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BEFORE THE  
NUCLEAR REGULATORY COMMISSION  
OFFICE OF INVESTIGATION

INVESTIGATIVE INTERVIEW

OF

BILLY RAY CLEMENTS

INVESTIGATOR: H. Brooks Griffin  
Nuclear Regulatory Commission  
611 Ryan Plaza Drive  
Arlington, TX 76011

REPORTER: Cynthia Clay  
DATE August 19, 1985

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PDR ADOCK 05000445  
A PDR

P R O C E E D I N G S

1  
2 MR. GRIFFIN: For the record, this is an  
3 interview of William Ray Clements--

4 MR. CLEMENTS: Billy.

5 \*MR. GRIFFIN: Billy. --Billy Ray Clements,  
6 spelled C-l-e-m-e-n-t-s, who is employed as a Vice-President  
7 for Texas Electric Service Company.

8 The date is August 19, 1985, and the time  
9 is 1:37 p.m.

10 Present at this interview are Billy Ray  
11 Clements and his personal representative, Robert Wooldridge.  
12 On behalf of the NRC, myself, H. Brooks Griffin.

13 This interview is being transcribed by a  
14 court reporter.

15 Mr. Clements, I need you to rise, raise your  
16 right hand; I want to swear you to the contents of your  
17 testimony.

18 Whereupon,

19 BILLY RAY CLEMENTS,

20 having first been duly sworn to tell the truth, the whole  
21 truth and nothing but the truth, testified on his oath as  
22 follows:

23 EXAMINATION

24 BY MR. GRIFFIN:

25 Q Before I start asking you some questions

1 about the MAC Report and the history of that, I want to  
2 explore your relationship with Mr. Wooldridge here.

3 Let me tell you to start with that you are  
4 entitled, when you're interviewed by the NRC, you're  
5 entitled to be represented, to have a representative present  
6 if you choose to. That representative can be anyone of  
7 your choosing. It can be a relative or friend or, if you  
8 choose, an attorney.

9 For the purposes of this interview, is Mr.  
10 Wooldridge your personal representative?

11 A Yes.

12 Q Mr. Clements, you're also aware of the other  
13 related groups and individuals that Mr. Wooldridge represents  
14 in relation to this particular investigation? I'm asking  
15 that as a question. Are you aware that he's represented  
16 others?

17 A Yes, I am.

18 Q Are you also aware that he formulated, or  
19 at least drafted the response to the NRC as to why this  
20 report was not produced in 1980? Were you aware of that?

21 A I was aware that he had some input to it.  
22 I didn't know that he did the whole thing.

23 Q The reason I ask the questions is only to  
24 make sure that you understand that he's representing other--

25 A In that context, yes, sir, I do.

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MR. GRIFFIN: Okay.

Mr. Wooldridge, if during this interview you perceive a potential conflict of interest between whatever guidance or counseling you might give Mr. Clements as to his testimony, if you perceive that there was a conflict of interest, what would you do in that instance?

MR. WOOLDRIDGE: I would confer with Mr. Clements and we would work out a mutually satisfactory arrangement.

MR. GRIFFIN: Okay.

MR. WOOLDRIDGE: And Mr. Clements and I have discussed that circumstance.

MR. GRIFFIN: Okay, good.

BY MR. GRIFFIN:

Q Mr. Clements, when did you first join the Utility? Do you remember when it was?

A Can you be a little more specific? when you say "the Utility," are you talking about Texas Utilities Company system?

Q Yes.

A July the 1st, 1974.

Q In what capacity?

A I was executive assistant to Mr. Perry Britton who was at that time the president of TUSI, Texas Utilities Service, Incorporated.

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A So the question about--the question I answered I answered as far as titles was concerned, but I was the manager of Nuclear Operations working in Lignite Operations.

Q Okay.

For the purposes of this interview, when did you take on the responsibility of overseeing the QA program?

A August the 1st, 1980.

Q Are you familiar with the history at all of the MAC contract in 1978, when they were hired to do a QA program review?

A No.

Q When did you first become aware of either the MAC Review or the MAC Report?

A Generally in 1978, I heard that they were going to do a review.

Q So you heard back before they actually started their review?

A I'm not sure whether it was before or after, or just generally I knew that MAC-- Your original question was was I familiar with the MAC contract, and the answer to that was no, but I knew in general that MAC was doing something.

Q Okay.

