever speak to Mr. DeWald about that?

16 A No, ma'am.

17 Q Did you speak to the NRC about that?

18 A No, ma'am.

19 Q Did you speak to anybody about that?

20 A Every inspector on the site.

21 Q In the NRC review of the case, it was that they
22 could not find any of that number; is that correct?

1 A They didn't find the documents. I believe that is
2 what it said.

3 Q Did you make any effort to locate the checklists
4 that you saw?

5 A I'm not allowed in the vault, ma'am.

6 Q Did the NRC interview you with respect to that
7 concern?

8 A No, ma'am.

9 Q Was that a concern that was raised while you were at
10 the meeting on March 29, 1985, with the NRC?

11 A Yes, ma'am.

12 Q Do you recall who it was who made that statement to
13 the NRC?

14 A No; not really.

15 Q Is there anything else about the NRC Inspection
16 Report that would lead you to believe, as you testified, that
17 you thought they had taken some shortcuts?

18 A No; not really, small things that keep popping up in
19 our heads as we inspect every day. I have re-inspected his
20 work. I have re-inspected other people's work. What my
21 biggest concern was at the time they started this plant, or I
22 would say up until the past two years, maybe three years, they

1 didn't have quality.

2 Q What do you mean by that?

3 A They didn't understand how to put a hanger up.

4 Q Are you talking about the crafts people?

5 A And the inspectors they had inspecting it.

6 Q To the best of your knowledge, have procedures with
7 respect to inspections of hangers changed?

8 A Yes; they have.

9 Q During the course of your re-inspections, do you
10 re-inspect to the requirements as they existed at the time, or
11 do you re-inspect to current requirements?

12 A It depended upon the job you were doing at the
13 time. If you were doing backlog, what we called a backlog at
14 one time, we inspected to what the hanger was installed.
15 Current inspections today, I would inspect to our current
16 accept/reject criteria.

17 Q With respect to the statement you made regarding
18 they didn't have quality, did you believe during the course of
19 your re-inspections of the pre-existing work, that
20 installations did not conform to the then existing criteria?

21 A Yes, ma'am.

22 Q What did you do whenever you found a hanger that you

1 felt did not conform with the then existing criteria?

2 A We had to write ICR's or NCR's, depending on what it
3 was at the time.

4 Q That was part of the assignment you had during the
5 course of re-inspections, to document any discrepancy that you
6 found?

7 A Yes, ma'am.

8 Q Did you ever have an occasion to fail to document a
9 discrepancy which you identified during the course of your
10 re-inspection work?

11 A No, ma'am.

12 Q Are you aware of any other QC Inspectors who may
13 have performed re-inspections of pre-existing work who would
14 have failed to document discrepancies that he or she found
15 with an ICR or NCR?

16 A No, ma'am.

17 Q In other words, your concern with respect to the
18 statement that they didn't have quality until two or three
19 years ago, refers to what you identified and documented during
20 the course of your re-inspections?

21 A Yes, ma'am.

22 Q I believe you testified a few moments ago that there

1 was really nothing else other than what you have already
2 testified to, that you felt was inappropriate with the NRC
3 Inspection Report in your review of it now? Is that basically
4 correct?

5 A Yes, ma'am.

6 Q With respect to the concerns you had made in May of
7 1985 regarding the hanger walk-down work, did you feel at any
8 time that your concerns about it would affect the manner in
9 which you would perform your own inspections or the quality of
10 your work?

11 A No, ma'am.

12 Q Do you recall ever having made any statement that it
13 would affect the quality of your work?

14 A Not personally; no, ma'am.

15 Q Do you recall ever having read a statement during
16 the course of the training class, that if you are transferred
17 out of this area of walk-down work, that it would affect your
18 inspections?

19 A Something basic to that; yes, ma'am.

20 Q Do you recall the circumstances surrounding that
21 statement?

22 A I felt at the time, if they didn't want to bring it

1 around to where what I was inspecting, that I could document
2 -- you have to understand. We weren't allow to ICR those
3 hangers or NCR them, which is not the way our program is
4 today. This was a special program. They would not allow you
5 to reject this hanger. That had to be done structurally
6 through Engineering. I felt that was a neglect on my part not
7 to be able to actually identify that they had a problem, but I
8 guess when you sit back and think about it, they knew they had
9 the problem.

10 Q Which is why, to the best of your understanding,
11 Sargent & Lundy is going to be performing the structural
12 analyses; is that correct?

13 A Yes, ma'am.

14 Q You recall making some kind of statement regarding
15 your concerns about the effects the walk-down would have on
16 your inspections during the training class?

17 A During that time, the five of us were pretty much
18 under pressure. It was done on like a productive rate, to get
19 this walk-down done in "X" amount of time, due to costs, or
20 whatever. I am not sure. S&L not being in my line of an
21 inspection, they didn't understand the time consuming job it
22 is to config some of these hangers. You could get one that

1 could take you half an hour or you could get one that would
2 take you two weeks, because of its complexity.

3 My main concern was we were working on all safety
4 related hangers. S&L had their field engineers doing the
5 non-safety hangers.

6 Q What were the circumstances surrounding the
7 statement that you believe you may have made during the
8 training session that your concerns might affect your
9 inspections?

10 A I am trying to remember back on it. It was the fact
11 that I wanted out of that program mainly, because they would
12 not listen to the inspectors that were doing the inspecting,
13 on how to write the paperwork up or how to put the procedure
14 together, so that it was verifiable as to what I was doing on
15 that site, in my particular job, so that 20 years down the
16 line, they come out and pull out a microphone ^{FILM} and see my name
17 on a hanger list stating "acceptable."

18 Q You are talking about the problem you had with the
19 Form 7 checklist?

20 A Yes, ma'am. That is basically all this was. We
21 also felt that we did not do a welding inspection, which was
22 ridiculous. If I am going to config the hanger, why don't I

1 weld inspect it at the same time? In a configuration problem,
2 they can buy it off structurally. That doesn't buy the
3 welds. They were missing a lot of documentation on cable pan
4 welding. I felt I was doing half a job.

5 Q That is the respect in which you felt it was
6 affecting or would affect your inspections?

7 A Yes, ma'am.

8 Q Was this what was referred to as an S&L walk-down?

9 A Yes, ma'am.

10 Q Do you have any reason for believing the welds on
11 those cable pans or the hangers that were being inspected
12 during the S&L walk-down, had not already been inspected in
13 other weld inspections or undergoing inspection based on other
14 ongoing programs?

15 A At that time, actually, as far as I am concerned,
16 started what you call the S&L cable pan walk-down, I was in
17 charge of a room. I was sent into to do some inspections in
18 what we call Unit 2 switch gear room. There are some 250
19 cable pan hangers alone in that room.

20 An inspector had left and left a whole pile of what
21 we call the old HIR's, hanger installation reports. My lead
22 at the time was Joe Hii. He assigned me this room to go do a

1 welding inspection on these hangers. I did. We found a lot
2 of documentation to be missing. I should say I found a lot of
3 documentation to be missing on hangers that had stamps on
4 them.

5 I wound up doing just about all those hangers, some
6 200 and some of them. We wrote them up. That is when I got
7 in trouble with my QC Manager. He didn't like the way I
8 inspected.

9 Q This is Mr. DeWald you are referring to?

10 A Yes; at the time.

11 Q In what respect did he not like your inspections?

12 A I was shooting these hangers down.

13 Q What did he say to you?

14 A He came in one day when I was in this room with
15 Mr. Cassero, CEC Co. I was with some craft personnel. He had
16 asked me where this hanger was that had 28 under sized welds,
17 I believe. I pointed it out to him. He asked me for my
18 fillet gauge, which is an instrument we use. I handed it to
19 him. He checked one size, which is your leg size. I'm
20 sorry. It is just the opposite. He checked the effective
21 throat size of the fillet gauge. He stood there and
22 reprimanded me in front of all these people that there was

1 nothing wrong, they had plenty of effective throat. That's
2 when I just told him to turn the gauge around and use it the
3 proper way.

4 Q What did Mr. DeWald say then?

5 A "I never use that end of a gauge."

6 Q What, if anything, happened next?

7 A They wound up repairing that hanger. He brought in
8 a Level III from S&L at the same hanger to see if I was right
9 or wrong on the same day. I felt that right there was -- he
10 felt I had no competence or something, even though the Level
11 III agreed with me. To me, it seemed like he would do
12 anything to prove you wrong to get something done which was
13 wrong.

14 Q Do you recall who the Level III was?

15 A Stuart.

16 Q His first name was Stuart?

17 A Yes, we did train him to our procedures also.

18 Q This was a Sargent & Lundy --

19 A Actually, it was CECco/Sargent & Lundy; yes.

20 Q Did Mr. DeWald at any time tell you not to issue
21 ICR's or NCR's, regarding any deficiencies that you might have
22 uncovered?

1 A No, ma'am.

2 Q Did anybody else at Comstock tell you not to issue
3 ICR's or NCR's bringing deficiencies that you might have
4 identified or uncovered?

5 A No, ma'am.

6 Q Were you ever reprimanded or chastised in any
7 respect for issuing any ICR's or NCR's for any deficiencies
8 that you might have uncovered?

9 A Only that particular time.

10 Q That is the only instance, the one you just
11 identified, regarding Mr. DeWald and the fillet gauge, and the
12 hanger with 28 rejectable welds?

13 A Yes, ma'am.

14 MS. KEZELIS: I would now like to have this document
15 marked as Perryman Deposition Exhibit No. 3 for
16 identification. For the record, that is a copy of the
17 Intervenors' QC Inspector Harassment Contention.

18 [Perryman Deposition Exhibit No. 3
19 was marked for identification.]

20 BY MS. KEZELIS:

21 Q Mr. Perryman, I will ask you to spend a few moments
22 looking at that, and then I am going to ask you whether you

1 have ever seen a copy of that document before.

2 A [Perusing document.]

3 Q Have you seen a copy of that document before?

4 A I couldn't swear to have seen the copy before, but I
5 know about the instances.

6 Q Before we get to your personal knowledge regarding
7 the allegations contained in Perryman Deposition Exhibit
8 No. 3, I have one more question to ask you.

9 In connection with the Sargent & Lundy walk-down we
10 have been talking about this morning, you made the statement
11 that there was a productive rate that you were under for
12 costs, or whatever, or words to that effect. Do you recall
13 making that statement?

14 A Yes, ma'am.

15 Q When you used the term "productive rate," what did
16 you mean?

17 A When we started the program, they wanted, according
18 to our field engineers that were with us from Sargent & Lundy,
19 their management wanted "X" amount of hangers done a day. We
20 did get in with their management and finally straighten them
21 out on it, that it was impossible to do that amount of hangers
22 in one day, and do them correctly.

1 Q This is in connection with the fact that Sargent &
2 Lundy engineers were inspecting non-safety related?

3 A It had to do with both. We had Sargent & Lundy with
4 us on each hanger we did. They took care of all non-safety
5 related hangers.

6 Q Sargent & Lundy had originally anticipated
7 completing a certain number of inspections a day?

8 A Yes, ma'am.

9 Q You and perhaps other individuals met with their
10 management?

11 A Yes. We met with Mr. Kalanowski and explained that
12 due to the way we inspect the hanger, there is a large amount
13 of figuring you have to put in there for plate sizes, weld
14 mapping. We were doing some weld mapping at the time for
15 under sized welds, nothing great. It was just a matter that
16 if the weld was not where it should have been, we would put it
17 down. Elevations, work points, things like that.

18 To do a proper job, you couldn't run through a
19 hanger the way they figured they could, because they didn't
20 sign off hangers, if you understand what I am saying.

21 Q Yes.

22 A They would look at a hanger and say, okay. They

1 might look at one size, but they might forget to look at the
2 other leg. They would see two plates up there, but they may
3 not, which we found, go up and say this is an 8 1/2 x 10 x
4 3/4, and they would look over there and see one and say, that
5 must be two. It wasn't. It might be an 8 1/2 x 10 x 3/4.
6 That is what an "as-built" is supposed to identify, exactly
7 what is there.

