

ORIGINAL

UNITED STATES
NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF:

DOCKET NO: 50-456 OL
50-457 OL

COMMONWEALTH EDISON COMPANY

(Braidwood Station, Units 1 and 2)

LOCATION: CHICAGO, ILLINOIS

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

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: In the Matter of: :
: COMMONWEALTH EDISON COMPANY : Docket No. 50-456
: : 50-457
: (Braidwood Station, Units 1 :
: and 2) :
-----X

Page: 14,747 - 14,912
United States District Court House
Courtroom 1919
Chicago, Illinois 60604
Thursday, October 16, 1986

The hearing in the above-entitled matter reconvened
at 11:00 A. M.

BEFORE:

JUDGE HERBERT GROSSMAN, Chairman
Atomic Safety and Licensing Board
U. S. Nuclear Regulatory Commission
Washington, D. C.

JUDGE RICHARD F. COLE, Member,
Atomic Safety and Licensing Board
U. S. Nuclear Regulatory Commission
Washington, D. C.

JUDGE A. DIXON CALLIHAN, Member,
Atomic Safety and Licensing Board
U. S. Nuclear Regulatory Commission

1 Washington, D. C.

2 APPEARANCES:

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10 Commission Staff:

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16 On behalf of the Intervenor:

17 ROBERT GUILD, ESQ.
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| | EXHIBIT INDEX | MARKED | RECEIVED |
|----|---|--------|----------|
| 1 | | | |
| 2 | Intervenors' Exhibits Nos. 164 and 165 | 14759 | 14768 |
| 3 | Intervenors' Exhibit No. 166 | 14760 | 14768 |
| 4 | Intervenors' Exhibit No. 167 | 14768 | 14778 |
| 5 | Intervenors' Exhibit No. 168 | 14799 | 14804 |
| 6 | Intervenors' Exhibit No. 169 | 14807 | 14844 |
| 7 | Intervenors' Exhibit No. 170 | 14839 | 14844 |
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TESTIMONY OF

THOMAS B. THORSELL
KENNETH THOMAS KOSTAL

CROSS EXAMINATION (Continued)
BY MR. GUILD:

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1 JUDGE GROSSMAN: The hearing is reconvened.
2 This is the 75th day of hearing.

3 I take it your discovery was fruitful and the Board
4 isn't being called upon to resolve any problems?

5 MR. GUILD: No, sir.

6 Applicant was helpful, and Mr. Kostal's associates
7 spent time with me, and it was quick, and we'll see if
8 we can communicate the substance of what we identified
9 were the basis for a number of changes.

10 I understand that, again, with the cooperation of
11 Applicant, copies of a number of documents that we
12 discussed this morning are available in sufficient
13 number that the Board and parties can follow along, and
14 I appreciate their assistance on that.

15 JUDGE GROSSMAN: Fine. Thank you.

16 Any other preliminary matters?

17 MR. STEPTOE: Judge Grossman, it's just that
18 last night in reviewing the bases for the changes, we
19 got a better understanding of what they were.

20 I think Mr. Guild will take the witness through
21 those changes.

22 JUDGE GROSSMAN: I think maybe we should have
23 taken yesterday afternoon off and started this morning.

24 But, in any event, let's proceed now --

1 JUDGE CALLIHAN: I have a correction.

2 I would like to refer to Intervenors' Exhibit 155B,
3 Page 14, that we discussed yesterday afternoon, also,
4 and I'd like to withdraw, and apologize, my challenge of
5 the unit for torque or for moment.

6 What is there is correct; and yesterday I thought
7 the moment of inertia was moment of force.

8 Thank you.

9 JUDGE GROSSMAN: Okay.

10 Mr. Guild.

11 CROSS EXAMINATION

12 (Continued)

13 BY MR. GUILD:

14 Q Mr. Kostal, let's start there, if we can, where Judge
15 Callihan pointed us to, Page 14 of Intervenors' Exhibit
16 155B.

17 Now, in the lower right-hand corner, there is an
18 X'd-through portion of the calc, the original calc.

19 And this calc again refers to the analysis of the
20 defect with respect to weld size for the connection of
21 the longitudinal member, the brace, to the gusset plate,
22 which, in turn, is attached to the vertical hanger
23 component; correct?

24 A (WITNESS KOSTAL) Correct.

1 Q All right.

2 Now, do I understand correctly that because this --
3 that in order to evaluate this weld discrepancy for its
4 design significance, you have to consider the effects of
5 the discrepancy at the centroid of the two welds that
6 are relevant? Those are the welds on either side of the
7 gusset plate, either side of the gusset plate -- the
8 portion of the gusset plate to which the longitudinal
9 brace is connected?

10 A (WITNESS KOSTAL) That's correct.

11 Q And, therefore, the reviewer -- or the evaluator
12 performed a calculation using two systems of
13 coordinates, and that in order to translate the analysis
14 performed initially, using a series of coordinates, to
15 the appropriate reference point -- that being the
16 centroid of the two welds -- that there were two --
17 there were analyses using two sets of coordinates, a
18 global coordinate and a local coordinate, and the
19 analysis had to be translated from the global-coordinate
20 analysis to the local-coordinate analysis reflecting the
21 analysis at the centroid of the two welds?

22 A (WITNESS KOSTAL) Correct.

23 Q All right, sir.

24 Now, the first evaluator in the marked-through

1 portion of the calculation did, indeed, make that
2 translation to the centroid of the two welds, and that
3 analysis using the initial assumptions, initial data and
4 initial methodology produced the calculated value of
5 design margin of 1.03, 3 percent design margin?

6 A (WITNESS KOSTAL) Correct.

7 Q All right.

8 Now, I believe there's a -- you were kind enough to
9 prepare a drawing reflecting the orientation of the
10 local and global coordinates with respect to this
11 particular discrepancy.

12 Perhaps if I could -- well, sorry.

13 MR. GUILD: In any event, Mr. Chairman,
14 members of the Board, Mr. Kostal has a diagram that he
15 described to me today that depicts those two sets of
16 coordinates, the local coordinates at the centroid of
17 the weld and the global coordinates with reference to
18 the longitudinal brace, and I think it would be helpful
19 to look at that.

20 I understand it's being copied, and we'll have that
21 momentarily.

22 JUDGE GROSSMAN: Fine.

23 BY MR. GUILD:

24 Q All right, sir.

1 Now, let's talk a little more generally about the
2 bases for the two calculations.

3 First, as you noted properly yesterday, the calc
4 refers to a Revision 4 to your Calculation Procedure
5 19.3.1?

6 A (WITNESS KOSTAL) Yes, sir.

7 Q And yet I take it that the revision to the calculation
8 procedure, to the best of your knowledge, does not
9 account for changes in the calculations? You didn't
10 make any change to the calculation methodology by those
11 revisions to the procedure, did you?

12 A (WITNESS KOSTAL) That's correct.

13 Q All right.

14 You surmised yesterday that the change in the
15 calculations might have depended on the use of a
16 Braidwood-specific seismic response spectra.

17 I believe overnight you determined that, indeed,
18 the Braidwood-specific seismic response spectra was used
19 for the initial calculation as well as the revised
20 calculation?

21 A (WITNESS KOSTAL) That's correct.

22 Q And, therefore, consideration of a Braidwood-specific
23 seismic response spectra does not account for any
24 changes in the calculational result?

1 A (WITNESS KOSTAL) That's correct.

2 Q Now, you also told me that you identified that the
3 changes did not result in any change in the computer
4 model or the methodology for analysis between the first
5 calculation and the second calculation?

6 A (WITNESS KOSTAL) That's correct.

7 Q All right.

8 That the changes are -- were from two sources,
9 having to do with the data that was used in the second
10 calculation, and that the data represented the analysis
11 of the cable loadings on the cable pan hanger in
12 question, Cable Pan Hanger 104, and differing values
13 used in the second calculation as compared to the first
14 for those cable loadings?

15 A (WITNESS KOSTAL) That's correct.

16 The first calculation was based on the -- a unit
17 load of 45 pounds per square foot in the pans, which was
18 the initial assumed load at the beginning of the
19 project.

20 The second computer analysis took into account the
21 actual cable pan -- cable weights that existed in the
22 pan at that point in time.

23 Q All right.

24 The 45-pound loading was the design basis for the

1 cable pan hanger in question?

2 A (WITNESS KOSTAL) That's correct, the initial design
3 basis, yes.

4 Q All right, sir.

5 One set of data that accounts for the change in
6 calculational result was different loadings.

7 And as I understand the additional piece of data
8 that was considered in the second calculation, not in
9 the first, was a change in the location of one of the
10 cable pans that runs through the hanger?

11 A (WITNESS KOSTAL) That's correct.

12 Q And that that change in location of the cable pan
13 running through this hanger was based on an inspection
14 or identification of the as-built location of that pan
15 in the field?

16 A (WITNESS KOSTAL) What I said was we would -- I didn't
17 know the source of the change in the location, but we
18 would go back into our data base and determine that
19 change, where it originated from.

20 Q Well, I appreciate that, and that's right.

21 You said, in particular, that you didn't know
22 whether it was a result of the Rev A Sargent & Lundy
23 walkdown identifying the actual location of that pan or
24 whether it was, for example, a result of the CSR

1 inspector who inspected the cable pan population for the
2 attributes of location or some other source.

3 But, indeed, you do understand it to represent the
4 as-built location of that cable pan from whatever source
5 you got that information?

6 A (WITNESS KOSTAL) Yes, sir.

7 Q All right.

8 And I appreciate you did say that you would make an
9 effort to determine where that came from.

10 All right, sir. So that the two changes that
11 account for the new calculation are the loadings of the
12 cable pan hanger, the cable loadings, and the location
13 of the one pan?

14 A (WITNESS KOSTAL) That's correct.

15 Q All right, sir.

16 Now, I saw some of your associates come in, and
17 perhaps they have copies of the documents.

18 MR. GUILD: If I could have a moment, Mr.
19 Chairman.

20 Off the record.

21 (There followed a discussion outside the
22 record.)

23 JUDGE GROSSMAN: Back on the record.

24 MR. GUILD: Judge, I'm going to hand up one

1 other document.

2 The first document I handed up says "DV-22
3 Coordinate Systems" on it, and I'm now handing up a
4 document that says "Local Coordinate System" in the
5 upper left-hand corner.

6 (Indicating.)

7 JUDGE GROSSMAN: Okay. The first one is
8 Intervenors' Exhibit 164, and that one, as you
9 indicated, has a DV-22, and then Intervenors' Exhibit
10 165 has that "Local Coordinate System" on the left side.

11 (The documents were thereupon marked
12 Intervenors' Exhibits Nos. 164 and 165
13 for identification as of October 16,
14 1986.)

15 MR. GUILD: Does the NRC Staff have a copy of
16 both documents?

17 MR. BERRY: Yes. Thank you.

18 A (WITNESS KOSTAL) All three of them; right?

19 MR. GUILD: Yes. I haven't handed them all
20 up yet.

21 And, Mr. Chairman, 166 is --

22 JUDGE GROSSMAN: Okay. But you know that the
23 Reporter hasn't yet gotten his copies of 164 and 165?

24 MR. GUILD: All right. I'll get them.

1 The third is entitled "DV-7 Coordinate Systems."
2 It's the third series of documents.

3 (Indicating.)

4 And I'm providing copies to the Reporter, Mr.
5 Chairman.

6 (Indicating.)

7 (The document was thereupon marked
8 Intervenors' Exhibit No. 166 for
9 identification as of October 16, 1986.)

10 BY MR. GUILD:

11 Q All right.

12 Mr. Kostal, I believe the Board --

13 JUDGE GROSSMAN: Have you given the Reporter
14 time to mark it?

15 MR. GUILD: He's got them marked.

16 JUDGE GROSSMAN: Oh, okay.

17 MR. GUILD: Mr. Chairman, I believe that the
18 Board and parties and the Reporter all have copies now
19 of what have been marked as Intervenors' 164, 165 and
20 166,.

21 BY MR. GUILD:

22 Q And, Mr. Kostal, can you start with 165, please, and
23 tell us what the two systems of coordinates are that are
24 depicted on that drawing?

1 A (WITNESS KOSTAL) Yes, sir.

2 The system in the lower right-hand corner is the
3 global coordinate system which defines, then, the
4 location of that hanger within a global framework, and
5 it defines it in terms of X, Y and Z, which relate to
6 the -- looking at this particular hanger -- the X is in
7 the direction which would be east and west as you are
8 looking at this hanger, the Y is in the vertical
9 direction and Z is in the perpendicular direction to the
10 hanger, which is in the north-south orientation.

11 The local coordinate system is the system used to
12 define the individual members within the hanger, and the
13 local coordinate system defines A along the axis of the
14 diagonal member, B perpendicular to the A axis and
15 perpendicular in the vertical direction, and C
16 perpendicular in the horizontal direction to the A axis.

17 Q All right, sir.

18 Now, the drawing that you have depicted for the
19 local coordinate system depicts the fit-up gap weld
20 discrepancy related to the diagonal member of the
21 hanger --

22 A (WITNESS KOSTAL) That's correct, sir.

23 Q -- for Cable Pan Hanger 104?

24 All right. Now, applying that local coordinate to

1 the other principal significant defect that was analyzed
2 in Cable Pan Hanger 104 -- and that was the longitudinal
3 brace to gusset plate -- or the gusset plate connection
4 involving the longitudinal brace, look at Intervenor's
5 164, and would you describe the orientation of local
6 coordinates with respect to that discrepant condition,
7 please?

8 A (WITNESS KOSTAL) Yes, sir.

9 The key is the -- is located at the bottom of
10 Exhibit 164.

11 It shows dashed lines, which will represent the
12 local coordinate system for the longitudinal diagonal
13 member. Those are large capital letters A, B and C

14 If you look at the sketch, you will notice, in the
15 dashed lines, the local axis A is along the axis of the
16 longitudinal diagonal member; the local coordinate axis
17 B is perpendicular to that longitudinal axis A in a
18 vertical direction; and the local coordinate axis C is
19 perpendicular to the local axis A in a horizontal
20 direction.

21 Q All right, sir.

22 Again, the global coordinates are with respect to
23 east-west, north-south and vertical?

24 A (WITNESS KOSTAL) That's correct. The X is in the

1 east-west direction, the Z is in the north-south
2 direction and the Y is in the vertical direction; and
3 that is a consistent orientation that exists on Exhibit
4 165, also.

5 Q All right, sir.

6 And how about the shifted axes, the lower case a, b
7 and c, with regard to Intervenors' Exhibit 164?

8 A (WITNESS KOSTAL) That defines, based on this dashed
9 dot line, the -- and it's using the lower case a, b and
10 c -- that represents the axis at the centroid of the
11 weld in question, which is the weld made between the
12 gusset plate and the vertical tube steel member.

13 That local system shows a being --

14 Q Let me interrupt you for a second.

15 You said centroid of the weld, singular, or welds,
16 plural?

17 A (WITNESS KOSTAL) Welds.

18 Q Welds, plural?

19 A (WITNESS KOSTAL) there are two welds on this particular
20 attachment on either side of this gusset plate.

21 Q We are considering the effects of the discrepancy on
22 both of them; therefore, the centroid of the two welds
23 is the relevant point of reference?

24 A (WITNESS KOSTAL) That's correct.

1 Q All right.

2 A (WITNES KOSTAL) The A axis is in the north-south
3 orientation, the B axis is in the vertical orientation
4 perpendicular to the A axis, and the C axis is in the
5 horizontal orientation also perpendicular to the A axis.

6 Q All right, sir.

7 Finally, Intervenor's 166 depicts the fit-up gap
8 defects -- again, the diagonal brace -- and represents
9 the application of the local and global coordinates to
10 that particular discrepant condition?

11 A (WITNESS KOSTAL) That's correct, sir.

12 Q All right, sir.

13 Now, for that particular discrepancy -- that is,
14 the fit-up gap discrepancy -- there is no necessity for
15 deriving a shifted axis -- that is, by analogy to
16 Intervenor's 164, a lower case a, b, c coordinate
17 system -- and that is because the analysis is
18 performed -- you don't need to derive the centroid --
19 the centroid of the -- strike that.

20 The point of analysis is, indeed, the local
21 coordinates that are shown on Intervenor's 166?

22 A (WITNESS KOSTAL) Maybe if I could clarify it for you
23 just a little bit.

24 The reason you don't have to shift the axis is

1 because the work point of the load from the diagonal
2 brace coincides with the centroid of the various welds
3 that are being analyzed.

4 Q All right.

5 The work point is the point that's relevant for
6 analysis?

7 A (WITNESS KOSTAL) That's correct.

8 Q And that's true for both defects? It's just that for
9 this defect, that work point coincides with the centroid
10 of the member in question?

11 A (WITNESS KOSTAL) That's correct.

12 Q And, therefore, you don't need to make a shifted
13 analysis for a shifted set of coordinates to account
14 for -- to account for the work point not coinciding with
15 the center of that member?

16 A (WITNESS KOSTAL) Yes, sir.

17 MR. STEPTOE: Excuse me.

18 "Center of the member," you said?

19 MR. GUILD: The member.

20 MR. STEPTOE: Thank you.

21 BY MR. GUILD:

22 Q Now, why do you have to make the analysis --

23 A (WITNESS KOSTAL) May I -- the centroid -- the centroid
24 of the weld root coincides with the applied load from

1 the member.

2 Q All right.

3 Now, why do you have to make the shift for the
4 DV-22 connection that appears in Intervenor's Exhibit
5 164 in order to analyze the significance of that --
6 those discrepancies, those weld discrepancies?

7 A (WITNESS KOSTAL) The reason you make the shift is
8 the -- given that the work point doesn't coincide, there
9 is some additional stress in the weld as a result of the
10 load being applied slightly off the centroid of the
11 weld.

12 So what you are accounting for is the translation
13 of the load back to the centroid of the weld, and in the
14 process of that translation, you also induce a moment
15 when you shift the axial load back to the centroid of
16 the weld.

17 Q Is that because of the -- here the longitudinal brace is
18 not attached at the center of the gusset plate or on the
19 edge of the gusset plate, it's attached to one side of
20 the gusset plate?

21 A (WITNESS KOSTAL) It -- no. It's because the
22 longitudinal brace -- when you take the axial load, the
23 centroid of the axial load, in the longitudinal brace
24 and reflect that onto the weld, it is located below the

1 centroid of the weld, and the -- my Exhibit 164 shows
2 pictorially where the centroid of the -- where the work
3 point is of that brace load coming down to the weld.

4 Q And that's the designation "work point of brace"?

5 A (WITNESS KOSTAL) That's correct.

6 Q All right.

7 And the other set of coordinates, the A, B and C,
8 are above that point?

9 A (WITNESS KOSTAL) That's correct.

10 Q And it's the translation of the load to that work
11 point -- that is, the higher work point, the center of
12 the discrepant weld -- that requires the use of the two
13 sets of local coordinates?

14 A (WITNESS KOSTAL) Yes, sir.

15 JUDGE GROSSMAN: And just to complete your
16 description on Intervenors' Exhibit 164, you have a
17 "center of" and you have a designation there.

18 What does that stands for?

19 A (WITNESS KOSTAL) It's the center of plate.

20 JUDGE GROSSMAN: Center of plate?

21 A (WITNESS KOSTAL) Right. "PL" stands for plate --

22 JUDGE GROSSMAN: Okay.

23 A (WITNESS KOSTAL) -- which also coincides with the
24 center of -- center of weld -- of the two welds.

1 JUDGE GROSSMAN: Fine.

2 MR. GUILD: Mr. Chairman, I'd ask that
3 Intervenors' 164, 165 and 166 be admitted into evidence.

4 MR. STEPTOE: No objection.

5 MR. BERRY: No objection.

6 JUDGE GROSSMAN: Received.

7 (The documents were thereupon received
8 into evidence as Intervenors' Exhibits
9 Nos. 164, 165 and 166.)

10 MR. GUILD: Mr. Chairman, I'm going to hand
11 up a series of documents. We're making -- sorting
12 additional copies -- or Applicant is -- and I'd ask
13 these be marked as Intervenors' Exhibit 167.

14 The top page is entitled, "Horizontal Floor
15 Response Spectra, North-South Component"; there is an
16 East-West Component on the second page; and there is a
17 Vertical Response Spectra on the third page,
18 Byron-Braidwood, Enveloped, Enveloped, Response
19 Spectra."

20 (Indicating.)

21 I'm getting copies for the other parties.

22 (The document was thereupon marked
23 Intervenors' Exhibit No. 167 for
24 identification as of October 16, 1986.)

1 BY MR. GUILD:

2 Q Mr. Kostal, do you have a copy of this?

3 A (WITNESS KOSTAL) Did you give this an exhibit number?

4 Q Yes.

5 A (WITNESS KOSTAL) Well, what did you call them?

6 Q 167.

7 A (WITNESS KOSTAL) Okay. All three of them are 167?

8 Q Yes.

9 A (WITNESS KOSTAL) Did you have them in order?

10 Q Mr. Kostal, the order I have is north-south, east-west
11 and vertical.

12 A (WITNESS KOSTAL) Fine.

13 Q And that's Intervenors' 167.

14 All right, sir. Now, as you stated a moment ago,
15 you determined overnight that both the original
16 calculation for Cable Pan Hanger 104 and the revised
17 calculation that appear in Intervenors' Exhibit 155B
18 included the Braidwood-specific seismic response
19 spectra?