Were you aware that it was related to the

1 Q When did you become the vice-president of  
2 TUGCO?

3 A June the 5th, 1978.

4 Q When did you assume responsibility for the  
5 Nuclear Act, for the Utilities enterprise?

6 A I was made manager of Nuclear Operations on  
7 September the 1st, 1975.

8 Q And then in '78 you assumed your vice-presidency  
9 of TUGCO? if I understand you.

10 A Yes.

11 Q Okay.

12 A The manager of Nuclear Operations was a TUGCO  
13 position.

14 Q Okay.

15 A Let me clarify that, if you will.

16 There was not much operations, obviously,  
17 going on between the first of September 1975, until a subse-  
18 quent reorganization in 1980. and so in about 1976 or '77  
19 our vice-president for Lignite Operations got cancer,  
20 developed cancer, so in those interim years from about 1977,  
21 Mr. Griffin, whenever this particular time was, until August  
22 1st of 1980, I spent 98 percent of my time working in--that  
23 may be a little bit high number--but I spent a large majority  
24 of my time working in Lignite Operations.

25 Q All right.

1 implementation of the QA program? when you first heard about  
2 it.

3 A I'm not sure, uh-uh, I'm not sure.

4 Q Mr. Clements, I have your statement that  
5 was included in part of Mr. Wooldridge's affidavits that  
6 he, prepared in response to the Intervenor and I'm going  
7 to be using that; it's dated August 8, 1985, and has your  
8 signature. I'm going to basically follow your testimony  
9 and then ask whatever additional questions I have.

10 A August the 8th?

11 Q Yes.

12 A All right.

13 Q Which I believe is the last one that was  
14 prepared, that I'm aware of.

15 MR. WOOLDRIDGE: Yes.

16 A Makes three of us.

17 BY MR. GRIFFIN:

18 Q Okay.

19 In your testimony you said you were not  
20 interviewed by the MAC representatives, nor did you attend  
21 the pre-audit or post-audit meetings. That is true, I  
22 assume?

23 A Yes.

24 Q Have you ever met any of the MAC representatives,  
like John Jackson, or Jack Norris?

1           A           Subsequently over the years, yes, I have.

2           Q           After MAC completed their review of-- I'm  
3 telling you this--they prepared a written report which  
4 they provided to various officials within the Utility. Did  
5 you ever have--did you ever see that report?

6           A           Not to my recollection.

7           Q           Did you ever have any discussions with any  
8 other Utility representatives regarding the findings or  
9 the results of that report?

10          A           I heard just general discussions among  
11 people, and I'm not even sure if the people making those  
12 discussions had access to the report, but I heard them  
13 talking about the MAC Report or MAC Review, or whatever.

14          Q           Do you remember the names of some of the  
15 people that you may have discussed this with?

16          A           The only one that comes to mind is David  
17 Chapman.

18          Q           Do you know in what context, or what was  
19 said during that conversation with Chapman?

20          A           Specifically I don't recall; just conversa-  
21 tions.

22          Q           As you may know I've already interviewed a  
23 number of other employees, including Mr. Chapman, on this  
24 particular issue, and you may already be aware that Mr.  
25 Chapman has conveyed to me that he believes that he did

1 have a discussion with you on this subject and that he--if  
2 I'm characterizing his testimony correctly, conveyed to  
3 you that he believed that this particular report was producible  
4 under the Intervenor's 1980 request. Do you remember Mr.  
5 Chapman conveying that to you?

6 A I remember a general discussion about that  
7 between David and me, yes.

8 Q And is that your recollection, that he felt  
9 that it was producible?

10 A Yes.

11 Q Are you-- Let me ask you a question. Are  
12 you also aware that Mr. Chapman has indicated, or has  
13 testified that he believes that you were generally in  
14 agreement with his assessment that it was producible at  
15 that time and that that is his recollection? Is that  
16 accurate?

17 A That's not accurate, mainly because I'd  
18 never seen the report. I had no notion of whether it was  
19 or not. I hadn't seen the report.

20 Q Okay.

21 Well, remembering back to that discussion,  
22 when you became aware, did you have an opinion at that  
23 time as to whether this report was produced at the  
24 Intervenor's request in 1980?

25 A I had no opinion because I'd never seen the

1 report and I had had no access to the report. So I was--  
2 any opinions I had would have been based on somebody else's  
3 discussions.

4 Q Okay.

5 Now when you assumed the responsibility over  
6 QA, I presume that this same Intervenor's request was in  
7 place, so to speak, for subsequent years, in that the  
8 Utility was obligated to respond to other audits that might  
9 fall into this same category, which I believe is referred  
10 to as Item 10 of the Intervenor's request. Are you familiar  
11 with that fact?

