Brown & Root, Inc.

7c

DECEMBER 9, 1983

MILLWRIGHT/BOILERMAKER DEPT.

EMPLOYEE NAME: [redacted]

DATE HIRED:

DATE TERMINATED:

REASON: REDUCTION IN FORCE

PROMOTION DATES: [redacted]

WHILE [redacted] WORKED FOR THE MILLWRIGHT/BOILERMAKER DEPARTMENT HIS MAIN DUTIES WERE [redacted] SECTIONS FOR UNIT #1 & 2 AND [redacted] FOR UNIT #1 AND THE [redacted] BUILDING.

FOR AN EXAMPLE DURING THE MONTH OF [redacted] SECTIONS UNIT # 1 & 2 AND [redacted] FOR UNIT #1 AND THE [redacted] DURING THIS MONTH ALL OF HIS TIME WAS CHARGED TO [redacted] FOR UNIT #1 & 2, WITH NO OTHER TIME BEING CHARGED TO [redacted]

FOIA-85-59

T/4

George Tanley

GEORGE TANLEY
MILLWRIGHT/BOILERMAKER SUPERINTENDENT
EXT. 262

GENERATING CO.:

Attachment "I"

UNIT	STRUCTURE/SYSTEM	ITEM/COMPONENT	TAG/ID NUMBER	LOCATION OR ELEVATION	RIR NO.
2	DG/3000	Skid Base	FSM-00232 R.0G	813'	N/A

REPORTING PERSONNEL

NONCONFORMING CONDITION

During the rework of the Diesel Generator support structure, the structural steel member referenced in NCR M-82-00902, dated 7/8/82 (attached), was damaged. The damage, a discontinuity in the base metal, was repaired. However, the requirements of CP-CPM-6.9B, Weld Filler Material Control, were not met because the filler material used for the repair was not issued specifically for this repair.

REFERENCE DOCUMENT: CP-CPM-6.9B REV _____ PARA _____

REPORTED BY: [redacted] DATE: [redacted]

QE REVIEW/APPROVAL: T. T. Martin DATE: 8/12/82

ACTION ADDRESSEE: J. T. Merritt/Moehlman DEPARTMENT: Engineering

ACTION ADDRESSEE

DISPOSITION:

REWORK _____ REPAIR _____ USE AS IS XXX SCRAP _____

Use as is. The repaired item was removed in accordance with the disposition of NCR M-82-00902.

ENG. REVIEW/APPROVAL: [signature] 8/12/82 Mark W. Dahl DATE: 8/12/82

QE

QE REVIEW APPROVAL: T. T. Martin DATE: 8/12/82

DISPOSITION VERIFICATION & CLOSURE: T. T. Martin DATE: 8/12/82

QE

COMMENTS:

COMANCHE PEAK STEAM ELECTRIC STATION

INSPECTION REPORT

SHEET 1 OF 1

IR-DG-A21.99

ITEM DESCRIPTION	CONSTRUCTION NO.	SYSTEM, STRUCTURE DESIGNATION
DELAVAL HUB SUB-BASE SKID	FSM-00232	2-2900 / 810' SG II

SPEC NO.	REV.	REF. DCC & REV. & CHANGE NO.	WELDER OR TEST EQUIP. IDENT. NO.
AWS D1.1	1975	CP-QP-11.11 A	NA

☒ IN PROCESS INSPECTION ☐ PRE INSTALLATION VERIFICATION ☐ INSTALLATION INSPECTION ☐ FINAL INSPECTION ☐ PRE-TEST INSPECTION

INSP. RESULTS

☒ INSPECTION COMPLETED, ALL APPLICABLE ITEMS SATISFACTORY

☐ INSPECTION COMPLETED, UNSATISFACTORY ITEMS LISTED BELOW

Franklin D. Smith 4/13/82
CC INSPECTOR DATE

ITEM NO.	INSPECTION ATTRIBUTES	SAT	UNSAT	DATE	CC SIGNATURE
1.	PER DISPOSITION OF M-82-00902 R1, ITEMS G HOLE BEEN REMOVED.	✓			
2	USE AS IS DISPOSITION OF MM-82-01207 BASED ON ITEM 1 ABOVE	✓			

REMARKS (DWGS, SPECS, ETC.)

MM-82-00902 R.1

RELATED NCR NO. MM-82-01207 | I.R. CLOSED NA ☐ | DATE NA | SIGNATURE NA CC INSPECTOR

TEXAS UTILITIES
GENERATING CO.

COMANCHE PEAK STEAM ELECTRIC STATION
NONCONFORMANCE REPORT (NCR)

LWS 8-5-82

NCR No.
M-82-00902 R.1

Work - Lind

UNIT	STRUCTURE/SYSTEM	ITEM/COMPONENT	TAG/ID NUMBER	LOCATION OR ELEVATION	RIR NO.
2	DG/3000	Skid Base	FSM-0C232 R.1G	813'	N/A

REPORTING PERSONNEL

NONCONFORMING CONDITION

During inspection of welds in Diesel Generator 2 linear indications were found in base metal (Item G). Indications ran the length of West side of channel.

Reference NDE #6166 (MT Report).

(1) Hold tag applied.

REFERENCE DOCUMENT: CP-QP-11.11 REV 2 PARA 3.5

REPORTED BY: Kirby Scott DATE: 7, 8, 82

QE

QE REVIEW/APPROVAL: [signature] DATE: 7 29, 82

ACTION ADDRESSEE: J. T. Merritt/Wehlman DEPARTMENT: Engineering

ACTION ADDRESSEE

DISPOSITION:
REWORK ____ REPAIR ____ USE AS IS ____ SCRAP XXX

Interim Disposition:

Item G will be removed and replaced with new material. Old piece is to be returned to vendor for analysis and final disposition.

Waiver: Work not related to Items G, H, J, K, L, M, N may continue.

ENG. REVIEW/APPROVAL: [signature] DATE: 8, 2, 82

QE

QE REVIEW APPROVAL: [signature] DATE: 8, 2, 82

DISPOSITION VERIFICATION & CLOSURE: DATE: / /

COMMENTS: Rev. 1 issued to add temporary waiver.

August 13, 1982

MEMORANDUM

TO: William M. Rice
Group Vice President
Brown & Root Power Division

FROM: H. C. Dodd, Jr.
Vice President
Brown & Root Power Division

SUBJECT: Brown & Root Management Investigation in Response to August 6, 1982 Complaint of [redacted] (Comanche Peak Nuclear Power Plant)

I. [redacted]

In an undated letter (Attachment "A") from [redacted] a B&R general foreman at the Comanche Peak Nuclear Power Plant ("CP"), personally delivered and discussed on August 6, 1982 with Thomas J. Feehan, President, Brown & Root, Inc., [redacted] listed eight areas in which he believed violations of CP safety procedures have occurred.

The letter states that [redacted] either has observed or has personal knowledge of the eight alleged violations. The letter does not indicate when any of the alleged violations occurred. The letter states that there was one instance (Item 5, involving steam generators) in which [redacted] reported a concern to B&R Management; however, the letter does not indicate that [redacted] previously reported any of the other concerns listed in the letter. For item 8, involving rebar cutting, [redacted] states that an [redacted] individual reported the alleged problem to a supervisor.

II. FEEHAN MEETING AND MANAGEMENT RESPONSE

Mr. Feehan and Richard P. Negri, B&R Power Division QA Department, discussed with Mr. [redacted] the concerns listed in his letter, in a meeting held on Friday, August 6, 1982, in Mr. Feehan's Houston office. At the request of Mr. Feehan, on Monday, August 9, 1982, a group of senior B&R Power Division management representatives under your direction went to the C.P. site to begin an investigation of the concerns raised by [redacted] In addition to Messrs. Rice, Dodd, and Negri, this group included Dr. Knox M. Broom, Jr., B&R Senior Vice President; Lawrence A. Ashley, Jr., B&R Senior Vice President; Raymond J. Vurpillat, Jr., head of the B&R Power Division QA Department; and Michael L. Herzik, an attorney in the B&R law department.

III. C.P. SITE INVESTIGATION

A. Initial Conference with [redacted]

Before any interviews were conducted of B&R employees having knowledge of the areas addressed in [redacted] letter, Messrs. Dodd, Negri, and Herzik conducted an initial interview with [redacted] to review the concerns listed in his letter. I reassured [redacted] that B&R management wanted to know of any potential safety problems at the plant, and that management appreciated the fact that [redacted] had made known his concerns to management in his letter to Mr. Feehan.

[redacted] has been with B&R approximately nine years, including two years on the Brunswick nuclear power plant, followed by approximately seven years at C.P. [redacted] began as a [redacted] to his current position as Boilermaker general foreman. Most of his

work at C.P. has been in the power block area of the plant, where he has supervised Millwrights, welders, and others in a variety of functions.

[redacted] told us that he is satisfied that the plant as constructed will be safe to operate. In fact, he pointed out that he owns property near the plant, and intends to live there during plant operation. Nonetheless, [redacted] said he did have concerns about past procedure violations as set out in his letter. He stated that he didn't believe any B&R employee involved in the areas of his concern needed to be fired, but just needed "to work per procedure and do quality work."

[redacted] was asked why he failed to report his concerns sooner. He responded that he was waiting for people (not named) to "work per procedures" and that when they didn't he reported his concerns to Mr. Feehan.

The only explanation [redacted] gave for going to Mr. Feehan rather than to the responsible site management personnel, was that he "wanted to go to the top". In this context, [redacted] gave no indication to us that he was ever discouraged from reporting concerns to site management. Still, when I encouraged [redacted] to report any future concerns to his superintendent, [redacted] or to Doug Frankum, B&R Project Manager; or to Charlie Scruggs, Assistant to Mr. Frankum; [redacted] told me he was not comfortable doing so, without giving any other explanation. I again urged him to report problems to site management, but also gave him my personal and business phone numbers in Houston to call if he had concerns. After out interviews, in an August 13, 1982 project general foreman meeting held by Doug Frankum, Mr. Frankum stressed again the importance of

encouraging any employee to bring any concern about the job to the attention of site supervision, without fear of retribution. [redacted] specific comments to us on each of the eight items listed in his letter to Mr. Feehan are discussed below.

B. Investigation of [redacted] Eight Letter Items

1. Item 1 - Swipe Tests

a. Letter States - "I have been instructed to clean the three areas known to be tested, and told to not worry about the other areas. It is my understanding that TUGCO wants a thorough job of cleaning in all areas, yet the time is not taken to do this."

b. [redacted] Interview

[redacted] told us he had only one incident in mind under Item 1. He said the incident occurred on a Saturday, about five weeks ago. He said he thought the incident occurred in the Steam Generator Compartment 3, but he wasn't sure. [redacted] said he and others were working under [redacted] supervision cleaning the compartment in question, prior to swipe testing. (Swipe testing involves running an absorbent material along random samples of a surface and then testing the material in a lab to determine whether there is debris remaining on the surface after cleaning. If excessive residue is found, the surfaces are cleaned and tested again.) [redacted] told us that TUGCO performs swipe tests for the steam generator.

According to our interview with [redacted], he recalled that [redacted] directed him to concentrate cleaning on three particular areas of the compartment in question, and that [redacted] indicated to [redacted] that TUGCO planned to perform swipe tests in those areas. (The procedures call for TUGCO to perform random sampling, and not to indicate test areas in advance.)

Contrary to the suggestion in [redacted] letter that areas were not thoroughly cleaned, he told us in the interview that B&R cleaned the entire steam generator compartment in question. His complaint in the interview was that he believed [redacted] had some improper advance knowledge of swipe test areas.

[redacted] suggested we discuss this issue with Bob Walton and Ken Lane.

c. Investigation Results

The steps and procedures governing cleaning and cleanliness testing of the steam generator are listed on construction operation travelers, which are required to be completed by responsible craft and QC personnel at designated hold points listed on the traveler. There are four travelers governing the final cleaning and swipe testing of the four steam generators, all of which are included in Attachment "B". [redacted] Because these travelers cover all cleaning and testing of steam generators, they would necessarily cover any instances such as those which [redacted] is concerned about. The travelers indicate that numerous hold points for cleaning and swipe testing were confirmed by various B&R and TUGCO personnel, and do not show any evidence of the kinds of irregularities about which [redacted] is concerned.

The travelers indicate that "all" residue and impurities were cleaned and inspected for the interior of the primary chambers of the steam generators. The travelers indicate that the primary side interiors were cleaned to a stated cleanliness standard, and that interior side swipe tests were performed confirming cleanliness. Additional procedures for closing the steam generator, and for swipe testing adjacent areas and pumps, were performed and verified on the traveler.

Final steam generator cleaning, as covered by the attached travelers, takes approximately 10 hours. The B&R employees performing the cleaning are suited out with gloves, hats, coveralls, booties, etc. The steam generator is rinsed or flushed with Grade A test water. All areas are wiped with alcohol, rinsed again, and then wiped again. Swipe tests are then taken by TUGCO. B&R QC witnesses all of these steps. When these steps are completed, the vessel is filled with Grade A water, and a water sample is taken by TUGCO to test for impurities.

We discussed [redacted] complaint with [redacted], who denied that he ever had advance knowledge from TUGCO of swipe test areas. [redacted] told us the men were always instructed to clean the entire vessel. This is consistent with what is reflected on the travelers. James Calicutt, B&R General Mechanical Superintendent, interviewed Bob Walton, as suggested by [redacted] Mr. Walton is a Boilermaker journeyman. Walton told Calicutt that procedures specified on the travelers were always followed on the work Walton did on the steam generator, and that cleaning and swipe tests were properly performed

...nessed by QC. Richard Negri interviewed Mike Ivey, one of inspectors whose signature appears on the attached steam generator travelers. Ivey stated that the generator was thoroughly cleaned and that swipe test areas were not known in advance. Al Moore, Millwright General Foreman, also confirmed that swipe test areas are not known in advance.

After we reviewed the travelers, we concluded that the "Lane" named by [redacted] was not "Ken" but Timothy Lane, B&R Millwright, whose signature appears on the travelers in question. I spoke with Mr. Lane who indicated to me categorically that B&R had no advance knowledge of particular areas to be swipe tested by TUGCO. Lane further stated B&R cleaned the entire interior areas of the vessels, as indicated on the attached travelers. Moreover, Lane stated that if a particular area was ever questioned by either B&R or TUGCO, B&R craft recleaned not only that area, but the entire vessel.