20 A (WITNESS KOSTAL) That's correct, sir.

21 Q All right.

22 And that that change in the result in that
23 calculation is accounted for by any change in seismic
24 data?

1 A (WITNESS KOSTAL) That's correct.

2 Q All right.

3 Now, can you describe the three documents that
4 comprise Intervenor's 167, please.

5 A (WITNESS KOSTAL) Yes, sir.

6 The documents are of the various spectra in the
7 horizontal north-south direction, in the horizontal
8 east-west direction, as well as the vertical direction
9 for the auxiliary building, turbine building, heater bay
10 at Elevation 451.

11 The individual spectra have a series of lines which
12 represent the spectra across various frequencies, and
13 these lines move up and down based on the G level
14 associated with a given frequency.

15 Q That's acceleration?

16 A (WITNESS KOSTAL) I'm sorry. A G level is
17 acceleration, yes, sir.

18 The solid heavy line represents, as well as the
19 lines above the solid heavy line -- represents the
20 enveloped Byron and Braidwood response spectra.

21 This was the spectra that was used for the initial
22 calculations on the cable pan hanger population.

23 The other lines --

24 Q Excuse me.

1 When you say "initial calculations," you mean the
2 design calculations that were used?

3 A (WITNESS KOSTAL) The design calculations and
4 subsequent calculations that were performed over a
5 period of time till such a point in time that the unique
6 spectra for each plant was used.

7 Q All right.

8 But when you say that the enveloped spectra were
9 used in the initial calculations, that doesn't mean the
10 initial calculation for the evaluation of Cable Pan
11 Hanger 104?

12 A (WITNESS KOSTAL) No. What I mean by initial
13 evaluation and analysis is the analysis that was
14 performed on this particular hanger as well as any other
15 hanger at some point in time, which was the first
16 analysis to determine the various members that would be
17 used, the various connections that would be used and the
18 loads that existed at that point in time.

19 Q All right, sir.

20 The --

21 A (WITNESS KOSTAL) The --

22 JUDGE GROSSMAN: Excuse me.

23 When you used the envelope of Byron/Braidwood, you
24 did have available to you the unique spectra for each of

1 those plants, didn't you?

2 A (WITNESS KOSTAL) That's correct, sir.

3 The reason we used the enveloped spectra is it
4 conservatively designs the hanger at either station and
5 envelopes both spectra, so it allows us to make one run,
6 which saves engineering man-hours, and it conservatively
7 then sizes that particular hanger for each plant.

8 JUDGE GROSSMAN: Okay.

9 I'm sorry I interrupted your answer.

10 A (WITNESS KOSTAL) The dashed portion of the line, where
11 it's shown, represents that portion of the spectra that
12 is unique to Braidwood.

13 In addition, there are other spectras for various
14 damping values that are also shown on this exhibit.

15 In the cable pan hanger population, the damping
16 value of 7 percent is the assigned damping value for the
17 population.

18 These various damping values are defined by the
19 NRC, and they also define where you can use different
20 damping values depending on the types of component that
21 are being analyzed.

22 In the case of cable pan hangers, 7 percent damping
23 is the allowed damping spectra that can be used in the
24 design.

1 JUDGE GROSSMAN: The higher the damping -- I
2 assume the higher damping reflects the loss of motion
3 from the ground to the particular item that you are
4 applying the spectra to; is that correct?

5 A (WITNESS KOSTAL) In essence, that's correct.

6 Maybe a little further explanation is the damping
7 normally also takes into account the ability of the
8 component, due to its characteristics, to absorb a
9 seismic load.

10 JUDGE GROSSMAN: Okay.

11 The point is the higher the damping, the less
12 motion is imputed to the item that you are considering;
13 is that so?

14 A (WITNESS KOSTAL) Yes, sir.

15 JUDGE GROSSMAN: Okay.

16 BY MR. GUILD:

17 Q And does that have to do generally with the rigidity of
18 the component in question?

19 A (WITNESS KOSTAL) That's one of the elements, yes, sir.

20 Q All right, sir.

21 Now, taking an example, for a given component, a
22 given design, there is a known frequency; is that
23 correct?

24 A (WITNESS KOSTAL) Yes, sir, you can calculate the

1 JUDGE GROSSMAN: The higher the damping -- I
2 assume the higher damping reflects the loss of motion
3 from the ground to the particular item that you are
4 applying the spectra to; is that correct?

5 A (WITNESS KOSTAL) In essence, that's correct.

6 Maybe a little further explanation is the damping
7 normally also takes into account the ability of the
8 component, due to its characteristics, to absorb a
9 seismic load.

10 JUDGE GROSSMAN: Okay.

11 The point is the higher the damping, the less
12 motion is imputed to the item that you are considering;
13 is that so?

14 A (WITNESS KOSTAL) Yes, sir.

15 JUDGE GROSSMAN: Okay.

16 BY MR. GUILD:

17 Q And does that have to do generally with the rigidity of
18 the component in question?

19 A (WITNESS KOSTAL) That's one of the elements, yes, sir.

20 Q All right, sir.

21 Now, taking an example, for a given component, a
22 given design, there is a known frequency; is that
23 correct?

24 A (WITNESS KOSTAL) Yes, sir, you can calculate the

1 frequency of a component.

2 Q All right.

3 And you calculate -- Sargent & Lundy does that or
4 the computer does that for you?

5 A (WITNESS KOSTAL) That's correct, sir.

6 Q You have a program that does that?

7 A (WITNESS KOSTAL) Yes, sir.

8 Q All right.

9 That value is found in this exhibit along the
10 horizontal axis right at the top of the page, frequency?

11 A (WITNESS KOSTAL) That's correct.

12 Q All right.

13 For a particular component, then, with a given
14 frequency, you find the point on the horizontal axis.

15 And is 10 a representative frequency for a
16 component of the sort we're talking about, cable pan
17 hangers?

18 A (WITNESS KOSTAL) I didn't go back -- you know, we
19 talked about this this morning. In our example, we
20 chose 10 as an example; but I can't speak to the exact
21 frequency level of this particular hanger --

22 Q All right.

23 Can you --

24 A (WITNESS KOSTAL) -- in question.

1 Q Can you tell whether 10 is a representative frequency
2 for cable pan hangers, would 5 be more representative or
3 do you know?

4 A (WITNESS KOSTAL) I would have to go back and check.

5 It's a number that I can get fairly easily, but I
6 just haven't done that check since you asked me that
7 question this morning.

8 Q All right, all right.

9 Well, let's take 10 just as a value for frequency.

10 You then run down that line until you intersect the
11 appropriate response spectra curve.

12 In this case, we're talking about a cable pan
13 hanger. It would be the 7-percent curve.

14 And it's the same for both Braidwood unique and the
15 Braidwood/Byron enveloped response spectra?

16 A (WITNESS KOSTAL) That's correct.

17 Q You read over to the vertical axis to the left, and you
18 get a value for acceleration expressed in G units?

19 A (WITNESS KOSTAL) That's correct.

20 Q All right.

21 And for 10, it's 2 --

22 A (WITNESS KOSTAL) That's correct.

23 Q -- 2 G?

24 Now, how is that value, the acceleration value of 2

1 G, applied in the design of a cable pan hanger?

2 A (WITNESS KOSTAL) That's applied at the note point
3 where the loads are put into the computer model.

4 The note points represent the attachment points of
5 the hanger to the horizontal members, so at a given
6 attachment point -- let's assume that we have a weight
7 at that attachment point equal to 100 pounds.

8 What you would, in essence, do is apply a
9 horizontal load at that note point in the north-south
10 orientation equal to 100 pounds times 2, because there
11 is an acceleration G level of 2 associated with the
12 frequency of 10 and a damping value of 7.

13 So, in essence, from a simplistic point of view, it
14 applies a 200-pound reaction in the horizontal
15 north-south direction at that note point.

16 Q All right, sir.

17 And in order to derive a full evaluation of the
18 seismic stresses imparted on a member, you would look
19 not just at the north-south, but the east-west, and
20 derive the value in the same fashion?

21 A (WITNESS KOSTAL) Yes, sir.

22 Q And then in the vertical direction from the third page
23 of Intervenors' Exhibit 167?

24 A (WITNESS KOSTAL) Yes, sir.

1 Q And the combined effects of those forces on those axes
2 would give you the resultant seismic stress for the
3 particular member in question?

4 A (WITNESS KOSTAL) Yes, sir.

5 Q All right, sir.

6 Now, what accounts for the difference principally
7 in the Braidwood-specific or Braidwood-unique response
8 spectra and the Byron/Braidwood enveloped spectra?

9 A (WITNESS KOSTAL) Each of these plants is founded in
10 different soil media, and the difference that exists
11 between the two spectra is a result of the inclusion of
12 the various soil media at Byron and Braidwood.

13 Q Byron's on rock, Braidwood's on soil?

14 A (WITNESS KOSTAL) That's correct.

15 Q Now, although that's helpful, but while a factor that
16 influences the evaluation of defects on components --
17 hangers, in this case -- again, no changes in seismic
18 stresses are reflected in the revisions from the
19 original to the revised calculations for Cable Pan
20 Hanger 104?

21 A (WITNESS KOSTAL) If I could, can I restate the
22 question and answer?

23 The only changes that exist between those two
24 analyses is that the loads, the weights, that we

1 referred to in the last example are multiplied by the
2 seismic response spectra values, and that results in a
3 unique change, purely because if the weight is slightly
4 less, the applied G level to a slightly less weight will
5 be different, which will result in a different stress --

6 Q Understood.

7 A (WITNESS KOSTAL) -- associated with the seismic loading
8 condition.

9 Q Understood.

10 The spectra have not changed, though?

11 A (WITNESS KOSTAL) The spectra have not changed.

12 MR. GUILD: Mr. Chairman, I ask that
13 Intervenors' 167 be received in evidence.

14 JUDGE GROSSMAN: Any objection?

15 MR. STEPTOE: No objection.

16 MR. BERRY: No objection.

17 JUDGE GROSSMAN: Received.

18 (The document was thereupon received into
19 evidence as Intervenors' Exhibit No.
20 167.)

21 JUDGE GROSSMAN: I take it the reason there's
22 a difference between the soil readings for Braidwood and
23 the rock readings for Byron is that it's assumed that
24 there's some damping value to having ground waves

1 propagate in soil at Braidwood versus the ground waves
2 propagating through rock at Byron; is that so?

3 A (WITNESS KOSTAL) That's correct.

4 JUDGE GROSSMAN: And I take it in the FSAR
5 you have consistently used the envelope of
6 Braidwood/Byron?

7 A (WITNESS KOSTAL) Yes, sir.

8 JUDGE GROSSMAN: And that's not changed, has
9 it?

10 A (WITNESS KOSTAL) No, sir.

11 JUDGE GROSSMAN: Okay, fine.

12 And I guess one reason why you have that
13 conservatism for the envelope of Braidwood/Byron is that
14 these ground-motion calculations or the understanding of
15 what happens is not as exact as perhaps some
16 seismologist would like to believe; is that so?

17 A (WITNESS KOSTAL) No, not quite, Judge Crossman.

18 The real reason for the enveloped spectra is the
19 initial analysis -- the engineering effort required
20 would have been doubled if we did an analysis based on
21 the Byron spectra and then a separate analysis on the
22 plant based on the Braidwood spectra.

23 It was a decision on the part of Commonwealth
24 Edison that we would envelope the spectra, which is a

1 more conservative criteria, and use that as the
2 design -- for the design of the plant, which was similar
3 at both stations, and only use the unique spectra when
4 we had unique conditions at either of the two plants.

5 (Indicating.)

6 BY MR. GUILD:

7 Q All right, sir.

8 Let's turn to Intervenors' Exhibit 155B again.
9 That's the calc package for Cable Pan Hanger 104.

10 Now, again, there are two discrepancies that have
11 different points for the bounding or limiting case
12 depending on whether we are looking at the original calc
13 or the revised calc.

14 The first of those appears beginning at Page 7, and
15 that is the fit-up gap and weld size associated with
16 that 1/8-inch gap for the diagonal brace; correct?

17 A (WITNESS KOSTAL) Yes, sir.

18 Q And the second of those is beginning at Page 13, the
19 undersize weld, Section BB; that is, for the
20 longitudinal brace, the gusset plate attachment to the
21 vertical hanger member?

22 A (WITNESS KOSTAL) Yes, sir.

23 There are other calcs that were made with the
24 second run.

1 Q Yes.

2 And let's look at the second of those two defects;
3 that is, beginning at Page 13.

4 Now, if you would, let's start with the revised
5 calc, and can you now, having had a chance to review the
6 basis for the changed calculation, explain to me what
7 the steps were and the data utilized in the revised
8 calculation for this particular detail?

9 A (WITNESS KOSTAL) The original calculation that was
10 performed demonstrated, and on Page 15, that the design
11 margins remaining in this particular connection detail
12 were greater than the code allowables.

13 Q It was 3 percent greater, 1.03?

14 A (WITNESS KOSTAL) It was greater than the code
15 allowables.

16 So we had already determined this to be a Z
17 discrepancy, and we have already determined that the
18 design significance consideration was taken into account
19 and that there was no design -- no design significant
20 discrepancy based on the fact that the as-built
21 connection met the allowable code limits.

22 In performing the -- this first analysis included
23 all the parameters that we would include in our normal
24 calculation analysis, meaning the forces resulting at

1 the weld and the transferring of those forces to the
2 centroid of the weld if the work point was not at the
3 centroid.

4 The second calculation was performed based on the
5 use of the loads that were generated from the second
6 seismic run on 8/22/85, and those loads were less than
7 the loads applied to this particular connection in the
8 computer run that was performed on June -- let me get
9 the date -- on June 1, 1985.

10 Since those loads were less than, we performed a
11 check to see what the new range of design margins are,
12 which we knew, based on the fact that the loads were
13 less, the design margins would be even greater.

14 In that particular second calc, we performed the
15 calculation associated with the loads in the -- applied
16 to the member in the global coordinate system.

17 We didn't perform the second phase of that
18 analysis, which was shifting those loads to the new --
19 to the centroid of the weld.

20 So what you see in the second calculation is a more
21 simplified calculation, which showed the range of the
22 increase in margins that occurred as a result of that
23 simpler -- that simplified calculation.

24 That showed that the design margin with that

1 simplier calculation would be 1.89.

2 Q All right, sir.

3 Now, let me interrupt you.

4 If you, indeed, had done the full calculation the
5 second time around, made the translation to the work
6 point, you would have derived a design margin not of
7 1.89, but of 1.28?

8 A (WITNESS KOSTAL) That's correct.

9 I explained to you when you were in my office that
10 we performed that additional calculation to show what
11 the effect would be, and it still was -- based on our
12 original design being greater than 1.0 and given that we
13 knew the loads were less than the original loads, it
14 gave it -- we performed that analysis last night, and
15 that particular value of design margin is 1.28.

16 Q All right, sir.

17 So as I understand, you did not, then, replicate
18 the use of the local coordinate analysis that appears at
19 Page 14 when you did your revised calculation, and,
20 therefore, it's simply -- the original calc for that
21 calculation -- the original calc for that set of
22 coordinates is simply X'd through here and replaced with
23 the results of the computer run?

24 A (WITNESS KOSTAL) That's correct.

1 Q Okay.

2 A (WITNESS KOSTAL) If I could clarify further, that
3 computer run does contain the shifting of the loads to
4 the local axis and does contain that interaction
5 coefficient within the computer run for that location of
6 weld.

7 Q All right, sir.

8 A (WITNES KOSTAL) Maybe if I could explain a little
9 further, one of the considerations in performing
10 reassessments is reviewing the time that is spent on
11 these re-evaluations.

12 There is a certain judgment on the part of the
13 engineers that is used in determining the level of the
14 detailedness of the calculation.

15 Given the fact that he already knows that the exact
16 calculations with a higher set of loads had a design
17 margin greater than 1, in an effort to save engineering
18 hours and cost, this particular simplified version was
19 used.

20 Q Well --

21 JUDGE GROSSMAN: Excuse me.

22 What figure did you use instead of the 45 pounds
23 per square inch that you had used originally?

24 A (WITNESS KOSTAL) We used the actual.

1 JUDGE GROSSMAN: Per square -- per linear
2 foot, is it?

3 A (WITNESS KOSTAL) Square foot.

4 JUDGE GROSSMAN: Per square foot. Okay.

5 A (WITNESS KOSTAL) There are nine cable trays in this
6 particular hanger. There is actual cable weights
7 associated with each cable tray; and we used the actual
8 cable weights that are tabulated in what is known as our
9 CIS 4 or Cable Information System, and that is a system
10 which tracks all cables in and all cable trays, and
11 provides an output of the load of those cables at
12 specific discrete points along the cable.

13 Using that information, we derived the actual
14 weights for these cables associated with this particular
15 hanger.

16 JUDGE GROSSMAN: I see.

17 BY MR. GUILD:

18 Q Now, just returning to the last point, if the computer
19 did the translation, in your revised calculation now,
20 from the -- involving the use of the local coordinates
21 to the work point in question, why didn't you state the
22 value of 1.28 as the resulting design margin and not
23 1.89, when you documented this calculation?

24 A (WITNESS KOSTAL) The computer will give you the value

1 based on the connection being per as designed.

2 This is a calculation to take into account the
3 discrepancy that exists.

4 Q I see. All right, sir.

5 So when you say that the computer made the
6 translation from the two coordinate systems, it didn't
7 do that for the defective as-built condition?

8 A (WITNESS KOSTAL) That's correct.

9 Q All right, sir.

10 So you eliminated the calculation, the original
11 calculation, aspects, the coordinate translation aspects
12 of the original calculation, appearing at Page 14?

13 A (WITNESS KOSTAL) That's correct.

14 Q All right.

15 Now, Page 15 of the calc package, again, focusing
16 on the revisions, what are the revised values,
17 therefore, that are utilized in the calc at Page 14 --
18 Page 15?

19 Excuse me.

20 A (WITNESS KOSTAL) The revised values that are utilized
21 are the forces that are shown in the cloud on Page 14,
22 and those forces are, in the global coordinate system,
23 FX equal to 0, FY equal to 12.22 kips, FZ equal to 3.493
24 kips, and moments MZ, MY and MX equal to 0.

1 The calculations on Page 15 reflect the stresses
2 along various planes.

3 For example, FZ is the stress that exists along the
4 Z axis based on the load of 3.493, which came out of the
5 computer analysis, divided by the area of the weld
6 group, which is 2.34.

7 That stress level revised is equal to 1.49 in the
8 cloud.

9 The stress along the Y axis is in the next
10 calculation, which shows the Y force, 12.22, also
11 divided by the area, 2.34, and in the cloud is the
12 stress of 5.22 kips per square inch along that axis.

13 The next line performs an analysis to get the
14 resultant of those two vector components, and in there,
15 under the square root sign, is the value of 1.49 squared
16 times the value of 5.22 squared. The square root of
17 that gives you the resultant stress of -- in the cloud
18 of 5.43, and that's compared with the allowable for this
19 particular weld of 19.75 kips per square inch.

20 The as-built condition is the next set of
21 calculations, which, again, goes through that same set
22 of calculations, defining the FZ stress, which is the
23 area of -- which is the force, 3.493, divided by the
24 area of the as-built weld, which is 1.219, and that

1 stress level in the cloud is 2.865.

2 The next line represents the stress in the Y
3 direction, which is the Y force, 12.22, divided by the
4 area, again, which is 1.219, and that stress is equal to
5 10.024.

6 To get the resultant stress, you multiply -- you
7 square those two forces and you get the square root, and
8 the resultant stress is 10.425, and the interaction is
9 the resultant stress over the allowable stress, which is
10 in the cloud as 10.425 divided by 19.75. That gives you
11 a value of -- in the cloud of 0.52 as compared to an
12 interaction value of 1.

13 The next calculation is the R value calculation,
14 which is the ratio of -- I've got to find that. Oh,
15 it's the ratio of the stress, 5.28, which is over the
16 previous interaction coefficient of 2.-- .275, and the R
17 value is in the cloud equal to 0.52. The design margin
18 for this particular methodology is 1.82 as defined in
19 the cloud next to --

20 Q 1.89?

21 A (WITNESS KOSTAL) I'm sorry.

22 -- 1.89.

23 Q All right, sir.

24 Now, looking at the as-designed portions of that

1 calculation that appear towards the top of the page,
2 that is the result -- the revised calculation is a
3 computer product as opposed to the result of the hand
4 calc as was the case with the original?

5 A (WITNESS KOSTAL) This is a hand calc. The product of
6 the computer run are the forces.

7 Q All right, sir.

8 I just don't see you replicating -- look at the
9 first line for the force at Z, formerly the force at a.

10 Originally you had a multi-component equation
11 there, and you simply X'd through all of the variables
12 in that equation and replaced them with a circled value
13 of 4.393?

14 A (WITNESS KOSTAL) Right.

15 Q You didn't pull that out of the air.

16 I take it the computer generated that number?

17 A (WITNESS KOSTAL) No. As I indicated before, this was
18 a more simplified version of the calculation -- the more
19 exact version of the calculation was the original
20 calculation that was done on 6/1/85 -- as a result of
21 the run on 6/1/85, which did take into account the work
22 point location of the force translated to the centroid
23 of the weld group.