12 A Well, you said "I assume" and "I believe,"  
13 and I'm not sure--is there a question in there?

14 Q Okay. I'm asking--I'm formulating this  
15 question based on the fact that the Utility did respond,  
16 or offered other audits over the years in response to Item  
17 10 of the Intervenor's 1980 request. During that time  
18 you were the QA--you supervised ultimately over QA.

19 A Yeah.

20 Q And in that the Utility made subsequent  
21 responses to Item 10, I'll put the question this way: Were  
22 you involved in those subsequent responses? like the Lobbin  
23 Report--

24 A Lobbin Report, yes, uh-huh. I made the  
25 decision to present that, yeah.

1 Q Now my question--

2 A I think I understand the question. On a con-  
3 tinuing basis, were we still--was I involved in feeding or  
4 providing stuff to the Intervenor based on that. The  
5 answer is yes.

6 Q Okay.

7 Well, with that in mind, why did you choose  
8 not, as I believe your response is, why did you choose not  
9 to revisit this matter when you assumed this responsibility  
10 over QA?

11 A There were several reasons. One, the  
12 decision was not a Quality Assurance decision. I was  
13 responsible through my chain of command for Quality Assurance,  
14 but this was not a Quality Assurance decision. This was a  
15 Licensing decision, and I had no responsibility, nor did  
16 anyone in my chain, my immediate boss, and so forth, have  
17 any responsibility for Licensing.

18 So, therefore, I felt it was made by a  
19 corporate officer senior to me, not in my chain, and there  
20 had been a lot of decisions made over the years from the  
21 time we started building Comanche Peak until I took over  
22 Quality Assurance the first of August 1980, which I didn't  
23 revisit. And I just didn't feel like it was my responsibility  
24 to revisit that decision, based on the fact it wasn't in  
25 my chain of command, and it wasn't under my auspices.

1           Q           Okay. I understand what you're saying about  
2 chain of command, but it's my understanding that the way t  
3 the way the Utility--the form that the Utility used to  
4 respond to the Intervenor's request and to the NRC's  
5 various requests over the years, was to have Licensing  
6 present whatever was needed to the various divisions within  
7 the Utility and require those divisions to make a response,  
8 thereby making the Licensing division or section just merely  
9 a conduit for that information.

10           A           That's true.

11           Q           So in this instance, it's my understanding,  
12 also, that the QA Department--and this is before you  
13 assumed responsibility over QA, I understand that--that the  
14 QA Department received this request and did make some kind  
15 of response to a licensing representative.

16                       And with that in mind, did you feel that it  
17 was--you were not obligated at the time you assume QA to  
18 go back and revisit, or review what had been presented  
19 before under this?

20           MR. WOOLDRIDGE: Before you answer that,  
21 he's made an awful lot of assumptions about what he under-  
22 stands the record to be to this date.

23           MR. GRIFFIN: Right.

24           MR. WOOLDRIDGE: And by your answer, you  
25 clarify what you understand those assumptions as being

1 correct or not, or whether you know about them or not.

2 THE WITNESS: Maybe we need to read the  
3 question back so I'll know what the assumptions are.

4 MR. GRIFFIN: If I have misstated something,  
5 would you say "you're wrong on this point"?

6 THE WITNESS: Well, awhile ago you said  
7 "I assume" and then "I believe" and I believe you're con-  
8 fusing the issue a little.

9 MR. GRIFFIN: Well, I can probably restate  
10 my question and break it up into segments and--

11 THE WITNESS: Okay, that would be easier.

12 MR. WOOLDRIDGE: You made, just for my  
13 purposes, you made the point that you thought that all  
14 Licensing did was act as a conduit and I don't believe  
15 that's what's reflected.

16 MR. GRIFFIN: I'm sure their activities are  
17 greater than that. But as it relates to this particular  
18 request by the Intervenor. See, I've interviewed other  
19 people before you and it's been explained to me that the  
20 Licensing Department did not do the research to respond  
21 to this request themselves.

22 In fact, what they did, they notified various  
23 division heads who I assume, in turn (this is another  
24 assumption on my part), had their subordinates collect or  
25 do the appropriate reviews.

1 So for the purposes of QA, it's my under-  
2 standing at this time that the Licensing people were not  
3 really the responsible party, as relates to the QA, but the  
4 QA Department was responsible for the response.