In light of our investigation, we can find no support for [redacted] concern that the steam generator was not properly and thoroughly cleaned and tested in accordance with all requirements. We understand that [redacted] was only assigned to clean the steam generator on a temporary basis, and only worked on cleaning under [redacted] for a short time. This may account for what appears to be a misunderstanding on [redacted] part concerning steam generator cleaning and testing practices. We found nothing to support Mr. Dillingham's concern that George Tanley had improper advance knowledge of swipe testing areas.

I have reviewed with Mr. Dodd the B&R management response to letter item #1, as contained in this memorandum. I no longer have a concern about this item, based on my review.

[redacted] [redacted]

(date)

Witnessed

8/13/82

(date)

2. Item 2 - Shims

a. The letter states: "In some instances, I have observed after chipping concrete that equipment shims had grey tape wrapped around them in order to achieve proper thickness. This was needless, as I feel sure that the proper thickness of shims could have been used without the tape."

b. [redacted] Interview

Although the letter refers to "instances", in our interview with [redacted] he could only recall one instance. His recollection in the interview was that the situation occurred in the turbine generator building, no. 1 building, at elevation 778. He was not certain, but thought the incident occurred on the feed pump for the auxiliary boiler.

With respect to this one incident, [redacted] basically repeated what he had asserted in his letter, namely that he had seen shims covered with grey tape, which suggested to him that the tape had been improperly used to thicken the shims in order to achieve proper leveling of the equipment resting on the shims. [redacted] did not document his concern at the time.

[redacted] told us that in the one incident in question, it had been necessary to remove and regrout the pump because the pump was grouted in about ½ inch out of line. The removal and re-grouting was not related to the use of tape, according to

[redacted] He told us that the pump was then re-shimmed correctly and re-grouted. Again, [redacted] told us this was the only instance of which he was aware in which tape was used on shims.

c. Investigation Results

We discussed [redacted] concern with Bob Turner, a B&R Millwright working at the location described by [redacted] We also spoke with James Cockfield and W.S. Fry, B&R Millwrights who worked in the general area of concern. In addition, we interviewed [redacted] supervisor.

None of the individuals we interviewed knew of any instance in which tape was used for the purpose of thickening shims to achieve proper leveling of pumps or other equipment.

Turner recalled the removal, re-shimming, and re-grouting of the pump at the general location described by [redacted] The removal and resetting of the pump had been requested by TUGCO, who complained that the base plates under the pump were warped. The plates were removed and straightened, and the pump was replaced and leveled to TUGCO's satisfaction.

It is important to emphasize that the pump to which [redacted] is referring is a non-safety-related pump. Moreover, the individuals with whom we spoke emphasized that even if someone wanted to circumvent shimming requirements as asserted by [redacted] (of which we have found no evidence), there would be

no reason to use tape on a shim for purposes of leveling, since any tape used would flatten upon tightening of the plate over the shims.

We located the grout placement card for the original setting of the pump in question, and the traveler used to verify the re-setting of the pump (Attachment "C"). [redacted] The original grout placement card for the June 28, 1978 placement indicates that the placement was properly witnessed and signed off by B&R craft and engineering personnel. The grout placement card indicates that the placement was reviewed for both "setting, position, level & alignment", as well as for "cleanliness." Had tape been improperly wrapped on the shims, it is likely that this would have been identified and corrected prior to signoff.

Therefore, after carefully investigating [redacted] concern under Item 2, we conclude that the concern is without basis, and that the one shimming he identified was conducted in accordance with all requirements.

I have reviewed with Mr. Dodd B&R management response to letter item #2, as contained in this memorandum. I no longer have a concern about this item, based on my review.

[redacted]

(date)

Witnessed

7/12/82
(date)

3. Item #3 - Paint

a. Letter Stated: "Paint was not allowed time to properly cure prior to installation of the floor plates on the Stainless Steel Liners, and under equipment in several instances. I have removed some of the floor plates for repair and discovered that the paint had not bonded to the concrete underneath."

b. [redacted] Interview

We could not tell from [redacted] letter whether the incident in question occurred in the containment building or the fuel pool building, and we asked for clarification in the interview. [redacted] told us that his concern related only to a single incident involving containment liner floor plates. He could not give us any approximate date for the incident in question. With respect to the statement in the letter that paint failed to cure "under equipment in several instances," [redacted] told us in the interview that he actually did not recall any such instances involving paint under equipment.

[redacted] told us that we could verify his concern regarding the containment stainless steel liners by checking concrete pour cards, paint dates and weld data cards, but he could give us no specifics as to which of these containment records to check. [redacted] suggested that we discuss this item with Craig Fowles, B&R Boilermaker foreman, and with Larry Witt, a former B&R Millwright documentation clerk.

c. Investigation Results

We interviewed both Fowles and Witt, and neither was aware of a paint curing problem such as [redacted] had described.

We reviewed the applicable drawing (DWG A1-538) which shows those areas of the plant having safety-related protective coatings. The drawing shows that neither the containment nor fuel pool building liners have safety-related coatings. Our investigation showed that the only coating applied under floor plates of stainless steel liners in either the containment or fuel pool buildings was a non-safety-related material with the trade name NUTEC 11S, which is a thick greyish substance applied to smooth concrete finish under the liner floor plates.

We reviewed all applicable containment records, and found no documentation reflecting the removal of floor plates as described by [redacted] in our interview. Although [redacted] clearly stated in our interview that his concern related only to the containment building, we decided to check the records for the stainless steel liners in the fuel pool building. We did find an NCR (M 1819, Rev. 2). Attachment "D" [redacted] includes the NCR and the inspection reports and travelers documenting four instances in which liner floor plates were removed in [redacted] area of responsibility. [redacted] signatures are not on the NCR and were not required. We talked with James Cole, the principal B&R QC inspector signing the travelers. Mr. Cole's recollection is that there was NUTEC 11S under the plates but no paint. He said that he could understand how someone could mistake the NUTEC 11S for paint. However, Cole

recalls no curing problem with NUTEC 11S. Cole's signatures on the travelers, and those of other inspectors on the travelers and NCR, indicate that the floor plate removal process was thoroughly inspected and that no curing or other problems were identified.

In light of our investigation, we conclude that there is no basis for [redacted] concern about improperly cured paint.

I have reviewed with Mr. Dodd B&R management response to letter item #3, as contained in this memorandum. I no longer have a concern about this item, based on my review.

[redacted] (date)

Witnessed 8/13/82 (date)

4. Item 4 - Welding

a. The letter states: "The welding in some instances on the permanent equipment was performed by non-qualified employees without any form of certification as welders. This project has plenty of qualified and certified welders, but in several instances the uncertified people were used to "speed up" the jobs."

b. [redacted] Interview

In our interview with [redacted] he stated that the second sentence of letter Item 4, quoted above, was written by [redacted] and that [redacted] had no personal knowledge of the use of unqualified welders to speed up the job. At this point in our interview, [redacted] told us that his letter to Mr. Feehan had been typed for him by [redacted].

With respect to the first sentence, [redacted] told us that at the time he wrote the letter, he was actually thinking of only one instance, and not "instances," as the letter states. After we discussed the one instance of concern, described below, [redacted]

stated that even in that one instance he did not actually witness welding by an unqualified employee.

The incident occurred approximately 1½ years ago. [redacted] was supervising welders at the time. (Although [redacted] is not a welder, as a Millwright general foreman, he has been responsible for directing welding work and assuring that welding is performed in accordance with procedures.)

[redacted] stated that Lee Carnes, B&R General Foreman, asked [redacted] to provide a welder on the day in question. [redacted] informed Mr. Carnes that none were available at that time. [redacted] told us that later in the day, he saw a Millwright (no name was given), who was not a certified welder, near a hot weld. (Millwrights who are not also certified as welders are not permitted to perform welding on the plant.) Although [redacted] did not see the Millwright welding, he had seen the same Millwright on site with a welding hood (it was not clear from our interview whether [redacted] actually saw the hood at the same time he saw the Millwright standing next to the weld in question.)

[redacted] became concerned that the Millwright might be improperly welding, and told George Tanley, his supervisor. [redacted] told us that around this time, he asked Hank Hankins, B&R Millwright, and Mike Phillips, B&R Millwright foreman, about the weld in question, and was told that the weld had been welded by a certified Ironworker welder.

After [redacted] reported his concern to George Tanley, he and Tanley and James Calicutt, B&R General Mechanical Superintendent, discussed [redacted] concern. According to our interview with [redacted] Tanley told [redacted] that if a non-certified Millwright was improperly welding, Calicut told [redacted] Tanley would fire him. After Tanley made this statement, [redacted] clarified that he had not witnessed the Millwright in question performing any welding. In the circumstances, according to [redacted], he and Mr. Tanley agreed not to take any action.

We asked [redacted] whether he had knowledge of any bad welding practices or bad welds on the C.P. site. He told us that to his knowledge, all welds and welding practices on the site are "good".

c. Investigation Results

As far as the one incident discussed during the interview, it appears that [redacted] is now satisfied, and was satisfied at the time of the incident, that there was no basis to take action, since he never actually witnessed the Millwright in question performing welding. (Millwrights are not permitted to perform welding on the plant.) It is not unusual or improper for a Millwright to have a welding hood on the site. There are a variety of possible explanations. The most common situation would be a Millwright who welded on a job prior to C.P. and who kept his hood in his tool box brought to the site. Since [redacted] told us he has no knowledge of welding by non-qualified employees, there is no basis for further investigation of the first sentence in letter Item 4.

In our interview with [redacted], he acknowledged that he typed the letter to Mr. Feehan, but he told us that he had not written the second sentence of letter Item 4, but had typed it from a handwritten letter prepared by [redacted] told us he had no knowledge of C.P. welding being performed by uncertified people to "speed up" the job or for any other reason.

Both [redacted] and [redacted] disclaim responsibility for sentence 2 of letter Item 4. [redacted] has no knowledge of welding by uncertified employees, as noted herin. Therefore, based on our interviews with Messrs. [redacted] we find no basis for the concerns expressed in letter Item 4.

I have reviewed with Mr. Dodd the B&R management response to letter Item #4, as contained in this memorandum. I no longer have a concern about this item, based on my review.

[redacted]

(date)

Witnessed

5/13/82
(date)

5. Item 5 - Steam Generators

a. The letter states: "The main support steel on installation of lagging on the steam generators was received on the jobsite with improper welding. I reported this to [redacted], my supervisor, and to [redacted], a mechanical engineer. I was told that the problem had been solved by writing a letter to Westinghouse telling them to strive for better craftsmanship among their subcontractors. The bad welds are still in existance and have not been repaired. We could have repaired them ourselves, as a backcharge to Westinghouse, but [redacted] accepted the faulty supports, thereby making Brown and Root responsible."

b. [redacted] Interview

[redacted] told us he identified a problem with welds on Westinghouse main support steel used for the installation of insulation lagging. He said he uncovered the problem "in the sandblast yard during blasting." [redacted] said he was looking at Westinghouse vendor material in the yard (prior to plant installation), and that welds on the material in question had pinholes and no penetration. [redacted] told us this was contrary to the requirements of "the print" (drawing) for the vendor material, which he said called for full penetration welds.

[redacted] told us that he brought his concern to [redacted] attention, and that [redacted] told him that the problem had been "solved." [redacted] stated that he is still concerned because he has seen no rework performed on the welds.

c. Investigation Results

We asked [redacted], B&R equipment engineer supervisor, whether they were familiar with [redacted] concern. Even though it was not [redacted] responsibility to install or inspect the welds in question, he did notice a potential problem and reported this to [redacted] told us that when he was informed of [redacted] concern, [redacted] went to the laydown yard with [redacted] to look at the welds. Mr. Tanley agreed that engineering should review the welds. Within a day, Mr. Tanley took Mr. Brown to the yard so that Mr. Brown could perform an engineering review.

We talked to Brown, who told us that he inspected the welds being questioned by [redacted] Brown said the welds were furnished not by Westinghouse, but by Mirror Insulation Co. Brown said the welds

were not safety-related and that therefore, QC inspections had not been required. Although Brown agreed that the welds were not of "top quality", his engineering judgment was that the welds would perform their intended function and could be used as is. This explains why no rework has been performed on the welds.

Although Mr. Brown's disposition was not required to be documented, we asked him to prepare a memo confirming the engineering review that was performed. Attachment "E" [redacted] is a memo to Mr. Tanley and Mr. Frankum, dated August 10, 1982, on this subject. The memo is signed by Mr. Brown, and by Mark Smith for C.K. Moehlman, Mechanical Engineering Supervisor. The memo states that "although the welds are not 'pretty' they are acceptable for this non-Q service." The memo also reflects that "the vendor has been cautioned regarding workmanship in the future."

Based on our investigation of letter Item 5, we are satisfied that [redacted] original concern over the referenced welds was properly investigated and dispositioned by B&R site management and engineering personnel. We find no evidence that any safety procedures were violated, or that there is any basis for the concern expressed in letter Item 5. As with all the other items addressed in this letter, management will carefully explain its finding to [redacted]

I have reviewed with Mr. Dodd the B&R management response to letter Item #5, as contained in this memorandum. I no longer have a concern about this item, based on my review.

[redacted]

(date)

Witnessed

8/13/82
(date)

6. Item 6 - False Documentation

a. Letter states: "In many instances, false documentation has been filed by the Millwright and Boilermaker departments. I was informed that approximately 350 'Travelers' had hold points missed. Later, they were filed as being complete without any re-work. These were all safety related 'Q' Travelers."

b. [redacted] Interview

[redacted] told us that approximately ~~3~~ months ago George Tanley instructed [redacted] and others to assemble all outstanding weld documentation, such as weld filler material logs, weld "chits" (showing the welder, weld number, and weld filler material number), NDE logs, and other documentation held by various disciplines, pertaining to completed welding performed on the stainless steel fuel pool liners. Tanley asked that all outstanding documentation be assembled, and that the information be transferred to the appropriate traveler, in order to update the travelers and move them to the QA Vault. [redacted] ~~said~~ that some 350 travelers were involved. An example of a stainless steel liner inspection traveler is attached (Attachment). The work in the field on the stainless steel liners ~~had been~~ completed at the time of Tanley's request.