24 Q I see.

1 So now in your revised calculation, the simpler
2 method, the force at Z is simply equal to -- well, is it
3 force of Z divided by A?

4 A (WITNESS KOSTAL) Right.

5 F -- little fz is actually a stress --

6 Q I see.

7 A (WITNESS KOSTAL) -- in the Z axis.

8 Q All right.

9 The same -- similar -- similar principle applies to
10 the calculation of the force at Y --

11 A (WITNESS KOSTAL) Yes, sir.

12 Q -- the next calculation?

13 All right. Now, you didn't recalculate an R
14 value -- or the reviewer didn't recalculate an R value
15 using the revised data.

16 Again, you had already done the calculation; you
17 didn't need to have a new R value.

18 A (WITNESS KOSTAL) We --

19 Q Why didn't the reviewer recalculate the R value?

20 A (WITNESS KOSTAL) We calculated an R value.

21 As indicated in the second to the last line, it was
22 equal to 0.52 in the simplified version.

23 Q I see.

24 You didn't recalculate the R value using the

1 original calculation methodology, the -- involving the
2 translation of coordinates?

3 You did that in your office this morning, though?

4 A (WITNESS KOSTAL) That's correct, I did it for you in
5 my office this morning, and the value came out to be
6 0.528.

7 Q All right, sir.

8 Still less than 9 -- less than .9, still required
9 evaluation?

10 A (WITNESS KOSTAL) Correct.

11 Q All right, sir.

12 MR. GUILD: Mr. Chairman, Mr. Kostal and his
13 people were assembling a package this morning that
14 talked about the computer model, and we did not have
15 time to get through -- get to that or it wasn't
16 available at the time we completed our discussions.

17 It is a topic I'd like to speak to Applicant off
18 the record about, and perhaps return to, but I'm going
19 to pass from that subject at this point with the Board's
20 permission.

21 JUDGE GROSSMAN: Well, okay.

22 Then I have just one or two questions.

23 Back to the response spectra. Did you say that you
24 don't recall at this time what frequency was used with

1 regard to this item?

2 A (WITNESS KOSTAL) The -- what -- the frequency exists
3 within the computer output. It's not normally printed
4 out, because it's automatically taken into account in
5 the analysis.

6 In essence, what takes place within the program,
7 there is a subroutine step which calculates the
8 frequency of the given hanger geometry. Then with that
9 given frequency, it goes to the appropriate spectra
10 curve and takes the appropriate G level from that
11 spectra curve and does the analysis with those
12 particular acceleration levels.

13 We can pull out -- or we can ask the -- for a
14 print-out of that particular value.

15 We didn't do it because we -- it's -- you know,
16 it's normally built in.

17 I would have to go back, put the run in and
18 generate that particular value to know what the exact
19 frequency is of this hanger.

20 JUDGE GROSSMAN: Well, I would like to find
21 out what that figure is, so if you can do that --

22 A (WITNESS KOSTAL) Sure.

23 JUDGE GROSSMAN: -- we'd appreciate it.

24 Now, I take it, then, you used the unique value

1 with regard to that individual item? You did not use
2 any kind of suggested value for that particular item; is
3 that correct?

4 A (WITNESS KOSTAL) A unique value relative to seismic
5 response spectra?

6 JUDGE GROSSMAN: Yes -- well, a unique value
7 for the frequency to which you applied the response
8 spectra.

9 A (WITNESS KOSTAL) The frequency that's calculated is
10 calculated based on the as-designed welds. The
11 frequency is not calculated based on the discrepant weld
12 conditions.

13 So the frequency is the -- in essence, is the
14 frequency that has existed in the -- in the computer
15 runs calculated based on the members being built as
16 exactly as we --

17 JUDGE GROSSMAN: Okay. That's not exactly
18 what I was driving at.

19 It was my recollection, and perhaps erroneous, that
20 there were values that are suggested with regard to
21 frequencies in the Reg Guides for particular kinds of
22 equipment, and my question was whether you used those
23 recommended values, those guideline values, or whether
24 you used a unique value.

1 And I understand you to say you used a unique
2 value?

3 A (WITNESS KOSTAL) No. We used the recommended
4 guideline value; and for cable pan hangers, the
5 guideline recommends 7 percent damping.

6 JUDGE GROSSMAN: Okay.

7 But does it also recommend -- I recall that there
8 are some different damping values.

9 But are there also recommended ranges of frequency
10 for different equipment or not?

11 A (WITNESS KOSTAL) No, no, sir.

12 JUDGE GROSSMAN: No, there aren't. Oh, okay.
13 Mr. Guild.

14 BY MR. GUILD:

15 Q Well, will the frequency of the hanger as built with
16 defective welds be the same as the frequency as designed
17 with the welds assumed to be as specified?

18 A (WITNESS KOSTAL) In order to input the welds, you then
19 have to input the geometry properties at the connection.

20 Our model is based on the properties that this
21 particular connection is a pin connection. The other
22 members, the horizontal members, are fixed connections.

23 In order to take into account --

24 Q Stop one second.

1 "This particular connection" meaning what, the
2 longitudinal --

3 A (WITNESS KOSTA) The longitudinal diagonal brace we've
4 been talking about is a pin connection because it acts
5 as a truss, and truss members are stiffer in the axial
6 direction as compared to the flexural capacities of the
7 vertical member. Therefore, it carries no load and
8 transfers no load. It really acts like a pin, pin
9 meaning transferring no moment.

10 In order to get a frequency -- an exact frequency
11 for this particular hanger, we would have to make a more
12 refined computer model, taking into account the joint
13 stiffness characteristics of each joint and also taking
14 into account the characteristics of these particular
15 discrepancies.

16 In essence, what would happen in this particular
17 detail, since the discrepancy is associated with the
18 size of a weld, you will have a joint that will be less
19 stiff, therefore, more flexible, and you would input
20 that more-flexible condition into this more refined
21 detailed computer analysis.

22 What would basically happen is, since it becomes
23 softer or less stiff, it will pick up less loads than
24 the previous computer run, and it will redistribute the

1 loads to other joints that are stiffer and can carry the
2 load.

3 So what you will get in a more detailed refined
4 analysis is an optimizing of the stresses in all the
5 connections, because the stiffer connections will carry
6 a larger load than the less-stiff connections, just
7 based on purely stiffness characteristics, so what, in
8 essence, will happen is you will show that the stress
9 level in the weld is going to be less than this
10 particular calculation.

11 We have done those calculations in the past, and,
12 in fact, we had done those at Byron in support of my
13 testimony under system control, and we did them on three
14 hangers, taking into account the unique discrepancies
15 that existed on the three worst hangers that we found at
16 Byron.

17 The results of that analysis that were performed
18 showed that --

19 Q Let me stop you right there.

20 How about this, Mr. Kostal: I always ask one more
21 question than you want me to.

22 A (WITNESS KOSTAL) Well, can I finish?

23 Q No, you can't.

24 JUDGE GROSSMAN: Well, I would ordinary let

1 you finish an answer, but that's beyond the response to
2 that question, and --

3 A (WITNESS KOSTAL) Fine.

4 JUDGE GROSSMAN: -- it's just not a fair way
5 of getting in that testimony.

6 MR. GUILD: I'd be happy to have you educate
7 me on what you did on Byron off the record, too, Mr.
8 Kostal, and then perhaps we can talk about that on the
9 record; but that's the protocol.

10 We are going to enter a new section and --

11 A (WITNESS KOSTAL) Fine.

12 JUDGE GROSSMAN: One more question on these
13 items.

14 You indicated that in your recalculation you also
15 took into account the changed location of the item;
16 isn't that correct?

17 A (WITNESS KOSTAL) In the recalculation, we took into
18 account the changed location of the cable pan.

19 One of the cable pans was located differently than
20 in its original location, and that basically moved the
21 note point on the horizontal member from its original
22 location.

23 JUDGE GROSSMAN: Well, did you get an
24 increased or a decreased load from moving that?

1 A (WITNESS KOSTAL) I can't -- I didn't look.

2 Locally what would generally happen -- and I'd have
3 to go into the calculations -- the pan moved slightly to
4 the center, which would mean that you would have locally
5 some changes in the connections, end connections of the
6 horizontal member from which that pan had been located,
7 so there could be -- would be some different stresses in
8 that connection.

9 Exactly how that changed, I would have to look at
10 the two note points to determine what that new stress
11 level is in the end connections.

12 But, also, at the same time, when we did shift the
13 pan location, we also inputted the actual weight of the
14 cable, so that would also, then, modify the end
15 reactions.

16 BY MR. GUILD:

17 Q Well, let me just be clear.

18 If you -- you've got a horizontal member supporting
19 two pans, and it's --

20 A (WITNESS KOSTAL) One pan. That is one pan.

21 Q Okay. Supporting one pan.

22 Then if the pan -- and as the pan is designed, it's
23 supposed to be in the center of the horizontal?

24 A (WITNESS KOSTAL) No. The pan is located in space in

1 some location.

2 Q Wherever it's supposed to be?

3 A (WITNESS KOSTAL) Relative to where it is on the
4 horizontal member of the hanger.

5 Q You've got two welds, a weld at either end of the
6 horizontal.

7 What's the effect on the stress on Weld A at the
8 north side of the horizontal if the -- if the cable pan
9 is closer to Weld A than as designed?

10 A (WITNESS KOSTAL) You would get a greater shear stress
11 on Weld A. If the pan was located closer to Weld A, you
12 would get a slight -- you would get a shifting of shear
13 and moment in each of the joints.

14 Q All right.

15 And less stress on Weld B if Weld B is at the
16 opposite end?

17 A (WITNESS KOSTAL) Further away, yes, sir.

18 MR. GUILD: May I have one moment, please,
19 Mr. Chairman.

20 Mr. Chairman, I've handed to the witness and Board
21 and parties a document that I'd ask be marked as
22 Intervenors' 168, please.

23 (The document was thereupon marked
24 Intervenors' Exhibit No. 168 for

1 identification as of October 16, 1986.)

2 BY MR. GUILD:

3 Q Now, Mr. Kostal, I've handed you a multi-page document.
4 It's Bates No. AR006904 through 09.

5 (Indicating.)

6 These are documents that you had prepared at my
7 request in discovery, and they list the R values and the
8 design margins for the electrical items, the BCAP CSR
9 sample items that Sargent & Lundy evaluated and
10 performed calculations on; correct?

11 A (WITNESS KOSTAL) These are the values I prepared for
12 you at your request when you came into our offices,
13 which formed the basis of my conclusions that are
14 documented in my testimony for each population regarding
15 the lowest design margin remaining and the average
16 design margins in the various populations.

17 Q All right, sir.

18 Well, that I understand; but reflect on my -- the
19 question I asked you, sir.

20 Are these not the R values and design margins
21 calculated for the electrical items in the CSR
22 population that were evaluated by Sargent & Lundy?

23 A (WITNESS KOSTAL) Yes, sir.

24 Q They also happen to be the basis for your testimony?

1 A (WITNESS KOSTAL) Yes, sir.

2 Q All right.

3 The first page is conduit hangers. On to the
4 second page, the third page, is cable pan hangers, as is
5 the fourth and fifth page. The last page is electrical
6 equipment; is that correct?

7 A (WITNESS KOSTAL) Yes, sir.

8 Q All right.

9 We have no cables and we have no conduits.

10 There were no calculations made for those
11 populations?

12 A (WITNESS KOSTAL) No, sir.

13 Q Now, sir, if we turn, please, to Bates No. AR006906, and
14 that is the first page for the cable pan hanger
15 population.

16 Do you see Cable Pan Hanger Sample Item 104?

17 It's the second to the bottom.

18 A (WITNESS KOSTAL) Yes, sir.

19 Q All right, sir.

20 Now, on the basis of your testimony today, you
21 would agree, would you not, that the design margin for
22 104-4, if you used the complete calculational method
23 used in the initial calculation for 104, the 1.89 there
24 should be changed to read 1.28?

1 A (WITNESS KOSTAL) Correct, sir.

2 Q All right, sir.

3 I want to make that change in my exhibit.

4 And that the R value, using the complete
5 calculational method consistent with the original
6 calculation approach, should be increased from .52 to
7 .528, or .53 if you round up to two significant digits;
8 correct?

9 A (WITNESS KOSTAL) Yes, sir.

10 JUDGE GROSSMAN: Excuse me.

11 You say consistent with the original calculation
12 approach?

13 BY MR. GUILD:

14 Q The first calculation done in the calculation package
15 for Cable Pan Hanger 104 that used the two local
16 coordinate systems to translate the load to the work
17 point as opposed to the revised calculation, which used
18 the simplified approach, which did not make that
19 translation?

20 A (WITNESS KOSTAL) May I -- actually, we would not
21 change it at all, because based on that definition, the
22 R value still remains at 0.52 based on the original
23 calculation.

24 Q All right, sir; all right, sir.

1 1.28, though, would be the calculated value for the
2 design margin using the new data but the original
3 calculation method?

4 A (WITNESS KOSTAL) Yes, sir.

5 Q How many other electrical equipment CSR sample items,
6 Mr. Kostal, are there for which you made revised
7 calculations; that is, for which there were original R
8 values or original design margin values that were
9 calculated that are not the values that are shown on
10 Intervenor's Exhibit 168?

11 A (WITNESS KOSTAL) I don't have that data in front of
12 me.

13 I would have to go back and tabulate that number.

14 Q Are there any?

15 A (WITNESS KOSTAL) Well, there was at least one, because
16 we looked at one which was Hanger -- Cable Pan Hanger
17 104.

18 Q All right, sir.

19 You don't know whether there are any others?

20 A (WITNESS KOSTAL) No, sir.

21 Q I may have just shot blind and hit the target on that
22 one.

23 All right, sir. How many are there on this
24 exhibit, Intervenor's 168, where, in the second revised

1 calculation -- or the revised calculation, you used a
2 simplified calculational method that, by analogy to the
3 instance of Cable Pan Hanger 104, produced a value that
4 is higher than the value that would be produced if you
5 used the complete calculational method utilized in the
6 original calculation?

7 A (WITNESS KOSTAL) Again, I don't have that data with
8 me.

9 Q All right, sir.

10 Are there any others aside from Cable Pan Hanger
11 104?

12 A (WITNESS KOSTAL) I would have to look through the
13 data.

14 Q All right, sir.

15 MR. GUILD: Mr. Chairman, I'd ask that
16 Intervenor's Exhibit 168 be received into evidence.

17 JUDGE GROSSMAN: Any objections?

18 MR. STEPTOE: No objection.

19 MR. BERRY: No objection.

20 JUDGE GROSSMAN: Received.

21 (The document was there received into
22 evidence as Intervenor's Exhibit No.
23 168.)

24 JUDGE GROSSMAN: Whenever you want to go on

1 to a new topic, it's time for lunch.

2 MR. GUILD: I believe it's appropriate for a
3 luncheon break at this point in time, Mr. Chairman.

4 JUDGE GROSSMAN: Okay.

5 Why don't we reconvene, then, at 1:45.

6 (WHEREUPON, the hearing was continued to
7 the hour of 1:45 P. M.)
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1 UNITED STATES OF AMERICA
2 NUCLEAR REGULATORY COMMISSION
3 BEFORE THE ATOMIC SAFETY AND LICENSING BOARD
4

5 -----X
6 In the Matter of: :
7 COMMONWEALTH EDISON COMPANY : Docket No. 50-456 OL
8 (Braidwood Station, Units 1 : 50-457 OL
9 and 2) :
10 -----X

11 Met pursuant to recess.

12 Thursday, October 16, 1986.
13 1:45 P. M.

14 JUDGE GROSSMAN: We're back in session.

15 Mr. Guild.

16 MR. GUILD: Thank you, Mr. Chairman.

17 BY MR. GUILD:

18 Q Now, Mr. Kostal --

19 JUDGE GROSSMAN: Before we start -- okay,
20 fine.

21 BY MR. GUILD:

22 Q Mr. Kostal, I had asked you earlier about Sargent &
23 Lundy's role in supplying the lists of
24 more-highly-stressed components for the BCAP sample
selection process, and you were kind enough this morning

1 to make available to me a list of the items from the
2 populations in which you identified more-highly-stressed
3 items, lists of those items to represent items
4 identified by Sargent & Lundy, items supplied to the
5 BCAP Task Force, and I'd like to show you some of those
6 lists and ask if you can explain a little bit about
7 them, please.

8 Let's start with a list of cable pan hangers, if I
9 might, and let me see if I can round up enough copies
10 for the Board and parties.

11 Do you need a copy, Mr. Kostal?

12 A (WITNESS KOSTAL) Yes, sir.

13 Q Okay.

14 (Indicating.)

15 MR. GUILD: It looks like it's Intervenors'
16 179, Mr. Chairman, if my notes --

17 JUDGE COLE: 169.

18 JUDGE GROSSMAN: 169.

19 MR. GUILD: I'm sorry. 169.

20 Excuse me.

21 (The document was thereupon marked
22 Intervenors' Exhibit No. 169 for
23 identification as of October 16, 1986.)

24 BY MR. GUILD:

1 Q All right, sir.

2 Now, I take it this document was prepared in
3 response to a request that I made?

4 It's a newly-created listing, is it not?

5 A (WITNESS KOSTAL) Yes, sir.

6 Q All right.

7 The left-hand column, I take it, is the CSR package
8 identification number?

9 A (WITNESS KOSTAL) Yes, sir.

10 Q The next column is the support number.

11 That's the number that's used to identify the
12 hanger on the Sargent & Lundy drawings?

13 A (WITNESS KOSTAL) Yes, sir.

14 Q Then there is the drawing number, the -- from which
15 the -- on which the hanger is shown.

16 Then there are a series of columns, one headed
17 "Byron," the last "Braidwood." In the "Bryon" column is
18 "HS IC" and "Current IC."

19 What are the data in the Byron column, the first
20 Byron column?

21 A (WITNESS KOSTAL) This data represents the interaction
22 coefficients from the list of highly-stressed that was
23 based on the data base of more-highly-stressed in the
24 cable pan hanger population which has in the past

1 referred to the number of 1,433 hangers.

2 These are the interaction coefficients that existed
3 in that point in time at which the -- the point in time
4 at which this particular list was created, which was a
5 Byron list of hangers which were in the process of
6 further analysis, and these are those interaction values
7 on these particular hangers that became part of the BCAP
8 sample.

9 Q All right.

10 Now, that was the list that was used for the
11 selection of Braidwood CSR highly-stressed sample items?

12 A (WITNESS KOSTAL) That's correct.

13 Q All right.

14 Now, what was the threshold value that was used to
15 derive a list of Braidwood -- Byron highly-stressed
16 items?

17 A (WITNESS KOSTAL) The threshold value was supposed to
18 be .8.

19 Q Again, the interaction coefficient here is the
20 reciprocal of the design or safety margin?

21 A (WITNESS KOSTAL) That's correct.

22 Q All right.

23 So a value of greater than .8 reflects a higher
24 level of stress relative to the allowable stress for the

1 particular component?

2 A (WITNESS KOSTAL) That's correct.

3 Q All right.

4 And 1 -- a value of 1 for the interaction
5 coefficient reflects a value of stress equal to the
6 design allowable?

7 A (WITNESS KOSTAL) That's correct.

8 Q Above 1, exceeding the design allowable?

9 A (WITNESS KOSTAL) That's correct.

10 Q All right, sir.

11 Now, are there values in here -- are there items in
12 here with interaction coefficient values of lower than
13 .8?

14 A (WITNESS KOSTAL) There are a few.

15 Q All right.

16 And let's -- the first I notice is for 042, about
17 two-thirds of the way down in the first page.

18 Do you know why that particular hanger was included
19 in the more-highly-stressed list despite that lower
20 value?

21 A (WITNESS KOSTAL) At the point in time, I do not know
22 why this one was -- I do know why it was chosen.

23 We had a list of 1,433, which was the list that
24 existed at Byron, of more -- of hangers that were being

1 evaluated at Byron, and that list represented hangers
2 which were believed to be .8 or greater -- .8 or greater
3 interaction values.

4 Q Now, let me stop you a second.

5 That list of 1,433 you believed, using this
6 measure, to represent those hangers with interaction
7 coefficients of .8 or higher?

8 A (WITNESS KOSTAL) Right.

9 Q All right, sir.

10 A (WITNESS KOSTAL) In looking at this list, there are a
11 few.

12 016, which is the fifth line down, has a .53
13 interaction.

14 Q Yes, I just missed that one.

15 A (WITNESS KOSTAL) 042 has a .74 interaction; and there
16 is -- on the third page, 141 has an interaction of .59;
17 and there is another one on the -- on the fourth page
18 which has a value of .45 for 164.

19 Q 164 or 5?

20 A (WITNESS KOSTAL) 165. Excuse me.

21 Q Yes.

22 And, again, do you know why those items with lower
23 interaction coefficients than .8 were included in the
24 list of more-highly-stressed cable pan hangers?

1 A (WITNESS KOSTAL) Again, they were on the list of
2 hangers; this 1,433 at that point in time we believed
3 had interaction values greater than .8.

4 Q Well, now, as I understand it, you reconstructed this
5 list in the present time; correct?

6 A (WITNESS KOSTAL) That's correct.

7 Q Because you didn't retain the data from the original
8 list when it was sent over; it was just sorted and sent
9 over without the values for interaction coefficients
10 being retained, I take it?