5 MR. WOOLDRIDGE: Why don't you answer that  
6 question as to whether you know that to be true or not.

7 THE WITNESS: At that period of time I'm  
8 not sure if that's true or not.

9 BY MR. GRIFFIN:

10 Q Okay, would it have been true at the time  
11 that you assumed--

12 A No. You're asking me about the time I  
13 assumed, I thought. At that particular time I do not know  
14 if that was a fact or not.

15 Q There were subsequent responses to Item 10  
16 of the Intervenor's 1980 request while you were over QA?

17 A Yes.

18 Q Did Licensing make these responses?

19 A No. We gathered the documents and presented  
20 them to Licensing.

21 Q That's what I'm trying to say.

22 A You asked me about the July period there,  
23 when this stuff was all put together. This decision was  
24 made prior to me taking over.

25 Q I understand that.

1           A           And subsequent to that, we gathered up the  
2           Quality Assurance documents, and presented them to Licensing.  
3           But I can't testify what happened prior to 1 August of '80.

4           Q           When you took over on August 1, did you  
5           have occasion to review any past decisions, or any past  
6           responses to the Intervenor's request?

7           A           No.

8           Q           As part of your duties?

9           A           No.

10          Q           So you just went forward from there rather  
11          than backward.

12          A           That's right.

13          Q           In 1978, did you have any input to the  
14          Utility's internal response to the MAC Report?

15          A           No.

16          Q           In 1980, after you assumed supervision over  
17          QA, did you ever see the internal response?

18          A           In 1980?

19          Q           Um-hmm.

20          A           No.

21          Q           In other words, you didn't see the MAC Report  
22          in 1980, and you also did not see TUGCO's, or the internal  
23          TUGCO response--

24          A           Best of my knowledge I never saw either one  
25          of them.

1           Q       In your discussions-- I know I'm jumping  
2 around here. But in your discussions with--this one  
3 discussion, anyway, with Mr. Chapman that you had some  
4 recollection of, did he convey to you the contents or the  
5 findings of the MAC Review?

6           A       I don't recall whether he did or not. I  
7 remember discussing it, but I don't remember whether he  
8 told me the specifics or not.

9           Q       Mr. Clements, as I've gone through this  
10 investigation I've talked to quite a few people now, and  
11 you may be aware that some of your subordinates that are  
12 high up in the chain on the Nuclear side had what I think  
13 ~~is~~ a strong opinion about the fact that this should have  
14 been a producible item.

15                       And this is a characterization that I'm  
16 putting in at this point; it appears, based on their testi-  
17 mony, that there was more than a few opportunities for  
18 upper management, you, Mr. Fikar, others, to have possibly  
19 been exposed to these people's opinions that this was  
20 producible.

21                       Did any of these individuals, like Chapman  
22 or Tolson, ever convey to you that they thought that you  
23 should reconsider this decision made earlier before you  
24 assumed control? Were you ever warned?

25           A       Warned? No.

1 Q Did they ever express this opinion to you  
2 after you took control?

3 A As I've testified, I've heard--I do recall  
4 Chapman, and just in general conversation, saying, "You  
5 know, I think we made a mistake" blah, blah, blah, but  
6 warning, that's a little strong. No, he did not warn me.

7 Q But whatever Mr. Chapman conveyed to you,  
8 it didn't cause you to go back and look at the report or  
9 think that you should, or consider that this maybe was,  
10 in fact, producible?

11 A No. It did not. Based on the reasons I'd  
12 already given you awhile ago.

13 Q In your affidavit of August the 8th, you  
14 say that it was your understanding that a decision had  
15 already been made by TUGCO management for the MAC Report  
16 was not within the scope of the Intervenor's request for  
17 information.

18 How did this information come to you?

19 A Would you read that again, please?

20 Q I'll read the sentence exactly as it appears  
21 in your statement.

22 A Okay.

23 Q "It was my understanding that the decision  
24 had already been made by TUGCO management that the MAC  
25 Report was not within the scope of CASE's request for

1 information."

2 A Um-hmm.

3 Q How did you come by that information? How  
4 did you come by this understanding that a decision had been  
5 made?

6 A Best of my recollection it was a discussion  
7 with Chapman.

8 Q Did you ever have any discussions with Fikar  
9 or Marshall in Licensing?

10 A No, I didn't have any with Fikar, and I  
11 don't recall any with Marshall.

12 Q Did you know at the time who had made this  
13 decision that this was not producible?

14 A No. I can make an assumption at that time,  
15 but I didn't know specifically who had made the decision.

16 Q If I understand correctly, you're saying you  
17 relied on this understanding, or this information, but  
18 you don't know who made the decision?