8 Q It is the condition of the installation as it is
9 built; is that correct?

10 A Yes, ma'am.

11 Q In these discrepancies you were just referring to,
12 for example, Sargent & Lundy not specifying with precision the
13 size or length of a particular weld, were these types of
14 problems that you saw during the course of Sargent & Lundy's
15 review of the non-safety related?

16 A Both.

17 Q Did this become clear to you early on during the
18 course of the S&L walk-down?

19 A Yes, ma'am.

20 Q You explained to Mr. Kalanowski together with some
21 other QC Inspectors who had been performing the walk-down,
22 what you just explained to us?

1 A Yes, ma'am.

2 Q This productive rate that you referred to, is this
3 an estimate that Sargent & Lundy had developed, to the best of
4 your knowledge?

5 A That I couldn't swear to, who gave me that number.
6 I believe it was Sargent & Lundy. They went off a Byron
7 station walkdown they had, I guess, and that's how they came
8 up with it, from what I understand.

9 Q I believe you testified earlier with respect to this
10 walkdown that the Comstock QC inspectors would actually
11 document the condition of each of the installations and that
12 Sargent & Lundy would merely prepare the drawings for them; is
13 that correct, or did I misunderstand your testimony?

14 A If you are talking about the safety-related --

15 Q Yes, let's talk about safety-related.

16 A Okay, safety-related. We did the inspection. We
17 had a Sargent & Lundy field engineer or draftsperson that
18 would draw exactly what I told him was up there.

19 Q And then would you review the drawing to ensure that
20 it conformed with the conditions that you had described to the
21 Sargent & Lundy field engineer?

22 A Yes, ma'am, and sign it.

1 Q And then where during the course of this process was
2 the problem that you identified just a few minutes ago, that a
3 Sargent & Lundy person would assume that a particular weld was
4 a certain shape or size when, in fact, it might not be?

5 A They had made some mistakes, I guess, when they were
6 walking down hangers. When they did the nonsafety-related
7 hangers, there was no Comstock inspector with them. They drew
8 them up by themselves. Somewhere in the course of this,
9 sometimes a hanger would be dual coded, maybe a nonsafety and
10 a safety-related, which automatically in our procedures
11 requires that to be a safety-related hanger.

12 Q Okay.

13 A Well, an S&L person might have written that hanger
14 and done all the inspection on it at the time. Now that we
15 have come out with these Rev A's and Rev B's, we have then
16 gone back on some hangers due to reworks and ICRs on old
17 hangers and stuff like that, we have gone out and reinspected
18 these hangers again, and we found those mistakes on the
19 drawings, that he did not include the size of the plate or he
20 did not specify exactly what was there.

21 Q So you have personally identified some of these
22 types of problems; is that correct?

1 A Yes, ma'am.

2 Q Do you recall how many such discrepancies you have
3 identified?

4 A It wasn't very many, probably three or four, and
5 it's over a large amount of hangers.

6 Q Well, once you determined that Sargent & Lundy was
7 performing its work the way you have just described with
8 respect to nonsafety-related, you and some of the other QC
9 inspectors talked to Mr. Kalanowski and explained to him the
10 manner in which the safety-related hangers were going to be
11 inspected by all of you; is that correct?

12 MR. WRIGHT: Excuse me, counsel. You said
13 nonsafety-related.

14 MS. KEZELIS: Right.

15 MR. WRIGHT: I thought this was with respect to dual
16 coded?

17 MS. KEZELIS: Well, let's ask the witness because
18 I'm a little confused right now.

19 THE WITNESS: At the time, they may have had a
20 hanger that was classified as a PlB, which is a nonsafety
21 hanger, and further research, as we would come down, it might
22 be nonsafety but connected to a safety-related hanger, which

1 in our opinion makes that a safety-related hanger no matter
2 what the SG code is on it now.

3 So the would have done the nonsafety side of this
4 hanger and we may have reworked it for an ICR or a rework or
5 something of that nature and come back and found that this
6 hanger is a safety-related hanger because it is structurally
7 attached to the other one. So that became my hanger, then.

8 BY MS. KEZELIS:

9 Q Where during the course of this S&L walkdown did you
10 and a couple of other QC inspectors sit down and talk to
11 Mr. Kalanowski and tell him what you have just been telling
12 us?

13 A That was at the very start, not so much with the
14 nonsafety hangers because that we didn't have much to do
15 with. We started with the amount of hangers allowable to do a
16 day and stuff. That was the first three or four meetings we
17 had with CECO and S&L and the QC inspectors. They called us
18 all in and their draftspeople and explained to us how this
19 program was going to work and stuff like that. So we tried
20 the first week or so to see how many hangers we could do
21 legitimately and correctly, and it wasn't coming up to his
22 numbers.

1 We had to explain to him why so that he would not
2 get on his people, you know, hey, you're not doing this,
3 you're not getting the hangers out. We had to explain to him
4 why this cannot be done.

5 Q Because the inspections you were performing were for
6 safety-related, and you needed to document all the aspects of
7 the installation that you have just described to us.

8 A They were much more critical, in my opinion.

9 Q And Mr. Kalanowski accepted the explanation?

10 A Yes, ma'am.

11 Q And you were satisfied with his reaction to your
12 explanation?

13 A Yes, ma'am. There was no more pressure, let's say,
14 as to, oh, I need 15 hangers a day per man. It got down to
15 what you get done is what we have.

16 Q So once you had had this meeting with
17 Mr. Kalanowski, you felt that there was no productivity quota
18 of any sort on your work in this walkdown, or that the --

19 A Somewhat there still was because we had an excellent
20 inspector, which is probably the one I forgot to mention, and
21 that was a guy we called Dick Gallick. He is a very good
22 configuration inspector, but he is not a fast inspector. He

1 is very thorough. He was taken out of this program because he
2 wasn't getting enough hangers for Sargent & Lundy at the time.

3 Q Do you know whether Sargent & Lundy asked that he be
4 transferred out of their walkdown?

5 A Yes, ma'am.

6 Q Do you recall who at Sargent & Lundy was responsible
7 for the request that he be transferred out of the S&L
8 walkdown?

9 A Mr. Kalanowski.

10 Q For how long of a period of time, if you know, did
11 this S&L walkdown take place?

12 A I believe it was five or six months.

13 Q Did you talk to Mr. Kalanowski about Mr. Gallick's
14 transfer out of this walkdown?

15 A No, ma'am.

16 Q Did you talk to Mr. Gallick about it?

17 A Yes, ma'am.

18 Q Do you recall what was said between the two of you
19 about his transfer?

20 A He was basically hurt because he knew he was good,
21 and I agreed with him. He is good at his job. And he felt it
22 was wrong to be thrown out of it because he takes his time to

1 do a hanger right.

2 Q Do you recall whether you had any conversations with
3 anybody else about Mr. Gallick's transfer?

4 A Just those of us that were in it.

5 Q That were involved in the walkdown?

6 A In the walkdown itself.

7 Q Do you know what area Mr. Gallick was transferred
8 into?

9 A He was transferred back in the welding and
10 configuration on the Comstock side, yes.

11 Q Is there anything else that you recall about this
12 walkdown or any concerns you might have had about the walkdown
13 or the manner in which assignments were given that you can
14 tell me that you haven't already?

15 A No, ma'am.

16 Q That pretty well exhausts your recollection about
17 the walkdown or any concerns you had about it at the time?

18 A Yes, ma'am.

19 Q You testified a few minutes ago that you had
20 knowledge of some of the allegations in the QC inspector
21 harassment allegation which has been marked for identification
22 as Perryman Deposition Exhibit No. 3; is that correct?

1 A Yes, ma'am.

2 Q Do you recall whether this document or a copy of
3 a document like this was sent to you by BPI?

4 A I can't recall. If it did, I may still have it.

5 Q Can you tell me which specific aspect or aspects of
6 the QC inspector harassment contention you have personal
7 knowledge of?

8 A Well, I know the part about John Seeders.

9 Q And with respect to the part about John Seeders that
10 you know about, what is it that you know about?

11 A Well, the way he was transferred back to
12 Engineering. He was given a choice to either get fired or go
13 to Engineering. And at the time, he was the only inspector
14 there that knew the first thing about what was going on in
15 Receipt.

16 Q You are talking about material receipt right now?

17 A Materials receipt, yes, ma'am.

18 Q Do you know whether anybody else was certified in
19 material receipts at the time that Mr. Seeders was transferred
20 to the Engineering Department?

21 A I believe there may have been one, which was a Larry
22 Phillips, but I won't swear to it.

1 Q What else did you know about Mr. Seeders' transfer
2 to Engineering?

3 A Well, just the way it had come down, that he was
4 given that choice because he wouldn't do something -- I forget
5 exactly what it was -- that Mr. Saklak had wanted done at the
6 time.

7 Q Do you recall whether this was a project involving
8 review of calibration documents that Mr. Seeders may have been
9 involved in?

10 A It's possible, ma'am. I really couldn't swear to
11 what it was now. It has been a long time.

12 Q Were you present during any conversations between
13 Mr. Seeders and Mr. Saklak?

14 A No, ma'am.

15 Q Have you ever spoken to Mr. Seeders about his
16 transfer to the Engineering Department?

17 A Yes, ma'am.

18 Q Do you recall what was said between the two of you?

19 A Well, he didn't really like it. He likes the job he
20 is in right now, but at the time, he also wanted to get into
21 the union with us as an inspector. It would, what do you say,
22 enhance his career eventually. They had some problems

1 going down with this. I don't even know if it was ever
2 solved.

3 Q What problems going down are you referring to, or
4 what is it that might not have been solved?

5 A Well, I know he had taken it through the NRC, and
6 if it has ever been solved, I have no idea.

7 Q Okay. You have no personal knowledge, in other
8 words; is that correct?

9 A No, ma'am.

10 Q Did Mr. Seeders ever speak to you about any
11 calibration document review that he was asked to perform
12 before he was transferred?

13 A No, ma'am.

14 Q So you have no knowledge about any document review
15 that he was --

16 A I wouldn't have understood it had he asked me at the
17 time.

18 Q Okay. At the time, to the best of your
19 recollection, you weren't certified in calibrations; is that
20 correct?

21 A No, ma'am.

22 Q Do you have any other knowledge of the circumstances

1 surrounding Mr. Seeders' transfer to the Engineering
2 Department?

3 A No, ma'am.

4 Q Do you have any knowledge of any other allegation
5 contained in the QC inspector harassment contention, Perryman
6 Deposition Exhibit No. 3?

7 A I know Worley O. Puckett.

8 Q Okay. What do you know about Mr. Puckett?

9 A He was a smart man.

10 Q And on what do you base that statement, sir?

11 A He knew welding.

12 Q Did you have occasion to talk to Mr. Puckett about
13 welding at Comstock?

14 A Yes, ma'am.

15 Q This was during the three months or so that
16 Mr. Puckett was on the Braidwood site?

17 A Yes, ma'am.

18 Q Do you recall the circumstances surrounding any of
19 your conversations with Mr. Puckett about welding?

20 A At the time he was brought in, from the best of my
21 recollection, he was brought in to become a Level III, I
22 believe, in welding inspection for review of your welding

1 procedures and all documentation on the welding parameters,
2 and when he started finding things that he thought were wrong,
3 he would document it, bring it up to Irv DeWald at the time or
4 some other supervisor and request that this be done or that be
5 done, whatever it was -- I am not dead sure -- and he did seem
6 to come up with quite a few different things that were wrong.
7 Whether they were minor or major, I am not sure. And at the
8 time he was still there and we were talking, and he just said
9 that he was suggesting a stopwork on a certain welding
10 procedure or a couple of them. I'm not exactly sure. And
11 right after that, it wasn't too long after that that he was
12 dismissed.