11 A (WITNESS KOSTAL) No. We do have a list of interaction
12 coefficients associated with this 1,433.

13 Q You have the original basis interaction coefficients
14 that you --

15 A (WITNESS KOSTAL) Yes, sir.

16 Q Oh, you do?

17 A (WITNESS KOSTAL) Yes, sir.

18 Q Oh, is that what this list is?

19 A (WITNESS KOSTAL) This is an extract from it of the
20 ones that are in question, which you asked for, which is
21 the 68 that were in the population inspected by BCAP for
22 the cable pan hanger.

23 Q Indeed.

24 So it's not a reconstituted list? This is the

1 original list, original interaction coefficients;
2 correct?

3 A (WITNESS KOSTAL) Yes.

4 Q Now, then, I was, I guess, surmising about an
5 explanation for why these 4 items with lower than .8
6 interaction coefficients might be on a list today if it
7 was a reconstituted list, but it was the same list you
8 had when you went over the BCAP.

9 Presuming those same items had at that time the
10 same interaction coefficient, why did you send them ones
11 with less than .8?

12 A (WITNESS KOSTAL) My only explanation is there were a
13 few that were less than .8.

14 The original intent of BCAP was to sample at least
15 60 highly-stressed, and excluding these few, we did,
16 indeed, sample 60 highly-stressed.

17 Q All right.

18 I can count as well, too. I accept that's true.

19 But we just don't know why they are on the list?

20 A (WITNESS KOSTAL) That's correct, sir.

21 Q Okay.

22 Now, as I gather from your testimony and from the
23 testimony of others in this part of the proceeding,
24 Applicant's rebuttal case, the design of the use of

1 more-highly-stressed sample items was to test items in
2 the field whose design margins at the outset were
3 smaller, where discrepancies might be presumed to have a
4 more -- a higher likelihood of having a significant
5 effect, from a design standpoint, on the ability of that
6 item to perform its function in service?

7 A (WITNESS KOSTAL) That's correct.

8 Q All right.

9 Well, bear with me a moment, Mr. Kostal.

10 If you would look at Intervenors' Exhibit 168 --
11 that's your listing of the R values and design margins
12 for the BCAP discrepancies evaluated -- and help me a
13 moment.

14 Let's take -- do you have that document, sir?

15 A (WITNESS KOSTAL) Well, I've got to find it. Hold on
16 for a second.

17 Yes, sir.

18 Q Do you need a copy?

19 A (WITNESS KOSTAL) No, sir.

20 Q You've got one?

21 A (WITNESS KOSTAL) Yes, sir.

22 Q All right.

23 If you turn to the cable pan hanger population in
24 that document, and let's look first at Sample Item 41,

1 please.

2 A (WITNESS KOSTAL) Yes, sir.

3 Q Okay.

4 For Sample Cable Pan Hanger 41, I see an R value of
5 .53 and a design margin of 66.7.

6 A (WITNESS KOSTAL) Yes, sir.

7 Q All right, sir.

8 That's 66.7 times the design requirements for that
9 particular hanger, even after the notable defect?

10 A (WITNESS KOSTAL) Not the particular hanger. It's the
11 particular -- the most notable discrepancy, which was
12 the discrepancy who had an R value of .53, and this is
13 the associated safety margin for that particular
14 discrepancy.

15 Q Oh, I see. All right.

16 Well, so it doesn't relate to the hanger as a
17 whole, it relates to the particular discrepancy on the
18 hanger?

19 A (WITNESS KOSTAL) That's correct.

20 Q All right.

21 Well, let's look at that same sample item in your
22 list of more-highly-stressed cable pan hangers.

23 Now, for 041, for 41, I see a Byron highly-stressed
24 interaction coefficient of 2.10; is that correct?

1 A (WITNESS KOSTAL) At the point in time when this was
2 created, that's correct, that particular hanger had a
3 connection which had an interaction value of greater
4 than 2.1.

5 Q Well, it had a connection with an interaction value of
6 greater than 2.1, not the whole hanger?

7 A (WITNESS KOSTAL) It had a given element within that
8 hanger which had a connection equal to 2.1.

9 Q Okay.

10 And what element was that?

11 A (WITNESS KOSTAL) One of the elements within the
12 hanger. I don't know which element that is.

13 Q All right.

14 So one of more than one connections; is that the --

15 A (WITNESS KOSTAL) This list was created based on the
16 interaction -- the highest interaction value that
17 existed on some portion of the component of the hanger
18 that were being evaluated, so this reflects the
19 highly-stressed interaction coefficient of the -- of one
20 element of that hanger.

21 Q Oh, I see.

22 So that the CSR discrepancy does not necessarily
23 occur at the same connection of the component that was
24 the connection analyzed for purposes of declaring the

1 component more highly stressed?

2 A (WITNESS KOSTAL) That's correct.

3 We used -- in a hanger, you have multiple
4 connections. Therefore, you have multiple analysis and
5 you have multiple design margins or interaction
6 coefficients.

7 Q All right, sir.

8 A (WITNESS KOSTAL) We characterized the hanger as highly
9 stressed if, in fact, there was a given joint or
10 connection that had an interaction value that exceeded
11 the value of .8.

12 Q Well, then, sir, this particular connection, the
13 particular connection in which there was a defect --
14 that particular connection was obviously not more highly
15 stressed, because even after a reduction in its capacity
16 of almost a half, 47 percent, it's got 66.7 percent --
17 66.7 times the design requirements at that particular
18 connection?

19 A (WITNESS KOSTAL) That's correct.

20 Q Well, what would happen, Mr. Kostal, if the BCAP
21 discrepancy, the R value, the reduction in capacity of
22 almost 50 percent, occurred at the point on this
23 particular hanger where it had the more-highly-stressed
24 connection, and that was the connection with, at least

1 for screening purposes, an interaction coefficient of
2 2.10?

3 A (WITNESS KOSTAL) We would have to do an analysis to
4 determine what the new interaction value was on the
5 Braidwood-unique hanger.

6 Q I see.

7 So for purposes of providing more-highly-stressed
8 items for the BCAP sample, the likelihood of a defect
9 adversely affecting the design margin of the component
10 is also a function of whether the defect occurred at the
11 particular connection in the component that was the
12 basis for selecting that component as more highly
13 stressed in the first instance?

14 A (WITNESS KOSTAL) State that question again.

15 MR. GUILD: Could I have it read back?

16 JUDGE GROSSMAN: Yes. Mr. Reporter, please.

17 (The question was thereupon read by the
18 Reporter.)

19 A (WITNESS KOSTAL) That's correct.

20 BY MR. GUILD:

21 Q So it's a joint probability function here? It's not a
22 sample probability of the occurrence of a defect; it's a
23 probability of the occurrence of the defect and then a
24 probability of the occurrence of the defect at the weak

1 link, at the point that's the basis for the
2 more-highly-stressed identification?

3 A (WITNESS KOSTAL) No. The basis for the
4 more-highly-stressed identification was based on hangers
5 that existed at a point in time in -- at Byron, which
6 were under further evaluation, which were further along
7 in their design and assessment than Braidwood was.

8 Q Now, you are --

9 A (WITNESS KOSTAL) That particular --

10 Q I don't think you are responding to my question.

11 A (WITNESS KOSTAL) I am.

12 Q It's a function, first, of where the defect happened and
13 the probability of the defect?

14 A (WITNESS KOSTAL) No, that's not how we chose the
15 sample of highly stressed.

16 We chose the sample of highly stressed based on the
17 hangers that had joints whose interaction coefficient
18 exceeded .8.

19 Q You are still missing me here.

20 I think what I am trying to focus on, Mr. Kostal,
21 is not how you picked the more highly stressed. I think
22 I've got that clear now.

23 The question is:

24 When you couple your selection of more highly

1 stressed, as you now describe the way you sampled more
2 highly stressed, with the BCAP discrepancy, what was
3 found, and the way you evaluated those discrepancies,
4 the likelihood of a discrepancy having design
5 significance is a joint probability function? The
6 function in the first instance is the probability of the
7 defect occurring and in the second instance the
8 probability of the defect occurring at the point of the
9 more-highly-stressed connection?

10 A (WITNESS KOSTAL) That's true.

11 The results of BCAP program demonstrated that for
12 highly-stressed connections, the level of the
13 discrepancy found was assessed, and determined in those
14 particular connections not to -- were determined to show
15 that the results of those discrepancies in the
16 highly-stressed joints still resulted in the joint being
17 within the code allowable.

18 Q All right, sir.

19 Well, let's take cable pan hangers as a population
20 now.

21 In how many instances did the defect, the notable
22 defect, that was subject to evaluation occur at the
23 connection which was the basis for selecting the item as
24 a more-highly-stressed sample item, if any?

1 A (WITNESS KOSTAL) I don't have that data.

2 Q Do you know if it happened at all?

3 A (WITNESS KOSTAL) We -- I don't have -- I'd have to
4 look at the population in the data base.

5 (Indicating.)

6 JUDGE GROSSMAN: Excuse me.

7 How many connections are there usually in the cable
8 pan hanger?

9 A (WITNESS KOSTAL) Well, in a -- in a -- in the hanger
10 that we discussed this morning, there are -- which is
11 Hanger 104, there are -- there are 10 horizontal
12 connections, there are 4 vertical connections and there
13 are 4 diagonal connections, so in terms of total
14 connections, there were 10, 12, 14, 16, 18; and in each
15 connection, you have different stress planes for
16 transferring the load through the connection, so there
17 were, you know, a multiple of the number of connections
18 in terms of the number of evaluations that were
19 performed.

20 JUDGE GROSSMAN: So do I understand, then,
21 correctly that the odds are at least 17 to 1 against the
22 highly-stressed connection, on which you base your
23 selection, being the one that has the defect?

24 A (WITNESS KOSTAL) In that particular example, that's

1 correct.

2 But in another example, which is a cable pan
3 hanger, which is a cantilever off of a wall, there is
4 only one connection.

5 BY MR. GUILD:

6 Q Okay.

7 Now, going back to Intervenors' Exhibit 169 --
8 that's your list of more-highly-stressed cable pan
9 hangers -- the screening basis for this selection, the
10 Byron highly-stressed interaction coefficients, does not
11 represent the final calculated interaction coefficient
12 for those items?

13 A (WITNESS KOSTAL) They represented the -- that's
14 correct. They represented the interaction coefficient
15 for those items at that point in time.

16 Q I see.

17 Now, under the Byron column in Intervenors' 169,
18 we've got current interaction coefficient.

19 I take it that's the current Byron?

20 A (WITNESS KOSTAL) That's correct. That's the
21 calculations that exist on Byron today of the
22 interaction coefficients on those particular hangers.

23 Q And for Cable Pan Hanger 41, the sampled so-called
24 more-highly-stressed cable pan hanger, the basis for

1 identifying as more highly stressed -- that is, that it
2 had an interaction coefficient of greater than .8 -- no
3 longer would qualify that item as a more-highly-stressed
4 item, since, for Byron purposes, the current interaction
5 coefficient was calculated to be .53?

6 A (WITNESS KOSTAL) That's correct.

7 Maybe if I can clarify --

8 Q Well, let me just round this out and then I'd be happy
9 to have you explain.

10 And yet for Braidwood, if you used the current
11 Braidwood interaction coefficient for that particular
12 cable pan hanger, it's .98?

13 A (WITNESS KOSTAL) That's correct.

14 Q All right, sir.

15 Do you want to add something?

16 A (WITNESS KOSTAL) What I wanted to add was the fact
17 that the process in time is a fluid process for the
18 analysis of these hangers.

19 There are many analyses on a given hanger, based on
20 changes in conditions on the hanger, which could be as a
21 result of as-building the hanger. It could be as a
22 result of a field problem that was determined to exist
23 on the hanger. It could be as a result of additional
24 loads applied to the hanger. So the hangers in the
25 analysis are updated and kept track of over time.

1 So at any point in time, the list of
2 highly-stressed hangers or the state of stress that
3 exists in any given hanger is fluid; it will change,
4 depending on the loads that exist on that hanger today
5 versus the conditions that exist on the hanger.

6 If we look back at the time of Byron when we
7 created this list, it was based on conditions that
8 existed in the 1984 time frame. We now have a set of
9 conditions that exist in the current interaction
10 coefficients based on the 1986 time frame, almost two
11 and a half years later. Things have occurred to these
12 hangers over that two and a half years.

13 Our responsibility is to keep track of those and
14 make sure that those calculations are updated and stay
15 condition code allowables or else repair the given
16 hanger such that we stay within the code allowables.

17 Q And looking at just the first page of Intervenor's
18 Exhibit 169, I count 19 items on that page. These again
19 are 19 items that became more-highly-stressed sample
20 items out of BCAP.

21 Would you agree with me, sir, that looking at the
22 last column, the current Braidwood interaction
23 coefficients, that only 10 of those 19 still even meet
24 your screening threshold of .80 or higher interaction
25 coefficient to be qualified as a more-highly-stressed

1 sample item?

2 A (WITNESS KOSTAL) At this point in time, if we were
3 creating a list of hangers to inspect and using the same
4 threshold of .8, we would have only 10 hangers that now
5 meet that threshold.

6 Q And would you expect that that relationship would remain
7 generally the same: that a smaller number, fewer than
8 originally identified through the rest of the
9 population, would still qualify as more-highly-stressed
10 after you iterated through the current interaction
11 coefficient calculation?

12 A (WITNESS KOSTAL) What we would have is a different
13 list of hangers because as the hangers change over time
14 and loads are applied to them, different hangers will
15 replace these as being more-highly-stressed.

16 Q But those different ones are not on the list, and they
17 weren't part of the BCAP sample?

18 A (WITNESS KOSTAL) That's correct.

19 Q My question is: Would you expect that the relationship
20 would remain the same through the rest of the
21 population?

22 A (WITNESS KOSTAL) The relationship of this population?

23 Q 10 of 19 on Page 1 would still meet the screening
24 criteria.

25 Would you expect that that would represent t'e

1 relationship if we went through the rest of the cable
2 pan hanger population and counted them up?

3 A (WITNESS KOSTAL) Well, it's 13 on the next page, and
4 it's 13 on the next page, and it's 7 out of 11 on the
5 last page.

6 Q All right, sir.

7 I take it that -- well, strike that. Let's look at
8 one other item, Mr. Kostal.

9 JUDGE GROSSMAN: Are we going off this
10 exhibit now?

11 MR. GUILD: No, sir, no, sir. One other
12 example I'm going to look at, if I might.

13 BY MR. GUILD:

14 Q Let's look at your Intervenors' Exhibit 168, the BCAP
15 result; again, the R value and the safety margin
16 calculation. Let's look at it for Cable Pan Hanger 123,
17 please.

18 I show at that point, for Cable Pan Hanger 123,
19 that the R value, the capacity reduction, is .63, and
20 the design margin was 1.5; correct?

21 A (WITNESS KOSTAL) That's correct. That's based on any
22 given joint within that particular hanger.

23 Q All right.

24 The same principle applies to that item as it did
25 to the last one that you've described?

1 A (WITNESS KOSTAL) That's correct.

2 Q Okay.

3 Now, looking at Intervenors' Exhibit 169 for that
4 same item, that item, using the Byron highly-stressed
5 interaction coefficient screening, had an interaction
6 coefficient of 2.13; correct?

7 A (WITNESS KOSTAL) Yes, sir.

8 Q All right.

9 It has a current Braidwood interaction coefficient
10 of 1.0?

11 A (WITNESS KOSTAL) Yes, sir.

12 Q Now, would you expect that the same principles apply to
13 all the items in the population; the more-highly-
14 stressed selection is based on the weakest link, if you
15 will, the most highly-stressed connection at the time
16 that evaluation is made?

17 A (WITNESS KOSTAL) At the time that sample was chosen,
18 yes.

19 Q At the time the evaluation was made, given the
20 methodology and assumptions made at the time of the
21 evaluation; loadings, et cetera?

22 A (WITNESS KOSTAL) Yes, sir.

23 Q All right.

24 And the BCAP CSR discrepancy that's evaluated for
25 design significance, capacity reduction, is only by

1 coincidence the same connection that got the item, the
2 hanger, into the more-highly-stressed sample in the
3 first instance?

4 A (WITNESS KOSTAL) It's not by coincidence. It's by
5 choice.

6 Q By chance?

7 They're not necessarily the same connections at
8 all?

9 A (WITNESS KOSTAL) What it represents is the fact that
10 when we do the analysis on the connections and if there
11 are discrepancies on it, the discrepancy then determines
12 what becomes the more-highly-stressed connection.

13 Q All right, sir.

14 The fact remains, though, that the BCAP
15 discrepancies don't occur at the same connection that
16 was the basis for the sample item being identified as
17 more-highly-stressed?

18 A (WITNESS KOSTAL) They may not.

19 Q They may?

20 A (WITNESS KOSTAL) They may.

21 Q Now, does that same principle apply to the other
22 populations for which you supplied lists of more-highly-
23 stressed items?

24 We've talked about cable pan hangers.

25 Now, if we move to the other populations --

1 A (WITNESS KOSTAL) The principle isn't the same in the
2 others because of the fact that the number of
3 connections that could exist are fewer.

4 For example, in the cable pan population, there are
5 only two locations where connections occur, and that's
6 where the pan is tied down to the horizontal member.

7 In a conduit hanger, the number of connections is
8 limited because normally conduit hangers are cantilever
9 members supported off walls or floors where you have
10 single welds, single connections.

11 Q The principle doesn't apply at all, so let's just talk
12 about this other population.

13 A (WITNESS KOSTAL) Sure.

14 Q You don't analyze it on the basis of the weakest
15 connection for conduit hangers; you use another approach
16 altogether. That's the approach you described the other
17 day:

18 You compare the actual weight load on the hanger
19 with the maximum allowable, and the relationship between
20 the two is used to derive a ratio which is the screening
21 factor?

22 A (WITNESS KOSTAL) That's correct, sir.

23 Q All right, sir.

24 JUDGE GROSSMAN: Excuse me.

25 Are you off 169 now?

1 MR. GUILD: Yes, sir.

2 JUDGE GROSSMAN: Were these original values
3 for Byron based on the as-built condition of those items
4 including the discrepant condition?

5 WITNESS KOSTAL: Some of them are. I can't
6 speak to each item, but what it represented at that
7 point in time was those hangers that we knew required
8 additional analysis to reconcile whatever had occurred
9 on that hanger.

10 A number of them were due to as-built conditions
11 and could in some way have been due to increased loads
12 because they attached more things to the hangers.

13 JUDGE GROSSMAN: Well, weren't all of these
14 items subject to rework?

15 WITNESS KOSTAL: No, sir. They're subject to
16 at least re-analysis to determine what the interaction
17 value is.

18 In some cases, rework could have been recommended.
19 In other cases, the re-analysis, refined analysis,
20 resulted in the interaction coefficients being less than
21 .1.

22 So it could be either one.

23 JUDGE GROSSMAN: Okay.

24 But the analysis depended upon the discrepant
25 condition?

1 WITNESS KOSTAL: Yes, sir.

2 JUDGE GROSSMAN: Okay.

3 Now, I notice that --

4 MR. GUILD: Mr. Chairman, excuse me. I don't
5 think that's correct.

6 BY MR. GUILD:

7 Q The Byron analysis is simply a design evaluation of
8 these hangers.

9 I don't believe it includes any discrepant
10 conditions, does it?

11 A (WITNESS KOSTAL) It included -- if there were
12 discrepant conditions, it included those as being the
13 reason for the interaction values to be at this level.

14 Q For Byron?

15 A (WITNESS KOSTAL) Sure.

16 The whole basis for this was we had a population of
17 hangers that we were reconciling for various reasons:
18 either they had outstanding nonconformances associated
19 with them that we had to do an analysis for, meaning
20 they had some type of field problem, or they had an
21 as-built drawing associated with them that we had to
22 still reconcile, or they may have had an additional
23 load.

24 That's what --

25 MR. GUILD: I apologize for interrupting, Mr.

1 Chairman. I really didn't understand that to be the
2 case at all. Excuse me.

3 JUDGE GROSSMAN: Well, now, it seems to me,
4 from looking at this list, that a great number must have
5 been subject to rework.

6 Is that your understanding, too?

7 Let me point out to you that except for one
8 instance -- and that is, with regard to Item 141 --
9 every single item here, unless I missed some, had
10 considerably lower values for the current than for the
11 initial determination. In that one exception, there was
12 a very slight increase from .59 to .60.

13 It would seem to me that a repair or rework of a
14 discrepant condition could very well account for all or
15 almost all of that because the magnitude of change was
16 so great in almost every single instance that I would
17 jump to that conclusion.

18 Is that unfounded, Mr. Kostal?

19 WITNESS KOSTAL: I believe, sir, that a
20 majority -- that a large -- I'd have to validate it, but
21 many of these were dispositioned through analysis.
22 Whether or not repairs were required on these particular
23 hangers, I do not know that at this moment.

24 But given the margins that are in our hanger
25 designs, I believe that many of these would have been

1 dispositioned by a further refined analysis.

2 It, in essence, would show that -- the refined
3 analysis would show that there are substantial margins
4 in the refined analysis technique.

5 JUDGE GROSSMAN: I see.

6 But if you were to eliminate the discrepant
7 condition existing in all of these items here, you would
8 expect, wouldn't you, that every single one of these
9 items would reflect a much lower value than the original
10 value shown here for Byron?