[redacted] was surprised that information in the various weld documents was sufficient to demonstrate that all weld hold points (as listed on the travelers) had in fact been completed. However, contrary to the reference to "many instances" in letter Item 6,

in the interview [redacted] told us he knew of only one specific instance, described below, where documentation could not be produced to verify a hold point. He was careful to state in the interview that even this one incident did not involve "false documentation," as alleged in the letter. [redacted] cited no instance of false documentation during the interview.

The only specific incident cited by [redacted] in the interview involved an NCR written by James Cole, B&R QC inspector. [redacted] said that in the incident in question, a stainless hanger had been hung over the weld, covering it up. When Mr. Cole went to the weld location for final inspection, he could not find the traveler verifying that a previous weld inspection had been performed. At the time, the traveler had been temporarily misplaced by the Boilermaker department. Since Mr. Cole did not have the traveler to verify that a previous inspection had been performed, he properly wrote an NCR, requiring removal of the hanger and reinspection of the weld. Thus, although [redacted] was apparently concerned about the misplaced traveler, he believed that B&R QC (Mr. Cole) responded in accordance with procedure, and [redacted] stated to us that no problem exists today with the weld. [redacted] suggested we discuss Item 6 with Craig Fowles, B&R Boilermaker Foreman.

c. Investigation Results

We talked with Mr. Cole about the incident described in our interview with [redacted] He confirmed the incident in

question, but agreed with [redacted] that proper QC procedure had been followed; the NCR in question is attached (Attachment "G"), [redacted] which verified that proper responsive action was taken. Mr. Cole told us that he had actually performed the original inspection on the weld, prior to placing the hanger. He indicated that the traveler in question was located subsequent to removal and reinspection of the hanger per the NCR. Cole said the original traveler is included with the current documentation for the weld in question.

Mr. Cole has had responsibility for fuel pool travelers since late 1981, and has worked with fuel pool travelers since January, 1980. He told us flatly that he never saw any evidence of falsification of the travelers. Cole could recall only "a few" instances where hold points had been missed on the fuel pool travelers. In each case, Cole wrote an NCR and properly dispositioned the nonconformance. These nonconformances did not involve any falsification.

Cole emphasized that the inspectors would have identified falsification of QC signatures on any fuel pool travelers, had it ever occurred. He said that missed hold points likewise would have easily been detected at final inspection points. In response to letter Item 6, we asked Mr. Cole and Sam Wilkerson, another QC inspector familiar with the fuel pool travelers, to select a random sample of fuel pool travelers from the QA vault, and to look for any signs of either missed hold points or

signature falsification. Attachment "H" summarizes the results of their reviews. Mr. Cole and Mr. Wilkerson state in the attachment that there were no indications of unsigned holdpoints or falsified signatures on the sample of fuel pool travelers examined.

We also discussed letter item 6 with Craig Fowles, as suggested by [redacted] Fowles knew of no instances of missed hold points, traveler falsification, or other procedural violations involving the fuel pool travelers.

We discussed this item with [redacted] during two interviews conducted this week. [redacted] is a documentation clerk working under [redacted] with the fuel pool traveler documentation. She has worked with the fuel pool travelers for approximately the past three years. During the first interview [redacted] cited an instance which appeared to her at the time to involve the improper traveler entry by [redacted] B&R millwright documentation clerk, of what she described in the first interview was a "weld number". She gave no other specifics.

We spoke with [redacted], who in addition to working at the plant serves as the [redacted] was not aware of the incident to which [redacted] was referring. [redacted] denied ever making an improper entry into a traveler without supporting documentation to justify the entry. [redacted] who has worked closely on traveler documentation with [redacted]

and in fact helped train [redacted]. Both have good employment records.

We interviewed [redacted] again to try to get some specifics on the alleged incident. We emphasized to [redacted] that we would be interested in any information she could give tending to support her recollection that [redacted] improperly entered a weld number on a traveler. We emphasized that her statement appeared to suggest that [redacted] falsified the traveler, and that if this could be verified [redacted] would be subject to immediate termination, and conceivably could be subject to criminal prosecution if it turned out that he actually falsified an official plant record. [redacted] was repeatedly encouraged to furnish any information without fear of retribution.

[redacted] could give few specifics. She did say in the second interview that she believed the information entered by [redacted] involved not a weld number, as she had previously stated, but a weld filler material log number. She said she had never seen [redacted] do anything else that appeared to her to violate procedures. [redacted] said she had never seen other examples of possible falsifications.

At the end of the second interview, [redacted] stated that she was no longer sure about what she had seen [redacted] do and that she wanted to leave the interview "to think it over." We encouraged her again to bring to management's attention any information on this incident, or any other incident, involving possible procedural violations or safety problems at the plant.

Finally, [redacted] stated in the second interview she had probably reviewed 50% of the C.P. fuel pool travelers, and that she had never received a traveler reflecting a missed hold point, which she said would have been easy to identify.

With respect to [redacted] letter item 6, it appeared from our interview with him that he is now only concerned about the one incident involving [redacted] identification of a misplaced traveler. [redacted] concern was not with falsification in that instance. We are satisfied from our investigation that the temporary misplacement of the traveler was properly handled by B&R QC, and that there is at present no indication that falsification or a missed hold point is involved. Our other interviews, as summarized herein, also satisfy us that safety procedures were followed in connection with the completion of the fuel pool travelers. Thus, we conclude that there is no basis for letter item 6.

With respect to [redacted] statement in our first interview that [redacted] improperly filled in a weld number on a traveler, [redacted] has denied any such occurrence. Further, [redacted] was not sure about her original assertion by the end of our second interview, and wanted to "think about it." Since [redacted] has not told us which traveler or plant area may have been involved, and has not directed us to any other relevant evidence, there is nothing left to investigate.

We conclude that there is no basis to find that safety procedures were violated by [redacted] based on the information presented by [redacted], and on information received from other employees with whom we spoke.

I have reviewed with Mr. Dodd the B&R management response to letter Item #8, as contained in this memorandum. I no longer have a concern about this item, based on my review.

[redacted]

Witnessed (date) 8/16/82

7. Item 7 - Diesel Generators

a. Letter states: "Repairs have been made on the diesel generator main supports without proper documentation. The main support now has five foot cracks around the repair area. (Proper paperwork would have taken about two hours to get)."

b. [redacted] interview

Contrary to the reference in the letter to "repairs," [redacted] told us he was really talking about only one instance which he said occurred recently. This involved the repair of the Unit #2 diesel generator support structure to correct a weld discontinuity. [redacted] stated that in the course of the repair, the welder involved, [redacted], had used weld filler material drawn for another temporary attachment ticket, rather than receiving new weld filler

material as required by procedure. [redacted] said that besides [redacted] the procedural violation was known by either [redacted] B&R millwright, or [redacted] B&R millwright.

[redacted] also stated in the interview that some time after the repair procedure, cracks were found in the same general base metal area on which the repair had been performed. However, contrary to the implication in letter item 7 that there was a relationship between the faulty repair procedure and subsequent base metal cracks, [redacted] made it clear in the interview that the cracks to which he referred were not related in any way to the earlier repair.

c. Investigation results

We interviewed Craig Fowles, B&R Boilermaker Foreman for the diesel generator area in question. We determined that the events to which [redacted] made reference in our interview with him had occurred in July and August of this year. After talking with the welder involved in the initial repair, Mr. Flowers, and with George Tanley, who also knew of the repair, we verified that Mr. Flowers had violated procedure by failing to draw new weld filler material, and that Mr. Flowers and Messrs. [redacted] AND LEE CARNES - Root [redacted] all failed to cause an NCR to be written as required.

Mr. Frankum and I directed that an NCR be written to document the procedural violation in question. The NCR (M-82-01207, dated August 12, 1982) is attached (Attachment "I"). Because the base metal area containing the weld in question was subsequently removed due to an unrelated repair of linear indication in the same general base metal area (see Attachment , NCR M-82-00902, referenced in NCR M-82-01207, which together verify that the base metal weld in question was removed), there is no further concern that Mr. Flowers' procedural violation presents any current problem with the diesel generator base metal area.

Mr. Frankum plans to hold a meeting in the next week with [redacted] Messrs. [redacted] and [redacted] (and possibly with either [redacted]). Mr. Frankum will distribute copies of NCR M-82-01207, and will reprimand those at the meeting for failing to ensure that an NCR was drafted and dispositioned at the time the procedural violation in question was first identified, as required by procedure.

We conclude that the above responsive actions properly address the concern raised by [redacted] pursuant to letter item 7.

[redacted]

I have reviewed with Mr. Dodd the B&R management response to letter Item #5, as contained in this memorandum. I no longer have a concern about this item, based on my review.

[redacted]

Witnessed (date) 8/14/82 (date)

8. Item 8 - Rebar Cutting

a. The letter states: "Rebar has been cut on the Main Steam Support and other supports without approval. This could result in millions of dollars in cost of re-work. [redacted] has personally cut rebar in order to save energy in moving the boring equipment to the correct location. I know that this was brought to the attention of [redacted], and [redacted] told this person to 'mind your own business if you know what's good for you'."

b. [redacted] interview

According to our interview with [redacted], he has no first hand knowledge of the concerns recorded in letter item 8. He told us the item was based on statements made to him by [redacted], a leaderman who works in the B&R hanger department. According to [redacted] told him that [redacted] was the individual who allegedly complained to [redacted], that [redacted] in the hanger department, was improperly cutting rebar. According to [redacted] contrary to statements in [redacted] letter, [redacted] knew of only one instance of apparent improper cutting of rebar by [redacted] told us was in the H. P. Turbine support of elevation 830. [redacted] told us in the interview that when [redacted] complained to [redacted] stated that [redacted] had removed rust off the rebar in question but had not cut any unauthorized rebar.

c. Investigation results

Doug Frankum and Larry Ashley interviewed Hal Goodson, Jim Starkey, and Danny Grisso. In addition, Doug Frankum and Jack Dodd accompanied Grisso, Starkey and Goodson to visually examine TG #1 Pipe Support MS-1-071-001, the area of Grisso's apparent concern. Griso looked in the top west hole of the support, and saw cut rebar, and confirmed that this was the area about which he was concerned.

We returned to the office, and pulled documentation for that support. We reviewed the documentation separately and together, and identified one document in particular (Attachment "J" dated 9/1/82), dated September 3, 1981, which provided engineering justification for cutting "second layer beam reinforcing or interior tie bars." Mr. Grisso and the rest of us concluded that the cutting Mr. Grisso has witnessed was of an interior tie bar, as permitted by the September 3, 1981 memeo. Mr. Grisso indicated that he was satisfied that there had not been any violation of procedure. Grisso further stated that he was not aware of any instances of rebar cutting without proper documentation.

In light of the above, we conclude that letter item 8 is without basis.

[redacted]

8

I have reviewed with Mr. Dodd the B&R management response to letter Item ~~#8~~, as contained in this memorandum. I no longer have a concern about this item, based on my review.

[redacted]

Witnessed

8/16/82
(date)

August 13, 1982

ADDENDUM

In a meeting today with Jack Dodd, I told him I think the Comanche Peak plant is a totally safe plant, and that I have no safety concerns. I said this of my own free will, and told Mr. Dodd I would be happy to say the same thing in writing.

[redacted]

Witnessed (date)

(date)

MEMORANDUM

TO: W. M. Rice
Group Vice President
Brown & Root Power Division

DATE: August 17, 1982

FROM: H. C. Dodd, Jr.
Vice President
Brown & Root Power Division

SUBJECT: Additional [redacted] Concern on
Swipe Testing in Pressurizer

As you know, on August 6, 1982 [redacted] discussed with Tom Feehan a letter written by [redacted] which describes eight items of concern about alleged procedural violations at the Comanche Peak plant. Based on interviews conducted first with [redacted] and then with other B&R employees, I prepared a management investigation report dated August 13, 1982, which is being transmitted to you today. When I met with [redacted] on August 13, 1982 to review our investigation of the eight items listed in his letter, as set forth in my August 13 report, [redacted] raised an additional item of concern during our discussion of letter Item 1. This additional concern is addressed below.

[redacted] informed me that he "was wrong" about statements he made during our previous interview discussion about letter Item 1. At that previous interview, on August 9, 1982 [redacted] had told me that letter Item 1 related to swipe tests in the steam generators for Unit #1, and concerned comments allegedly made by [redacted] during swipe testing. However, during the August 13 interview [redacted] stated that his concerns were actually with swipe tests in the Unit #1 pressurizer vessel and concerned an alleged comment made by [redacted]

[redacted] only was concerned about a single incident, and said he did not have first hand knowledge of the incident but had been told of it by [redacted] According to [redacted] said there was a conversation between [redacted], B&R millwright, and an unnamed QC inspector (it was unclear whether this was a B&R or TUGCO inspector). As told to [redacted] asked the inspector which areas he planned to "inspect" (it was not clear whether [redacted] was referring to visual inspection or swipe testing here). [redacted] allegedly told the inspector that in the past, [redacted] had been told in advance the locations of planned swipe tests. According to [redacted], the inspector refused to disclose the swipe test areas; asked [redacted] to identify inspectors who had given such information in the past; and warned that any such inspector "would be given a talking to".

After the interview with [redacted] Doug Frankum and I met with [redacted], who agreed that the conversation described by [redacted] had taken place. [redacted] said he informed [redacted], his General Foreman, about the conversation. [redacted] could not tell us when the conversation in question took place. [redacted] said he thought there had been instances in the past in which inspectors had told construction in advance the areas to be swipe tested; however he could cite to us no specific evidence of this. [redacted] stated that prior to the incident in question, he personally had not cleaned any vessels. He told us he thought [redacted] was an "above average" journeyman and "very dependeable". [redacted] further told us that in the case of the incident in question, the entire pressurizer was cleaned thoroughly.