13 Q Do you recall whether Mr. Puckett ever attained
14 Level III certification at Comstock?

15 A No, ma'am.

16 Q Does your response mean that you don't recall or you
17 don't know?

18 A I don't really know if he ever made it.

19 Q Did Mr. Puckett discuss with you during the course
20 of his three months or so employment at Braidwood the
21 specifics of any of the procedures or welding parameters that
22 he identified to Mr. DeWald or other supervisors?

1 A He had mentioned some small stuff, like one was a
2 6010 welding for unistrut, and there was something wrong with
3 that. He had found two or three that I really don't remember
4 what they were, but it was something small like that, I guess.

5 Q The 6010 that you just referred to, is that the weld
6 rod or electrode?

7 A That's the welding rod we used, yes.

8 Q Other than the, I assume, three 60 series weld rod
9 that you just referred to, do you recall any other specifics
10 that Mr. Puckett might have discussed with you?

11 A No, ma'am.

12 Q Did you have occasion to discuss with him, if you
13 recall, specific L.K. Comstock welding procedures as opposed
14 to AWS weld codes or any other codes?

15 A As far as I knew, the only thing he was working on
16 was L.K. Comstock's. If he referred them to another type such
17 as AWS, it would be kind of difficult because our welding
18 procedures are referenced to AWS; they are not AWS.

19 Q That is the AWS D.1.1, 1975?

20 A Yes, ma'am.

21 Q Do you recall any other conversations or subjects
22 that you discussed with Mr. Puckett, either specifically or

1 generally?

2 A No, ma'am. Just his naval background.

3 Q Do you have a naval background, Mr. Perryman?

4 A No, ma'am.

5 Q Did you ever discuss Mr. Puckett's experience at
6 Zimmer with him?

7 A No, ma'am.

8 Q Did Mr. Puckett ever discuss with you any phone
9 calls he was making to personnel outside the site regarding
10 welding?

11 A Yes, ma'am.

12 Q He did?

13 A Yes, ma'am.

14 Q Do you recall what he said to you about that?

15 A From what I remember, he did have some friend or
16 something or somebody he knew in Region III, and he would call
17 him if he found a problem. He had mentioned he had called
18 somebody and probably recommended what to do or asked what he
19 thought would be the best way to handle something. Now, what
20 he actually did, I don't know. I'm saying that is about all I
21 had known. He did call somebody. I believe it was Region
22 III.

1 Q Do you recall whether it might have been an NRC
2 person or whether it might have been somebody that you had
3 worked under at Zimmer?

4 A That I couldn't swear to. I wouldn't really know.

5 Q Were you ever in his presence when he made such a
6 phone call or did he merely just tell you about them?

7 A Just merely told me about them.

8 Q Did he give you any impression of how many such
9 phone calls he made?

10 A He had mentioned a few, but as to how many, I
11 couldn't swear to it.

12 Q Do you recall him discussing the specifics of any of
13 those telephone conversations with you?

14 A Just something over a welding procedure.

15 Q Is there anything else in Perryman Deposition
16 Exhibit No. 3 with respect to Mr. Puckett that you have
17 personal knowledge of or that that document might refresh your
18 recollection as to Mr. Puckett other than what you have
19 already testified to?

20 A Only that I heard he won.

21 Q Okay. When you say you heard that he won, are you
22 referring to the Department of Labor action that he had?

1 A It was either that or NRC or something. He had
2 something going.

3 Q Have you spoken with Mr. Puckett since he left the
4 Braidwood site?

5 A No, ma'am.

6 Q And do you recall how he heard that he "won"?

7 A There's a couple guys that knew him pretty good, I
8 guess, for years off and on, and it had come back through the
9 plant that he had won his case.

10 Q Anything else that you know about Mr. Puckett that
11 you haven't testified about already today?

12 A No, ma'am.

13 Q Or the allegations regarding Mr. Puckett?

14 A No, ma'am.

15 Q Mr. Perryman, have you ever personally ever been
16 pressured to approve deficient work by any member of Comstock
17 management?

18 A No, ma'am.

19 Q Are you aware of any other individual who might have
20 been pressured to approve deficient work by Comstock
21 management?

22 A Only through hearsay.

1 Q And what have you heard?

2 A There was a deal with Rick Snyder, and I think it
3 was Saklak.

4 Q That would be the Snyder-Saklak incident?

5 A Yes, ma'am.

6 Q And that would have been, to the best of your
7 recollection, the day before the group of you went to the NRC
8 on March 29, 1985?

9 A Yes, ma'am.

10 Q You weren't present at the Saklak-Snyder incident,
11 were you?

12 A No, ma'am.

13 Q Are you aware of any other instance of any pressure
14 by any member of Comstock management to approve deficient
15 work?

16 A No, ma'am.

17 Q Either by rumor or personal knowledge?

18 A No, ma'am.

19 Q Have you ever been personally pressured to sacrifice
20 quality for production and cost considerations?

21 A There was a time -- oh, it would have to be my first
22 year there or so -- it was more or less, it seemed, they

1 wanted x amount done. This was when we had a tremendous
2 backlog, and then we had a backlog of NCR, ICR. We were
3 promised all kinds of stuff to get this done, get that done.
4 I don't believe it affected anybody's inspections. Right now
5 today I would say you have got a very good inspection force
6 out there now, which is a change, like I said, from what they
7 did have. I mean it's 100 percent different.

8 And I don't believe that anything was hurt on that
9 matter except that people would get tired of being pushed to
10 do this or that because with Commonwealth Edison's knowledge
11 and background in these plants, I think my problem comes to
12 that I can't see how they let some of this go for so long
13 before it was caught, and now we're paying for it in the sense
14 of doubling our work or three times inspecting the same
15 hanger.

16 I have inspected some hangers as many as seven
17 times, the same hanger that someone else has inspected, it has
18 been rejected or bought off. Their documentation is what --
19 not ComEd's, but Comstock's documentation, or Ernst, if you
20 want to call it Ernst, that one time it was, their
21 documentation has either been lost or thrown away or dumped,
22 and I think that's why you have, or I should say they had,

1 the problem with these backlogs and the pressure to get
2 something done. CECo gives a time limit, says I want x done
3 by this certain date, just like your startup date. And if it
4 can't be done, it naturally puts pressure on management and on
5 down the line. I have been in both spots, so I know.

6 At that time there was pressure to do the job, and
7 you did have to do, I would say, more work. I mean you were at
8 a constant run, where today I'm a lead of welding inspectors
9 now, and I explain to my people how I want them to do
10 something, and I could care less what ComEd or BESTCO or any
11 of the rest tell me they want done. It's going to get done
12 the way I want it done, not to the way they want it done.

13 Q One of the problems you just identified was lack of
14 documentation or missing documentation.

15 A Yes, ma'am.

16 Q To the best of your knowledge, the lack of
17 documentation or missing documentation has either been NCR'd
18 or ICR'd; is that correct?

19 A That I couldn't swear to. They lose my documents
20 all the time.

21 Q Who loses your documents?

22 A Our vault.

1 Q Are those documents ever found again, to the best of
2 your knowledge?

3 A Some are, some aren't.

4 Q Can you give me a specific example?

5 A I have had inspectors go out and do certain
6 hangers. Now I've got them over a barrel because I copy every
7 inspection my people do. I have a copy of my own. We will
8 get a call wanting something from craft personnel or
9 Engineering, saying has this hanger ever been done? I can
10 pull out my file and tell you if it has been done, and then I
11 can call down to the vault and ask them to find it, and they
12 can't find it. It took them two weeks to find the hanger that
13 I had turned in maybe only a couple days before.

14 Q To return to my original question, which was whether
15 you were personally pressured to sacrifice quality for
16 production and cost considerations, were you ever told, either
17 explicitly or implicitly, by any member of Comstock management
18 to sacrifice quality for cost or production?

19 A No, ma'am.

20 Q Other than the fact, as you have testified, that a
21 few years ago you felt more pressure, felt that you had a lot
22 more work to do, particularly in light of the welding

1 inspection backlog, was there anything else that would lead
2 you to believe that you would have been or had been pressured
3 to sacrifice quality for production and cost considerations by
4 any member of Comstock management?

5 A In one sense, no.

6 Q Okay.

7 Q In other senses -- I'm not giving up quality, but I
8 believe in myself. I know what I'm good at. I'm good at
9 welding. Another person may be good at terminations. He has
10 the background or he has done it for years, and he is good. I
11 can't consider myself as he is, good in every area, and they
12 would put this pressure when they came out with this 50 cents
13 a cert and things like that to train in other areas, just
14 giving an increase in wages. I have argued it. I haven't
15 argued it with Bob Marino and everybody that I can dream of
16 that's come out there that I don't care who you are, you are
17 going to be good at one thing and one thing only.

18 I can pass a test. I can give my kid a test and he
19 will pass welding, but that don't make him good at it. You
20 have to know what your limitations are, and they don't care.
21 They need x amount of people to do this rather than pay for
22 qualified people in an area, such as an experienced cable

1 puller, or a terminator, something that I don't consider
2 myself to be good in. I can do it, but I'm not good. I don't
3 feel comfortable. I wouldn't make a mistake on purpose. I may
4 make a mistake, and that would bother me. I would worry all
5 the time while I'm doing this about am I making a mistake, and
6 I would be a lot longer in my job to do it. And that's where
7 I feel you've got a pressure there, that people were training
8 just -- I mean they were literally fighting for training so
9 they could get 50 cents.

10 Q And did that, in your opinion, affect the morale?

11 A Oh, yes, ma'am.

12 Q In your opinion, did it affect -- this
13 cross-training problem after April or so of 1984 and the 50
14 cents per hour additional certification salary structure
15 change -- did that affect the quality of inspections being
16 performed?

17 A I would say yes.

18 Q In what respect?

19 A As I was stating, I may do a job -- like I said,
20 I've got CEAs -- and not knowingly would I make a mistake, but
21 I don't believe that you are good. We have got people that
22 are certified in ten areas. You may work that area a very

1 small percentage of your time, and the way procedures have
2 changed and upgraded so often, for me to say that I could
3 honestly give you the best that I can do, I would be a liar.

4 Q Can you name for me anybody who is certified in ten
5 areas?

6 A I believe Bruce Brown had nine or ten. He is no
7 longer there. He is with the UA now, as a matter of fact.
8 You have Soberski. We have a couple of supervisors now that
9 have probably seven, maybe eight.

10 Q Can you name them?

11 A Joe Hii would have about seven or eight now.

12 Q Okay. Anybody else?

13 A No, that would be about it of the old people that
14 are still there, as a matter of fact.

15 Let me clarify one thing. I'm not picking on Joe.
16 He's a good man.

17 Q Mr. Perryman, all I want is the best of your
18 recollection and the truth. That's all I want.

19 You mentioned UA. What is that?

20 A United Association, Local 306.

21 Q Oh, okay. That's the Local.

22 A Yes, ma'am.

1 Q Local 306.

2 A He's the training coordinator.

3 Q You have testified that even though you had four or
4 five certifications -- is that correct?

5 A Yes, ma'am.

6 Q Ninety-five percent of your time has been spent in
7 the welding area, welding configurations; is that correct?

8 A Yes, ma'am.

9 Q Do you have any personal knowledge as to the manner
10 in which other people's work was distributed after they
11 achieved additional certifications?

12 A You mainly go back to what you were hired in for to
13 start with, depending upon the workload at the time. If we
14 needed welding, you would be back in the welding, one part of
15 it or another, like a ^{QCIRP} ~~CRP~~ program, ^{LIRP} ~~LRP~~ program, whatever they
16 decide. If you were hired in at the time and you did have a
17 background in something electrical, you would be put into that
18 area. You may be cross-trained in the welding or you may be
19 cross-trained into another area, but basically, they will put
20 you where they really needed you when they hired you.

21 Q So even though you may achieve additional
22 certifications, you will have one predominant area in which

1 you spend most of your time.