11 Is that so?

12 WITNESS KOSTAL: Yes, sir.

13 JUDGE GROSSMAN: Okay.

14 BY MR. GUILD:

15 Q So, Mr. Kostal, the screening basis for more-highly-
16 stressed items was not simply whether the item as
17 designed, because of its design, was closer to the
18 margin, closer to the design allowable.

19 The screening device was given the chance of a
20 defect occurring in that item as built at Byron, how
21 close that item with that defect came to the design
22 allowable?

23 A (WITNESS KOSTAL) I didn't say that.

24 I said that some of these could have had that as a
25 reason for being in this population, amongst many of the

1 other reasons.

2 Q All right, sir.

3 But these represented the as-built conditions for
4 the Byron hangers, with all of the flaws that may or may
5 not have existed in those hangers?

6 A (WITNESS KOSTAL) No. They represented the interaction
7 values at a point in time at which a particular analysis
8 existed, and that additional further analysis was still
9 required.

10 Q But it would have included the as-built condition of
11 some of those hangers?

12 A (WITNESS KOSTAL) It may have.

13 You asked me what could have been the reason for
14 these existing in this fashion, and I gave you a
15 multitude of reasons why I thought that could exist for
16 these values.

17 One of those was NCR's that were being
18 dispositioned, one of those was additional loads, and a
19 variety of other reasons.

20 Q All right, sir.

21 Well, don't you recognize, Mr. Kostal, that by
22 injecting the element of defective construction into
23 your screen for more-highly-stressed components, you
24 insert yet another multiple or joint probability -- that
25 is, the likelihood that there was defective construction

1 at Byron -- to determine whether or not a sample item,
2 in turn, got picked to be reviewed at Braidwood?

3 A (WITNESS KOSTAL) I didn't characterize it as
4 "defective construction." I characterized it as a
5 condition that could exist at Byron. It could just be a
6 different as-built condition.

7 Q It could be also a defect in welding, for example?

8 A (WITNESS KOSTAL) It could possibly be.

9 Q All right, sir.

10 JUDGE GROSSMAN: Excuse me, but I think we
11 could make a further generalization than that.

12 Each one of these items was re-evaluated, Mr.
13 Kostal; isn't that so?

14 WITNESS KOSTAL: Yes, sir.

15 Part of our commitment is to review each hanger and
16 to assure that each hanger, when construction is
17 complete and prior to fuel load -- that the interaction
18 coefficient is within code.

19 So we have to do an additional analysis to complete
20 the cycle to show that all connections on all hangers
21 meet the code requirements.

22 JUDGE GROSSMAN: Even those hangers in which
23 no discrepancies have been observed?

24 WITNESS KOSTAL: If no discrepancies are
25 observed, there would have been a calculation already in

1 existence that would have dispositioned that hanger at
2 some previous point in time.

3 JUDGE GROSSMAN: And so you wouldn't have an
4 initial calculation and then a recalculation, would you?

5 WITNESS KOSTAL: These hangers have all gone
6 through more than one cycle of -- I believe that these
7 hangers have all gone through more than one cycle of
8 analysis primarily because the original calculations for
9 these hangers were performed in the late '70s.

10 We were constructing the plant over a period of
11 years, and various conditions occurred to the hangers
12 over a period of years. So there are subsequent
13 analyses that exist on these hangers.

14 JUDGE GROSSMAN: Well, when you have your
15 initial value for the initial Byron value here, you're
16 not talking about a 1970s figure, are you?

17 You're talking about a figure that you used at the
18 time you ran the Braidwood CSR review; isn't that so?

19 WITNESS KOSTAL: These were the calculations
20 that existed at Byron. Some of those calculations could
21 have been calculations that were, let's say, made much
22 earlier in the time frame. We may have received them
23 just recently, meaning "recently" in the time frame of
24 '84, that needed to have an additional calculation made
25 on them.

1 JUDGE GROSSMAN: Okay, but the point is: You
2 were using the 1984 values, whether or not they were
3 originally calculated in the 1970s?

4 WITNESS KOSTAL: That's correct.

5 JUDGE GROSSMAN: And that's shown on that
6 first column, "HS IC"; isn't that so?

7 WITNESS KOSTAL: That's correct.

8 JUDGE GROSSMAN: Now, to the extent that you
9 had an item that did not have some discrepant condition
10 that required a recalculation, you wouldn't have made a
11 recalculation on that item, would you?

12 WITNESS KOSTAL: We could have made a
13 recalculation on the item because additional loads were
14 being added.

15 One of the ongoing processes is the addition, for
16 example, of cables into cable pans. That report I
17 mentioned earlier, the CIS-4, which is the Cable
18 Information System report, tracks the routing of cables
19 and pans and the change in load at node points along the
20 cable.

21 That tracking is updated on a regular basis, and we
22 assess the impact of changes in loads at given points in
23 the cable pans as they associate with hangers.

24 So if we had routed, let's say, a hanger that was
25 previously analyzed and found to have an interaction

1 value less than .1 and now we route in a given cable pan
2 an additional amount of load or we attach to that
3 hanger, let's say, a piece of lighting -- maybe we want
4 to attach lighting -- we would go back and, at that
5 point in time, assess those changes in load on that
6 particular hanger and perform another analysis.

7 JUDGE GROSSMAN: So it's possible that you
8 covered some subsequent occurrence which would require
9 you to recalculate; is that what you're telling me?

10 WITNESS KOSTAL: Yes, sir.

11 JUDGE GROSSMAN: But assuming that the item
12 was not changed at all or the loads were not changed on
13 an item or there was no discrepant condition, there
14 would ordinarily not be the obligation to re-evaluate?

15 WITNESS KOSTAL: That's correct.

16 JUDGE GROSSMAN: So what we're talking about
17 here are basically anomalous situations or -- I'm not
18 sure "anomalous" is a correct word, but not the norm.

19 These are situations in which there was some
20 condition that required re-analysis, a change or a
21 discrepant condition; is that so?

22 WITNESS KOSTAL: It could be it required a
23 change because either additional loads occurred or any
24 of those other factors.

25 What it did represent, at that point in time, was a

1 known population of hangers that were indeed highly-
2 stressed at Byron.

3 Given that as being a known large quantity of
4 hangers that were highly-stressed, that was the basis
5 for the choice for the sampling at Braidwood, because we
6 hadn't been that far along in the Braidwood cycle.

7 We hadn't finished routing, let's say, all the
8 unique cables at Braidwood. We hadn't finished adding
9 additional loads for a variety of -- whatever could be
10 added to it.

11 So we didn't necessarily have a set of highly-
12 stressed which reflected an almost as-completed plant.

13 JUDGE GROSSMAN: Mr. Guild?

14 MR. GUILD: Thank you, Mr. Chairman.

15 BY MR. GUILD:

16 Q Let's talk about conduit hangers. Let's approach that
17 subject, Mr. Kostal. All right, sir.

18 This is a list again prepared by you in response to
19 a request I made, identified "Conduit Hangers More
20 Highly Stressed.

21 (Indicating.)

22 MR. GUILD: Mr. Chairman, I ask this be
23 marked as Intervenors' Exhibit 170.

24 (The document was thereupon marked
25 Intervenors' Exhibit No. 170 for

1 identification as of October 16, 1986.)

2 BY MR. GUILD:

3 Q Now, indeed, as you've testified, the conduit hanger
4 more-highly-stressed items were selected in a fashion
5 that is different from the way you selected cable pan
6 hangers.

7 These items were selected on the basis of the
8 comparison of the allowable weight loading on the hanger
9 compared to the then-projected actual weight.

10 A percentage was computed, and you used that
11 percentage to screen for more-highly-stressed conduit
12 hangers; correct?

13 A (WITNESS KOSTAL) Yes, sir.

14 Q And what was the threshold for identification of a
15 conduit hanger as more-highly-stressed for this purpose?

16 A (WITNESS KOSTAL) 70 percent.

17 Q All right. Now, the percent figure is shown in the
18 second column from the right.

19 It is a comparison of the actual weight, as then
20 projected at the time you made this selection, to the
21 maximum allowable weight, correct, the first two
22 columns?

23 A (WITNESS KOSTAL) Yes, sir.

24 Q But there may be further evaluations performed with
25 regard to the particular conduit hanger.

1 I take it the projected loading may change, and
2 that may be the basis for a changed value in the far
3 right column, "Current Weight"?

4 A (WITNESS KOSTAL) That's correct.

5 Q And in the instances where the percent of maximum
6 allowable exceeds 100, I note by your asterisk that you
7 had to perform unique calculations?

8 A (WITNESS KOSTAL) Yes, sir.

9 Q All right.

10 Now, if you turn to Intervenor's Exhibit 168, the
11 first page is the BCAP results, the notable
12 discrepancies that were subject to Sargent & Lundy's
13 evaluation in the conduit hanger population.

14 At the bottom of the page, you note "average design
15 margin 9.90; say, 900 percent of design margin
16 remaining."

17 And I take it, from the notes appearing in the
18 remarks above, that you derived that average figure of
19 9.90 by eliminating the extreme item -- that is, the
20 38.50 for Conduit Hanger 026 -- and summing the rest,
21 dividing by the number?

22 A (WITNESS KOSTAL) Yes, sir.

23 Q All right.

24 Now, if you'd look at Intervenor's 170, the more-
25 highly-stressed conduit hangers, can we agree that none

1 of the CSR sample results, sample items, for which a
2 design margin exceeded your average value of 9.90 --
3 that none of those items represented more-highly-
4 stressed conduit hangers from your more-highly-stressed
5 conduit hanger list?

6 Let's go down the list. The first is 30.30 for
7 Conduit Hanger 24.

8 Can we agree that 24 is not on your list --

9 A (WITNESS KOSTAL) Yes, sir.

10 Q -- of more-highly-stressed conduit hangers?

11 The same is true for 26, the 38.5 value; it's not a
12 more-highly-stressed item, is it?

13 A (WITNESS KOSTAL) No, sir.

14 Q Let's see. Let's give you the benefit of rounding down
15 to be conservative.

16 For Conduit Hanger 050, you've got a design margin
17 of 9.06, slightly below average.

18 But it's not on the more-highly-stressed list,
19 either, is it?

20 A (WITNESS KOSTAL) No, sir.

21 Q 062, the 18.70 value.

22 It's not more-highly-stressed, is it?

23 A (WITNESS KOSTAL) No, sir.

24 Q For 112 you get a value of 14.10 for the design margin.

25 It's not on the list?

- 1 A (WITNESS KOSTAL) That's correct.
- 2 Q 121, a value of 29.50 design margin.
- 3 It's not on the list of more-highly-stressed items?
- 4 A (WITNESS KOSTAL) Correct.
- 5 Q Nor is 121, the second observation, also 29.50, listed
- 6 here?
- 7 A (WITNESS KOSTAL) Which number?
- 8 Q There are two Conduit Hanger 121 sample items shown on
- 9 your list --
- 10 A (WITNESS KOSTAL) Oh, I'm sorry.
- 11 Q -- with the same result.
- 12 Neither are on your more-highly-stressed list?
- 13 A (WITNESS KOSTAL) That's correct.
- 14 Q Finally, again rounding down for conservatism, 127,
- 15 design margin of 9.50.
- 16 It's not on your more-highly-stressed list?
- 17 A (WITNESS KOSTAL) That's correct.
- 18 Q Do you know what your average design margin remaining
- 19 would be if you averaged the results only of the
- 20 more-highly-stressed conduit hangers?
- 21 A (WITNESS KOSTAL) I would have to perform that
- 22 calculation.
- 23 Q Would it be significantly lower than the value of 900
- 24 percent that you calculated?
- 25 A (WITNESS KOSTAL) It may be.

1 Q All right.

2 MR. GUILD: Mr. Chairman, I'm not sure how
3 many dangling exhibits I have, but I would ask that 168
4 and 170 be admitted. I intended to offer --

5 JUDGE GROSSMAN: 168 already was. 169 and
6 170 were not. We'll receive them now.

7 MR. GUILD: Okay.

8 (The documents were thereupon received
9 into evidence as Intervenors' Exhibits
10 Nos. 169 and 170.)

11 JUDGE GROSSMAN: There are still some
12 dangling exhibits from yesterday --

13 MR. GUILD: All right, sir.

14 MR. STEPTOE: Can we have all the sketches
15 returned?

16 JUDGE GROSSMAN: -- because most of them are
17 sketches, and I'm looking to see if any are other than
18 sketches.

19 MR. BERRY: Mr. Chairman, my notes reflect
20 that Intervenors' Exhibit 155-B --

21 JUDGE GROSSMAN: I'm sorry? Pardon?

22 MR. BERRY: My notes reflect that
23 Intervenors' Exhibit 155-B has not yet been received in
24 evidence.

25 MR. GUILD: That would be the calculation

1 package, Mr. Chairman.

2 I certainly intended to offer it.

3 MR. BERRY: 155-A as well.

4 JUDGE GROSSMAN: Intervenors' 155 -- they
5 were all admitted. 155, 155-A and 155-B I have as being
6 admitted already.

7 MR. BERRY: Do you have a date on that, Mr.
8 Chairman?

9 JUDGE GROSSMAN: I don't want to mess up the
10 transcript.

11 If they weren't -- we'll just assume they are.
12 There's no reason why they wouldn't be, and I'm not
13 going to receive them again and cause the Reporters any
14 problem.

15 Now, I take it we're not prepared to admit those
16 sketches because we don't have them yet; is that
17 correct?

18 MR. STEPTOE: We have all but a few, but I
19 don't think Mr. Guild and I have had a chance to discuss
20 them.

21 JUDGE GROSSMAN: Oh, okay. We're not pushing
22 on that. I just want to remind you that you have them
23 outstanding now, and I'm just looking through my notes
24 to see if there are any nonsketches that --

25 MR. STEPTOE: There's a drawing and a --

1 JUDGE GROSSMAN: Now, there's Intervenors'
2 Exhibit 162, which is a BCAP evaluation summary of
3 discrepancies, which I don't believe was offered.

4 MR. MILLER: 162?

5 JUDGE GROSSMAN: You have it received?
6 It's on Cable 130.

7 MR. MILLER: Our records show that it was
8 received.

9 JUDGE GROSSMAN: It was received? Okay. I
10 stand corrected on that.

11 All I have missing now are sketches and Applicant's
12 Exhibits 151 and 152; that is, the proposal of technical
13 data for that 600-volt -- there was one large item and
14 one small one.

15 You have to reproduce that along with the sketches,
16 so we won't take any action on that now.

17 MR. MILLER: Your Honor, I believe that we've
18 deferred on Intervenors' Exhibit 141 as well.

19 MR. GUILD: What's that?

20 MR. MILLER: That is the Sargent & Lundy
21 print-out of inspection points and discrepancy points.

22 MR. BERRY: My records reflect that that was
23 received on October the 9th.

24 JUDGE GROSSMAN: I have that as admitted.

25 MR. MILLER: Thank you.

1 MR. BERRY: Your Honor, my records also
2 reflect that Intervenors still owe us Exhibit 163.

3 MR. GUILD: And what's that?

4 MR. BERRY: The Bojan letter.

5 MR. GUILD: Yes.

6 JUDGE GROSSMAN: Plus we do need a copy of
7 Intervenors' Exhibit 163, which is that Bojan letter to
8 Bartolucci of May 13, 1985.

9 But you'll have a chance to review this transcript
10 over the weekend, and you can supply us with everything
11 on Monday.

12 MR. GUILD: May I continue, Mr. Chairman?

13 JUDGE GROSSMAN: Yes, please.

14 BY MR. GUILD:

15 Q Now, with respect to Intervenors' 170, Mr. Kostal, the
16 conduit hanger population, do I understand that the
17 values that were used for screening were Braidwood-
18 specific values?

19 A (WITNESS KOSTAL) Yes, sir.

20 Q All right.

21 And did those values include as-built conditions of
22 the conduit hangers?

23 A (WITNESS KOSTAL) They included the loads of the
24 conduit.

25 Q Well, did they --

1 A (WITNESS KOSTAL) That's the weight of the conduit
2 attached to the hanger.

3 Q Right.

4 They included the weight as it was projected at the
5 time you did the screening?

6 A (WITNESS KOSTAL) That's correct.

7 Q All right.

8 You didn't go out to the field and actually look at
9 the loading of the conduits and base your screening of
10 conduit hangers on the as-built condition, did you?

11 A (WITNESS KOSTAL) No, sir.

12 Q And, therefore, the conduit hangers by definition
13 wouldn't include such things as as-built discrepant
14 conditions, weld defects, workmanship problems?

15 A (WITNESS KOSTAL) They may have.

16 The reason they may have is at that point in time
17 there may have been adjacent hangers, let's say, on a
18 given hanger that had been moved.

19 We would have calculated the appropriate weight
20 associated with the hanger in question, which could have
21 then accounted for an as-built condition.

22 I just can't say effectually whether or not it did
23 or didn't include as-built conditions.

24 Q For conduit hangers?

25 A (WITNESS KOSTAL) For conduit hangers.

1 Q All right, sir.

2 Can you say categorically that it did not include
3 weld discrepancies?

4 A (WITNESS KOSTAL) This is purely a weight calculation,
5 so it had nothing to do with weld discrepancies.

6 Q I see.

7 Let's round out this discussion, if we might, and
8 talk about electrical equipment, the last --

9 JUDGE GROSSMAN: Wait.

10 Before we get to that, I'm not sure whether you
11 used what you took to be the actual weight or whether
12 you used a set figure like that 45 pounds per square
13 foot kind of figure.

14 Which was it?

15 WITNESS KOSTAL: What we would have used,
16 Judge Grossman, is -- we would have used either one of
17 two things:

18 We would have used the cable pan -- the conduit
19 hanger drawing, which shows the various locations of the
20 drawing, which then would define the tributary length of
21 conduit that would be attached to a given hanger.

22 We would have also have used the number of conduits
23 that were attached to that hanger.

24 The unit load is the load associated with the
25 diameter of the conduit that's being attached. So we

1 would multiply the unit load for that particular conduit
2 and its tributary length; and that would be then the
3 weight that we would calculate, that we would review for
4 the load table.

5 JUDGE GROSSMAN: And there was no --

6 WITNESS THORSELL: Could I --

7 JUDGE GROSSMAN: -- factor included with
8 regard to cable that goes through that conduit?

9 WITNESS KOSTAL: It includes the weight of
10 the cable.

11 WITNESS THORSELL: Could I make a
12 clarification, Judge Grossman?

13 JUDGE GROSSMAN: Yes.

14 WITNESS THORSELL: The weights are based on a
15 full conduit whether that conduit is full of cable or
16 not. It's just a standard weight for the conduit,
17 assuming that the conduit is full of cable.

18 Many conduits are not full of cable, so it's a
19 conservative weight in that regard.

20 JUDGE GROSSMAN: Okay.

21 So when it comes to actual calculations later on
22 for design margin, you would then have whatever factor
23 would be implicit in having less than a fully loaded
24 conduit?

25 WITNESS THORSELL: Depending on the level of

1 refinement to which that calculation was performed.

2 JUDGE GROSSMAN: Okay.

3 BY MR. GUILD:

4 Q Let's turn to electrical equipment, if I could ask
5 Applicant's assistance if they have a copy.

6 MR. STEPTOE: (Indicating.)

7 MR. GUILD: We're not threatening to burden
8 the record with this stack, but we want to dissect some
9 documents here.

10 Mr. Chairman, I've distributed to the Board and
11 parties a document entitled "Highly Stressed Electrical
12 Equipment."

13 Mr. Kostal, do you have your own copy?

14 I'm short one.

15 WITNESS KOSTAL: (Indicating.)

16 MR. GUILD: Great.

17 I request we mark this, please, as Intervenors'
18 Exhibit 171.

19 (The document was thereupon marked
20 Intervenors' Exhibit No. 171 for
21 identification as of October 16, 1986.)

22 BY MR. GUILD:

23 Q Now, the document that I extracted this two-page exhibit
24 from, Mr. Kostal, is a list.

25 I take it that it's a list that was used to derive

1 the selection of more-highly-stressed pieces of
2 electrical equipment for submission to the BCAP Task
3 Force?

4 (Indicating.)

5 A (WITNESS KOSTAL) The document you're holding, yes,
6 sir.

7 Q Yes.

8 The list is entitled "Equipment Loads for Floor
9 Slab Foundation Design Status Report," and it lists a
10 number of pieces of equipment.

11 Now, can you tell me how the item got from that
12 rather voluminous listing to the listing of the items
13 that appear on the two-page exhibit of more-highly-
14 stressed electrical equipment, please?

15 (Indicating.)

16 A (WITNESS KOSTAL) If I could have the document, the
17 explanation is in that cover sheet --

18 Q Sure.

19 (Indicating.)

20 A (WITNESS FIRST) -- so I don't misquote it.

21 What this document is is it's a component -- this
22 is a document of the equipment that we have information
23 on at a point in time. This particular run was made on
24 1/10/1985. This document reflects all the equipment
25 that we had data on within Sargent & Lundy.

1 This equipment includes both safety-related and
2 nonsafety-related equipment. It also includes equipment
3 that is nonsafety-related yet seismically qualified.

4 This list was the list that existed at the point in
5 time of all equipment when BCAP asked for a list of
6 more-highly-stressed.

7 What was done with this list is we reviewed the
8 list; and the first thing we did was, since we were only
9 evaluating safety-related equipment, we struck out all
10 equipment that was not safety-related.