Doug Frankum and I then interviewed Melvin Todd, a B&R QC inspector whose signature appears on the traveler for the pressurizer. The traveler is Attachment "A" hereto. Mr. Todd said he recalled one instance in wich the TUGCO lab people expresses a concern that a rope lowering the B&R cleaning personnel into the vessel was rubbing near the lip (opening) area, causing potential contamination. But Todd said the lab

people made it clear that if the area near the opening needed to be recleaned, the entire vessel would have to be recleaned.

[redacted] stated that on one occasion he did hear [redacted] ask an inspector which areas in the pressurizer were to be swipe tested. [redacted] told us that the inspector refused to disclose the pre-determined swipe test areas. [redacted] further stated that he never heard any other similar request for information by [redacted] or other B&R employees, and that he does not believe that pressurizer swipe test areas were ever disclosed in advance. [redacted] further stated that he is not aware of any failure to adequately clean and test the pressurizer per procedure (and said that the same was true for the cleaning of the steam generator).

I spoke with [redacted] about the alleged conversation. [redacted] denied ever asking for pre-determined swipe test areas. He indicated there is normally no TUGCO inspector even present prior to completion of cleaning, which we confirmed. Once cleaning is completed, B&R personnel will sometimes assist TUGCO inspectors by lowering them into the vessel for inspection. [redacted] speculated that the conversation being questioned may have occurred after cleaning, during this interaction with TUGCO inspectors going into the pressurizer vessel, and may have been misinterpreted. Again, [redacted] was not aware of the conversation alleged to have taken place, and was never questioned or criticized concerning such a conversation until now. [redacted] emphasized again that there is normally no interaction with TUGCO inspectors until after cleaning.

[redacted] never, to my knowledge, followed up on the conversation in question. We have no specifics from them as to the time or inspector in question. Further, we understand from them that they believe Lane to be a good journeyman, and that they know of no failure to properly clean the pressurizer and no instance when Lane or any other B&R worker obtained knowledge of pre-determined swipe test areas. Further, TUGCO carefully reviewed and documented the cleaning and cleanliness of the pressurizer. As with the steam generator a final

test confirming cleanliness was performed, by filling the vessel with Grade A water, and lab testing a water sample for purity.

Based on the above, I can find no evidence that cleaning or swipe testing in the pressurizer was not conducted in accordance with procedure. With respect to the one alleged remark by [redacted], we were unable to verify that Lane intended to circumvent cleaning procedures, and have no basis to reprimand [redacted]

L. A. Addy

for H. C. Dodd, Jr.

cm

ATTACHMENT A

CONSTRUCTION OPERATION TRAVELER [illegible]

(1) TRAVELER NO.	(2) EQUIPMENT NO.	(3) UNIT NO.	(4) QUANTITY	(5) PAGE 1 OF 2
[illegible] -5500	TBX-RC-PCPR-01	/	/	

(6) ACTIVITY DESCRIPTION: FINAL CLEANING OF PRESSURIZER

(7) REFERENCE DRAWINGS: N/A

(8) SPEC / PROC / ENG. INSTR.	(9) LOCATION	(10) SYSTEM
(W) PS. 292722 R.9	RB #1 853', 45° Az	RC-5500

PREPARED BY [illegible] DATE 6/15/82 DEPT. [illegible]

REVIEWED BY [illegible] DATE 6-18-82

ANI REVIEW [illegible] DATE 6-18-82

(W) WSD [illegible] 6/17/82

OP NO	DEPT.	OPERATION	CONSTR	QA/QC ENG.	ANI
Note 1		This traveler is written to do the final cleaning of the PRESSURIZER interior prior to cold hydro.			
Note 2		Reference: (W) PS. 292722 / Rev. 9 (attached) (W) PS. 84351 NL Rev. 3 ASTM A-380-72 (2 pages attached) QI-QP-11.1-05 Rev. 4 (equals (W) PS. 84351 NL Rev. 3)			
Note 3		Reference SWA = 3782			
Note 4		acceptable water: plant demin. water, 0-1000 ppm " solvents: acetone, alcohol, MEGAFLUX PT cleaner " mech. cleaning: 3M scotchbrite pads, 3-M polishing wheels, fiber wheels, 3-M "sponge" wheels, SS wire brushes. Other materials are acceptable as shown on PS. 292722.			

CONSTRUCTION OPERATION TRAVELER CONTINUATION

TRAVELER NO.	ACTIVITY DESCRIPTION	
71502 - 2365 - 5500	FINAL CLEANING OF PRESSURIZER	PAGE 2 OF 3

PREPARED BY [illegible signature] DATE 6/15/82

REVIEWED BY [illegible signature] DATE 6-18-82

ANI REVIEW [illegible signature] DATE 6-18-82

DED 6/17/82 (W)

OP. NO.	DEPT.	OPERATION	CONSTR	QA/QC ENG.	ANI
Note 5		Personnel coming in contact with or working in close proximity to cleaned surfaces shall wear protective clothing such as coveralls, booties, hats and gloves to prevent recontamination of surfaces.			
Note 6		Operations may be performed out of sequence or concurrently if logically permitted and the end result is the same except that all mechanical and solvent cleaning will be followed by demin. water and the swipe tests shall be done after all cleaning.			
1.	M/W QC(V)	Inspect and clean as needed the PRESSURIZER interior to remove all: grease, dust, welding marks oil, dirt, [illegible] [illegible], wood chips, rust (except as permitted in [illegible]) [illegible], metal chips [illegible], [illegible], etc.	[illegible] 6-28-82	M. [illegible] 6-29-82	

CONSTRUCTION OPERATION TRAVELER CONTINUATION

TRAVELER NO. ME82-2365-5500

ACTIVITY DESCRIPTION FINAL CLEANING PRESSURIZER

PAGE 2 OF 3

PREPARED BY [signature] DATE 6/15/82

REVIEWED BY [signature] DATE 6-18-82

ANI REVIEW [signature] DATE 6-18-82

[stamp] 6/17/82

OP NO.	DEPT.	OPERATION	CONSTR	QA/QC ENG.	ANI
2.	M/W QC(V)	The PRESSURIZER INTERIOR shall meet Cleanliness Class B as stated in P.S. [illegible] Section 4.1.2. NOTE THE INSIDE OF PRESSURIZER IS NON-INSULATED. ~~[illegible]~~ RLW 6-24-82 of Course [initials] 6/29/82	[signature] 6-28-82	M. Ladd 6-29-82	
3.	TUGCO LAB QC(V)	Perform swipe tests on the PRESSURIZER interior per QI-QP-11.1-65 Rev. 4. Swipe Tests Report No. J161		[signature] 6-29-82 M. Ladd 6-29-82	
4.	M/W QC(V)	After obtaining acceptable swipe tests results, protect the PRESSURIZER from further contamination by covering manway until it can be installed (Ref. ME82-2344-5500).	[signature] 6-29-82	[signature] 6/29/82	
5	QC (S)	Verify completion of traveler.		[signature] 6/?/82	

7C

MEMORANDUM

DATE: August 17, 1982

TO: W. M. Rice
Group Vice President
Brown & Root Power Division

FROM: H. C. Dodd, Jr.
Vice President
Brown & Root Power Division

SUBJECT: Investigation of [redacted] Concerns

In the course of our investigation of [redacted] August 6, 1982 complaint to Tom Fechan about alleged procedural violations at the Comanche Peak plant, Larry Ashley, Knox Broom, Doug Frankum, and Michael Hertik interviewed [redacted], a former Comanche Peak employee and informed me of the results of those discussions. [redacted] allegations, as discussed in my investigation report to you on the Dillingham complaint. In addition, [redacted] raised several concerns not related to the [redacted] issues. These were discussed in conversations with Ashley, Broom, Hertik, and Frankum, and during a phone conversation with Charlie Scruggs, Assistant Comanche Peak Project Manager. These concerns are addressed below.

First, [redacted] told us that when he was working at the concrete batch plant as a front-end loader operator early in the project, [redacted] improperly used aggregate material from a reject pile. We interviewed at length William George, who worked in the batch plant during the time [redacted] was working in the area. George was not aware of any instance in which [redacted] or anyone else used rejected aggregate material from a reject pile in a pour, without proper documentation and resolution of such error. George's brother, who also worked at the batch plant, was of the same view. [redacted] batch plant supervisor at the time, Bob Morris, is deceased.

Attachment "A" is an example of a deficiency and disposition report (DDR) used to document and resolve use of untested aggregate material in a pour. This is not an example of using rejected material, as [redacted] alleged, but is the closest example to Witt's concern that we could find. Attachment "A" shows that the use of untested material was properly identified and dispositioned, and that there was no safety problem presented.

FOIA-85-59

T/8

Verification of concrete acceptability is ensured by a variety of tests. These include slump tests, material testing, temperature verification at point of placement and cylinders taken during pouring. These tests would have identified any purity problems caused by the use of rejected material, as [redacted] has alleged.

[redacted] was not able to give us any specifics concerning his allegation. Further, to our knowledge, he never reported or documented any instances such as he is now alleging. I am satisfied that we have adequately investigated the area of his concern, and that there is no evidence of a safety problem.

[redacted] expressed additional concerns which we investigated. Witt also claimed that there were instances in which employees leaned on wires running to an aggregate weighing sensor, in order to cause the sensor to malfunction and skew the results. Again, no specifics were given. This allegation was carefully reviewed with William George, who indicated that he was not familiar with any improper activity similar to that described by [redacted]

Further, George explained the sensors' configuration and the processes involved, both of which suggest to us that it would have been difficult to manipulate the sensor in question, and that even if someone wanted to do this, such an evasion would likely have been identified by QC inspectors who observed the inspections. Thus, we can find nothing evidencing a safety problem.

[redacted] raised two additional concerns, one involving a possible missed hold point on weld 988 on the fuel pool liner (a copy of the traveler for weld 988 is Attachment "B" hereto); and another concern involving an alleged instance of welding by an uncertified welder. We thoroughly investigated both concerns and found them to be without basis.

H. C. Dodd, Jr.

meb
Attachments

ATTACHMENT "A"

Brown & Root, Inc.

QUALITY ASSURANCE DEPARTMENT
DEFICIENCY & DISPOSITION REPORT

PROJECT: CPSES JOB NO.: 35-1195 UNIT: N/A PAGE 1 OF 7

QDR NO.	CATAGORY:	REPORTABLE DEFICIENCY:
C-446	H-3	No

DOCUMENT VIOLATED:	REV. NO.	PAR.
2323-SS-9	4	7.2.2.b.

DEFICIENCY

Cited document states "A daily inspection control program shall be carried out during concrete production to ascertain consistency in potential variable characteristics such as ...gradation..."

3/4" gravel from Bin #3 was used for concrete production prior to completion of gradation tests. Pours 006-2808-002 and 032-5730-003 are affected by this.

QA RECORD ROUTING

RTN.	QA REVIEW
L	12/10/76
FILE NO.	DR2-76
SUBFILE NO.	C-446

1. QA Log
2. RNB
3. _____
4. _____
5. _____

REPORTED BY:	DATE:	APPROVED BY:	DATE:
S. F. Miller S. M.	12-9-76	Peter L. Bussalini	12-9-76

DISPOSITION

CORRECTIVE ACTION

RESPONSE: REWORK ☐ REPAIR ☐ SCRAP ☐ USE AS IS ☒ OTHER ☐

The gradation test results of the 3/4" gravel from Bin No. 3 meet the specification requirements. See attached Hunt Lab Test Report HCP No. 20108 thru 20112 for passing results.

ASSIGNED TO:	DATE:	SUBMITTED BY:	DATE:
H. C. Dodd, Jr.	12-10-76	W. F. Ingle	12-14-76
APPROVED BY: S&R QA	**DATE:**	**APPROVED BY: TUSI QA**	**DATE:**
L Miller	12-14-76	James G. Stanley	12-16-76

PREVENTATIVE ACTION

RESPONSE:

The Batch Plant Supervisor has initiated a system where as the aggregate bin operator will be notified in advance by writing as to what aggregate bins are approved for use.

This will be verified by the Batch Plant General Foreman and Batch Plant Inspector prior to concrete batching.

In addition any future violations of this procedure will result in person(s) being subject to termination. Also, closer supervision will be conducted in the future on the aggregate handling operation.

ASSIGNED TO:	DATE:	SUBMITTED BY:	DATE:
H. C. Dodd, Jr.	12-10-76	W. F. Ingle	12-14-76

CLOSE-OUT (To be completed by Quality Assurance Department)

CORRECTIVE ACTION: ☒ SATISFACTORY	VERIFIED BY: S&R QA	DATE:
	L Miller	12-16-76
☒ DEFICIENCY CLOSED: APPROVED BY: TUSI James G. Stanley	DATE: 12-16-76	APPROVED BY: S&R QA Peter L. Bussalini — DATE: 12-16-76

REMARKS: NONE

FOR INFORMATION ONLY

COPIES:

S&R CONST. SITE	☒	TUSI Site	☒
S&R QA SITE	☐	S&R QA, HOUSTON	☒
TUSI QA SITE	☒	TUSI QA, DALLAS	☒
		NSSS SUPPLIER	☐

CP-QA-012-2

Pg 2 of 7

REPORT HCP 20108
PAGE

FILE NO. 3777-6
ORDER 13-C-9927

Date: 12-9-76

Brown & Root, Inc.
P. O. Box 1001
Glen Rose, Texas 76043

RE: Texas Utilities Services, Inc.
Comanche Peak Steam Electric Station
1980-1982 Units 1 & 2
Job No. 35-1195
B & R Subcontract No. 35-1195-0225
Hunt Project No. 513

Gentlemen:

We report results of Sieve Analysis of Coarse Aggregates, ASTM C-136, (Hunt E1019).