2 A Yes, ma'am.

3 Q And for you that area is welding?

4 A Yes, ma'am.

5 Q During the five percent or so, roughly, of your time
6 that you spent performing inspections in other areas of
7 certification, did you ever request any refresher courses or
8 any additional guidance before you commenced such inspections?

9 A Yes, ma'am. When I come out of the walkdown
10 program, they threw me on nights and put me into
11 terminations. I hadn't done a termination since I got
12 certified. So I did request and received the training that I
13 asked for so that I could refresh myself before I just jumped
14 in and did it.

15 Q At any time did you make requests for additional
16 training or refresher courses that were rejected?

17 A No, ma'am.

18 Q Are you aware of anybody who at any time has made
19 requests for additional training in terms of refreshing
20 themselves that have been rejected?

21 A I couldn't swear to it. I believe I have heard that
22 before, but the specific case, I couldn't tell you who it was

1 right now.

2 Q Do you recall what area it was?

3 A It was probably going back into an electrical
4 because the people I deal mostly with are welding, and they
5 wanted to go back into another area or requested to be put
6 into another area.

7 Q Do you recall hearing Ms. Myra Sproull indicating
8 that she would need additional refresher training in
9 calibrations before she did work in that area?

10 A I dealt very little with Myra Sproull.

11 Q Okay. So you don't recall whether that is the
12 instance that you heard of?

13 A No, ma'am.

14 Q Do you recall anything else about the specifics of
15 any instance that you heard about where refresher courses
16 might have been rejected when a request was made?

17 A No, ma'am.

18 Q Okay. You just recall hearing the rumor that
19 somebody had been rejected a request?

20 A Yes, ma'am.

21 Q Do you ever recall hearing that anybody else was
22 pressured to sacrifice quality for production and cost

1 considerations?

2 A No, ma'am.

3 Q Have you personally ever been pressured to knowingly
4 violate established quality procedures by any member of
5 Comstock management?

6 A No, ma'am.

7 Q Have you heard of any instance where anybody else
8 has been pressured to knowingly violate established quality
9 procedures by any member of Comstock management?

10 A No, ma'am.

11 Q Have you ever personally been threatened with
12 violence by any member of Comstock management because of your
13 expression of quality or safety concerns?

14 A They ain't that big.

15 Q I'm sorry?

16 A They're not big enough.

17 Q They're not big enough. Okay.

18 Can I take it, then, that your answer would be no,
19 you personally have never been threatened with violence
20 because of your expression of quality or safety concerns?

21 A Yes, ma'am.

22 Q Okay. Have you ever heard of any instance where any

1 other Comstock QC inspector has been threatened with violence
2 because of his or her expression of quality or safety
3 concerns?

4 A Just the ones that have already been addressed.

5 Q And when you refer to that, are you talking about
6 the Snyder-Saklak incident?

7 A Yes, ma'am.

8 Q Did you have any others in mind other than the
9 Saklak-Snyder incident?

10 A I have heard threats to other people at different
11 times, but they were all by the same person.

12 Q In other words, you have heard Mr. Saklak making
13 threats to other persons?

14 A Yes, ma'am.

15 Q Can you recall who those other persons were?

16 A Joe Hii.

17 Q Were you present when Mr. Saklak threatened Mr. Hii?

18 A Yes, ma'am.

19 Q And do you recall what was said?

20 A He says if we weren't on the plant site, I'd kill
21 him.

22 Q Do you recall when that took place?

1 A Oh, the date I couldn't tell you, no. It has been
2 quite a while.

3 Q If you think back in terms of when you started at
4 the Braidwood site and March of 1985 when the Saklak-Snyder
5 incident took place, can you roughly estimate when during that
6 time period it would have taken place?

7 A It had to be back right around the time I was
8 training in cable pulling because that's when I dealt mainly
9 with Saklak.

10 Q Do you recall the circumstances of Mr. Saklak saying
11 to Mr. Hii that if he weren't on the site, he would kill him?

12 A I forget what it was. He verbally abused the guy
13 one day, and I happen to be standing right next to him when he
14 did it.

15 Q Okay.

16 A And I told him if he ever pointed his finger like
17 that at me, I'd tear it off and make him eat it.

18 Q You said that to Mr. Saklak?

19 A Right.

20 Q Did Mr. Saklak respond?

21 A He never pointed his finger at me [laughing].

22 Q Did Mr. Saklak say anything to you in response?

1 A No, ma'am.

2 Q Okay. Do you know whether Mr. Hii complained to
3 anybody about this incident?

4 A No, ma'am.

5 Q You don't know, in other words?

6 A No, he didn't, that I know of.

7 Q Okay. Were you present at any other incident where
8 Mr. Saklak verbally threatened any other QC inspector?

9 A No, ma'am.

10 Q Okay. So the only two that you're aware of are the
11 Snyder-Saklak incident and then Mr. Hii and Mr. Saklak?

12 A Yes, ma'am.

13 Q Okay. Have you heard rumors about any others?

14 A Frank O. Rolan.

15 Q And that's Mr. Rolan, Jr.?

16 A Yes, ma'am.

17 Q And what do you recall hearing about that?

18 A I just heard they had had a big outing like that
19 before Snyder and them had it. I don't know what it was
20 about. I just heard they had a good one one time.

21 Q Okay. I may have asked you this already, and if I
22 did, please let me know.

1 Do you recall any of the circumstances at all
2 surrounding Mr. Saklak's threat to Mr. Hii? Do you recall
3 what started that incident?

4 A No, I really couldn't remember.

5 Q Okay. Is there anybody other than Mr. Hii,
6 Mr. Snyder, and Mr. Rolan that you recall hearing or being
7 present when Mr. Saklak threatened them?

8 A No, ma'am.

9 Q Okay. Other than these three incidents you have
10 just referred to, were you ever present when any Comstock QC
11 manager or Comstock manager verbally abused any member of the
12 QC force?

13 A There had been times during meetings when there was
14 a lot of verbal abuse, but to one specific person, no.

15 Q Okay. Other than the DeWald incident that you have
16 already testified to, were you ever verbally abused by any
17 member of Comstock management because of your expression of
18 quality or safety concerns?

19 A No, ma'am.

20 Q In connection with that incident, were you satisfied
21 with the Level 3 inspector's conclusions regarding your
22 inspections and your documentation of deficiencies you

1 had identified?

2 A Yes, ma'am.

3 Q Okay. Do you have any knowledge of any Comstock QC
4 inspector being terminated because of his or her expression of
5 quality or safety concerns?

6 [Pause.]

7 A No, ma'am.

8 Q Okay. Have you personally ever been transferred to
9 an undesirable job or to work in an area where quality
10 deficiencies could not be noted because of your expression of
11 quality or safety concerns?

12 A Just after the walkdown.

13 Q Okay. But you asked to be transferred out of the
14 walkdown, didn't you?

15 A Not where I went [laughing].

16 Q Did you specify where you wished to be transferred
17 to when you requested that you be transferred out of the
18 walkdown?

19 A Yes, ma'am.

20 Q Okay. Where did you request that you be transferred
21 to?

22 A Welding.

1 Q Okay. Let's take a look at those documents.

2 Is your request that you be transferred back into
3 welding reflected on what has been identified as Deposition
4 Exhibit No. 2?

5 [Witness reviewing document.]

6 A Yes, ma'am.

7 Q Okay. And which document was that? That was the
8 document dated May 8, 1985, and your request was that you be
9 transferred from cable pan walkdown back to ~~end~~^{IN}-process weld
10 and configuration inspections; is that correct?

11 A Yes, ma'am.

12 Q Okay. Now can you tell me -- I don't recall right
13 now -- what area were you transferred into out of the
14 walkdown?

15 A Night shift, terminations.

16 Q Okay. Did you complain to anybody about your
17 transfer to night shift terminations?

18 A Yes, ma'am.

19 Q To whom?

20 A My supervisor, Tony Simile.

21 Q Okay. And what did Mr. Simile say to you about that,
22 if anything?

1 A It wasn't much, because he's the one who transferred
2 me, and he also did that to Larry Bossong, the same exact
3 thing. The way that came down was actually was as a little
4 punishment at the time.

5 Q You felt that you were being punished because --

6 A Oh, definitely.

7 Q -- you had requested that you be transferred out of
8 the walkdown?

9 A Yes, ma'am.

10 Q Okay. Other than the fact that you were transferred
11 into night shift terminations, is there anything else other
12 than that that led you to believe or feel that you were being
13 punished because of your request to be transferred out of the
14 walkdown?

15 A Yes, ma'am. There was five of us that had requested
16 to be transferred out of the cable pan walkdown, which they
17 stated I was transferred, I was. My supervisor came into the
18 trailer. He called one man aside, took him outside, and told
19 him -- asked him -- well, the first one he told that he was
20 being transferred back to welding.

21 The second man, he come in and asked him if he still
22 wanted to get out of the cable pan walkdown. The man said no,

1 that the procedure was changed, and it was fine. So he stayed
2 in cable pan walkdown.

3 Then he came in and looked at Larry Bossong and
4 myself in the trailer in front of all these people and says,
5 "Come see me after work. You have been transferred, and you
6 won't like where you're going."

7 Q So you and Mr. Bossong went to see Mr. Simile after
8 your work that day?

9 A No, ma'am. I wasn't wasting my time.

10 Q Okay.

11 A I waited until the next day.

12 Q Okay. In what respect didn't you like the transfer
13 to night shift terminations?

14 A One thing, I don't like nights. I've worked them
15 for too many years. He knew that. And at the time, my mother
16 was dying, and it was impossible for me to work nights. But
17 she happened to die that weekend, so it didn't make too much
18 difference.

19 Q How long did you stay in the area of terminations on
20 night shift, if you recall?

21 A Probably about four or five months.

22 Q And then where were you transferred to?

1 A I was transferred back to day shift.

2 Q Did you complain to anybody about working nights?

3 A All the time [laughing].

4 Q To whom did you complain?

5 A Just mainly the guys I work with, because I wouldn't
6 pass that back to Tony or anybody else at the time. We
7 weren't hitting it off too good.

8 Q In other words, you didn't specifically complain to
9 Mr. Simile?

10 A No, ma'am.

11 Q About the night shift.

12 A Just once or twice when he first bid it. I told
13 him, I didn't want it. And Irv DeWald. I'd walk in there,
14 and he was going to put my on days, and then Tony talked him
15 back out of it.

16 Q Did Mr. DeWald tell you that?

17 A Yes, ma'am.

18 Q Okay. What else did Mr. DeWald say to you about
19 that?

20 A Well, when he threw me on nights, I told him I was
21 going to file a suit against the company. And he said,
22 "Well, if you're going to do that, you're not going to

1 have go on nights,' and I said, "Well, I'm going to do it if
2 I go on nights,' because, like I said, I was working six days
3 a week then, and I had to babysit my mother on Sundays all
4 day, because she was an invalid. And this put just too much
5 on me, to be on the night shift. So I told him I would file
6 suit against the company, and he said, "Well, if that's the
7 way you're going to be about this,' he says, "You're not
8 going on nights.'"

9 So as far as I knew, I wasn't going on nights.
10 Tony Simile walked into the room, and a half hour later I was
11 back on nights.

12 Q Okay. Did you talk to Mr. Simile about that?

13 A I'm not that nice a guy [laughing].

14 Q Did you talk to Mr. DeWald again about that?

15 A No.

16 Q Did this incident take place shortly after your
17 transfer to night shift, or was it right after your transfer?

18 A The day I was told I was going on nights.

19 Q You testified that five of you requested transfer
20 out of walkdown. Were these the five that had been performing
21 the walkdown?

22 A Yes, ma'am.

1 Q And this was, in other words, all the QC inspectors
2 that you recall at the time who were involved in this walkdown
3 project?

4 A Yes, ma'am.

5 Q Okay. You testified that Mr. Simile had indicated
6 to Mr. Bossong that he wouldn't like where he was going.

7 A Yes, ma'am.

8 Q Where was Mr. Bossong transferred to, if you recall?

9 A I'm trying to remember, because we had a switch
10 there, because once he became a steward, he couldn't touch us,
11 see. He couldn't move Bossong where he wanted to, and Bossong
12 was the day steward. I was the night steward. So it affected
13 wherever he was supposed to go.