11 The next thing that we struck out is those items
12 where no calculations existed; and that you would find
13 under the heading "Item No.," which is the sixth heading
14 in the column. There would be an "NC" listing, which
15 represented the fact that there was no calculation.

16 (Indicating.)

17 The next thing that we did was we took the
18 remainder of the pieces of equipment that were screened
19 by these two criterias, and we've reviewed the
20 calculations that we had in-house on the remainder of
21 the equipment.

22 From that remainder of equipment, reviewing those
23 calculations, we used a screening of .8 interaction
24 value or an allowable stress equal to 80 percent -- the
25 actual stress equal to 80 percent of the allowable

1 stress. As a result of that screening process, we
2 obtained a list of 38 pieces of equipment that met that
3 criteria.

4 This list then was submitted to Braidwood in the
5 form of two lists: one which was Unit 1, representing
6 20 pieces of equipment; and one which was Unit 2,
7 representing 18 pieces of equipment. So there was a
8 total of 38 pieces of equipment.

9 What Exhibit 171 has is a listing of all that
10 equipment and whether or not BCAP chose those in the
11 sample and whether or not the interaction coefficient
12 was at the point in time at the time we selected the
13 component as well as the elevation at which the
14 equipment is located.

15 Q All right, sir.

16 Were the 38 that appear on Intervenors' 171 all of
17 the items of electrical equipment that met the screening
18 criteria that you've just described?

19 A (WITNESS KOSTAL) To my knowledge, they are.

20 Q Now, are there items of equipment with an interaction
21 coefficient of .8 or greater for which you did not have
22 a calculation at the time the list of equipment items
23 was prepared in January of '85?

24 A (WITNESS KOSTAL) These represented all the
25 calculations we had with interaction values greater than

1 .8 at that point in time.

2 Q That's not exactly my question, Mr. Kostal.

3 The question is: Are there others for which you
4 didn't have calculations which had interaction
5 coefficient values of .8 or greater?

6 A (WITNESS KOSTAL) I don't know. We only had what we
7 had, and what we had is what we evaluated.

8 Q All right, sir.

9 A (WITNESS KOSTAL) Speculating on things that we didn't
10 have -- I can't.

11 Q I don't want you to do that, sir.

12 Now, again, these are items that are stressed --
13 these are items of equipment that are analyzed for
14 stress on the basis of their attachment connections?

15 A (WITNESS KOSTAL) That's correct.

16 Q Now, does the listing that was the basis for the
17 more-highly-stressed electrical equipment, the
18 screening, contain items of equipment that are not
19 electrical?

20 A (WITNESS KOSTAL) Yes, sir.

21 Q Does it contain all equipment items that were identified
22 at the time: electrical, mechanical, other?

23 A (WITNESS KOSTAL) Yes, sir. They're the complete
24 population that existed on equipment at the 1/10/85
25 date.

1 Q It includes tanks, for example?

2 A (WITNESS KOSTAL) I don't know. I did not review this
3 complete list to determine whether or not tanks is noted
4 or not.

5 Q Well, I saw diesel fuel tank, boron injection tank.

6 A (WITNESS KOSTAL) Okay. The description of the
7 equipment is provided. If we we were to read through
8 it, there would be a variety of equipment, both
9 electrical and mechanical.

10 Q And who decided what was electrical and what was not
11 electrical, for purposes of making the more-highly-
12 stressed evaluation?

13 A (WITNESS KOSTAL) The list that was created for -- I
14 don't have the name of the individual in front of me.
15 There is a memorandum that was authored by an individual
16 who created this particular list of 38.

17 Q And the memo does what; it describes how that choice was
18 made?

19 A (WITNESS KOSTAL) No.

20 It lists the electrical equipment that met this
21 screening criteria; and that memo was created and
22 authored by an individual, listing all those pieces of
23 electrical equipment.

24 You asked me who did that, and I don't at this
25 moment know the name of that individual.

1 Q All right, sir.

2 A (WITNESS KOSTAL) But it was an individual within
3 Sargent & Lundy.

4 Q All right, sir.

5 And someone made a judgment about which items met
6 the criterion of being electrical equipment?

7 Mr. Thorsell, can you add to that?

8 A (WITNESS THORSELL) You can tell by the equipment
9 number whether it's an electrical piece of equipment or
10 not.

11 Q How can you tell that?

12 A (WITNESS THORSELL) In this particular case, the first
13 piece of equipment on the list is 1CX13J. J is a
14 designation for an electrical panel.

15 If you go down the list, you'll see --

16 Q I just didn't see the one you have.

17 I see; it's the first on Intervenors' 171?

18 A (WITNESS THORSELL) Yes, the first piece of equipment
19 on Intervenors' 171.

20 Q All right, sir. Understood.

21 A (WITNESS THORSELL) If you go to the second item on
22 that list, the 1JB008A, JB is a designation for a
23 junction box.

24 Q Yes, sir. Well, that's helpful; and there's also, on
25 the longer list, a narrative description.

1 But someone has to decide that a tank is not a
2 piece of electrical equipment, unless you included tanks
3 as pieces of electrical equipment.

4 Is there a judgment that a piece is or a piece
5 isn't electrical equipment?

6 A (WITNESS THORSELL) To the degree that judgment is
7 required, I think most electrical engineers are familiar
8 with what pieces of equipment are electrical and what --

9 Q Well, how about a pump? How about a pump with a
10 junction box on it? What's that?

11 JUDGE COLE: You mean a motor with a junction
12 box?

13 MR. GUILD: That's what I mean: a motor with
14 a junction box, a pump motor with a junction box.

15 A (WITNESS THORSELL) That is listed as a pump motor --
16 or as a pump, and the motor is a sublisting associated
17 with the pump. The junction box would be a sublisting
18 associated with the pump motor.

19 That entire assembly is considered a piece of
20 mechanical equipment.

21 BY MR. GUILD:

22 Q So somebody has to make a judgment that that junction
23 box is not a piece of electrical equipment; it's a piece
24 of mechanical equipment?

25 A (WITNESS THORSELL) Okay.

1 Q Well, I don't want you to agree with me for the sake of
2 agreement.

3 Is that a true statement or not?

4 A (WITNESS THORSELL) That's a judgment.

5 That judgment is also based on the knowledge of who
6 is responsible for the installation of that piece of
7 equipment. It comes as a single assembly, and one
8 contractor is responsible for the installation of that
9 assembly.

10 In the example that you gave where you have a pump,
11 a motor with the pump and a junction box or, actually, a
12 motor termination box on the motor, that entire assembly
13 is installed by the mechanical installation contractor.

14 Q Except, of course, somebody has to hook the wires up,
15 and I guess they don't do that?

16 A (WITNESS THORSELL) That's true, but this is electrical
17 equipment installation. The connection of the wires is
18 covered under cable.

19 Q But that connection, that termination, would be an
20 electrical contractor's responsibility?

21 A (WITNESS THORSELL) Correct, and that's covered in the
22 cable population rather than the electrical equipment
23 population.

24 Q Well, let me ask you a question more generally:

25 Was the sample of more-highly-stressed items from

1 this listing made for use by BCAP more generally than
2 just for the Comstock scope of work?

3 Did you select more-highly-stressed pieces of
4 equipment that were also sampled in mechanical, for
5 example?

6 MR. STEPTOE: Can you define "this listing"
7 for me?

8 MR. GUILD: The listing that was the basis
9 for the electrical equipment.

10 MR. STEPTOE: The full document that you have
11 not marked?

12 MR. GUILD: Indeed.

13 A (WITNESS KOSTAL) There was a list of mechanical
14 equipment prepared and given to BCAP on mechanical
15 equipment.

16 BY MR. GUILD:

17 Q From this same source document?

18 A (WITNESS KOSTAL) Yes.

19 Q Someone went through and picked more-highly-stressed
20 items, whether they were electrical or mechanical;
21 someone else made the cull of whether they were
22 electrical?

23 A (WITNESS KOSTAL) No. I didn't say that.

24 Q Well, that's what I'm asking.

25 A (WITNESS KOSTAL) I think it was one and the same

1 individual. I just don't know that individual.

2 Q All right.

3 A (WITNESS KOSTAL) I believe it to be one individual,
4 and I believe it to be an individual from the Component
5 Qualification Division.

6 That division is responsible for qualifying all
7 equipment, both mechanical and electrical; and these
8 engineers are familiar with the differences between
9 mechanical and electrical equipment.

10 Q I'm sure they are.

11 MR. GUILD: Mr. Chairman, can I ask that
12 Applicant at a later time provide a copy of this
13 memorandum, the document that apparently will clarify
14 this question?

15 MR. STEPTOE: Bob, I think you already have
16 it.

17 Do you want to take a moment to look for it, the
18 one he's referring to?

19 MR. GUILD: That would be fine, sure.

20 MR. STEPTOE: He's referring to this and the
21 other one, too.

22 (Indicating.)

23 JUDGE GROSSMAN: Do you wish to take your
24 break now, Mr. Guild?

25 MR. GUILD: It would be a convenient time,

1 Mr. Chairman.

2 JUDGE GROSSMAN: Fine. 10 minutes.

3 (WHEREUPON, a recess was had, after which
4 the proceedings were resumed as follows:)

5 JUDGE GROSSMAN: Mr. Guild?

6 MR. GUILD: I think we established off the
7 record that the memo in question was not a memo that's
8 available at this point.

9 MR. STEPTOE: We're trying to get it.

10 WITNESS KOSTAL: It's not in the courtroom.
11 It's being brought over.

12 MR. GUILD: All right, sir.

13 JUDGE GROSSMAN: By the way, Mr. Kostal, did
14 you ever get that figure on the frequency?

15 WITNESS KOSTAL: I forgot. I apologize,
16 Judge. No, I didn't get that.

17 MR. STEPTOE: We've got somebody working on
18 it, Judge Grossman.

19 JUDGE GROSSMAN: Oh, you do, okay. That's
20 fine.

21 MR. GUILD: Mr. Chairman, I'd offer 171, the
22 more-highly-stressed equipment.

23 JUDGE GROSSMAN: Received.

24 (The document was thereupon received into
25 evidence as Intervenors' Exhibit No.

1 171.)

2 BY MR. GUILD:

3 Q Now, Mr. Kostal, let's shift gears a bit here.

4 The CSR people derived checklists to conduct their
5 CSR inspections. The sample items to be inspected were
6 identified with Sargent & Lundy's contribution to a
7 certain extent that we've discussed.

8 After those two steps in the process, Sargent &
9 Lundy thereafter undertook the task of counting
10 inspection points and counting discrepancy points;
11 correct?

12 A (WITNESS KOSTAL) Yes, sir.

13 Q Okay.

14 Now, did Sargent & Lundy participate in the process
15 of reviewing and responding to the NRC's comments on the
16 Braidwood draft program document in the May-June-July,
17 '85, time frame?

18 A (WITNESS KOSTAL) No, sir.

19 Q Were you aware, when Sargent & Lundy undertook your role
20 in BCAP, that the NRC had expressed a concern about the
21 use of inspection points to evaluate the results of BCAP
22 and that such a concern was expressed in a letter from
23 Mr. Keppler to Mr. O'Connor?

24 A (WITNESS KOSTAL) No, sir.

25 Q Were you aware, when Sargent & Lundy undertook its role

1 in BCAP, that Commonwealth Edison Company, Mr. O'Connor,
2 responded to that NRC concern from Mr. Keppler and
3 asserted that the BCAP results would not be evaluated on
4 the basis of so-called inspection points but would be
5 evaluated on the basis of items found discrepant?

6 A (WITNESS KOSTAL) No, sir.

7 Q Did Commonwealth Edison Company discuss either those NRC
8 comments or Edison's response to those NRC comments when
9 you, Sargent & Lundy, were asked to undertake the
10 counting of inspection points?

11 A (WITNESS KOSTAL) Not to my recollection.

12 Q I show you a document on the subject of inspection point
13 counting that you made available to me in discovery, Mr.
14 Kostal, a Sargent & Lundy document.

15 (Indicating.)

16 MR. GUILD: Mr. Chairman, I'd ask this be
17 marked as Intervenors' Exhibit 172, please.

18 (The document was thereupon marked
19 Intervenors' Exhibit No. 172 for
20 identification as of October 16, 1986.)

21 BY MR. GUILD:

22 Q Now, Mr. Kostal, do you recall me asking you whether or
23 not there was any written procedure for the counting of
24 inspection points by Sargent & Lundy?

25 A (WITNESS KOSTAL) Yes, sir, when you came in to our

1 offices.

2 Q Yes, and I asked you whether or not there was any
3 written description of any training given to the persons
4 employed by Sargent & Lundy who undertook the counting
5 of inspection points?

6 A (WITNESS KOSTAL) Yes, sir.

7 Q And the documents that I've had placed before you,
8 marked as Intervenors' Exhibit 172, represent the only
9 documents that are either Sargent & Lundy procedures or
10 memoranda of training for inspection point counting?

11 A (WITNESS KOSTAL) It's the only document that I had
12 that I could supply to you.

13 Q Well, sir, that's one of those answers that leads me to
14 want to ask another one, because it doesn't seem that
15 you responded clearly to my question.

16 Is this the only written document that either is a
17 description of the inspection point counting procedure
18 or the training given to those who did the inspection
19 point counting for Sargent & Lundy?

20 Are there any other documents?

21 A (WITNESS THORSELL) Perhaps I can answer that more
22 directly, Mr. Guild.

23 Q Yes, if you would, sir.

24 A (WITNESS THORSELL) I undertook to search our files to
25 determine if any such documents as requested by Mr.

1 Guild existed, and this is the only such document that I
2 was able to find.

3 Q All right, sir.

4 Mr. Kostal, as far as you know, these are the only
5 documents that are responsive to my request?

6 A (WITNESS KOSTAL) For training, yes, sir.

7 Q How about written procedures for inspection point
8 counting?

9 A (WITNESS KOSTAL) There are documents which discuss
10 inspection point counting, various memorandums: the
11 development of the inspection point counting form that
12 was used --

13 Q The forms I --

14 A (WITNESS KOSTAL) -- memorandums transmitting those
15 forms, the evolution of the forms. Those types of
16 documents exist.

17 MR. GUILD: Well, Mr. Chairman, at the risk
18 of missing something with that answer, I would ask that
19 Applicant produce for inspection whatever documents
20 exist above and beyond what was produced in response to
21 my request on the subject of inspection point counting.

22 MR. STEPTOE: The request was for training.

23 I have no problem in seeing what documents exist
24 and what Mr. Kostal is talking about producing, but the
25 request was for training and not with respect to

1 counting.

2 But we'll see what Mr. Kostal is referring to and
3 get them.

4 JUDGE GROSSMAN: Okay. You'll attempt to
5 supply --

6 MR. STEPTOE: Yes.

7 JUDGE GROSSMAN: -- what Mr. Kostal was
8 referring to?

9 MR. STEPTOE: Yes.

10 JUDGE GROSSMAN: That's fine.

11 BY MR. GUILD:

12 Q In the document that's before you, Intervenors' 172, the
13 first page is an attendance list.

14 I take it that documents the training that you were
15 able to find any documentation of?

16 A (WITNESS KOSTAL) For these particular individuals,
17 yes, sir.

18 Q Well, was there other training?

19 At least Mr. Steptoe heard that part of my request.

20 A (WITNESS KOSTAL) There was other training, informal
21 training, that was conducted on the job; but it wasn't
22 documented in this fashion.

23 Q Was it documented in any fashion?

24 A (WITNESS KOSTAL) Per the review that was done by
25 Mr. --

1 A (WITNESS THORSELL) Well, this is the only documented
2 training that I was able to find in the files. Whether
3 the other training was documented or not, I do not know.

4 I have been told that there was additional
5 training; there were other individuals trained at
6 various times.

7 Q You're not aware of any other documentation of that
8 training?

9 A (WITNESS THORSELL) No, sir, I am not.

10 Q All right, sir.

11 Then the second page and the pages following appear
12 to be "Inspection Point Counting Guideline." That's the
13 title on the cover page.

14 Does this represent the procedures, the Sargent &
15 Lundy written procedures, for inspection point counting?

16 A (WITNESS THORSELL) No, sir.

17 That, to my understanding, represents an outline
18 that was used in the training session. There never was
19 a formal documented procedure for inspection counting.
20 What followed from this was an evolution of the
21 inspection point counting checklist.

22 When you examine the inspection point counting
23 checklist, it carries many of the line items,
24 particularly the line items that aren't
25 self-explanatory, the methodology that could be used in

1 counting.

2 For example, if a label has a required location, a
3 required identifier on it and is required to be a
4 certain color and that was going to be counted as three
5 inspection points -- in other words, did you get it in
6 the right place? Does it say the right thing? Is it
7 the right color to indicate the right safety division?
8 -- if that was going to be counted as three inspection
9 points, it would indicate that that should be counted as
10 three inspection points on the inspection point counting
11 form.

12 So what evolved essentially was that the
13 instructions were contained on the counting forms
14 themselves, and the additional training that was done
15 was merely a clarification of those items for the
16 individuals doing the counting.

17 Q All right, sir.

18 The final page of this document -- can you identify
19 it, sir?

20 A (WITNESS THORSELL) I believe it establishes the
21 inspection point counting form numbers and which
22 population they relate to.

23 In the electrical area, for example, inspection
24 point counting form E-CND is the form to be used for
25 counting inspection points in the conduit population.

1 Q How abou' the dates that appear in the columns to the
2 right? What do they represent, sir?

3 A (WITNESS THORSELL) Well, the column heading is
4 "C-O-M-P-L. MONTH," and there are months listed under
5 that column. I presume that it means "completion month"
6 and that this at one point represented a schedule.

7 All of that appears to have been crossed out, and a
8 one-time schedule or draft schedule was merely used as a
9 convenient way of generating a list that tabulates the
10 inspection point counting form numbers.

11 Q Well, to the right it says "fit on one page." It
12 appears to be a markup of what was a schedule.

13 Was that the schedule?

14 A (WITNESS THORSELL) I don't know actually whether it
15 was or not.

16 Q Was there a schedule?

17 A (WITNESS KOSTAL) Yes, sir.

18 Q Is this the schedule, Mr. Kostal?

19 A (WITNESS KOSTAL) It's the beginning of the schedules.

20 They were evolved as time went on, and the
21 schedules were discussed on a weekly basis at meetings
22 that I held at the site with the key people in each of
23 the disciplines. That included Mr. Thorsell at those
24 same meetings.

25 Q All right, sir. Well, I see a date in there of April

1 for the preparation of the conduit checklist.

2 Did you prepare a conduit checklist in April?

3 A (WITNESS KOSTAL) We prepared a conduit checklist.
4 Whether or not it was in April, I would have to review
5 the records.

6 Q Do you know, Mr. Thorsell?

7 A (WITNESS THORSELL) I do not know.

8 Q All right, sir.

9 The third page of the exhibit states under 1.0, the
10 guideline purpose, "This guideline is for the tabulation
11 of construction elements inspected under the
12 Construction Sample Reinspection, CSR, area of the
13 Braidwood Construction Assessment Program, BCAP.

14 "Its purpose is to generate an inspection result
15 data base which will be used during BCAP's assessment of
16 the quality of construction at Braidwood Station."

17 Now, was it Sargent & Lundy's idea to accomplish
18 that purpose by counting inspection points, Mr. Kostal?

19 A (WITNESS KOSTAL) No, sir. That's Edison's idea.

20 Q Edison, in turn, contacted Sargent & Lundy and asked you
21 to accomplish this; they stated this purpose and asked
22 you to accomplish it?

23 A (WITNESS KOSTAL) They asked us if we would perform the
24 inspection point counting function.

25 Q All right.

1 I take it you agreed to do that?

2 A (WITNESS KOSTAL) Yes, sir.

3 Q Now, you also did discrepancy point counting?

4 A (WITNESS KOSTAL) Yes, sir.

5 Q Do you have a copy of Intervenors' Exhibit 155-A
6 available to you?

7 That's the discrepancy type counting forms for
8 Cable Pan Hanger 104.

9 A (WITNESS KOSTAL) This is -- hold on one second.

10 Q Sure. 155-A is entitled "Discrepancy Type Counting
11 Forms."

12 A (WITNESS KOSTAL) The title is "Discrepancy Type
13 Counting Forms"?

14 Q Yes, for Cable Pan Hanger 104.

15 A (WITNESS KOSTAL) Okay.

16 And this is your Exhibit --

17 Q 155-A is the number.

18 Now, Sargent & Lundy also undertook to do the
19 discrepancy counting for the BCAP CSR sample items?

20 A (WITNESS KOSTAL) Yes, sir.

21 Q All right.

22 And I take it that for Cable Pan Hanger 104, this
23 package, Intervenors' 155-A, represents the counting of
24 discrepancies for that cable pan hanger?

25 A (WITNESS KOSTAL) Yes, sir.

1 Q All right.

2 Now, can you describe for me, Mr. Kostal or Mr.
3 Thorsell, either gentleman, how the discrepancy counting
4 was performed with regard to Cable Pan Hanger 104 with
5 reference to these documents?

6 A (WITNESS KOSTAL) You have to work with the discrepancy
7 point counting form. You also work with the observation
8 package, and you also work with the engineering
9 calculations associated with this 104.

10 Q I see.

11 So you've already got the engineering calculations
12 at the point where you start counting the discrepancy
13 points?