Material Description: 3/4 GRAVEL Date Sampled: 12-9-76

Material Sources: Bin 3 Date Tested: 12-9-76

Set 1 Sample 1

Quantities Represented by Report: N/A DAILY

Control No.	U.S. Standard Sieve Size	Sample Wt. - Lb. + Tare Wt. - Lb.	Cumulative % Retained	Cumulative % Passing	Project Specification % Passing
---	2"		---	---	---
---	1 1/2"		---	---	---
L-256-1	1"	15.68 - 15.68 = 0.0	0	100	100
L-256-2	3/4"	16.39 - 15.98 = 0.41	2	98	90-100
L-256-3	1/2"	20.00 - 15.54 = 4.87	24	76	---
L-256-4	3/8"	20.78 - 15.40 = 10.25	51	49	20-55
L-256-5A	#4	23.59 - 14.98 = 18.86	94	6	0-10
L-256-6	#8	15.07 - 14.20 = 19.73	98	2	0-5
N/A	Pan	13.70 - 13.30 = 20.13	100	0	---

Fineness Modulus: 6.45

Results comply/~~do not comply~~ with project requirements.

Tested by: B.S.B.

Checked by: J.S.

Control No. L-263 Scale

C... Weight 22.14

FOR INFORMATION ONLY

Respectfully submitted,
ROBERT W. HUNT COMPANY

Jerry Scratchie
Level II

Form ...-E1019B (Rev. 6/76)
ROBERT W. HUNT COMPANY

Pg 3 of 7

FILE NO. 3777-6
CONTRACT 13-C-9927

Date: 12-9-76

REPORT HCP 20109
PAGE

Brown & Root, Inc.
P.O. Box 1001
Glen Rose, Texas 76043

Re: Texas Utilities Services, Inc.
Comanche Peak Steam Electric Station
1980-1982 Units 1 & 2
Job No. 35-1195
B & R Subcontract No. 35-1195-0225
Hunt Project No. 513

Gentlemen:

We report results of Material Finer than a No. 200 Sieve, ASTM C117, (Hunt E1023)

Material Description: 3/4 GRAVEL Date Sampled: 12-9-76

Material Sources: BIN 3 Date Tested: 12-9-76

Quantities Represented by Report: SAT! Sample! N/A DAILY

Before Test Weight (c) = 2578

After Test Weight (h) = 2556

Material Passing #200 Sieve = $\frac{(c)\ 2578 - (h)\ 2556}{(c)\ 2578} = \frac{22}{2578}$ X 100 = 0.9 %

Project Specification (Maximum) = 1.0 %

Results comply/~~do not comply~~ with project requirements.

Control No. L-138 Balance
L-142 Weights
L-124 Sieve

Tested by B. & B.

Checked by J.S.

Respectfully submitted,

ROBERT W. HUNT COMPANY

LEVEL II

FOR INFORMATION ONLY

Form HCP-E1023 (Rev. 6/76)

FILE NO. 3777-6
ORDER 13-C-9927

REPORT HCP 20110
PAGE

Date: 12-9-76

Brown & Root, Inc.
P.O. Box 1001
Glen Rose, Texas

RE: Texas Utilities Services, Inc.
Comanche Peak Steam Electric Station
1980-1982 Units 1 &2
Job No. 35-1195
B & R Subcontract No. 35-1195-0225
Hunt Project No. 513

Gentlemen:

We report results of Moisture Content of Aggregate, ASTM C566, (Hunt E1053)

Material Description: 3/4 GRAVEL Date Sampled: 12-9-76

Plant No: Bin 3 Date Tested: 12-9-76 Time: N/A

Set 1 Sample 1

Quanitities Represented by Report: N/A DAILY

Weight of wet sample plus tare 5259 gm.

0 gm.

Weight of wet sample 5259 gm. (A)

Weight of sample plus tare after drying 5099 gm.

Tare 0 gm.

Weight of dry Sample 5099 gm. (B)

Weight of Water (A) - (B) 160 gm. (C)

Total Moisture Content $\frac{(C)}{(B)} = \frac{160}{5099} \times 100 = 3.1$ % (D)

Free Moisture Content = (D) 3.1 % - Absorption 1.1 % = 2.0 %

Control No. L-139 Balance

L-142 Weights

N/A 12-9-76 Speedy

Tested by: B.L.B.

Checked by: J.S.

Jerry Saathoff
ROBERT W. HUNT COMPANY LEVEL II

Batch Plant Representative

Time Report received

Form HCP-E1053 (Rev. 6/76) ROBERT W. HUNT COMPANY

FOR INFORMATION ONLY

Pg 5 of 7

FILE NO. 3777-6
ORDER 13-C-9927

Date: 12-9-76

REPORT HCP 20111
PAGE

Brown & Root, Inc.
P. O. Box 1001
Glen Rose, Texas 76043

RE: Texas Utilities Services, Inc
Comanche Peak Steam Electric Station
1980-1982 Units 1 & 2
Job No. 35-1195
B & R Subcontract No. 35-1195-0225
Hunt Project No. 513

Gentlemen:

We report results of Sieve Analysis of Coarse Agregates, ASTM C-136, (Hunt E1019).

Material Description: 3/4 GRAVEL Date Sampled: 12-9-76

Material Sources: BIN 3 Date Tested: 12-9-76

Set 2 Sample 4

Quantities Represented by Report: N/A DAILY

Control No.	U.S. Standard Sieve Size	Sample Wt. - Lb. + Tare Wt. - Lb.	Cumulative % Retained	Cumulative % Passing	Project Specification % Passing
	2"				
	1 1/2"				
L-256-1	1"	15.68-15.68= 0.0	0	100	100
L-256-2	3/4"	16.29-15.98= 0.31	1	99	90-100
L-256-3	1/2"	20.05-15.54= 4.82	23	77	—
L-256-4	3/8"	21.32-15.40= 10.74	51	49	20-55
L-256-5A	04	24.05-14.98= 19.81	94	6	0-10
L-256-6	08	15.07-14.20= 20.68	98	2	0-5
N/A	Pan	13.65-13.30= 21.03	100	0	—

Fineness Modulus: 6.44

FOR INFORMATION ONLY

Results comply/~~do not comply~~ with project requirements.

Tested by: B.S.B.

Checked by: J.S.

Control No. L-263 Scale

Constant Weight 23.29

Respectfully submitted,

ROBERT W. HUNT COMPANY

Jerry Saucator
LEVEL II

Form HCP-E1019B (Rev. 6/76)

ROBERT W. HUNT COMPANY

Doc C-4776
Pg 6 of 7

FILE NO. 3777-6
ORDER 13-C-9927

Date: 12-9-76

REPORT HCP20112
PAGE

Brown & Root, Inc.
P.O. Box 1001
Glen Rose, Texas 76043

Re: Texas Utilities Services, Inc.
Comanche Peak Steam Electric Station
1980-1982 Units 1 & 2
Job No. 35-1195
B & R Subcontract No. 35-1195-0225
Hunt Project No. 513

Gentlemen:

We report results of Material Finer than a No. 200 Sieve, ASTM C117, (Hunt E1023)

Material Description: 3/4 GRAVEL Date Sampled: 12-9-76

Material Sources: BIN 3 Date Tested: 12-9-76

Quantities Represented by Report: Set 2 Sample 4 N/A DAILY

Before Test Weight (c) = 2722

After Test Weight (h) = 2706

Material (c) 2722 - (h) 2706

Passing #200 Sieve = $\frac{16}{(c)\ 2722}$ X 100 = 0.6 %

Project Specification (Maximum) = 1.0 %

Results comply/~~do not comply~~ with project requirements.

Control No. L-138 Balance
L-142 Weights
L-124 Sieve

Tested by B & B

Checked by L.S.

Respectfully submitted,

ROBERT W. HUNT COMPANY

LEVEL II

FOR INFORMATION ONLY

Form HCP-E1023 (Rev. 6/76)

GHF-1141

Gibbs & Hill, Inc.
ENGINEERS, DESIGNERS, CONSTRUCTORS
New York

DDR C-446
Pg 1 of 1

To C. H. Gatchell
At TUSI - Jobsite

Date December 15, 1976

JOB NO. 35-1195

RECEIVED
DEC 16 1976
RECEIVED

From J. J. Moorhead
At G&H - Jobsite

COMANCHE PEAK STEAM ELECTRIC STATION
1980-82 2300 MW INSTALLATION
CONCRETE
REF: DDR C-446

We are in receipt of DDR C-446 which was submitted for our review due to its "Use As Is" disposition.

Based on the passing gradation tests which were reported, the aggregate used in the production of subject concrete meets specification requirements and, therefore, no further review is required.

J. J. Moorhead
Resident Engineer

JJM:MRM:te
cc: H. C. Schmidt 6L
R. E. Hersperger 1L
L. T. Van Amerongen 1L
H. C. Dodd 1L
P. M. Milam 1L

B & R DCC DIST.

DODD	1
CHILDRESS	1
BUSSOLINI	1
WELLER	1
TUGCO QA	
LEH	1
GHF	1
	1

FOR INFORMATION ONLY

F-168, 11-66

ATTACHMENT "B"

Brown & Root, Inc.

FOR INFORMATION ONLY

988
WELD NO.

B&R Stainless Steel Liner Inspection Traveler

PROJECT: CPSES JOB NO: 33-1195 UNIT 2 PAGE 1 OF 3

WFB00831	N. Trans. Canal	Stainless Steel	7/16"	Angle to R A41
Drawing No.	Pool	Metal Type	Mtl. Thk.	PC. to PC.

☐ Plate to Plate ☐ Insert to Plate ☑ Angle to Plate ☐ Other

Welder Symbol	WPHL No.	Weld Proced.	Hold Point
AEO	D-080	88023	5
BAG	D-251	88023	5
BAF	D-255	88023	7
BAF	D-262	88023	7
BAG	D-717	88023	7
BAG	D-1378	88023	7
BAG	D-1438	88023	7

BROWN & ROOT
RECEIVED
MAR 10 1980
FILES NOTED
QUALITY ASSURANCE

PERM. PLT. RECORD
ATTN L FILE LOC 17.1.98.7
SUBFILE CODE 995

1. Fit up and Cleanliness of Above:

NA	NA	NA
Results	Inspector Signature	Date

2. V.T. of Backing Strip Tack/Fillet Welds:

NA	NA	NA
Results	Inspector Signature	Date

3. Cleanliness of Channel, Liner, and B. Strip:

NA	NA	NA
Results	Inspector Signature	Date

4. Final V.T. of Channel Fillet Weld:

NA	NA	NA
Results	Inspector Signature	Date

5. Inside Fit Up and Cleanliness:

Sat.	Mike Brooks	8-27-79
Results	Inspector Signature	Date

6. V.T. of Fillet Prior to Grinding:

NA	NA	NA
Results	Inspector Signature	Date

7. Final V.T. of Inside Weld:

Sat	Robert J Kearney	2-26-80
Results	Inspector Signature	Date

8. Completion of Weld Inspection: (NDE P200)

Sat.	James W. Cole	3-6-80
Results	Inspector Signature	Date

BROWN & ROOT, INC.

QUALITY ASSURANCE DEPARTMENT

STAINLESS STEEL LINER INSPECTION TRAVLER/NDE REPORT

CP-QCI-2.11-1
Revision 1

JWC 3.3.80

PROJECT: CPSES   JOB NO.: 35-1195   UNIT 2   PAGE ~~4~~ 2 OF ~~7~~ 3

DRAWING WEB00831   POOL Fuel Bldg North Canal   MTL TYPE S/S   MTL. THICKNESS 3/16"

WELD/ITEM NO. 988   PC. TO PC. ANGLE TO PL A41

___ Plate to Plate
___ Insert to Plate
✓ Angle to Plate

WMR NO.	43903	43903	54066	54018	54079	61660	61672
WELD PROCEDURE	88023	88023	88023	88023	88023	88023	88023
WELDER SYMBOL	AIH	AIH	AEP	AIH	AEP	AET	AEK
STAGE OF MANUFACTURE	Fit-Up	Tack B.S.	Tack B.S.	Final Channel Weld	Channel Final	Stup to Box Assy	B.S. O.U. Box assy

DESCRIPTION(s) and INSPECTION REMARK(s)	RESULTS	INSPECTOR SIGNATURE	DATE
1. Fit up of Liner (Plate) to plate, (angle) insert. Cleanliness of liner and backing	SAT	[signature]	5-2-78
1a. V.T. of backing strip (tack) fillet welds.	SAT	[signature]	5-2-78
1b. Cleanliness of channel, liner and backing strip.	SAT	[signature]	5-2-78
3. Final V.T. on Channel Welds.	SAT	[signature]	5-2-78
4. Liner Fit-up Verification. Cleanliness Verification.			
5a. Final V.T.	X	X	X

Acceptance Std. [illegible]

5b. Penetrant Mfg. Magnaflux-Spotcheck-Batch ________ Dwell Time ________

Cleaner Mfg. Magnaflux-Spotcheck-Batch ________

Developer Mfg. Magnaflux-Spotcheck-Batch ________ Developing Time ________

NDE Procedure 300-ND-5350 Attach. 63

Surface As Welded ____ Ground ____ Other ____

Final P.T. ________ ________ ________

5c. Vacuum Box ____ by ________ Gasket Type ________ Solution Type ________

Pre-test Cleaning ____ Pressure ____ Temperature ____ NDE Procedure 600 ________

Solution Application Method ________ Post Test Cleaning ________

Gauge Serial Number ________ Pressure Differential Maintained for ____ Sec. ____ Min.

Final V.B. ________

N/A = Not Applicable

Satisfactory ____ Unsatisfactory ____ INSPECTOR ________ DATE ______ CERT. LEVEL ______

988

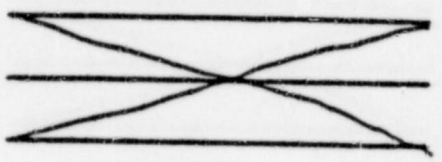
Weld No.

Acceptance Std.
Gibbs & Hill 2323-SS-18

5b. Penetrant Mfg. Magnaflux-Spotcheck

Cleaner Mfg. Magnaflux-Spotcheck

Developer Mfg. Magnaflux-Spotcheck



NDE Procedure
300-NB-5350 Attach. 6B

Final P.T. Level II SAT. (RESULTS) Robert J Kamsey (INSPECTOR SIGN.) 2-26-80 (DATE)

5c. Vacuum Box GASKET TYPE SOLUTION TYPE

24" by 5" rubber SNOOP

Pretest Cleaning Sat. Pre ssure 2-5 Temperature 240° NDE Procedure 600

Solution Application Method Squeegee Post Test Cleaning Sat.