14 Q Okay. So you don't recall where Mr. Bossong was
15 transferred to.

16 A No, I really don't.

17 Q Do you recall when you became the night steward?

18 A Yes, ma'am.

19 Q When was that?

20 A The day we got certified, the day of the transfer
21 over, which would have been the 23rd of July or something like
22 that.

1 Q July of 1985?

2 A Yes, ma'am.

3 Q Okay. So in other words, between the end of May of
4 1985 and sometime until the end or so of July, 1985, you were
5 working night shift, but you weren't the night steward during
6 that time period.

7 A Right. Yes, ma'am.

8 Q Now how did it come to be that you were transferred
9 out of night shift back to the day shift?

10 A I requested it.

11 Q Was that the first time you made -- well, strike
12 that.

13 Did you make this request in writing?

14 A No, ma'am.

15 Q Okay. Well, was it an oral request?

16 A Yes.

17 Q Do you recall to whom you made the request?

18 A Tony.

19 Q Okay. And how soon after you made the request to
20 Mr. Simile were you transferred back into day shift?

21 A About a week later.

22 Q Okay. Was there anything other than the fact that

1 you didn't want to work the night shift and your mother was
2 ill that led you to feel that you were being punished for your
3 request to transfer out of the walkdown area?

4 A No, ma'am.

5 Q Okay. Did Mr. Bossong tell you at any time that he
6 felt he was being punished for his request to be transferred
7 out of the walkdown?

8 A The day that it came down, we knew it was coming.

9 Q Do you recall the specifics of what Mr. Bossong said
10 to you or you said to him about this?

11 A It had gone somewhere along the line of filing a
12 suit with the National Labor Relations Board, that we had
13 thought about it and thought about it, and like I said, with
14 my mother dying, there wasn't that big an inconvenience to go
15 along with it, you know, to go ahead and work it, as far as I
16 was concerned, and I figured sooner or later they're going to
17 need me on another project. And they did.

18 Q And what project was that?

19 A Cable pan risers walkdown [laughing].

20 Q How long did that project last?

21 A Until last November.

22 Q Do you recall discussing this with anybody other

1 than Mr. Bossong or Mr. DeWald or Mr. Simile in the
2 conversations you've already described to us?

3 A No, ma'am.

4 Q Other than what you've just described regarding your
5 transfer to an area that you did not find desirable, are you
6 aware of anybody else being transferred an undesirable job or
7 work in an area where quality deficiencies could not be noted,
8 because of his or her expression of quality or safety
9 concerns?

10 A Well, I don't know if it would be quality or safety
11 concerns. I remember they pulled certs on Rick Martin, and he
12 was transferred around quite a bit.

13 Q Okay.

14 A But other than that, no.

15 Q You testified that they pulled certs from Rick
16 Martin. You mean that he was decertified, or his
17 certifications were removed; is that what you're saying?

18 A Yes, ma'am. They pulled his certs away from him,
19 his config certs, although I do believe he's got them back now
20 finally.

21 Q Okay. Did you know the circumstances surrounding
22 the pulling of the certifications?

1 A Everybody knows about Rick Martin [laughing].

2 Q Okay. Can you tell me what you recall the
3 circumstances surrounding his decertifications were?

4 A Well, he had a ~~red~~^T~~eck~~^T rate, a bad ~~red~~^T~~eck~~^T rate. He
5 was using mimeographed copies for certain parts of our
6 letterhead, and it was just he was told to do something, and
7 he was vulnerable. He's that type of person, you know.
8 You'll understand it if you meet him. But he's been picked on
9 a lot over there. It's ridiculous, but he has, stuff that
10 will never come out in any of these hearings or anything else.

11 Q What do you recall specifically with respect to his
12 being picked on, as you just testified?

13 A Well, he was one of the few people I know that had
14 to fill out a status report for every hour of what he was
15 doing.

16 Q Do you recall whether that's something he complained
17 about to the NRC, when he went to the March 29th --

18 A He's religious.

19 Q I'm sorry?

20 A He's a religious person now. He wouldn't do that.

21 Q He won't come forward; is that what you're saying?

22 A Yes, ma'am.

1 Q Okay. Is there anything else that you recall that
2 you can tell me about Mr. Martin with respect to his
3 transfers, if any?

4 A No. There's just been so many things they've done
5 to that poor guy, that if I were him, I'd retire.

6 Q Do you have any basis for believing that any of the
7 things that you've just stated were done to Mr. Martin were
8 because of any expressions that he had of quality or safety
9 concerns?

10 A No, ma'am.

11 Q Okay. So in your opinion or to the best of your
12 knowledge, whatever action might have been taken as to
13 Mr. Martin has been unrelated, to the best of your knowledge,
14 to quality or safety concerns that he might have had?

15 A Yes, ma'am.

16 Q Let's turn back momentarily to your transfer out of
17 the walkdown area. When you were transferred into night shift
18 for terminations, did you feel you were being punished because
19 you had requested a transfer out of walkdown, or because you
20 had voiced concerns regarding the manner in which the walkdown
21 procedures were being handled.

22 A It would have been two things. One was because of

1 the voice I had in the procedures of the walkdown and probably
2 the way I wrote that memo to them.

3 Q So in other words -- well, strike that.

4 When you say the way you wrote that memo, which memo
5 are you referring to, Mr. Perryman?

6 A All these here [indicating documents].

7 Q Specify the date of the memo that you have in mind.
8 [Witness reviewing documents.]

9 A One would be the one dated 5/17/85. And then this
10 one, 5/13.

11 Q Okay. And what did you mean when you referred to
12 the way in which the memos are written?

13 A Well, this one here, I told them I thought they were
14 irresponsible and ^{BAD} management practice between supervisor and
15 inspectors, not to answer written requests. And this one here
16 was mainly because of the way I wrote it up, stating that I
17 was misinformed from management on what I was doing on the
18 job.

19 Q Okay. And when you wrote that, you were referring
20 to the Form 7 checklist?

21 A Yes, ma'am.

22 Q And that's the memo dated 5/17/85?

1 A Yes, ma'am.

2 Q Now you made the statement that you felt your
3 transfer into an area that you didn't want was, in part,
4 because of your voice in the procedures. Were you referring
5 to the change that was effectuated regarding the procedures by
6 which the walkdown inspections were being handled?

7 A Yes, ma'am.

8 Q Okay. Other than what you've already testified to,
9 are you aware of any other Comstock QC inspector being
10 transferred to an undesirable job or work in an area where
11 quality deficiencies could not be noted because of his or her
12 expressions of quality or safety concerns?

13 A No, ma'am.

14 Q Have you personally been assigned to perform
15 burdensome or menial special projects or other adverse
16 treatment, in your opinion, because of your expression of
17 quality or safety concerns?

18 A No, ma'am.

19 Q Okay. Are you aware of anybody else that you feel
20 or you heard might have been assigned to perform burdensome or
21 menial special projects or treated otherwise adversely because
22 of his or her expression of quality or safety concerns?

1 A No, ma'am.

2 MS. KEZELIS: That completes my questions for
3 Mr. Perryman.

4 Mr. Perryman, I do have a self-addressed and
5 stamped envelope addressed to me, and I will ask that any
6 documents that you do have in your possession that are
7 responsive to that schedule of documents attached to your
8 subpoena, that you send the originals to me, and I will make
9 photocopies and provide the other parties with copies of them.

10 THE WITNESS: Okay.

11 MS. KEZELIS: And then I will return the originals.

12 THE WITNESS: No problem.

13 MS. KEZELIS: Mr. Wright?

14 MR. WRIGHT: Yes, I'll have a few questions.

15 Perhaps we should take a five-minute break.

16 [Brief recess.]

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EXAMINATION

BY MR. WRIGHT:

Q Mr. Perryman, I have a few questions that I would like to ask. Some of them will be follow-up questions in regard to the discussion between you and Ms. Kezelis, or I might even have one original question.

In your discussions of the Configuration Form 7, you stated that it was signed on the walkdown.

A Yes.

Q And it went to the vault.

A Yes, it went to the vault with the Rev. O print, a copy of the Rev. O print. The original Rev. O went to S&L in Chicago to reevaluate it structurally. That's what we were told, to reevaluate it structurally to see if it was sound and what we had found was still an acceptable item.

Q And was it your concern that that document, the Configuration Form 7 and the Rev. O print, would then be the final inspection papers for that hanger?

A Yes, it was.

Q You also testified that there was no weld inspection done at the time of that walkdown.

A That's correct. There was what we call a weld

1 mapping, which was, if you notice the weld that was really too
2 short, which if you're accustomed to seeing some, I could spot
3 it, for the way you can spot that this is wrong, and we would
4 identify this on our prints. They had a Level 3 from S&L who
5 would go out with another man and weld evaluate what they had
6 up there for, say, if it was an inch shorter than normal,
7 they would evaluate this or mark it up, and from their
8 evaluations, they came out with Revs. to repair them or to use
9 it as-is, depending upon how it was structurally found to be.

10 Q And those were only the welds that you could eyeball
11 from experience?

12 A Yeah, we did not actually inspect every weld to what
13 our criteria is.

14 Q To your knowledge would there ever be an additional
15 weld inspection that would be done on that particular hanger?

16 A Yes, there will. There will definitely be welding
17 done on them. We've brought it up. Some were done, like I
18 said, they had -- they've got documentation on some that were
19 already done. Those that weren't done, we're doing now.

20 Q Okay. But before that change in the procedures,
21 would there have been an additional weld inspection of that
22 particular hanger?

1 A I wasn't sure. I was worried.

2 Q And how long, if you know, had that procedure been
3 in operation?

4 A The procedure we use for the walkdown; is that what
5 you're --

6 Q Yes.

7 A It had just started. That was a brand new
8 procedure, at least on our site. That was a new procedure to
9 us.

10 MS. KEZELIS: I guess just for the record, the
11 person who is asking the questions is Mr. Timothy Wright, who
12 represents BPI, the Intervenors in the Braidwood licensing
13 proceeding.

14 MR. WRIGHT: I've already identified myself early
15 on.

16 MS. KEZELIS: Okay. I don't recall it being on the
17 record. I'm sorry, Tim.

18 BY MR. WRIGHT:

19 Q In response to a question by Ms. Kezelis, you stated
20 that you had no reason to believe that the quality or the
21 safety of the plant was being jeopardized in regard to the
22 Form 7 walkdown.

1 A Right. A lot of those hangers had been inspected at
2 one time, configuration and welding. When we went through the
3 walkdown or started that walkdown, I was satisfied to the fact
4 that they are structurally being reevaluated. I'm not an
5 engineer, so I can't say it's unsafe. I'd say if the welding
6 was really bad or -- configuration isn't as important as a
7 weld would be to me. Configuration is just what pieces they
8 put here, you know. If they put a bigger piece, that isn't
9 going to hurt it, as far as I'm concerned. But like I said,
10 I'm not an engineer, so I wasn't concerned with the quality or
11 the safety of the plant in respect to the configuration.

12 I worried only when I wasn't sure that the welding
13 was going to be identified and document, so that that could be
14 structurally taken into effect.

15 Q Now let's focus on the welding for one moment. Did
16 you know that those hangers had been inspected for welding?

17 A Some had, some had not.

18 Q How did you know that?

19 A Well, we have -- each welding inspector has a stamp,
20 an identifying stamp, and you could walk through a hanger, and
21 you'd be looking at this, and you could see his stamp. It
22 would be either a letter or a number or something that

1 identifies him. So you could see some that had been inspected
2 previously.

3 But from what I had learned previous of people that
4 had been there previous to me on inspections that I had redone
5 or whatever, I didn't feel confident in all of them.