14 A (WITNESS KOSTAL) Yes, sir.

15 Q All right.

16 You know what the answer is, in terms of what the
17 evaluation has been of the item, before you start
18 counting discrepancy points?

19 A (WITNESS KOSTAL) Yes, sir.

20 Q Okay.

21 Now, Intervenor's 155 is the observation packages
22 for that cable pan hanger, and 155-B is again the
23 Sargent & Lundy calculation package. If you can turn to
24 155, let's look at Observation 04, the weld
25 discrepancies.

1 Before we get there, do you have 155, Mr. Kostal?

2 A (WITNESS KOSTAL) Yes, sir.

3 Q It's the first series of documents in 155 for
4 Observation 01 for that cable pan hanger, 02, 03 and
5 finally 04.

6 Do I understand correctly that with regard to the
7 first three observations, which are configuration
8 observations, there was no discrepancy point counting
9 done because discrepancies in the configuration area for
10 cable pan hangers were all declared out of scope?

11 A (WITNESS KOSTAL) Yes.

12 Q All right, sir.

13 So the first time for this item that you got down
14 to counting discrepancies was with Observation Cable Pan
15 Hanger 104-04?

16 A (WITNESS KOSTAL) Yes, sir.

17 Q All right. I've got that.

18 If you would, help me relate that observation to
19 the discrepancy point counting.

20 A (WITNESS KOSTAL) There are attached to your Exhibit
21 155-A the individual pages, Pages 245 through 262, which
22 document the discrepancies point counts for various
23 welds.

24 Q All right, sir. Let's look at the first page. That's
25 245.

1 What weld does that refer to?

2 A (WITNESS KOSTAL) That refers to the undercut welds,
3 and it refers to Page 11 of the calculations -- I'm
4 sorry -- to Item 1 in the calculations found on Page --
5 this is your Exhibit 155-B.

6 Q Right.

7 A (WITNESS KOSTAL) It would be found on Page 1 of those
8 calculations.

9 Q Page 1 of the calculations?

10 A (WITNESS KOSTAL) Right, at the bottom of the page,
11 reference to "undercut."

12 Q Just one second. Excuse me.

13 All right, sir, Page 1 of the calc package.

14 And this is undercut?

15 A (WITNESS KOSTAL) Yes, sir.

16 Q And where do you derive the counting of 10 discrepant
17 inspection points that appears --

18 A (WITNESS KOSTAL) You derive it from the -- well, you
19 use this particular page along with the weld maps. You
20 can count item by item what's reflected on the weld
21 maps, which represents a discrepancy in the undercut
22 area.

23 Q Well, you could do that, but what I'm interested in
24 knowing is: How was it done for this particular item?

25 A (WITNESS KOSTAL) For example, if you go to the --

1 let's take Point 1, circled "1."

2 Q Now, we're on Page 1 of the calculation package, 155-B?

3 A (WITNESS KOSTAL) Right.

4 And if you were to go to Page 3 and you look for --

5 Q Page 3 of what, now?

6 A (WITNESS KOSTAL) Page 3 of the calculations.

7 You look for the indication "1," which is U/C,
8 which is the top diagonal on the left -- on the right --
9 on the right-hand side --

10 Q All right.

11 A (WITNESS KOSTAL) -- it shows the point where this
12 undercut is being counted.

13 If you then go back to the weld map, it points to
14 an undercut on the underside of that connection. This
15 is in the weld map on Page 1, and it shows undercut 3/8
16 of an inch long, 1/8 inch wide, 1/32 of an inch deep on
17 the north side of the Unistrut.

18 Q You lost me there.

19 You're deriving that data from where, sir?

20 A (WITNESS KOSTAL) I'm deriving it from the weld map,
21 which is your Exhibit Bates Stamp 4667, which is the
22 Page 1 of 3 of the weld map which has formed part of the
23 discrepancy observation.

24 Q It's an attachment to the observation form.

25 A (WITNESS KOSTAL) Yes, sir.

1 MR. MILLER: Intervenors' 155.

2 MR. GUILD: All right.

3 BY MR. GUILD:

4 Q So we've gone from the counting form to the calculation
5 package to the observation form attachment?

6 A (WITNESS KOSTAL) Yes, sir.

7 Q All right.

8 A (WITNESS KOSTAL) That's Point 1. That represents one
9 discrepancy.

10 Q All right, sir.

11 Now, what does the parenthetical mean on the
12 discrepancy point counting form for the Item 11,
13 undercut?

14 It says "one per weld," paren, "(depth end),"
15 paren.

16 A (WITNESS KOSTAL) You're looking at the depth of the
17 undercut. That's all that's referring to.

18 An undercut has three dimensions: a horizontal --
19 two horizontal dimensions, which define the planar
20 section, and there is a depth to the undercut.

21 Q All right.

22 So why have we got depth here as a parenthetical in
23 your discrepancy point counting form?

24 A (WITNESS KOSTAL) That's what represents one undercut,
25 one weld with depth, meaning the depth of the undercut,

1 which affects -- you take the horizontal dimension and
2 the depth.

3 That defines the cross sectional area that's cut
4 out of the given member, which then reduces the cross
5 sectional area of the member that you evaluate for, the
6 remaining area.

7 Q That all sounds helpful, but what's the purpose of
8 noting depth when you're counting discrepancy points for
9 undercut, if any?

10 A (WITNESS KOSTAL) There is a criteria which defines
11 undercut in terms of a depth.

12 You have to go back to BCAP and the checklist and
13 look at what is considered acceptable undercut versus
14 unacceptable undercut.

15 Q What if there is intermittent undercut on the same weld,
16 undercut in more than one place on that weld?

17 A (WITNESS KOSTAL) It's defined as one discrepancy. If
18 you have on a weld more than one -- one weld, you have
19 more than one undercut, it's defined per the weld as one
20 discrepancy in that weld which is related to undercut.

21 Q All right, sir.

22 So this particular discrepancy point counting form
23 counts all of the incidences of undercut reflected in
24 the observation for Cable Pan Hanger 104 with the
25 measure that you only count one instance of undercut,

1 one discrepancy point, per weld; and you get a value of
2 10 discrepancies points?

3 A (WITNESS KOSTAL) Yes. That's the logic of where the
4 10 is derived, yes, sir.

5 Q Now, what's the basis for the value that appears to the
6 right-hand margin, .98, and the categorization of this
7 discrepancy as a Y on this discrepancy point counting
8 form?

9 A (WITNESS KOSTAL) That's the R value associated with
10 this particular -- if you recall, when I went through
11 this example, we didn't individually analyze each of
12 these undercuts.

13 We took the worst case of undercut; and we
14 accumulated that and performed one calculation found on
15 Page 4, which determined what the R value was for that
16 worst-case condition, that R value being equal to .98.

17 We assigned then that .98 for conservative method
18 to all those undercuts, and the .98 that you see over on
19 the right-hand side of the discrepancy point counting
20 form reflects that value.

21 Q I see. You didn't sum up R values or average R values;
22 you took the R value for the case that happened to have
23 been calculated.

24 In this case, it was the R value for the most
25 significant undercut?

1 A (WITNESS KOSTAL) For the most -- correct, for the
2 greatest amount of undercut.

3 Q All right, sir. Let's flip through. You have two weld
4 size discrepancies.

5 Now, which two weld size discrepancies are
6 reflected on the second page of your discrepancy point
7 count?

8 A (WITNESS KOSTAL) This is the next discrepancy point
9 count?

10 Q Yes. It's the second form in the package.

11 A (WITNESS KOSTAL) This relates to Item -- now, you go
12 back to the weld map. This relates to Item 2, which is
13 the next item in the calculation, which is found on Page
14 -- found on Page 5.

15 Q Page 4?

16 A (WITNESS KOSTAL) Well, the calculation is found -- it
17 starts on Page 4, but it proceeds to Page 5. It's
18 actually the connection associated with the diagonal
19 brace.

20 Q How do you know that's the one they list on this page of
21 the discrepancy point counting form?

22 A (WITNESS KOSTAL) The way you can determine that is by
23 looking at the R value that's indicated in the lower
24 right-hand margin and also the SM value.

25 If you turn to the bottom of Page 6, you will see

1 that R value of .695, and you will see that SM value of
2 5.18.

3 Q And that's from your revised calculation?

4 A (WITNESS KOSTAL) Well, it's the same discrepancy in
5 the original calculation or the revised calculation.

6 Q Yes, but the R value that's indicated as the revised R
7 value for the revised calculation?

8 A (WITNESS KOSTAL) Yes, sir.

9 Q Now, the first page of your discrepancy point count
10 appears to have been completed on September 5, 1985; the
11 second page, October 1, 1985.

12 I gather that that reflects that a single person
13 didn't sit down and count all the discrepancy points at
14 a single point in time?

15 A (WITNESS KOSTAL) That's correct.

16 Q Why did you do it, at least in those two instances, over
17 about a month's period of time?

18 A (WITNESS KOSTAL) Well, one thing that was happening --
19 I don't know exactly why in this particular case this
20 counting was done over a period of time. It does date
21 when each of these forms was prepared. Some were
22 prepared in September; some were prepared in October.

23 The process took a long time in terms of the
24 tabulating of all of the data and filling out all the
25 appropriate discrepancy point forms and inspection point

1 forms. For some reason, it was done in a two-step
2 stage.

3 Q Do you know whether or not there was a discrepancy point
4 count made before you revised your calculations?

5 A (WITNESS KOSTAL) Based on the dates that are indicated
6 in each of these pages, there would have been no
7 discrepancy point counts prior to the date that we had
8 performed the calculations.

9 I think the earliest date that any of these
10 discrepancy point counts are filled out is 9/5/85. The
11 date of the revised calculation was approved -- it was
12 prepared -- started to be prepared on many sheets as
13 early as 7/25/85, and the approval dates were 9/3/85.

14 So this would reflect that the calculation was
15 indeed revised for that second run prior to any of these
16 forms being filled out.

17 Q I see that.

18 My question really is: Are there any dry runs in
19 the discrepancy point counts for this item that don't
20 appear in the documents that we have before us?

21 A (WITNESS KOSTAL) Not to my knowledge.

22 Q Did you do any more than once? Did you do revised
23 discrepancy point counting?

24 A (WITNESS KOSTAL) In the process of the BCAP validation
25 of observations that were out of scope versus valid

1 observations in scope, there was an iteration in the
2 counting of changes that occurred.

3 Q Something was counted as in-scope first; you counted
4 those discrepancy points.

5 If it became out of scope, you deleted those
6 discrepancy points?

7 A (WITNESS KOSTAL) That's correct.

8 Q But for individual items, did you do more than a single
9 stab at counting discrepancy points?

10 MR. STEPTOE: Excuse me.

11 Counsel, are you referring to the time period here?

12 BY MR. GUILD:

13 Q During any time period, did you count discrepancy points
14 more than once for a single item and come up with
15 different results and revise your discrepancy point
16 counts?

17 A (WITNESS KOSTAL) At this point in time or at any point
18 in time?

19 Q At any point in time.

20 A (WITNESS KOSTAL) Yes, sir.

21 Q You did?

22 A (WITNESS KOSTAL) Well, we provided you changes with
23 the -- I don't know. This is the BCAP discrepancy point
24 counting.

25 Q Right.

1 A (WITNESS KOSTAL) There were changes in five of those
2 populations.

3 Q Right.

4 A (WITNESS KOSTAL) You are aware and we talked to you
5 about the fact that we are and we have just completed a
6 reassessment of the complete cable pan hanger
7 population.

8 Q I'm going to ask you about that in a moment.

9 So you did do revised counts, more than one
10 discrepancy point count, for BCAP CSR population items?

11 A (WITNESS KOSTAL) Yes, sir.

12 Q All right.

13 Not this one in particular; this one appears to
14 have been gone through once and all done after the
15 calculations were made and revised?

16 A (WITNESS KOSTAL) Yes, sir.

17 Q Now, is there any identification on the discrepancy
18 point counting forms of which particular locations on
19 the component are the subject of the count or are you
20 inferring the association based on the R value number?

21 A (WITNESS KOSTAL) Well, utilizing the discrepancy point
22 count, utilizing the characterization of that
23 discrepancy, utilizing the R value that's given and the
24 M value that's given, I can correlate each of these
25 pages to the appropriate calculation that was made on a

1 given connection.

2 JUDGE GROSSMAN: We'll take five minutes.

3 (WHEREUPON, a recess was had, after which
4 the proceedings were resumed as follows:)

5 JUDGE GROSSMAN: Back on the record.

6 WITNESS KOSTAL: We did bring over that
7 computer run for the frequency. The frequency of that
8 hanger in question, 104, is 6.2 cycles per second.

9 So it's close to that 10 that we were talking
10 about, which is the flat portion of the spectra.

11 JUDGE GROSSMAN: Now, could you tell me why,
12 if that is the case, you or whoever made the calculation
13 used the Braidwood-unique response spectra?

14 WITNESS KOSTAL: The response spectra for the
15 project. In this particular case, it's the location in
16 the enveloped spectra. This particular frequency of the
17 hanger is in an area where the Byron/Braidwood spectra
18 is the same.

19 JUDGE GROSSMAN: And I take it the
20 calculation confirms that you used a factor of 2; is
21 that so?

22 WITNESS KOSTAL: Well, the calculation -- I
23 just don't have the spectra in front of me, but it would
24 confirm that if I went up to that --

25 MR. BERRY: (Indicating.)

1 WITNESS KOSTAL: -- in this particular
2 example for the north-south direction, we would have
3 used 2. We would have used then on the east-west
4 direction a value of 1.5; and on the vertical direction,
5 we would have used a value somewhere around 3.

6 JUDGE GROSSMAN: I'm sorry. I was misled by
7 just looking at the north-south, but there is a
8 difference, then -- no. I'm sorry, I'm sorry. There is
9 no difference -- oh, yes, there is on the vertical
10 spectra.

11 WITNESS KOSTAL: Right.

12 JUDGE GROSSMAN: There is a difference.

13 WITNESS KOSTAL: No. The vertical spectra is
14 still in the range of the enveloped Byron/Braidwood.

15 I said it was 3. I see I was reading slightly off.
16 It's probably more in the range of 2.2, 2.4.

17 See, that's still the enveloped portion of the
18 spectra with a frequency of over 6.

19 JUDGE GROSSMAN: I'm sorry. You're looking
20 at the --

21 MR. GUILD: The vertical, I believe.

22 JUDGE GROSSMAN: -- at the vertical spectra?

23 WITNESS KOSTAL: Yes, sir, yes, sir.

24 (Indicating.)

25 JUDGE GROSSMAN: Now, I see that there is a

1 difference at 6.2 cycles per second.

2 WITNESS KOSTAL: Oh, I apologize. There
3 would be a slight difference, yes, sir. I was reading a
4 little too far over to the left.

5 But in that case, there would be -- it's close to
6 one another, but there would be a slight difference.

7 JUDGE GROSSMAN: Okay. That's fine.

8 BY MR. GUILD:

9 Q Let's return to Cable Pan Hanger 104 and the discrepancy
10 point counting exercise. If you would, sir, look at
11 Page 252, and that is 252 in the Intervenor's Exhibit
12 155-A.

13 Do you have that, sir?

14 A (WITNESS KOSTAL) Yes, sir.

15 Q Now, for this particular discrepancy point counting
16 form, this counts one weld size discrepancy and one weld
17 length discrepancy on the same form?

18 A (WITNESS KOSTAL) That's correct.

19 Q Why did they aggregate two different attributes on one
20 form in this case when they used the first form to
21 aggregate only the single attribute of undercut?

22 A (WITNESS KOSTAL) There are two welds that are
23 documented on this particular form. You'll have to go
24 again to -- this is Weld G and Weld 7 that are
25 associated with this form.

1 Q How do you know that?

2 A (WITNESS KOSTAL) Because I worked back and forth
3 between the calculations and the discrepancy point forms
4 and the observation and derived that.

5 Q You matched the R value?

6 A (WITNESS KOSTAL) Yes, sir. I matched the -- well, I
7 matched the weld size, the weld length and the weld.
8 The R value in this case is indicated as .906, but in
9 reality it's .91.

10 Q Rounded to .91?

11 A (WITNESS KOSTAL) Yes, sir.

12 Q Where does that appear in the calculation? Where did
13 you trace that to in the calculation?

14 A (WITNESS KOSTAL) Okay. We have to go to Page 12 of
15 the calculations.

16 Along with Page 12 we look at what's defined as
17 undersize Weld G, as Weld G. The Weld G location -- you
18 have to go back to the figure on Page 3.

19 Q Let me just slow you down here. At Page 12 we have an R
20 value of .91.

21 How did you get one more significant decimal place
22 when you listed the R value on the discrepancy point
23 counting form than you did when you did the calculation,
24 if the calculation was the basis for putting the data on
25 the discrepancy point counting form?

1 A (WITNESS KOSTAL) Well, if you go to Page 17, it was an
2 error in translation.

3 If you go to Page 17 and if you look under Weld 7,
4 that's the second phase of the reported discrepancy,
5 which relates to weld length.

6 Now, if you go back to the weld -- if you go back
7 to Page 3 --

8 Q Page 3 of what?

9 A (WITNESS KOSTAL) Of the calculations.

10 I want to show you where Weld Size G and Weld Size
11 7 appear.

12 Q All right.

13 A (WITNESS THORSELL) (Indicating.)

14 A (WITNESS KOSTAL) Thank you.

15 Okay. If you look at the bottom of that figure, on
16 the lowest horizontal member on the left-hand side, it
17 reports a length not welded of 1/16 inch.

18 Q Yes.

19 A (WITNESS KOSTAL) Okay. That's Weld 7.

20 If you go back into the calculation, Page 17, it
21 reports that same length undersize of 1/16 on the north
22 side.

23 If you go back to the --

24 Q Wait a minute, now. You lost me.

25 Where does Weld 7 get evaluated on Page 16, then?

1 A (WITNESS KOSTAL) Well, on Page 17 -- excuse me.

2 Q Page 17?

3 A (WITNESS KOSTAL) -- there is a calculation on the
4 length not welded.

5 Q Right, and an R value of .91 is derived.

6 A (WITNESS KOSTAL) It also includes in that the
7 undersize weld associated with that same connection,
8 which is Weld G.

9 You have to look at those --

10 Q You know that from looking at the diagram on Page 3 of
11 the calculation?

12 A (WITNESS KOSTAL) The diagram on Page 3 of the
13 calculation shows the fact that there is a weld -- a
14 vertical portion of the -- there is a vertical weld
15 that's undersized.

16 That's the Weld G, and it's undersized by 1/32 of
17 an inch for its length. You can find that description
18 on your Exhibit 155, Bates Stamp Page 4667, which is the
19 welder's map.

20 (Indicating.)

21 Q I've got you.

22 A (WITNESS KOSTAL) You'll note over on that welder's map
23 in that lower corner, there indicates a note on that
24 horizontal member that the weld size is 1/32 of an inch
25 undersize 7/8 of an inch for 7/8 inch on the south side.

1 Q I follow all that stuff.

2 Now, what I'm trying to figure out is: How did you
3 happen to get an R value of .906 on your discrepancy
4 point counting form when you only calculated an R value
5 to two digits in the calculation?

6 A (WITNESS KOSTAL) Like I said, it was a translational
7 area. It's 9.1, per the calculation.

8 Q Somebody put "06" down in error?

9 Where did they get that from?

10 There's no translation involved. It's a matter, as
11 I understand your testimony, of simply taking data off
12 of the calculation for the discrepancy and transferring
13 that data onto the discrepancy form.

14 No one made an additional calculation, did they?

15 A (WITNESS KOSTAL) No. This is the calculation on that
16 given connection, which is represented in this
17 particular discrepancy form.

18 Q But the numbers ".906" don't appear anywhere in your
19 calculation.

20 A (WITNESS KOSTAL) That's correct.

21 Q So somebody made it up?

22 A (WITNESS KOSTAL) He translated it wrong. It should
23 have been indicated as 9.1. The calculations still
24 define the 9.1 on Page 17.

25 JUDGE GROSSMAN: You mean .91?

1 WITNESS KOSTAL: I'm sorry; .91 on Page 17.

2 BY MR. GUILD:

3 Q The fact of the matter is the discrepancy point counting
4 form can only be associated with a particular weld or a
5 particular discrepancy by the process of inference that
6 you're making right now.

7 That is, comparing the character of the discrepancy
8 counted and a numerical value and trying to find that
9 numerical value stated in some other document to help
10 you associate that discrepancy with a particular portion
11 of the observation or observation evaluation?

12 A (WITNESS KOSTAL) That's correct.

13 I went through that exercise and was able to
14 determine each of the welds that are represented in
15 these particular discrepancy point counting forms.

16 Q Well, sir, is there any control for the process of
17 counting discrepancy points that states that one must
18 use the discrepancy point forms in a consistent fashion;
19 let's say, on the one hand, either to aggregate all of
20 the same discrepant attributes on one form or to use one
21 form to count all of the discrepant attributes for a
22 single weld?

23 Is there any control and requirement for a uniform
24 application of your discrepancy forms?

25 A (WITNESS KOSTAL) People were trained in reporting the

1 data on discrepancy point counting forms. Sometimes
2 you'd have to look at a given, let's say, observation
3 package.