Gauge Serial Number 898 Preassure Differential Maintained for 20 Sec. 0 Min.

Final V.B. James W. Cole

N/A - Not Applicable

Satisfactory ✓ Unsatisfactory ___ Level II Inspector JWC Date 3-5-80

MEMORANDUM

DATE: August 17, 1982

TO: W. M. Rice
Group Vice President
Brown & Root Power Division

FROM: H. C. Dodd, Jr.
Vice President
Brown & Root Power Division

SUBJECT: Investigation of [redacted] Concerns

In the course of our investigation of [redacted] August 6, 1982 complaint to Tom Fechan about alleged procedural violations at the Comanche Peak plant, Larry Ashley, Knox Broom, Doug Frankum, and Michael Herrik interviewed [redacted], a former Comanche Peak employee and informed me of the results of those discussions. [redacted] refuted [redacted] allegations, as discussed in my investigation report to you on the [redacted] complaint. In addition, [redacted] raised several concerns not related to the [redacted] issues. These were discussed in conversations with Ashley, Broom, Herrik, and Frankum, and during a phone conversation with Charlie Scruggs, Assistant Comanche Peak Project Manager. These concerns are addressed below.

First, [redacted] told us that when he was working at the concrete batch plant as a front-end loader operator early in the project, [redacted] improperly used aggregate material from a reject pile. We interviewed at length William George, who worked in the batch plant during the time [redacted] was working in the area. George was not aware of any instance in which [redacted] or anyone else used rejected aggregate material from a reject pile in a pour, without proper documentation and resolution of such error. George's brother, who also worked at the batch plant, was of the same view. [redacted] batch plant supervisor at the time, Bob Morris, is deceased.

Attachment "A" is an example of a deficiency and disposition report (DDR) used to document and resolve use of untested aggregate material in a pour. This is not an example of using rejected material, as Witt alleged, but is the closest example to Witt's concern that we could find. Attachment "A" shows that the use of untested material was properly identified and dispositioned, and that there was no safety problem presented.

T/9

MEMORANDUM

TO: W. M. Rice
Group Vice President
Brown & Root Power Division

DATE: August 17, 1982

FROM: H. C. Dodd, Jr.
Vice President
Brown & Root Power Division

SUBJECT: Enclosed Investigation Report on Complaint of [redacted]

Enclosed is a memorandum dated August 13, 1982, summarizing the results of the Brown & Root management investigation of [redacted] August 6 letter to Thomas J. Feehan. The letter sets out eight items of concern relating to the Comanche Peak Nuclear Power Plant. The letter was delivered and discussed with Mr. Feehan and Mr. Negri on August 6, 1982 and is Attachment "A" to the enclosed August 13 memorandum.

The investigation was conducted at the Comanche Peak site, beginning on Monday, August 9, 1982, and was performed under my direct supervision. I was assisted by those B&R management personnel listed on page 2 of the August 13 memorandum and by other B&R management representatives. Over 500 hours were spent by B&R management officials in the investigation of [redacted] concerns. In addition, over 130 hours of time was spent by B&R non-supervisory workers on the investigation.

Every employee I interviewed was asked whether he or she knew of anything at Comanche Peak that could adversely affect the construction or safe operation of the plant. Each employee was urged to report any concern to his or her supervisor, and to report to higher levels of management if the supervisor failed to take appropriate action on the concern within a reasonable time. I told employees that if site management was unresponsive, they could call me and I would come to the plant to meet with the employee if necessary in order to resolve a concern. The enclosed report summarizes the information received from B&R employees concerning issues raised by [redacted] With respect to discussions I had with employees on any issues not related to the [redacted] letter, I checked into all comments and questions that were raised during my discussions and found no conditions or practices at the Comanche Peak plant constituting a safety problem.

The only procedural violation relating to [redacted] letter that was identified in the investigation was a failure by a welder to follow procedure in the use of weld filler material (Item 7). [redacted] and several others failed to cause an NCR to be written at the time of the procedural violation, and have been reprimanded. Since the weld in question was removed a short time after the procedural error (for reasons unrelated to the procedural error), there is no question concerning the adequacy of the structure. No other uncorrected procedural violations were identified by our investigation.

After the August 13, 1982 memorandum was drafted, I carefully reviewed the memorandum in its entirety with [redacted] I also carefully reviewed with [redacted] each attachment referenced in the August 13 memorandum. A number of corrections and clarifications were agreed upon, as reflected in the handwritten notations on the August 13 memorandum. So that there can be no questions concerning the document that was discussed and concurred in by myself and [redacted] I have left the handwritten notations on the August 13 memorandum just as they were discussed and initialled and have only filled in Attachment letters, as discussed with Mr. Dillingham, and corrected two minor typographical errors on page 1 as noted.

[redacted] has indicated with respect to each original letter item that he no longer has any safety concerns. This is noted by [redacted] signature at the end of each letter item discussed in the enclosed report. I stressed to [redacted] that he was under no obligation whatsoever to sign the August 13 memorandum. However, after [redacted] was satisfied that his concerns were fully addressed by management, he indicated to me that he would be happy to note this in writing by signing each item of the report, as he did.

As stated in the August 13 memorandum, [redacted] and I are satisfied that [redacted] August 6 complaint has been thoroughly investigated and that there are no safety questions presented. As noted in the Addendum to the August 13 memorandum, [redacted] now has "no safety concerns", and is of the view that Comanche Peak is "a totally safe plant".

In further support of the findings of the August 13 memorandum, we have checked with Hal Goodson on Item 8, and [redacted] denies ever telling [redacted] to "mind your own business", as alleged in [redacted] letter. Further, [redacted] said he reported

his concern not to [redacted], but to his superintendent, G. Bunt, who investigated [redacted] concerns. We also talked to [redacted] further about letter Item 6, and [redacted] denied ever indicating to [redacted] that there were any irregularities with any of the travelers referenced by [redacted]. Finally, we checked with [redacted] on Item 2, and [redacted] has no personal knowledge of any tape having been used on shims.

TUGCO has been advised of [redacted] complaint, and has been kept apprised of our investigation and findings. I have informed TUGCO that although we know of no items that must be reported by B&R to the NRC, we are of course available to discuss the details of our investigation with either TUGCO or the NRC.

Finally, I am attaching two additional memos. The first addresses a concern about swipe testing in the pressurizer vessel, first raised by [redacted] with me on Friday, August 13, after I had investigated the concern [redacted] first articulated concerning swipe testing in the steam generator. The second memorandum addresses certain miscellaneous issues raised by [redacted] on subjects other than those contained in [redacted] letter.

B. C. Dodd, Jr.

bjk

Enclosures

cc: D. C. Frankum
Project Manager

Reviewed and Approved:

Knox M. Broom, Jr. — 8-17-82
Knox M. Broom, Jr. — Date
Senior Vice President

L. A. Ashley, Jr. — 8-17-82
Lawrence A. Ashley, Jr. — Date
Senior Vice President

R. P. Negri — 8-17-82
Richard P. Negri — Date
Assistant QA Manager

QTQ-162 TEXAS UTILITIES GENERATING COMPANY

OFFICE MEMORANDUM

To D.N. Chapman Dallas, Texas September 2, 1982

Subject INVESTIGATION OF ALLEGATIONS MADE BY [redacted]

The subject investigation was conducted by Antonio Vega and D.L. Anderson during August 12, 1982 through August 23, 1982. The investigation was conducted by interviewing [redacted] and other persons who he stated were either the primary source of information on a particular allegation, or someone who might be able to provide additional facts on any item.

The results of our investigation are as follows:

1. The first allegation implied an improper advanced knowledge on the part of craft personnel as to what areas were going to be swipe-test inspected by QC.

[redacted] was interviewed. He did not have first hand information on this subject. He referred us to three individuals who he cited could provide additional information on this subject.

The three individuals were interviewed. There was no support for [redacted] statement. Some conversations were referenced which could have been the basis for [redacted] allegation but did not constitute either a QA or craft impropriety.

In conclusion, this allegation could not be substantiated and does not constitute an isolated or generic problem. It has no safety implication.

2. The second allegation implied a first hand observation of shims being taped to achieve proper thickness. [redacted] did not have first hand information on this subject. Furthermore, he could not provide the name of anyone who did have first hand information. He stated this information was relayed to him but can't remember by whom. He further stated he knew of only one instance where this was observed. This happened in the Turbine Building. He does know that not only the shims, but the whole foundation was subsequently replaced.

In conclusion, this allegation could not be substantiated and has no safety implication, generic or isolated.

3. The third allegation implied that some painting application on concrete had not been allowed to cure prior to placing stainless steel liner plates. [redacted] stated this was his own observation but stated it was not really paint, but some compound. He stated he only saw this in the fuel transfer canal when "bowed" liner plates were removed for repair. [redacted] stated this occurrence had been identified in an NCR.

NCR No. M-1819 R2 and associated QC and engineering documentation was reviewed. This was also discussed with representatives of TUSI Engineering. This is a non-safety related application used to smooth concrete surfaces and to ease sloping requirements.

In conclusion, this allegation has no safety implication and does not constitute either an isolated or generic problem.

4. The fourth allegation implied that welding on permanent equipment was done by non-qualified welders. [redacted] stated this allegation was not based on first hand observations. He stated he never saw a person in the act of performing the weld in question but suspected an unqualified person of performing a weld on a turbine ventilation fan at elevation 803'. Although there is no basis to substantiate this allegation, the weld in question would be non-safety related. [redacted] has no other first hand or specific information on any other instance where welds were performed by unqualified personnel.

In conclusion, this allegation could not be substantiated and does not constitute either an isolated or generic problem. It has no safety implication.

5. The fifth allegation states that the welding on the steam generator lagging structural supports is unacceptable. [redacted] stated this applied to Unit 1.

This was discussed with the cognizant engineer who stated that he evaluated the welds. It is his professional opinion and position that the welds as supplied are adequate to perform their design function which is to maintain design geometry during a seismic event. Consequently, he has dispositioned these welds use-as-is. Since that disposition, the welds have been discussed with the vendor who is committed to meet AWS requirements and has agreed to accept backcharges for rework to bring them to AWS standards. Additional NCR's have been issued to initiate rework activities.

In conclusion, the allegation was substantiated in that the welds as supplied failed to meet AWS criteria. The weld conditions were discussed with inspection personnel to preclude recurrence. However, since the welds were deemed adequate to perform design function as received, there is no safety implication related to this allegation. NCR's have been reissued and will form the basis for rework, QC inspection and closeout.

6. The sixth allegation implied that safety related travelers had been fraudulantly filled out by the Millwright and Boilermaker Departments. [redacted] stated this allegation was based entirely on a conversation with [redacted], a documentation clerk in the Millwright office. [redacted] suggested we discuss this with [redacted] and two other individuals. He further stated the activities pertained to fitup and cleanliness inspections, emphasizing he was sure the inspections had been done and that work done was acceptable but the method of documentation was improper. [redacted] explained the procedural history on traveler signoff. He explained that in all cases "chits" form the basis for inspection signoffs. If "chits" are lost, the work is NCR'd. He knew of no instance where an inspector's signoff was not supported by a corresponding "chit". [redacted] statement was substantially supported by Mr. Jim Cole, a QC inspector involved in that area.

The third person was interviewed. She stated the facts were not very clear and did not want to state anytying she was unsure of. She could offer no information that would help support or repudiate the allegation.

In conclusion, this allegation is based entirely on a conversation and cannot be substantiated. On the contrary, discussions with the persons suggested by the alleger all directly contradict improper action. There is no safety implication and no generic or isolated problem.

7. The seventh allegation states that repairs have been made on the diesel generator main support without proper documentation. It further implies the repair area is still in use with five foot cracks.

[redacted] stated the beam on which the subject repair was made has been cut out and is no longer in service. However, an arc strike on it was repaired prior to it being cut out, without following proper procedure. The reason for not following proper procedure was investigated. [redacted] alleges [redacted] told a boilermaker to repair the beam in question and that the boilermaker then told a subordinate welder to do it. This incident was discussed with every individual mentioned as having some knowledge or involvement, either directly or indirectly, with the exception of [redacted] who was hospitalized.

The allegation that an arc strike was repaired on a diesel generator support beam at variance with proper procedure was substantiated. The repaired beam was subsequently cut out because of a separate crack and does not present a safety problem.

An effort was made to determine why the repair had been handled improperly. The following key points were made. Nobody heard [redacted] state the repair was to be done in any certain manner that might be at variance with program requirements. However, [redacted] was reported to have asked whether a welder and weld rod was available to do the repair. To someone familiar with program details, it would appear that a procedure violation was intended in that, if the required Repair Process Sheet (RPS) was requested, and issued, it would provide for the issuance of weld rod specifically for that purpose. Subsequent directives to get the job done, when taken in light of these questions, could be interpreted as a directive to violate procedure. Consequently, there was a general perception among those involved that the directive given intended the bypassing of the issuance of the required RPS. Because [redacted] has, in the past, frequently emphasized the importance of complying with procedural requirements, this was seen as an inconsistency.

This incident appears to be an isolated occurrence and does not constitute a generic problem. It has no adverse safety implication. A reprimand was given to some of the persons involved on August 12, 1982. However, not all persons involved in this incident were present then. By copy of this letter to Mr. Merritt, we recommend this be repeated with all involved personnel present at the same time. This is deemed adequate corrective action.

8. The eighth allegation states that rebar has been cut on a main steam support and other supports without approval. It further states that this was brought to the attention of [redacted] who replied with an admonition to mind his own business.

[redacted] stated he had no first hand knowledge of this. Rather, it had been mentioned to him by [redacted] stated he had mentioned this but also mentioned the possible existence of paper work that may allow this. [redacted] stated he only knew of one instance where rebar was cut and has since verified there was engineering approval for this. [redacted] stated he has never talked to [redacted]. He stated his immediate supervisor has always given him all the support he needs and has no need to go to [redacted].

This allegation was not supported by the person referred to as having first hand knowledge and therefore cannot be substantiated. It does not constitute a safety problem, either generic or isolated.