19 A Like I say, I assumed who had made the  
20 decision, but I didn't know for sure who had--

21 Q Who had you assumed had made it?

22 A I assumed it was Lou Fikar.

23 Q And you--

24 A Licensing reported to Lou, and I've been  
25 told it had been made by management of Licensing, or in

1 general terms like that, and I presumed that Lou had made  
2 the decision. He'd been the one in position to do that.  
3 But I didn't know for sure. I didn't hear Lou make the  
4 decision, or Lou never discussed it with me.

5 Q In your statement you also recall being  
6 told that the MAC Report was an informal review and was  
7 used as a management tool and, therefore, was not subject  
8 to discovery. Who conveyed this information to you?

9 A David Chapman.

10 Q Did Chapman ever tell you about some of the  
11 critical parts of the MAC Report as it related to, like,  
12 implementation of QA or adherence to Appendix B?

13 A I don't recall; I'm trying to think, but  
14 I don't recall any specific time of what he told me was  
15 in the contents. I have just a general vague idea that  
16 it was a review of the project for senior management.

17 But any specific items in it, best of my  
18 recollection, I don't remember those.

19 Q I think I already asked you earlier in this  
20 interview about whether or not you knew Jackson or Norris  
21 with MAC. Could you tell me how you got to know these  
22 people, what you were doing?

23 A Jackson--John Jackson, isn't it?

24 Q Um-hmm.

25 A --had come by a couple of times within recent

1 years to see if he could sell MAC services to the company.  
2 And Jack Norris, the name strikes--he wouldn't be the one  
3 that works now for the paint company, would he?

4 Q No, he's still--

5 MR. WOOLDRIDGE: That's not the same.

6 THE WITNESS: Not the same Jack Norris?

7 MR. GRIFFIN: No, he still works for MAC.

8 A Best of my knowledge, then, I may have met  
9 him, but I don't know him.

10 BY MR. GRIFFIN:

11 Q When these MAC representatives, Jackson at  
12 least, since you seem to recall him, when they recontacted  
13 you, it was for more business, they were trying to get  
14 other contracts?

15 A Yes. More consulting business with us.

16 Q Did you ever hire them for any--or were  
17 they ever hired?

18 A No.

19 Q Do you know why?

20 A Well, one reason-- You mean why I didn't  
21 hire them, or why anybody else didn't hire them?

22 Q Why anybody else didn't.

23 A No, I do not know why anyone else--

24 Q Okay, do you know why you didn't hire them?

25 A At one time John Jackson had made an offhand

1 comment to our president about our record management system,  
2 and it took me three months of working to prove that it was  
3 a good record management system, and come to find out that  
4 this was just an offhand remark by Mr. Jackson in front of  
5 Mr. Britton. He really meant that he didn't like automated  
6 record management systems, but he left the impression that  
7 we had--that we had a bad one.

8 So I wasn't interested in doing business with  
9 a guy that would cause me that kind of problems just by an  
10 offhand comment.

11 Q Did you have any other input from any other  
12 Texas Utilities employees regarding the validity of, say,  
13 the findings or the findings of that 1978 report that  
14 influenced you not to give MAC more business?

15 A No. That had nothing to do with it at all.

16 Q The reason I asked is because I had taped  
17 a conversation where other members of the Utility had dis-  
18 agreed with some of MAC's findings and I thought this might  
19 have been factored in--

20 A No, since I didn't know what the findings  
21 were I couldn't come to that conclusion.

22 Q At the time that you assumed supervision  
23 over QA, were you responsible for seeing that the Intervenor's  
24 requests were filled as information was developed, in  
25 response to their original request?

1 MR. WOOLDRIDGE: Personally responsible?

2 MR. GRIFFIN; Yes.

3 A No, that was a Licensing function.

4 BY MR. GRIFFIN:

5 Q So if they needed information from QA or  
6 from any other department under your--

7 A They'd spread it out and ask for it.

8 Q So you weren't personally involved?

9 A No.

10 Q You indicated--we mentioned the Lobbin  
11 Report awhile ago. Did you have to make a decision as to  
12 whether that would be produced?