6 Q Well, those that had the stamp and that you knew had
7 been inspected, did you feel or did you believe that there was
8 any quality problems with respect to the inspections?

9 A For the ones that somebody had already inspected, to
10 see if there was a quality problem with it?

11 Q Yes.

12 A No, not if the man had bought it. I would have to
13 take his word. If I was to reinspect it myself for the weld,
14 then I could say yes or no definitely.

15 Q Now with respect to those that had not been
16 inspected previously, do you feel there could have been any
17 quality problems with the welds?

18 A Well, you always have a doubt. If something's not
19 inspected, until you have somebody there that is certifiably
20 and qualified to actually say, "That is a good weld," so until
21 I know that there's documentation on that, as far as I'm
22 concerned, yes, it's a quality problem.

1 Q In response to a question in regards to the NRC
2 inspection report, I guess it was 821 and 822 --

3 MS. KEZELIS: 85-21 and 85-22?

4 MR. WRIGHT: 85-21 and 85-22.

5 BY MR. WRIGHT:

6 Q You stated that you weren't satisfied with the NRC
7 investigation because it was a shortcut, correct?

8 A Right.

9 Q What specifically did you mean by "shortcut?"

10 A Well, when you're working every day on something,
11 and if you're talking strictly on this NRC thing, it was like
12 they had said, they didn't have -- they couldn't find the
13 paperwork, or they didn't pull that man's certs for welding
14 when they found some of this to be true.

15 When you work with somebody, you know them better,
16 and you form an opinion of them. It may be your own or it may
17 be a group of people that have an opinion of someone.

18 And when you go on qualifications in the line of
19 work we do, you can tell who's a good person and who isn't.
20 It would be like lawyers know lawyers. They're going to know
21 who's a good lawyer and who is not a good lawyer; you know
22 what I'm saying?

1 And that's where I base it. When I look at
2 something, I don't like to see a shortcut.

3 Q So would you say that the NRC did not do a thorough
4 job of investigation the allegations?

5 A Right.

6 Q Did the NRC contact you as a result of those
7 allegations?

8 A No.

9 Q At one point you stated that you had actually had
10 the inspection report that, on its face, had in excess of 1000
11 welds on it.

12 A Right. Yes, I have.

13 Q Did you make that known to the NRC at the time?

14 A It had been already brought up by another person. I
15 didn't add to it. It was a pretty quick session that day, and
16 we weren't really there for small items such as that one at
17 that particular time. We were there because if they didn't
18 want to do what we wanted them to do -- in other words, to get
19 a man that is, let's say he was lacking in discipline,
20 self-discipline and how to address people, how to work with
21 people -- you have to know how to do that, whether you're a
22 big man or a little man -- and he liked to use his size on

1 someone that he knew it would work on, and that is where we
2 had the biggest complaint, and I know they have sent these
3 people to training on management classes. I know Comstock has
4 done that. I've known some of the supervisor that have gone
5 through this class.

6 Q Do you know whether the NRC contacted the person who
7 initially brought up the 1000 welds on the inspection report
8 to see where that piece of paper was?

9 A I believe all of us -- I can't swear to everybody,
10 but I know they had called me, like this walkdown one was a
11 part of mine when I went in that day. I brought that up. But
12 I believe everybody was answered as to what was done or what
13 they had come down to, I guess, as well as you can read it,
14 you know, not being a lawyer.

15 Q Everyone was answered. But did they contact you in
16 the resolution of those allegations?

17 A No, I don't believe they did.

18 Q Now with respect to the inspection report that
19 showed the 1000-plus welds, you stated that was by -- those
20 welds had been inspected by Mr. DeWald, correct?

21 A Yes.

22 Q Do you know of any other sheets that had anywhere in

1 the range of 600, 700 or 1000 or more inspections on one
2 sheet?

3 A I have seen them off and on, because they had used
4 them like a joke a couple times from different people that
5 were working -- "Hey, look at this one," you know, and they'd
6 show you something that had an extreme number of welds or
7 inspections, but they were from, like I said, different times
8 and long before I ever came there, and it was just something
9 that we knew we had already -- most of this, I would say right
10 now, we've already reinspected. But I couldn't swear to
11 everything, you know.

12 Q In your experience as a weld inspector, would it be
13 possible for you to inspect 1000 welds in one day?

14 A No. It's very impossible.

15 Q In one week?

16 A Depending upon the circumstances, yes, you could do
17 1000 in a week.

18 Q With the kind of quality that you feel is necessary
19 to inspect a weld?

20 A Yes.

21 Q Now you also stated that at one point in time when
22 you had found a number of welds, that you'd written up a lot

1 of welds, referring to the switch gear, that Mr. DeWald stated
2 that you were wrong with respect to those welds, that you're
3 inspection was wrong; is that right?

4 A Yes, sir.

5 MS. KEZELIS: Well, I don't think that's precisely
6 what Mr. Perryman testified. I think the record will speak
7 for itself. If you are just attempting to refresh
8 Mr. Perryman's recollection as to your area of inquiry, that's
9 fine.

10 BY MR. WRIGHT:

11 Q Perhaps you can restate that for us.

12 A What it was is, I had written up a lot of hangers in
13 that room on ICRs, and he happened to come in that particular
14 day, had pulled out a hanger -- I believe the number of the
15 hanger was HO-28; it was one of the 20 Series hangers -- and
16 he had asked me where this hanger was that had somewhere
17 around, I believe it was 28 undersized welds.

18 And I pointed it out to him as the hanger that was
19 setting right there, and he happened to be with Mr. Cassero
20 from CECO, and I gave him my fillet gauge, which is an
21 inspection item, and he started checking them out, and he
22 checked for one thing and not all the deficiencies on the size

1 of a weld, which is effective throat and your leg sizes and
2 length, and he had told me, "Well, this weld has plenty of
3 theoretical throat," and I says, "Fine," I says, "Now turn it
4 over and use the other end, which gives you your leg size."
5 And he threw it on the floor. He was mad, and he says, "I
6 don't use that end," and I says, "Well, you'd better start
7 because that hanger has X amounts of welds that were bad,
8 because they have an undersized leg."

9 Q He so stated that he never used that side of the
10 fillet gauge.

11 A Out of anger, yes, he has definitely stated that.

12 Q In your opinion, was he joking or was he serious
13 that he had never used that fillet gauge?

14 A I would hope he had been joking, for the simple fact
15 he was a welding inspector at one time himself.

16 Q You would hope that he was joking.

17 A Yes, I would hope.

18 Q Did you think at the time that he was joking?

19 A No.

20 Q If he had never used that side of the fillet gauge
21 before, would you ^{OPINION} ~~opine~~ that his prior inspections may not
22 have been accurate due to his inability to use the fillet

1 gauge?

2 A Yes.

3 Q When did that occur? On what date did that occur?

4 A I couldn't even tell you the date. It would have
5 been early to mid-'84.

6 Q And at that time, was Mr. DeWald the QA manager for
7 Comstock?

8 A QC manager.

9 Q QC manager? Excuse me.

10 A Yes.

11 Q In regards to that special walkdown, you stated that
12 you weren't allowed to reject hangers.

13 A Yes, sir.

14 Q Was that reject hangers due to configuration or was
15 that reject hangers due to weld?

16 A Rejecting them due to configuration, which that
17 procedure strictly was made for an as-built situation. What
18 was rejected or ICR'd later was after the Rev. A's and
19 Rev. O's were done.

20 Q And you felt that was a problem with the procedures
21 in the special walkdown?

22 A When we first started it, it would bother you to

1 look at something and know it was wrong. We knew what we were
2 supposed to be doing, and it seemed they turned it around and
3 used it another way, such as using my Form 7 as a final.
4 Eventually it would become a final inspection for that
5 hanger. That bothered me because I had signed something with
6 all except check boxes, which is what we were supposed to do
7 through this procedure that they were using. They had a
8 specific procedure that is strictly for this, nothing else.

9 I felt by accepting something when I knew it was
10 wrong like that, because I was not going to do the final on
11 the Rev. A, Rev. O, that bothered me, where on a normal
12 inspection today, when I go out to look at it, I go out, I
13 inspect it, and I either accept it or reject it. That's the
14 way it works.

15 Q In response to a question from Ms. Kezelis, you
16 stated that there was a productive rate and that Sargent &
17 Lundy wanted x amount of hangers inspected per day. Do you
18 remember that conversation?

19 A Yes, I do.

20 Q Was that with respect to the walkdown?

21 A Yes, it was. That was strictly the walkdown.

22 Q And as a resolution of that, you stated that you

1 talked to Mr. Kalanowski?

2 A Correct.

3 Q And that in order to do a proper job, you couldn't
4 meet that amount.

5 A That's correct.

6 Q Now, that was ultimately resolved by Mr. Kalanowski?

7 A Yes, it was.

8 Q Was the resolution a proper resolution, in your
9 opinion?

10 A Yes, it was.

11 Q And what was that resolution?

12 A That those of us that were doing the electrical
13 inspection for safety-related hangers, which were the Comstock
14 guys, like myself, that were working with us, now we were to
15 do the hangers at our speed, after where we would inspect
16 everything and that there was no way we could get the amount
17 that they had originally estimated per day.

18 Q But even after that meeting and that resolution,
19 you stated that a Mr. Gallick was transferred out for being
20 too slow.

21 A Yes, it was right around that time when he was
22 transferred out because he was what you would call, I guess, a

1 perfectionist. Now, there's a big difference between being an
2 inspector and a perfectionist. He did not like to make any
3 mistakes, and he was slower than most; but he was a good
4 inspector.

5 Q And you feel that that's the reason they transferred
6 him, because he was slower than most?

7 A Yes.

8 Q You also stated that because of that, you felt there
9 was still some kind of a production quota in the program.

10 MS. KEZELIS: Objection. I don't think that's at
11 all what Mr. Perryman testified.

12 MR. WRIGHT: I think it was.

13 BY MR. WRIGHT:

14 Q You can go ahead. As I remembered your testimony,
15 you stated that even after this meeting, there was still
16 somewhat of a productive quota.

17 A No, it wouldn't be productive. It would be --
18 you've got a basis that I would imagine almost anyone would
19 use for -- you've got five inspectors and five of them are
20 turning in five hangers a day per man, and if you have a man
21 that does one or maybe two, I wouldn't call that necessarily
22 production as he was definitely too slow for the job, and I

1 think that's why he was actually eliminated.

2 Q Do you know that Mr. Gallick was turning in one or
3 two hangers?

4 A I forget what the exact amount was, but it was lower
5 than most at the time.

6 Q Now, outside of this walkdown, with respect to the
7 normal inspection duties, was there any other production,
8 either explicit production quota or an implied production
9 quota?

10 A No.

11 Q Had you heard anyone else speak of what they felt
12 was a production quota?

13 A There had always been rumors that they were trying
14 to push something, but as for a specific number, no. It was
15 somewhat like I had said before. There was a pressure to get
16 so much done to time limits.

17 Q I believe you testified, and correct me if I'm
18 wrong, that there was never any attempt to prevent you from
19 writing NCRs or ICRs; is that correct?

20 A That's correct.

21 Q Did anyone ever talk to you about the amount of NCRs
22 or ICRs you were writing?

1 A Only once, and that was in that they had doubted
2 that I was correct in all my assumptions on these welding, and
3 then again consequently on the configuration of these hangers
4 later, and from there is where you came with what caused them
5 to have a cable pan walkdown. They sent five engineers in to
6 check me, and they agreed that I was right.

7 Q Who was the person that talked to you about that?
8 Was that DeWald?

9 A That was DeWald that time, yes.

10 Q Did Mr. Saklak ever talk to you about the amount of
11 NCRs or ICRs you were writing?

12 A No, never.

13 Q You also testified that Saklak had threatened Joe
14 Hii and you were present; is that correct?

15 A Right. Verbally.

16 Q And he stated: If we were not on site, I would kill
17 you.

18 A He had told me that.

19 Q Oh, he told you that?

20 A We had walked back out of the office and had gone
21 heading for the plant, and he had mentioned that. He says --
22 I'm trying to think of his exact words, but it was basically

1 on the order of if we weren't at the plant, I would have
2 killed the little something or another.