Summary

In summary, allegations 1,2,3,4,6 and 8 could not be substantiated or do not involve safety related activities. These do not constitute safety problems, are not indicative of program weakness and are not either generic or isolated problems.

Allegation number 5 was substantiated but does not constitute a safety problem. The problem has been documented for proper disposition and corrective action. The non-conformance reports will serve as the basis for rework, QC inspection and closeout.

Allegation number 7 was substantiated in that improper procedure was used to repair an arc strike on a beam that has since been cut out and removed. There is no safety question involved. This appears to be an isolated incident and does not represent a program weakness or generic problem. The reprimand issued to the personnel involved is deemed adequate corrective action.

Antonio Vega

Antonio Vega

D.L. Anderson

D.L. Anderson

AV/DLA:brd

cc: B.R. Clements
J.T. Merritt
R.G. Tolson

Brown & Root Inc.

[redacted]

LETTER OF DISCREPANCIES NOTED IN THE OPERATION OF THE MILLWRIGHT TOOL ROOM.

IT HAS BEEN REPORTED AND OBSERVED THAT [redacted] HAS BEEN DISTURBING THE PEOPLE WORKING IN THE MILLWRIGHT SHOP.

[redacted] NEEDS TO STAY IN THE TOOL ROOM AND TAKE CARE OF HIS DUTIES.

[redacted] IS ALLOWING PERSONNEL TO LINGER AT THE TOOL ROOM DOOR.

COMPANY BUSINESS ONLY NEEDS TO TAKE PLACE IN THIS AREA, AND THEN SEND THESE PEOPLE ON THEIR WAY.

THIS IS TO CERTIFY THAT I HAVE BEEN FORMALLY NOTIFIED OF THESE DISCREPANCIES LISTED ABOVE.

SIGNED: _____
TOOL ROOM ATTENDANT

[redacted] WAS TALKED TO ABOUT THE ITEMS.
REFUSED TO SIGN THE ABOVE STATEMENT.

George Tanley
GEORGE TANLEY

J. W. Calicutt
J. W. CALICUTT

FOIA-85-59

T/12

own & Root Inc.

[redacted]

DUTIES OF THE MILLWRIGHT DEPARTMENT'S TOOL ROOM ATTENDANT:

1. MAKE SURE ALL PERMANENT AND TEMPORARY PARTS ARE STORED IN THEIR PLACE AND TO ENSURE THAT THEY ARE STORED IN ACCORDANCE WITH ALL PROCEDURES AND SPECIFICATIONS.
2. KEEP THE TOOL ROOM CLEAN AND IN ORDER.
3. NOTIFY THE DEPARTMENT OF ANY EXPENDABLE ITEMS THAT NEED TO BE REORDERED.
4. MAKE SURE THAT ONLY PEOPLE INVOLVED IN GETTING TOOLS OR PERMANENT PARTS ARE IN THE TOOL ROOM.
5. DO NOT ALLOW PEOPLE TO GANG-UP AT THE TOOL ROOM RECEIVING DOOR.
6. THE TOOL ROOM ATTENDANT SHOULD NOT BE IN THE SHOP AREA DISTURBING OTHER PEOPLE FROM DOING THEIR WORK.
7. PICK-UP AND RECEIVE MATERIAL, COMING IN FOR THE TOOL ROOM FROM THE WAREHOUSE.
8. DO NOT LEAVE THE TOOL ROOM UNLESS HE IS TAKING CARE OF HIS DUTIES THAT ARE ASSIGNED TO HIM IN THE ABOVE.

[redacted]

T/13

QTQ-215 TEXAS UTILITIES GENERATING COMPANY

OFFICE MEMORANDUM

To D.N. Chapman Dallas, Texas December 10, 1982

Subject TELEPHONE CONVERSATION WITH [redacted]

On Friday, December 10, 1982 at approximately 10:30 a.m. I received a telephone call from [redacted] As you are aware, he had previously made some allegations which I investigated and reported to you on. He called today to advise me that he had been layed off. He attributed this action to having called Bill Rice at Brown & Root offices in Houston.

[redacted] was upset over his firing and stated he had withheld some concerns from me when I conducted the previous investigation. He stated the following:

1. [redacted] at the site knows of instances when [redacted] did some welding he was not qualified to do. He again cited turbine pedestal work which he couldn't elaborate on.

2. He stated that [redacted] from Glen Rose knew of one instance when a sensor in the main dam was broken by a bulldozer. It was picked up and packed back in the sand.

3. He stated that [redacted] had also personally driven a front end loader that returned "dry and lumpy" cement, rejected by QC, to a bin. He stated this cement was used in the "reactor core." He cited this as the reason why the "cracks happened."

He stated these items would have very serious and significant impact and delay the project four years to "chip it all out."

He charged that [redacted], previous B&R Construction Manager had bought hunting rifles with B&R petty cash on CPSES and that [redacted] had stolen chainlink fence for his cabin in South Texas from CPSES and had used CPSES labor to skin a deer on site.

He stated he had notarized statements from individuals who would substantiate his charges and intended to go to the newspapers.

He asked if I could get his job back since he had not yet gone to the newspapers. I advised him my job was to investigate concerns that might have a safety significance and could therefore make no commitments on jobs at CPSES.

He mentioned he had some other concerns. I asked him to relate them to me if he indeed was interested in promoting a safe plant. He refused. I encouraged him to go to NRC. He stated he had no intent of going to NRC, but was going to the newspapers and congress.

I intend to talk to the two individuals mentioned and will report any items if significa

FOIA-85-59

T/14

Antonio Vega

Antonio Vega

12

DO NOT DISCLOSE

Interviewee: A. Vega, Site QA Manager
Date Interviewed: 4/9/84

- Were having problems with Brown & Root (B&R) personnel previously
- Interviewed all inspectors in August '80, lower pay, etc. was identified as a concern, we heard about the use-as-is syndrome, we were not aware of all the complaints prior to that time
- We implemented combined training programs
- Became more aware after [redacted] hearing
- Protective coatings questions surfaced
    - had a very tight spec.
    - took a long time to gradually reduce criteria
    - had credibility problems during this period, appeared like we reduced requirements because they could not be met
    - had some poor supervision (Williams removed)
    - Williams' statement was blown out of proportion - he said they were nitpicking and may be overlooking real deficiencies because of it
- We recognized need for better communications
- There was overreaction to a T-shirt incident by management
    - most T-shirt personnel said they intended no message by wearing of the T-shirts
- Vega is in process of meeting with inspectors to address their concerns
- A letter has been distributed indicating an open door policy to encourage any inspector with concerns to come to Vega
- Getting some visits by inspectors
- Investigating series of management letters to personnel being combined into one directive
- Have program to track and feed-back to inspectors
- Don't seem to have problems in ASME area now
- Still looking at other loose termination problem
- Have told inspectors to go to NRC as necessary - encouraged to go

Note: In conjuction with this interview I reviewed various documents which addressed inspector concerns and various directives to personnel indicating management sensitivity to concerns.

T/11

DO NOT DISCLOSE

Interviewee: R. Sievei, QC Group Supervisor, ASME
Date Interviewed: 4/11/84
Background: 3 yrs. Kemper, Brown & Root (B&R) 3 yrs., 3 yrs. United Engineering

- Have very little hassle with my people
- Feel we have good rapport
- Goes out with people and check out inspections - wears copper (non-supervisor) hat when in field
- Some feedback that some foreman are harder to get along with - rare
- Been told by Frankum that if anybody gives my people bad time they will be out the gate
- Explains use-as-is whenever there is a question by an inspector
- Never pressure not to write NCR's
- Tell supervisors to explain to inspectors that if they have any problem to bring it to me
- Tell people can go to anybody including NRC
- Other personnel and me are upset about people getting attention at hearing and dragging us down, hurts our pride
- We have low turnover in QC

DO NOT DISCLOSE

Interviewee: B. Grier, Special Assistant to QA Manager
Date Interviewed: not recorded

- On site approximately 6 mo., 1 month orientation, 5 mo. reviewing concerns
- Have been involved in one inv. on craftsman after he quit
  - Was a hardware accusation
  - investigator showed that there were no tech concerns
- A recent concern involved the fact that the computer info didn't match dwg.
  - problem concerned status of DCA's
  - am still reviewing
- Got involved in T-shirt incident

Interviewee: Greg Bennetzen, Building Manager
Date Interviewed: 4/6/84
Background: 7 yrs. at CPSES - all QC from B&W, Lynchberg, have degree in nuclear systems, 2 yrs. assoc. degree

- Good construction, no major problem in final product
- Corrective action process is working
- Have not experienced suppression of NCR's
- Has been some misunderstandings (mostly involving inexperienced people) as to legitimacy of voiding NCR's
- Have told inspector it's not their job to evaluate NCR problems but try to explain disposition
- Have gone many times to eng. to get improved answer to NCR's
- One problem was that building management got uncooperative after inspectors found lighting problems
- Procedure was too broad - not limited
- Inspectors were told that inspection of lighting would be handled another way and I told them this, they were reluctant to accept (we unsated lighting until procedure was changed) attitude had deteriorated at this time
- Got poor support from bldg. management at one time
    - stabbed us in back by squealing to management after we would have things worked out
    - my boss realized what was going on, situation was corrected
- I heard that inspectors were concerned that they were transferred due to the fact that they found problems, not a legitimate reason
- No pressure to approve workmanship at CPSES
- There was only a perception of problems concerning lighting, this problem was not fully explained to inspectors
- Nothing was slid under table
- NRC talked to me but not to generally assess job
- There is some natural fear of NRC due to their position
- Main problem that occured - handling of problems by bldg. management leading to disgruntled inspectors and ongoing comm. problem
- No safety problem at this plant, plant is built with necessary quailty

DO NOT DISCLOSE

Interviewee: Mark Welch
Date Interviewed: 4/6/84
Background: B.S. Mech. 3yrs. QA/QC elec.

- Was sup. of T-shirt people in S/G on day of incident and still hold position,
  prior-QA specialists sup. (special projects)
- Plant is built ok, normal problems being addressed and corrected
- Greg (Bennetzen) was having comm. problems with bldg. mangt. - maybe management
  felt need to move him
- Put me in because better suited due to my background, Greg was mostly ASME background
- Perceived from T-shirts that men were testing me

  - My management already had given me direction to tell insp. to remove shirts

- I perceived T-shirts as indicating that they were actually nit-pickers
- Knew ahead of time that I was going into a communications problem but had no opinion as to personal ability
- They (inspectors) have said and I feel it was a comm. problem - nobody fully explained proc. changes to them
- Lighting now handled by BOP-site has not decided what to do yet regarding lighting
- Had a problem with lighting, was mainly concerned of effect on other equipment, if failure occured, some felt we needed to only monitor this area generally
- Determined inspection of lighting not critical, test of circuit is sufficient, not a safety problem, a BOP problem
- Don't think we have a lot of these loose termination problems
- Feel inspectors now understand why changes were made
- Post - const. inspectors were on hold so transferred people to Unit 2, have not yet added people to replace, 3 of 8 (T-shirt inspectors) were transferred to Unit 2, 6 people transferred, 3 of which were T-shirts (see memo's) (made table on about March 28, 1984)
- Didn't want [redacted] to be lead-not his job, Stan Moore was assigned
- Unit 2 not necessarily expendable people, also experienced pool to draw from
- No discrimination in transfer
- Kept people, only transferred them
- Knew I was overstaffed before I went out, Crane (Building Manager) had some influence via general discussion only
- I chose on my own who would be transferred, Hicks (supervisor) made that clear
- Don't see any safety problem that has not been addressed - evaluated and corrected as necessary
- Has been some breakdown in comm.
- Have improved in comm. area

DO NOT DISCLOSE

Welch Con't

- Can now talk to eng. at location
- Seem to be communicating better
- Craft taking better care of problems
- Have good QE to assist
- We explain NCR answers as necessary

- Vega has an open door policy

- Grier has been available to listen to problems, his position was created about 6 mos. ago
- Inspectors can go to NRC anytime and in fact it is their responsibility to identify safety problems
- May be some fear of NRC - natural because of position, mostly would be ones who have not dealt with NRC
- NRC does talk to inspectors
- Bottom line communications and lack of understanding by insp.

DO NOT DISCLOSE

Interviewee: D. W. Cox
Date Interviewed: 4/12/84
Background: NDE/Mech/Struct CP-2 yrs all QC

- Good quality
- Problems are identified and answered
- Use-as-is dispositions are explained but I don't always agree with them, only problem-partial penetration vs. full thickness welding situation, ok to AWS Code but doesn't get fitup inspection as would weld designed as a full penetration, seems to be structurally sound and Code requirements are met
- No pressure not to identify problems
- We have a good run program
- I feel free to go to NRC

  - See NRC in field
  - NRC has looked at my work

- Craft generally cooperative, no serious problems
- Training in structural - OK

  - NDE - written could have been tougher
  - Dwgs with changes work ok - takes some getting use to, DCC better controlled now

Interviewee: J. D. Duncan
Date Interviewed: 4/12/84
Background: 15 mo. Mech/QC lead, Exp - 5th Nuclear Plant, Const. 23 yrs. Bechtel QE

- Best plant I've seen
- Trying to do more than almost humanly possible
- Top quality Unit
- Corrective action process working well
- Good followup occurs regarding problem
- Good management support
- No pressure not to write up problems
- Training good, learned a lot even though I was experienced
- I help inspectors when they have questions
- CMC, DCA document process normal for construction, not confusing to me, allowed enough time to figure out, simple once you are used to it
- Have good inspectors
- I have no quality/safety problems
- Have freedom to go to NRC - invited more to go than I was at any other plant
- Get good craft cooperation

Interviewee: L. A. Chandler
Date Interviewed: 4/12/84
Background: Mech.-QC lead, 6 yrs. total, elec. 3, QC-3

- Things I am involved with I have no problems with
- Have no problem identifying problems and having fixed and/or evaluated
- Get good feedback
- No pressure not to write up problems
- Think complainers don't understand everything
- We are very thorough
- Feel free to go to NRC, have talked to NRC in interview and seen in field
- Training is ok, sufficient to assure inspections properly performed, new people came to me for guidance

DO NOT DISCLOSE

Interviewee: R. C. Whiteman
Date Interviewed: 4/12/84
Background: QC Elec. Lead - Aux. Bldg., CP-7½ yrs., all QC

- Good quality plant
- Sometimes write NCR's and use-as-is dispositions sometimes questioned, sometimes I'm not sure of evaluation, management doesn't necessarily feed back reasons - are minor issues of nonsafety concern
- No problem writing NCR's, no pressure not to
- Is better support now - will probably get better feedback
- Safe plant
- No pressure to not identify problems
- Communication (feedback) problems in past
- Feel fully free to go to NRC - told ever since I've been here to feel free
- Have seen NRC and talked to NRC in field
- Complaints of individuals getting attention are not legitimate - they don't understand procedures, complaints are not tech. sig. as to quality
- Had recent communications problems
- QC training could be better
- I think - QE people need to help us more, go into field more to understand more what we have to do, have brought this up to management and have been told they will get back to me

DO NOT DISCLOSE

Interviewee: S. A. Patterson,
Date Interviewed: 4/12/84
Background: QC Thermo-lag, Civil Mech., CP-2 yrs. 4 mos., all QC, Hilti, epoxy, UT of bolts qualifications

- Quality good
- Good job on thermo-lag, took a while to train
- Good quality on other areas
- Craft cooperates
- No pressure not to write NCR
- Good management support
- Free to go to NRC
- Training ok
- Lot of illegal aliens at Comanche, I think
- Not enough blacks hired, in my opinion
- Safe plant

Interviewee: G. D. Knox
Date Interviewed: 4/12/84
Background: Weld VT Supports and Structures, CP-4 yrs., QC approx. 10 mo.