13 A No. Oh. I misunderstood. Did I have to  
14 make a decision. It was obvious to me that that would be  
15 produced.

16 Q Were you in on the decision making that that  
17 was producible?

18 A Sure.

19 Q I'm not that familiar with the system--

20 A No, and I don't mean to be facetious. What  
21 I'm saying is that that Lobbin Report was chartered by me  
22 for a purpose--

23 Q Okay.

24 A --and I knew all about the Lobbin Report.  
25 I was the guy who hired Fred Lobbin, based on recommendation.



1 the response to the Intervenor's request?

2 A I don't remember--I don't know. We did  
3 audits. The answer is I don't know.

4 Q I'm trying to make a distinction here between  
5 third-party audits of the TUGCO program versus third-party  
6 audits of Brown & Root or Westinghouse or any....

7 A Anything like that would have been put  
8 together by David Chapman and his folks, and I would not  
9 personally have overseen a collection of that, and so forth.  
10 It would have just gone on to Licensing as a routine matter.

11 Q I'm asking, then, do you know if any were  
12 referred to Licensing?

13 A I do not know.

14 Sorry I missed the question.

15 Q I'm afraid I'm a little wordy today.

16 Mr. Clements, did you choose not to revisit  
17 the matter of the production of the MAC Report in 1980 in  
18 response to the Intervenor's request because you knew that  
19 it was--that the findings were adverse to the best interests  
20 of the Utility?

21 A I did not.

22 Q Do you know who, besides Mr. Fikar, was  
23 responsible for formulating, or making the decision not  
24 to produce the MAC Report as part of the--in response  
25 to the Intervenor's request?

1           A:       I do not.

2           Q        Are you familiar with Mr. Wooldridge's  
3 letter of June 12, 1985, which is to the Administrative  
4 Judges of the ASLB for Comanche Peak? I'll let you take  
5 a look at a copy of it. Have you seen this document  
6 before?

7                     In this, Mr. Wooldridge--

8           A        Yes, I've seen this.

9           Q        --writes the explanation of why the document  
10 was not produced.

11          A        I have seen it.

12          Q        And you're familiar with the contents or  
13 the explanation of why it was not produced?

14          A        Yes.

15          Q        Beyond what is contained in this document,  
16 in this response, do you know of any other information as  
17 to why the MAC Report was not produced in 1980 that would  
18 shed light on this subject?

19          A        I do not.

20          Q        Okay.

21                     I want to read a short paragraph in here  
22 in which Mr. Wooldridge characterizes your testimony. I  
23 want you to tell me if it's accurate.

24                     "The interviews also indicated that a TUGCO  
25 officer, Mr. Clements, was aware of the report in 1980, even

1           though he had not read the report." Is this correct?

2           A           That's correct.

3           Q           "Mr. Clements assumed responsibility for  
4           QA shortly after Mr. Fikar made the decision that the  
5           report should not be produced, was aware of the decision  
6           not to produce the report, but did not revisit that decision."

7                       Is that a true statement?

8           A           That's true. For the reasons I've so  
9           indicated earlier.

10          Q           Mr. Clements, can you think of any other  
11          information that you possess or that you recall, or any  
12          information that has come into your possession, that sheds  
13          any further light on why this document was not produced  
14          in 1980?

15          A           No, I can't. Well, you said-- No, I don't.

16          Q           I'm asking you for--

17          A           No. I understand. Not to my knowledge.

18          Q           Okay.

19                       So you think as far as your testimony is  
20          concerned that the NRC and all parties have your testimony  
21          on this subject and it's the truth as you know it to be?

22          A           That's correct.

23          Q           Mr. Clements, have I threatened you in any  
24          manner or offered you any rewards in return for this  
25          statement?

1 A No. t

2 Q Have you given this statement freely and  
3 voluntarily?

4 A Yes.

5 Q \*Is there anything further that you would  
6 care to add to the record?

7 A No.

8 Q Okay. I appreciate your time.

9 MR. GRIFFIN: Off the record.

10 [Whereupon, at 2:15 p.m., the interview  
11 was concluded.]

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CERTIFICATE OF OFFICIAL REPORTER

This is to certify that the attached proceedings before the  
FEDERAL ENERGY REGULATORY COMMISSION in the matter of:

Name of Proceeding:

INVESTIGATIVE INTERVIEW (CLOSED MEETING)

NAME OF WITNESS: BILLY RAY CLEMENTS

Docket No.: NONE

Place: ~~ROCKWELLTON~~, TEXAS  
Fort Worth

Date: August 19, 1985

were held as herein appears, and that this is the original  
transcript thereof for the file of the Federal Energy Regulatory  
Commission, and is a full correct transcription of the  
proceedings.

Capitola C. Long  
Official Reporter