3 Q Do you know whether or not Mr. Saklak kept a
4 personal file on QC inspectors?

5 A Personally I don't know. I have heard that.

6 Q And what, exactly, did you hear with respect to that
7 personal file?

8 A That he had kept files on everybody that had worked
9 under him and he would keep a separate file on what he did or
10 times he did things and stuff like that, but like I said, I
11 did not really work under Saklak. He was more electrical and
12 I was on the welding side.

13 Q You also stated in response to a question by
14 Ms. Kezelis that you had no knowledge of anyone being fired or
15 transferred due to an expression of quality or safety; is that
16 correct?

17 A Other than Worley Puckett, no.

18 Q Other than Worley Puckett. How about John Seeders?

19 A I don't know all the facts on John Seeders. I just
20 knew that he had had some type of problem, whether it was
21 paperwork or what he had set up there, because I wasn't in the
22 calibration, knew very little about him. I don't exactly know

1 why he was ever transferred. I just didn't like the way he
2 was transferred.

3 Q You said he had an option of either being
4 transferred or being fired.

5 A That's what he told me.

6 Q After you were transferred out of the walkdown and
7 put on night shifts in terminations, you said that you viewed
8 this as punishment; is that correct?

9 A Yes, sir.

10 Q And you also stated that at that particular time,
11 that your mother was dying and that you didn't want to do
12 night shift.

13 A Yes, sir.

14 Q Did Mr. Simile know about this before he transferred
15 you?

16 A Yes, sir.

17 Q Did he say anything in regards to this?

18 A Not that I can remember, sir.

19 Q You also mentioned Mr. Rick Martin, and you stated
20 that he was transferred around a lot.

21 A I know Rick Martin had had his certs pulled. I
22 believe he had them all pulled at one time, some of them

1 twice, which was his welding, I believe, that it was pulled
2 twice.

3 Q Did you say you didn't know why?

4 A Not really, no. I couldn't specify exactly what he
5 did wrong. I had heard he just did what he was told to do and
6 was impressionable, I guess the word might be. From someone
7 that is more knowledgeable in an area, he would listen to that
8 man, and at the time it just wasn't correct. But I believe
9 that's all on the record on what they have gotten from him.

10 Q You said that they told him to do things and he
11 would do it.

12 A Basically.

13 Q And you just mentioned someone more knowledgeable
14 than he.

15 A Right.

16 Q Was he told to do things by the CEC Co QC management?

17 A No, no. There would never be anybody from CEC Co in
18 our area.

19 Q Was he told to do things by the Comstock management?

20 A That could be a possibility. I couldn't swear to
21 who told him. That is just what I've heard.

22 Q Now, the things that he was told to do, were they

1 things that would have impacted on the quality of inspections
2 or the safety of the equipment?

3 A That I would be unable to really specify because I
4 don't know that much about what he had done wrong, but I
5 believe he was at the NRC thing, so I imagine they have dug
6 into that some.

7 Q Do you know whether or not he was told to sign off
8 on inspection reports that he didn't actually inspect?

9 A No, I wouldn't know that for a fact, no.

10 Q You also stated that Mr. Martin's treatment was
11 unrelated to expressions of safety or quality. What did you
12 mean by that?

13 A If that was the time I was referring to his -- he
14 was put into some kind of documentation work or something,
15 hold tag review or something like that, and I know Larry Seese
16 used to make him fill out a status report for every hour on
17 how much work he did and what he did, where I don't do an
18 hourly status. I would give a daily status but not an hourly
19 status.

20 Q You stated that Comstock QC management did so many
21 things to Rick Martin. What do you mean by did so many things
22 to Rick Martin?

1 A It seemed like anything that came down had Rick
2 Martin on it. When I was negotiating for the contract and
3 that, he would come down and talk to myself and Bossong that
4 he was being messed with, like Larry Seese there on that
5 status, and that Larry Seese would always pick on him about
6 one thing or another. Exactly what they were any more I can't
7 even remember. We would tell him a way to go handle
8 something, and he would just let it slide again because, like
9 I said, he did turn -- he's a very religious person, so
10 there's no way he can come back at you, if you understand what
11 I mean. So he pretty well just let everything slide.

12 Q What kind of things other than what you have just
13 mentioned did they do to Rick Martin?

14 A I really don't know all of them. I knew they were
15 messing with him that way and they pulled his certs a couple
16 of times for different reasons, and that's what to me, you
17 know, is messing with him, when you pull his certs and then
18 give them back, and he trained and everything else to get them
19 back, and then they would pull them again or something. You
20 know, there had to be something that I didn't know that
21 somebody else knows that's higher than I am.

22 MS. KEZELIS: Just for the record, Mr. Wright,

1 Mr. Martin will be here in about 15 minutes.

2 MR. WRIGHT: Thank you, for the record.

3 MS. KEZELIS: You're welcome.

4 BY MR. WRIGHT:

5 Q Do you know, in regard to welding inspections, who
6 trained Mr. Rick Martin?

7 A No. He was on site before I was. He was already on
8 site.

9 Q Did you review any of Rick Martin's work with
10 respect to welding inspections?

11 A I have run across hangers that he had signed off and
12 stamped. Most of the ones I found were correctly identified.
13 Like I said, I know the one problem they had with him at one
14 time, he had mimeographed the word "conduit hanger" instead of
15 us writing the word "conduit hanger" in there. He had
16 mimeographed it. I know that's one thing he had done wrong and
17 they pulled it for that, because he had mimeographed that.

18 Q Do you know whether or not he had inspected any of
19 these thousand welds within one day and had signed off an
20 inspection report to that effect?

21 A No, I didn't know.

22 Q Did you know whether or not he was trained by Irv

1 DeWald for weld inspections?

2 MS. KEZELIS: Objection. Mr. Perryman has already
3 testified that he doesn't know who trained Mr. Martin, and we
4 can ask Mr. Martin that when he shows up.

5 MR. WRIGHT: Excuse me. I appreciate your
6 objections, but I am entitled to ask this witness anything
7 related to that and his knowledge as to that, so I would
8 appreciate your withholding those. I will ask Mr. Martin what
9 I feel is appropriate for him.

10 MS. KEZELIS: Mr. Wright, I'm still entitled to
11 interpose my objections.

12 MR. WRIGHT: Thank you. Do so, and then allow me to
13 ask my question.

14 THE WITNESS: No, I really don't know who trained
15 him.

16 BY MR. WRIGHT:

17 Q Do you have any questions about his ability to
18 inspect welds if, in fact, Mr. DeWald did train him?

19 A No.

20 Q And that includes the use of the fillet gauge?

21 A Yes.

22 MR. WRIGHT: At this point I don't have any further

1 questions.

2 MS. KEZELIS: I have a follow-up question for
3 Mr. Perryman.

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EXAMINATION

BY MS. KEZELIS:

Q You testified in response to a question from Mr. Timothy Wright that you believed that Mr. Puckett had been terminated because of his expression of quality or safety concerns. What did you mean when you answered in the affirmative to Mr. Wright's question?

A From what I had heard, he was terminated on his 89th day, which you've got a 90-day probationary period, I guess you would call it, and he had found all these problems prior to his 90 days. Now, if they had been substantiated, let's put it that way, if what he had found -- I'll rephrase it maybe -- was substantiated, why did they fire the man?

Q So that was the basis for your statement that you felt that Mr. Puckett was terminated because of his expression of quality or safety concerns?

A Yes, ma'am.

Q Do you know whether, in fact, Mr. Puckett himself identified problems or whether other QC inspectors advised him of problems which he then relayed?

A In the area he was working, he is the only man I knew that was working in that particular area at the time.

1 Q And what area was that?

2 A Your welding procedures.

3 Q Other QC inspectors would be familiar with welding
4 procedures, wouldn't they?

5 A Yes, ma'am.

6 Q So in other words, you don't know specifically or
7 personally whether Mr. Puckett himself found problems or
8 whether other QC inspectors advised him of problems they
9 thought existed with welding procedures; is that correct?

10 A Yes, ma'am.

11 Q Any welding procedures which Mr. Puckett might have
12 either identified or documented, to the best of your
13 knowledge, were any of the substantiated?

14 A I have no idea if they were or they were not.

15 Q So you're not speaking in terms of any personal
16 knowledge regarding Mr. Puckett's termination, are you?

17 A No, ma'am.

18 Q Or whether or not he expressed quality or safety
19 concerns which had not already been identified or been made
20 known?

21 A Yes, ma'am.

22 Q Or whether any of those concerns were substantiated?

1 A I have no idea.

2 MS. KEZELIS: I have no further questions,

3 Mr. Perryman.

4 MR. WRIGHT: I just have one.

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EXAMINATION

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BY MR. WRIGHT:

Q In the NRC report that you read, did you find where Mr. Puckett's allegations had been substantiated?

MS. KEZELIS: Just for the record, the NRC inspection report which Mr. Perryman was given a copy of during the deposition today by me is 85-21 and 22. To the best of my knowledge it doesn't contain any Puckett allegations or dispositions of allegations. It is another inspection report, Mr. Wright.

MR. WRIGHT: Thank you.

BY MR. WRIGHT:

Q In any of the NRC inspection reports that you read, did you find where Mr. Worley's allegations had been substantiated?

A No. All I know is that from what I had heard, he had won his case, whatever that was.

MR. WRIGHT: I don't have any more questions.

MS. KEZELIS: Mr. Perryman, thank you very much. We appreciate your coming into Chicago today. That completes this deposition.

There is one more statement I need to make for the

1 record, and that is this. When the court reporter returns to
2 me the original copy of the transcript of this deposition, I
3 will send it to you and ask that you read it over, and then if
4 you have any problems with any substantive aspect of the
5 statements that were taken down, if you feel that it wasn't
6 accurate in any respect, I will ask you to make the
7 corrections on the face of the transcript pages and then sign
8 it and have it notarized.

9 I will give you another self-addressed stamped
10 envelope when the deposition arrives and ask you to return the
11 original to me, and I will send it over to the court reporter.

12 THE WITNESS: All right. No problem.

13 MS. KEZELIS: Thank you very much.

14 THE WITNESS: You're welcome.

15 [Whereupon, at 1:32 p.m. the taking of the
16 deposition was concluded.]

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1 CERTIFICATE OF DEPONENT
2

3 I, LARRY A. PERRYMAN, do hereby certify that I have read
4 the foregoing transcript of my deposition testimony and, with
5 the exception of additions and corrections, if any, hereto,
6 find it to be a true and accurate transcription thereof.
7

8 Larry A. Perryman
9 LARRY A. PERRYMAN

10
11 3-29-86

12 DATE

13 ***

14 CERTIFICATE OF NOTARY PUBLIC

15 Sworn and subscribed to before me, this the 29th
16 day of March, 1986.
17

18 Leggy L. Mezzant
19

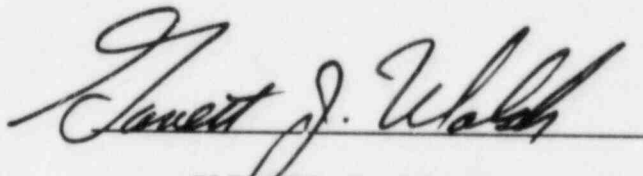
20 NOTARY PUBLIC IN AND FOR

21 My commission expires:

July 30 1988

22 CERTIFICATE OF NOTARY PUBLIC

1 I, GARRETT J. WALSH, the officer before whom the
2 foregoing deposition was taken do hereby certify that the
3 witness whose testimony appears in the foregoing deposition
4 was duly sworn by me; that the testimony of said witness was
5 taken by me and thereafter reduced to typewriting by me or
6 under my direction; that said deposition is a true record of
7 the testimony given by the witness; that I am neither counsel
8 for, related to, nor employed by any of the parties to the
9 action in which this deposition was taken; and further, that I
10 am not a relative or employee of any attorney or counsel
11 employed by the parties hereto, nor financially or otherwise
12 interested in the outcome of the action.