4 This is a fairly detailed and lengthy observation
5 package; so it was felt by the designers who were doing
6 this particular counting to document them on more than
7 one discrepancy point counting form, since there were
8 multiple discrepancies associated with this hanger.

9 Q I see.

10 I take it there was no requirement of the Sargent &
11 Lundy program for discrepancy point counting that each
12 form be associated explicitly with a particular
13 discrepancy that the form was intended to count?

14 In other words, did the form indicate, "We were
15 evaluating the discrepancies contained in Weld No. 1,"
16 if Weld No. 1 is a designation used by the CSR inspector
17 or the Sargent & Lundy evaluator of the discrepancy?

18 A (WITNESS KOSTAL) There was training, for the various
19 people that were involved in this program, to translate
20 the discrepancies that were observed in the observation
21 packages and document to these types of forms.

22 There was no strict requirement that I'm aware of
23 that said you had to have an individual discrepancy
24 point form for each and every single weld.

25 In this particular case, this happens to be one

1 weld; and in general, these represent a corresponding
2 calculation which is on a weld.

3 Q Except on the first page, in which case there are the
4 evaluation of 10 welds?

5 A (WITNESS KOSTAL) That's correct, and there it just
6 didn't --

7 Q There may be some cases where there is also a
8 combination of the two?

9 A (WITNESS KOSTAL) Sure, sure.

10 It didn't make any sense to make 10 single forms to
11 document 10 unique individual undercut discrepancies
12 when one form can summarize that same data.

13 Q So I take it that the process for discrepancy point
14 counting that's reflected in the counting for Cable Pan
15 Hanger 104 is consistent with any discrepancy point
16 counting procedures or instructions given by Sargent &
17 Lundy, as best you can determine?

18 A (WITNESS KOSTAL) It's supposed to be consistent.

19 Q Well, is it, from your evaluation?

20 You've tried to match it up and, I take it,
21 reviewed the counting forms for this cable pan hanger?

22 A (WITNESS KOSTAL) That's correct.

23 I think I told you on this particular one that I
24 found some differences that exist that weren't properly
25 reported and that I told you what those differences

1 were --

2 Q Well, maybe --

3 A (WITNESS KOSTAL) -- and that we were going through the
4 exercise as a result of this and recounting all of the
5 discrepancies associated with the cable pan hanger
6 population.

7 Q I guess I missed that part of what you told me, because
8 I only understood that you were going back and doing the
9 discrepancy point counting all over again for some
10 unstated reason. Perhaps I didn't hear that it was
11 associated with having identified a miscount for Cable
12 Pan Hanger 104.

13 If that's the case, would you tell me what the
14 miscount was that you identified?

15 A (WITNESS KOSTAL) Well, let me refresh your memory.

16 As you recall, when we were in the other chamber, I
17 sat down and gave you an illustration of an item I found
18 that was not counted in this particular population --

19 Q How about --

20 A (WITNESS KOSTAL) -- which had to do with the
21 underlength of the weld associated with the Unistrut
22 welded to the plate.

23 Q I see.

24 A (WITNESS KOSTAL) Do you recall that?

25 Q I do recall that, but that was associated with this

1 particular Cable Pan Hanger 104 item?

2 A (WITNESS KOSTAL) Yes, sir.

3 Q And you, Mr. Kostal, identified that in the course of
4 reviewing this discrepancy point counting?

5 A (WITNESS KOSTAL) Yes, sir, yes, sir. That was a week
6 ago, I think, Tuesday evening.

7 Q I do recall you telling me about that, and I didn't
8 understand it was associated with Cable Pan Hanger 104.
9 Well, all right, sir.

10 Now, tell me what you identified, then, or why
11 don't you tell the Board what you identified in the
12 course of doing your discrepancy point counting for
13 Cable Pan Hanger 104.

14 What was the error you identified?

15 A (WITNESS KOSTAL) In essence, what I identified -- this
16 particular package of discrepancy point counting forms
17 has a tabulation of 37 discrepancies. That tabulation
18 is found in --

19 WITNESS KOSTAL: Does this have a number?

20 (Indicating.)

21 MR. STEPTOE: Intervenors' 141?

22 A (WITNESS KOSTAL) (Continuing.) -- Intervenors' 141.

23 BY MR. GUILD:

24 Q Your print-out -- is that what you're looking at?

25 A (WITNESS KOSTAL) Yes. In my print-out we documented,

1 under the Cable Pan Hanger 104, that there were 37
2 discrepancies, 31 of which were insignificant and six
3 were notable.

4 In the process of my reviewing this package in
5 preparation for this testimony, this particular
6 testimony, I reviewed the weld maps, I reviewed each of
7 the discrepancy counting forms, and I reviewed the
8 complete set of calculations to determine whether or not
9 everything was consistent across each of these
10 particular documents.

11 In the process of that review, I uncovered a
12 difference in the reported discrepancies as compared to
13 my evaluation of the number of discrepancies that exist
14 on this hanger.

15 Q Okay. I've got you that far.

16 A (WITNESS KOSTAL) The difference is a total of six
17 discrepancies. We originally had six Z's and 31 Y's.

18 From my reviewing of these documents, it's been my
19 determination that there are three X's, there are eight
20 Z's and there are 32 Y's, for a total of 43
21 discrepancies.

22 Q All right, sir.

23 Now, how did you find the missing six in the course
24 of your review of this packet?

25 A (WITNESS KOSTAL) By comparing each joint, by comparing

1 the discrepancy point counting forms and by comparing
2 the calculations that were performed.

3 In the process of doing that, I located areas where
4 we reported incorrectly the number of discrepancies.

5 Q All right, sir.

6 Where did you identify -- excuse me. Go ahead and
7 finish. I'm sorry.

8 A (WITNESS KOSTAL) That's all I wanted to say.

9 Q Where were the discrepancies identified in this package,
10 Mr. Kostal, that were not counted properly in the
11 discrepancy point counts for the package?

12 A (WITNESS KOSTAL) When you look at the weld map, you
13 can count X number of -- you can count all the
14 discrepancies that exist throughout each connection.

15 Q You're talking about the diagram associated with the
16 observation itself?

17 A (WITNESS KOSTAL) Right; in terms of the Bates Stamp,
18 4667 and 4668.

19 Q Okay, all right.

20 A (WITNESS KOSTAL) In the process of doing that and
21 looking at each joint and looking at the number of
22 discrepancies that exist at each joint and also looking
23 at the discrepancy point counting forms on that which
24 define each of the discrepancies, I uncovered
25 differences that were documented.

1 Q Okay. I'm still waiting for the punch line.

2 What are the discrepancies that you identified on
3 this weld map or these weld maps that the man who
4 counted discrepancies missed?

5 A (WITNESS KOSTAL) Okay. There is one undercut.

6 Q Where is that?

7 A (WITNESS KOSTAL) Let me go over it.

8 If you go back to Page -- if you go back to Page 1
9 of the calculation --

10 Q All right, sir.

11 A (WITNESS KOSTAL) -- which is in 155-B --

12 Q Yes.

13 A (WITNESS KOSTAL) -- and if you look at each of these,
14 there is a -- let me see. There is -- if you -- there
15 is an Item 3.

16 If you go back to the weld map and if you go back
17 to Page 3, Page 3 indicates where undercut is defined.

18 Q Page 3 of what, now, sir?

19 A (WITNESS KOSTAL) Page 3 of the calculations shows that
20 on the third diagonal on the right-hand side, it
21 indicates undercut.

22 Q Third diagonal from the bottom?

23 A (WITNESS KOSTAL) Yes, sir.

24 Q The right-hand side; I've got you.

25 A (WITNESS KOSTAL) Okay.

1 Now, if you go back to the weld map and you look at
2 the information that's reported on the weld map at that
3 location, it says there is undercut "on south side of
4 Unistrut top and side."

5 I would interpret that to mean that there is a top
6 weld and there is a vertical weld, and there would be
7 undercut associated with the top weld and there would be
8 undercut associated with the side weld.

9 (Indicating.)

10 Q Two welds?

11 A (WITNESS KOSTAL) That would be two welds.

12 Q And how did the discrepancy point counter count those?

13 A (WITNESS KOSTAL) The discrepancy point counter, in
14 reading this note -- what I believe he read is it said
15 "top and side," and he read it to mean that it was at
16 the top of the side weld and somewhere further down the
17 side weld.

18 Q You're assuming that's what he did?

19 A (WITNESS KOSTAL) Well, he reported -- by looking at
20 the calculations, you can see that he added those two
21 together as one undercut, which is found on Page 1, Item
22 3.

23 Q Oh, I see.

24 So it wasn't just the counter who made the mistake;
25 it was the evaluator as well?

1 A (WITNESS KOSTAL) No. The evaluator welded all the
2 undercut that was associated at that joint.

3 Q The guy who did the calculation mischaracterized the two
4 instances of undercut as one?

5 A (WITNESS KOSTAL) No, he didn't mischaracterize it at
6 all. He correctly added the two together.

7 You are looking at the effect of the undercut on
8 the Unistrut, and the undercut is in the Unistrut.
9 Therefore, you lose a certain cross section of the
10 Unistrut at that location as a result of those two
11 undercuts.

12 Q Oh, I see, okay.

13 So Item 3 on Page 1 of the calculation in reality
14 shows the sum of two welds with one undercut each?

15 A (WITNESS KOSTAL) Correct.

16 Q And the discrepancy point counting man simply counted
17 that as one instance of undercut?

18 A (WITNESS KOSTAL) That's correct. Now, that's my --

19 Q You determined he was in error because you looked at the
20 weld map associated with the observation and read it to
21 indicate two welds?

22 A (WITNESS KOSTAL) That's the way I read it. This is my
23 understanding of where these two different undercuts
24 are.

25 In the spirit of documenting undercut associated

1 with a weld, as I told you before, if undercut was
2 associated -- if more than one place was associated with
3 the weld, we reported it as one undercut.

4 However, if it's associated with two different
5 welds, we would report it as two undercuts.

6 Q All right.

7 In this case somebody exercised some judgment in
8 counting discrepancy points, and they exercised it in
9 error, in your opinion; two welds, not one weld?

10 A (WITNESS KOSTAL) Yes, sir.

11 Q I've got you. That's one out of six.

12 Where are the others?

13 A (WITNESS KOSTAL) If you look at Item 10 --

14 Q Undercut?

15 A (WITNESS KOSTAL) Undercut.

16 Q Page 1 of the calc?

17 A (WITNESS KOSTAL) Page 1 of the calc.

18 Q Okay.

19 A (WITNESS KOSTAL) Well, we really don't have to go any
20 further.

21 Q It takes us to Page 4.

22 A (WITNESS KOSTAL) That is the one that adds to get to
23 the 11. We had 10 noted. This now becomes the 11th
24 one.

25 Q The one, this undercut?

1 A (WITNESS KOSTAL) Yes, sir.

2 Q All right, sir. So that's one additional discrepancy.
3 Where are the other five discrepancies?

4 A (WITNESS KOSTAL) That's one additional discrepancy
5 relating to the undercut.

6 Let's go to 246 of discrepancy point counting form
7 Exhibit 155-A.

8 Q All right.

9 A (WITNESS KOSTAL) That would be the second sheet.

10 Let's also turn, then, to Page 4 of the
11 calculations, which refers to the check of the
12 undersized weld on the two diagonal -- on the Point A
13 and B of the diagonal brace.

14 Now, Point A and B -- we have to go back to Page 3
15 of the calculations, and it defines the plane at which A
16 and B are represented.

17 If you look at the top of that page, on the
18 right-hand side, you'll see a circled A regarding weld
19 undersize. That is the weld between the diagonal plate
20 and the vertical member.

21 If you also look at the bottom of that diagonal on
22 the left-hand side, there is a Weld B, which is the weld
23 between the plate and the vertical member, the same weld
24 location.

25 Now, if we go back to your Exhibit 155 on the weld

1 map and you read on the top, which is Weld A, it says
2 the weld size is "1/16 inch under throat size 3-1/4
3 inches of 3-1/4 inches both sides." So that's two
4 welds.

5 If you read the note on the lower portion of the
6 diagonal, which would represent Weld B, it says, "Weld
7 size 1/16 inch under throat size 3-1/4 inches and 3-1/4
8 inches south side." That is one weld discrepancy.

9 So together between those two locations, there are
10 three discrepant welds.

11 The calculation that was performed was performed on
12 the worst side. That worst side is what's reflected in
13 Page 4 of the calculations, which is the weld which is
14 the connection noted as A.

15 That calculation was made based on an R value of
16 two discrepant welds. They were discrepant by 1/16 inch
17 undersize, okay.

18 If you go then to the discrepancy point counting
19 form, which is Page 246 of Exhibit 155-A, it notes there
20 are two weld size discrepancies that are Z. It failed
21 to report -- since the calculation was done at Joint A,
22 it failed to report the fact that that calculation
23 represented also Weld B, and it didn't report that other
24 discrepancy.

25 So instead of having two weld sizes for this

1 particular discrepancy point counting form, there should
2 be three. That's one more.

3 JUDGE GROSSMAN: Excuse me, Mr. Guild.

4 Is there any reason why we have to go through the
5 other six?

6 MR. GUILD: Somebody is going to have to
7 decide they counted these discrepancy points correctly
8 for all of the thousands of welds that are evaluated in
9 BCAP, Judge. It's an arduous process, I'll certainly
10 concede.

11 But it would seem to me that the obscurity and the
12 judgment that's required in order to correctly count
13 these discrepancy points should be a matter of record so
14 that appropriate inferences can be drawn about the
15 likely errors that exist in other instances.

16 JUDGE GROSSMAN: Well, Mr. Kostal, is there
17 any difference in kind between the other six than from
18 the two that you've discussed?

19 WITNESS KOSTAL: Well, there are basically
20 those same kind.

21 However, we did double-count some undercut which
22 shouldn't have been. It was counted twice. It was
23 counted once on one form, and then it was counted again
24 on another form. So, in essence, we had two undercuts
25 reported -- three undercuts reported twice.

1 So there were some deletions from the --

2 JUDGE GROSSMAN: But you have a net gain
3 of --

4 WITNESS KOSTAL: We have a net gain of six.

5 JUDGE GROSSMAN: Okay.

6 So that's nine that were reported and three that
7 were reported twice; is that correct?

8 WITNESS KOSTAL: That's correct.

9 JUDGE GROSSMAN: I don't really think it's
10 worth our while to go through each of these now.

11 If you, Mr. Guild, wish to go through these with
12 the witness on your own time and then decide whether
13 there's any significance over and above what we've
14 already heard with regard to the two, we'll entertain
15 that testimony.

16 But otherwise it just doesn't seem profitable.

17 MR. GUILD: Perhaps if I could just ask that
18 Applicant supply a description of where the other errors
19 occurred in a documentary form. I don't mean to take
20 the Board's time unduly, but I'm learning about this for
21 the first time as well.

22 I hesitate only because I don't mean to waive my
23 rights and be in a position where I have to join an
24 argument from Applicant about the degree of accuracy in
25 their discrepancy point counting that I can't completely

1 meet because I haven't pursued this matter with this
2 witness.

3 But if Applicant will agree to supply a written
4 description of where the other errors existed for this
5 cable pan hanger -- I'm only using one example now, Mr.
6 Chairman. I'm not going through multiple examples of
7 any of these Sargent & Lundy pieces of work. I simply
8 want to have this as exemplary.

9 JUDGE GROSSMAN: Okay. I don't think we need
10 to have that by tomorrow.

11 So, Mr. Steptoe, if you can have Mr. Kostal write
12 out the items or find some way of getting that written
13 out --

14 MR. STEPTOE: We can generate such a piece of
15 paper I think over the weekend, not tomorrow.

16 But Mr. Kostal is frowning at me. Maybe I'd better
17 check with him.

18 JUDGE GROSSMAN: Well, if you were planning
19 on going to Acapulco over the weekend, Mr. Kostal --

20 (Laughter.)

21 WITNESS KOSTAL: I'm not going anywhere.

22 I guess I was trying to, you know -- in the spirit
23 of cooperating with Mr. Guild, I guess I -- would he
24 accept the fact if I just marked up these discrepancy
25 point counting forms with the correct values and

1 indicate where in the calculation you would find those
2 given joints?

3 MR. GUILD: That would be fine if you could
4 do that as a starter, Mr. Kostal, and it may make
5 perfect sense and be all that's required.

6 JUDGE GROSSMAN: And then put a short
7 narrative which you think will explain what was done
8 with each point.

9 That's out of the way. Let's get on to the next
10 item, Mr. Guild.

11 MR. GUILD: All right, sir.

12 Mr. Chairman, the hour is almost 5:00 o'clock.
13 Perhaps if I can collect my notes, I can complete Mr.
14 Kostal promptly first thing in the morning.

15 I do have one other subject that I'm still awaiting
16 information from Applicant on, and that had to do with
17 the computer model that was used for evaluating the
18 cable pan hanger discrepancy.

19 MR. STEPTOE: We can take care of that this
20 evening, Judge Grossman.

21 JUDGE GROSSMAN: Okay.

22 Well, maybe I have one or two questions, since it's
23 before 5:00.

24 We have a revision of the BCAP document which has
25 the categories X, Y, Z and D in the document. I think

1 it's sometime in the middle of 1985.

2 When was Category D put into the plan, Mr. Kostal?

3 WITNESS KOSTAL: Category D was put in at the
4 same time X, Y, Z was put in. It represented the
5 concept of design-significant discrepancies, "D"
6 standing for design-significant.

7 JUDGE GROSSMAN: And that was in there all
8 the time?

9 WITNESS KOSTAL: Yes, sir.

10 JUDGE GROSSMAN: Was that similar to the
11 Byron BCAP program?

12 WITNESS KOSTAL: Yes, sir.

13 JUDGE GROSSMAN: And that was in all the time
14 in Byron, too?

15 WITNESS KOSTAL: Yes, sir.

16 JUDGE GROSSMAN: Okay.

17 When you made your calculations with regard to
18 stress, either in conduit or cable pan hangers or
19 whatever items we had here in the six categories that
20 required that kind of calculation, did you take into
21 account items that were not subject to your calculation
22 that might have affected stress?

23 By that I mean items that were right next to the
24 conduit or, let's say, were connected to the conduit.

25 WITNESS KOSTAL: Yes, sir. Let me give you

1 an example: a weld.

2 A weld we would take into account -- a weld
3 represents a definition of a length of weld that, when
4 you make a right-hand turn, you have another weld.

5 So if you're looking -- you don't analyze just each
6 individual weld; you analyze the welds that are
7 associated with the connection to transfer the load from
8 one element to another element.

9 JUDGE GROSSMAN: Okay. But you're now
10 discussing welds on the items that you evaluated.

11 WITNESS KOSTAL: I just wanted to start with
12 that. Then I'll get to the next one.

13 Let's take, for example, in the weld population we
14 would include all the welds in that connection and all
15 the discrepancies in that connection and analyze all
16 those discrepancies on that weld group simultaneously.

17 Let's take the conduit hanger population, where
18 conduit is attached by clamps to vertical Unistruts.

19 In the case where we have an observation package
20 that's reviewing a given hanger and that hanger shows a
21 missing clamp, meaning the conduit is not attached to
22 that hanger, we would look at the two adjacent hangers,
23 which now carry more load. That would be an example
24 where we would look at the two adjacent hangers.

25 The reciprocal of that would be if we were looking

1 at the conduit population and we were missing the clamp,
2 we would look at what the new effect is of the conduit
3 for that longer span to make sure that the reaction at
4 the two adjacent hangers are still within, quote,
5 "allowables" for the conduit.

6 So yes, indeed, we do take into account, when
7 appropriate, adjacent elements.

8 JUDGE GROSSMAN: Well, how about cable
9 hangers? Is that the way it's characterized?

10 WITNESS KOSTAL: In the cable pan hanger
11 population, we define every joint as being a
12 calculation. As long as every joint still stays within
13 code, there is no -- it defines each joint. Each joint
14 stays within code. Therefore, the entire hanger is
15 within code.

16 So rather than looking at the combined effect of
17 all the discrepancies -- which you could, and you could
18 input that into a given analysis -- we look at each
19 individual connection and ensure that the connection
20 satisfies the criteria of meeting the code allowable,
21 rather than relying on at least from the first cut.

22 We haven't relied upon it in any of these
23 calculations on redistributing the loads by a more
24 detailed hanger analysis, taking into account the
25 revised stiffness characteristics of each of the joints.

1 We don't have to do that, since each joint still stays
2 within the code.

3 JUDGE GROSSMAN: Okay, fine. I have no more
4 questions now.

5 We'll adjourn until 8:00 o'clock tomorrow morning.

6 (WHEREUPON, at the hour of 5:00 P. M., the
7 hearing of the above-entitled matter was
8 continued to the 17th day of October,
9 1986, at the hour of 8:00 o'clock A. M.)

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CERTIFICATE OF OFFICIAL REPORTER

This is to certify that the attached proceedings before the UNITED STATES NUCLEAR REGULATORY COMMISSION in the matter of:

NAME OF PROCEEDING: Braidwood Station
Units 1 & 2

DOCKET NO.: 50-456/457-OL

PLACE: Chicago, Illinois

DATE: Thursday, October 16, 1986

were held as herein appears, and that this is the original transcript thereof for the file of the United States Nuclear Regulatory Commission.

(sig) Nancy J. Hopp
(TYPED) Nancy J. Hopp

Official Reporter

Reporter's Affiliation