13 
14

15 GARRETT J. WALSH

16 Notary Public in and for the
17 Commonwealth of Virginia
18

19 My Commission expires January 9, 1989.
20
21
22

United States of America

NUCLEAR REGULATORY COMMISSION

In the matter of:

COMMONWEALTH EDISON COMPANY

(Braidwood Station, Units 1 and 2)

TO

Lawrence Perryman
229 Karen Site
Romeoville, Illinois 60441

50-456
DOCKET NO. 50-457

YOU ARE HEREBY COMMANDED to appear at Isham, Lincoln & Beale,
Three First National Plaza, Suite 5200

in the city of Chicago, Illinois

on the 3rd day of March 1986 at 2:00 o'clock P. M.

to ~~XXXXXX~~ be deposed

in the above entitled action and bring with you the document(s) or object(s) described
in the attached schedule.

BY ORDER OF THE ATOMIC SAFETY AND LICENSING BOARD

BY

Herbert Grossman

Herbert Grossman, Administrative Judge

ATTORNEY FOR Commonwealth Edison Company
Elena Z. Kezelis
Isham, Lincoln & Beale
Three First National Plaza
Chicago, Illinois 60602
TELEPHONE (312) 558-7500

February 21 1986

SCHEDULE OF DOCUMENTS TO BE
PRODUCED AT DEPOSITION

1. Any and all documents related to your employment at L.K. Comstock at the Braidwood Power Station.
2. Any and all documents related to discussions or correspondence involving Braidwood Station and Intervenor Bridget Little Rorem, et al., agents and employees of Business and Professional People for the Public Interest, or employees of the Nuclear Regulatory Commission.
3. Any and all documents related to claims of harassment, intimidation, retaliation, or discrimination by any L.K. Comstock employee or manager including Irv DeWald, Robert Seltmann, Larry Seese, Bob Marino and Richard Saklak.
4. Any and all documents related to claims of inadequate quality or of safety concerns at Braidwood Station.

Pennyman Depo #2

TYPE OF
DOCUMENT:

SUBJECT: Transfer out of one area to another.

DATE: 5-17-85, 5-13-85

PERSONS
INVOLVED: L. Perryman
I. DeWald

RESOLUTION: Granted



L. K. COMSTOCK & COMPANY, INC.

file

READ & REPLY

PRIORITY
<input checked="" type="checkbox"/> URGENT
SOON AS POSSIBLE
NO REPLY NECESSARY

Reply requested

DATE 5-17-85

SUBJECT TRANSFER AND CORRECTION OF FORMS

TO: T. SIMME
R. SEITMAN
B. SCHNEIDER

MESSAGE

I AM REQUESTING TRANSFER OUT OF THE CADRE PAN WALKDOWN DUE TO MISMANAGEMENT AND MISLEADING INFORMATION ON THE PART OF L.K.C. MANAGEMENT AND THE QA. DEPARTMENT. I WAS INFORMED THAT I WAS VERIFYING THE AS-BUILT DIMENSIONAL INFORMATION OF THE HQX AND THIS INFORMATION WAS ^{NOT} TO BE RELIED UPON IN ANY WAY, SHAPE, OR FORM OTHER THAN MY OWN REVIEW AT A LATER DATE FOR THESE HQX TO BE APPROVED DESIGN DOCUMENT. ANY INTENTION OF USE OF THE FORMS I HAVE SIGNED UP TO THIS DATE OTHER THAN DIMENSIONAL VERIFICATION WAS NOT MY INTENT. AT THIS TIME I WISH TO MAKE CORRECTIONS TO MY FORMS IN ACCORDANCE TO PROCEDURE 4.13.1 TO REFLECT THIS FACT SIGNED *J. Ferguson*

REPORT

TRANSFER FROM WALKDOWN IS GRANTED, Supplement HAS BEEN REVISED TO INCLUDE YOUR CONCERNS
3RD 5-31-85

SIGNED

J. Ferguson

DATE

5-31-85

RECEIVER: WRITE REPLY, DETACH STUB, KEEP PINK COPY, RETURN WHITE COPY TO SENDER.



L. K. COMSTOCK & COMPANY, INC.

PRIORITY	URGENT
	SOON AS POSSIBLE
	NO REPLY NECESSARY

READ & REPLY

L. Perryman, Jr.

TO: D I DE WARD

DATE 5-13-85

SUBJECT TRANSFER

I HAVE SENT IN (2) PREVIOUS REQUEST TO BE TRANSFERRED FROM CHASE FARM WORK DOWN BACK INTO INPROCESS WELDING AND CERTIFICATION DUE TO PERSONIA NEWSONS TO, T.SIMIRE, DANDEKS, AND MY HAND, I THINK IT IS IRRESPONSIBLE AND BAD MANAGEMENT PRACTICE ON TWOEN SUPERVISORS AND INSPECTORS NOT TO ANSWER WRITTEN REQUEST



SIGNED L. Perryman

TRANSFER IS NOT POSSIBLE AT THE PRESENT TIME.

YOUR REQUEST HAS BEEN REVIEWED FOR REASSIGNMENT, THIS IS A SHORT TERM PROJECT SCHEDULED TO BE COMPLETED THE FIRST OF AUGUST, WITH THE PROJECT BEING A THIRD COMPLETE REASSIGNING A REC 5-13-85 NEW INFORMATION WOULD BE IMPRACTICAL AT THIS TIME

SIGNED [Signature] DATE 5-15-85

RECEIVER: WRITE REPLY, DETACH STUB, KEEP PINK COPY, RETURN WHITE COPY TO SENDER.

SENDER FOLD ON 
REPLIER FOLD ON 

A

Alpha Business Forms - Delmont, PA 15626

READ & REPLY
REPLIER FORM NO. 6200



L. K. COMSTOCK & COMPANY, INC.

READ & REPLY	PRIORITY
	<input checked="" type="checkbox"/> URGENT
	<input type="checkbox"/> SOON AS POSSIBLE
	<input type="checkbox"/> NO REPLY NECESSARY

TO: *RON LAMB*
MYRL LANDERS

DATE *5-7-85*
SUBJECT *TRANSFER*

MESSAGE

*I WOULD LIKE TO BE TRANSFERED FROM THE
CABAE PAN WALK DOWN BACK TO INPROCESS WELD
INSPECTION DUE TO PERSONAL REASONS*

SIGNED

L. Perryman



REPLY

Ron Lamb

SIGNED _____ DATE _____

RECEIVER: WRITE REPLY, DETACH STUB, KEEP PINK COPY, RETURN WHITE COPY TO SENDER.

SENDER: DETACH AND FILE THIS COPY FOR FOLLOW UP.

SENDER FOLD ON 
REPLIER FOLD ON 

A

Alpha Business Forms - Delmont, PA 15626

READ & REPLY
REORDER FORM NO. 6203



L. K. COMSTOCK & COMPANY, INC.

READ & REPLY

PRIORITY

☒ URGENT

☐ SOON AS POSSIBLE

☐ NO REPLY NECESSARY

TO: 

B SCHREIMIER
D LANDERS
T SIMILE

DATE 5-8-85

SUBJECT TRANSFER

MESSAGE

Request immediate Reply of the status of my previous Request to transfer from the cable for walkdown back to inprocess weld and config inspection

SIGNED

L. Perryman

REPLY

Reply Requested

SIGNED _____

DATE _____

RECEIVER: WRITE REPLY, DETACH STUB, KEEP PINK COPY, RETURN WHITE COPY TO SENDER.

QC INSPECTOR HARASSMENT CONTENTION

Contrary to Criterion I, "Organization" of 10 C.F.R. Part 50, Appendix B, and 10 C.F.R. Section 50.7, Commonwealth Edison Company and its electrical contractor, L.K. Comstock Engineering Company have failed to provide sufficient authority and organizational freedom and independence from cost and schedule as opposed to safety considerations to permit the effective identification of and correction of quality and safety significant deficiencies. Systematic and widespread harassment, intimidation, retaliation and other discrimination has been directed against Comstock QC inspectors and other employees who express safety and quality concerns by Comstock management. Such misconduct discourages the identification and correction of deficiencies in safety related components and systems at the Braidwood Station.

Instances of harassment and intimidation include at least the following:

1. At various times since at least August 1984, including in March 1985, more than twenty five (25) Comstock QC inspectors have complained to the NRC about harassment and intimidation by Comstock supervisors. Such harassment and intimidation has been carried out or participated in by QC Manager Irv DeWald, Assistant QC Manager Larry Seese, QA Manager Bob Seltman and QC Supervisor R.M. Sakalac.

Such harassment included widespread pressure to approve deficient work, to sacrifice quality for production and cost considerations and to knowingly violate established quality procedures. Harassment and retaliatory treatment included threats of violence, verbal abuse, termination of employment, transfer to undesirable jobs or work in areas where quality deficiencies could not be noted, assignments to perform burdensome or menial "special projects" and other adverse treatment. Such discriminatory action was taken because of the victim's expression of quality or safety concerns. Former Level II QC inspector John D. Seeders has knowledge of these widespread instances of harassment. By letter of August 17, 1984, Seeders complained to the NRC, Edison and Comstock management regarding instances of harassment directed against him. Subsequently, Mr. Seeders was involuntarily transferred to the position of Engineering Clerk in retaliation for his expression of quality concerns. Such assignment was intended by Comstock to keep Mr. Seeders away from sensitive work areas. Although QC Supervisor R.M.

Sakalac was finally terminated in 1985 for his mistreatment of QC inspectors and other misconduct, the effects of his harassment remain uncorrected and systematic harassment continues at Comstock to the present. The existence of widespread harassment impugns the integrity and effectiveness of on-going corrective action programs designed only to address other widespread QA failures at Comstock.

2. Comstock management, including QC Manager Irv DeWald and Corporate QA Manager Bob Marino harassed, discriminated and retaliated against, and ultimately terminated Level III QC Inspector Worley O. Puckett because Mr. Puckett made numerous complaints about safety and quality deficiencies which he identified in the course of his duties at Braidwood.

Mr. Puckett was hired by Comstock in May 1984 in the newly created position of Level III QC Inspector whose duties included conducting a review of Comstock procedures, tests requirements for the more than 50 Level II QC Inspectors, review of the Level II's inspection work, and the resolution of inspection disputes. Mr. Puckett was highly qualified with 20 years' nuclear Navy and nine years' nuclear power experience. See, Resume, Exhibit B. During the course of his employment with Comstock Mr. Puckett was shocked by the widespread deficiencies in procedures, qualifications and workmanship. He identified numerous instances of improper construction procedures, improper qualification of welders, and material traceability deficiencies. He ultimately recommended a complete stop work order for all welding activity to permit effective corrective action. See, Memos of August 10 and August 17, 1984, Exhibits C and D.

Finally, he warned QC Manager Irv DeWald that "we are approaching a complete breakdown in our QC program." August 22, 1984 Memo, Exhibit E. Puckett was subjected to harassment and retaliation because he raised these safety and quality concerns and was terminated on August 27, 1984 by DeWald on the pretext that he should have scored higher than his 86% on a qualification test. He filed a complaint with the U.S. Department of Labor, alleging violation of the employee protection provisions of the Energy Reorganization Act, 42 USC 5851. Letter, September 5, 1984, Exhibit F. The U.S. Department of Labor Area Director sustained Mr. Puckett's complaint finding unlawful discrimination by Comstock against

Puckett and ordered relief. Notes of Decision, November 6, 1984, Exhibit G. Mr. Puckett presented his case at a hearing before an Administrative Law Judge on Comstock's appeal. See, Complainants' Pre-Hearing Exchange, Exhibit H. Comstock settled Mr. Puckett's claim before putting on its case. The terms of settlement are subject to a non-disclosure agreement between Comstock and Mr. Puckett.