- No quality/safety concerns
- Good management supports on identified problems
- Get good feedback on use-as-is questions
- Training is adequate, good field training
- Have freedom to go to NRC
- Craft are cooperative

Interviewee: J. A. Caldwell
Date Interviewed: 4/11/84
Background: About 8 yrs. various areas, welder etc.; QC-2 yrs. mech., all certs, mostly worked in reactor building

- Management support good - craft wasn't always quality minded - no significant tech. problems, some minor procedure requirements violated
- Problems get addressed
- Feel free to identify problems
- Get good feedback on use-and-is
- Perform surveillances at random sometimes - not alot, have freedom to do
- Craft work pretty well with us
- Some craft aren't as cooperative
- No pressure to not identify problems
- Have no quality concerns
- Painters damaging some cotter keys, we need to look after they get out of areas
- Free to talk to NRC, have talked to Taylor without being even asked by my management what I said, generally talked with Taylor
- I live close and feel safe

DO NOT DISCLOSE

Interviewee: G. D. Vaughan
Date Interviewed: 4/11/84
Background: B&R 4 yrs. at CP, QC-all but 3 mo., coatings 6 mos, rest mech. QC, Mech./Weld/NDE - Level II qualifications

- Get good management support
- Good support if we have problems
- No pressure not to write NCR's
- Some pressure from craft previously (old management scheme) was hard to keep up, didn't lead to any quality problems, never threatened
- Good quality, no safety concerns
- Use-as-is reasons are well communicated
- People complaining weren't happy here so aren't happy elsewhere
- I know [redacted] - she was treated fairly, think she is complaining to get back at them
- Feel free to go to NRC, have been told I have the right to, no pressure not to
- Never talked to NRC but see NRC in field
- Would live close without worry

DO NOT DISCLOSE

DO NOT DISCLOSE

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Interviewee: W. T. Sims
Date Interviewed: 4/11/84
Background: B&R QC lead, RC #1 hangers; worked Fab, piping also, 7½ yrs at CPSES, VT and NDE qualifications, prior - NDE - Fort Worth

- Good quality program
- Communications were had in early stages (Hawkins previous) several years ago
- Purdy has much improved
- No problem writing NCR's now
- Previous problems were in minor technical areas - no safety significance, primarily communications
- No known safety problems
- Craft better now
- Craft working well with QC
- Good management support
- No pressure by craft
- Not much contact with NRC
- Been told to cooperate with NRC
- Been told numerous times to feel free to talk to NRC
- [redacted] asked me if I wanted to go to intervenors - she was recruiting people before she left
- Allegers don't have serious concerns - blown out of proportion
- Live near plant and am not worried about it's safe operation

DO NOT DISCLOSE

DO NOT DISCLOSE

Interviewee: H. L. Hill, Jr.
Date Interviewed: 4/11/84
Background: B&R QC insp., C1.A ASME 1 yr., 5 yrs. CP, previous pipe welder

- Feel responsible for plant - hold people to the line - have lot of pride
- Didn't like some personnel problems in craft - actual work is fine
- Get good management support
- No one has ever pressured me when I've found something wrong
- Live close and feel safe
- Good support up and down chain of command
- Told 1st thing (2nd day) I could go to NRC and in fact I'm obligated if can't get attention of management, can go anytime
- Feel NRC is open - have talked, seen around, are courteous people
- Worked with [redacted] they were treated right, no mistreatment; [redacted] knew she was leaving (told me) but asked for ROF, I think she complained unnecessarily and drags us down too
- Everything I see in newspaper is wrong and inaccurate
- I get upset with unwarranted allegations
- 95% of people, even sweepers are very concientious, a few are complainers but don't have much credibility
- I knew [redacted] she's just trying to get back at them - she was a "bitch" (ask the girls who worked for her), girls were poorly treated, they disliked her very much, she abused her authority
- No safety problems - no uncorrected problems
- Excellent quality down to the nits

DO NOT DISCLOSE

Interviewee: J. R. Parker
Date Interviewed: 4/11/84
Background: B/R CP-4 yrs., 4 mos., QC Insp.; previous exp.- Frito Lay, maintenance research, started RT 3 yrs., insp. 1 yr. 4 mos.

- Told if I have problem with too many CMC's to have eng. incorporate into dwg.
- Training program ok - but think it could be more professional (tougher)
- Good management support - good feedback
- Don't feel any pressure from craft not to write NCR's
- Don't understand what alleger complaints are about when they say pressure not to write NCR
- End product is extremely high quality
- Live closer, plant is safe, feel safe
- Feel free to go to NRC, told I am free to go any time
- No one has ever talked to me from NRC, see them in the field
- Allegers seem to be trying to get back at company

DO NOT DISCLOSE

Interviewee: M. R. Todd 4-11
Date Interviewed: 4/11/84
Background: B&R _8 yrs., CP in QC, lead QCE, worked in every group

- Know of nothing I have concern about (adamant)
- Don't think allegers have a leg to stand on
- Have talked to investigators from NRC
- Get good management support
- Get good feedback
- No pressure ever to not write NCR's
- Problems are well documented
- Feel free to talk to NRC, have talked to NRC, been told regularly they have freedom to talk to NRC
- Know all allegers - think they are getting back at company and they think company owes them a living - they aren't qualified to make allegations, knew [redacted] are backstabbers
- Need more positive PR (educate public) from NRC - only hear negative in media, not equal time to our side - the good side
- Live close, not worried

DO NOT DISCLOSE

Interviewee: B. J. Chadwick
Date Interviewed: 4/11/84
Background: B&R; previous-South Texas Project 8 yrs., CP-total 2 yrs. QC, VT, MT, PT, Vac. Test, MIFI, MEI, hangers/pipe

- Good quality
- Are conjested areas
- Get good support on IR and NCR's
- Never have problems with management
- No unknown problems or concerns
- Always had freedom to go to NRC
- Documentation package system working well
- No problem getting questions answered
- feel free to talk to NRC, right to go to NRC is repeatedly expressed, have talked to NRC here once on interview survey, NRC's always in field, normally official approach
- Live close - no fear

Interviewee: R. M. Duncan
Date Interviewed: 4/11/84
Background: B&R, Level II B insp., 6 yrs. CP, pipe shop 5½ yrs., helper - fitter, QC since August, VT, NDE in pipe

- Recently qualified, had excellent training
- Good quality when I was in craft
- Get good support on questions
- Was responsible for heat # review, data cards, configurations, checks, ect.
- had good ht. list
- never changed ht. #'s don't know of anyone doing, QC always checked
- was well organized
- sometimes ht. Nos. got removed accidentally, threw material away or applied to non-safety related application or temporary piping application
- QC inspected transfer of Nos. during cutting of material
- have only seen higher class material used in lower grade system
- Have good inspectors
- Some nepotism but generally good craft
- Got good management support
- Get problems corrected, not pressured to not identify problem
- I hold them to procedures
- Would live close - no problems
- People only see bad side in newspaper
- NRC, feel free to contact, told I can, never have talked to NRC, have seen resident insp. talking to people - mainly craft

DO NOT DISCLOSE

Interviewee: [redacted]
Date Interviewed: 4/4/84
Background: Elec. Level I - 2½ yrs total, no previous experience, started craft, 15 mos. QC

- Training ok, transition was confusing
- Paper flow group wasn't organized, don't get everything I need for inspection right way
- Name 'nuclear' is scary but seems ok relative to CPSES
- Are declassifying lighting on A&B train

DO NOT DISCLOSE

DO NOT DISCLOSE

Interviewee: [redacted]
Date Interviewed: 4/6/84
Background: QC 1 yr 4 mos., B/R previous exp. 1½ yrs., drafting elec.

- Only problem involved procedures for post-construction inspection
- No feedback on changes
- Post const. procedure, especially lighting, I think changes are ok safety wise
- I did not do post-construction inspection
- Can't go into cabinet-loose terminations had been found inside cabinets
- People transferred to Unit 2 because of post-insp., 6 of 8 were transferred (all 6 were post-insp. plus one person who sent newspaper articles), looks like move a guy because he stirred the pot, think opinions have been made to Tony (Vega)
- One guy was pressuring, [redacted] pressured [redacted] by complaining directly not through supervisor, foreman told [redacted] it was his fault for problems; work not adversely affected
- Have a woman with no previous experience as a Level II elec. insp. at CP, insufficient training for people with no previous expreience, have enough training to follow basic procedure go/nogo requirements but not to see big problems,
  recertification - read procedure only
- Program being met on paper
- Person in charge doing post-inspection now (Bowers) is more qualified than original people, don't know about new inspectors although they are young - do have previous training
- Was no original check on lighting terminations (surveillance only) but was inspection on cabinets
- Are some loose terminations in cabinets I think
- Have stranded wire under screw blocks (referred to Ruff)
- No big safety-related problems
- Some engineers are not fully considering all aspects of problems
- I have some double heresay - I heard third hand that they steered around problem of bubbles in concrete dome when taking core samples (referred to Lenahan)
- Have no problem concerning safety of plant

DO NOT DISCLOSE

Interviewee: W. S. Vore
Date Interviewed: 4/12/84
Background: QC Lead S/G Elec., 9 yrs. total, QC 4 yrs.

- In some respects it is hard to say my opinion on quality
- Don't know eng. requirements
- Some procedure changes made - incomplete feedback but don't know of safety problems
- Told open door policy, better feedback now then before
- Nothing I know of would affect safety, no serious concerns
- T-shirts incident was blown out of proportion
- Inspectors had legitimate complaints - probably over inspected a few things but 95% needed correction, 50% of terminations were bad in all rooms - need 60 lb. pull off - was not met (referred to Ruff)
  Vega appears to be open to concerns
- In the broad scope - quality good
- Some craft make mistakes
- Get good cooperation from craft
- No pressure not to write NCRs, some in past (got direction on unnecessary NCRs) but were in fact not NCRs
- No one told not to write NCRs, sometimes NCR upgrades occured
- Free to talk to NRC, seen NRC in field, had some interviews with NRC in past
- Only real concern is @ 95% complete - no explanation as to why procedures keep changing - all keep changing, some get more strict, some less
- Examples of less restrictive or clarified are:

    - lighting terminations
    - MOV - no verification of terminations (no critical problems)
    - mech. term. blocks (still inspecting)

- Have gotten no feedback on these problems yet (have talked with Vega)
- Would live close with no concern

Interviewee: L. F. Taggart
Date Interviewed: 4/12/84
Background: QC Elec. Lead Un. 2, QC-CP-7 yrs. QC, Elec. Contractor prior - 6 mos., also electrician, worked civil also

- No quality safety concerns
- Problems get immediate attention
- Get good management support identifying problems
- Recent complaints involved good inspectors that had management problems - evolved around lighting complaints and was blown out of proportion, some inspectors went overboard on lighting, created alot of animosity, some have bad attitude that they are probably not going to cooperate fully with craft, some convinced others there were problems, have settled down now
- Feedback on problems is good
- Feel free to go to NRC, would like inspectors to come to me before going to NRC, but ok if don't
- Most of my people who have concerns - have personnel concerns

DO NOT DISCLOSE

Interviewee: R. L. Adams
Date Interviewed: 4/12/84
Background: QC II Elec.- 3 yrs., 3rd Nuclear Plant, worked at South Texas Project and Prarie Island

- Elec. const. is ok
- I have written CAR's (major corrective action request) and they have listened
- Worked on traceability program
- Problems were evaluated and corrected
- Get good feedback
- No pressure not to write NRC's
- Had major problem in cable pulling, responded with major corrective action
- Worst thing on job was pay and getting qualified people - some people go overboard with insp. and get overly excited about same things - they are afraid to sign, alot of complaints are not justified, they would see use-as-is and say I'll get them
- Had some bad supervision - [redacted] was not too good - always would go with management, all problems were resolved
- Felt I was trying to be blackballed at one time, got transferred and had fewer problems, a lot better now
- Have had dwgs with alot of changes - got together with others and reviewed everything to assure myself of requirements
- I have caused alot of trouble (written up alot of problems) but problems have been addressed eventually
- Training program significantly improved a few months ago but has slacked off again, hard time keeping up with changes, probably hard on new people, training adequate to do job
- No quality concerns - intend to stay at CP
- Everything I have been involved with is ok
- No problem going to NRC, may have in most, probably would have quit first in past if I felt I had to go to NRC

DO NOT DISCLOSE

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Interviewee: Randy McGaughy
Date Interviewed: 4/6/84
Background: 6 yrs., all elec. QC

- T-shirt (post-const.) people are complaining about minor issues, overblowing problems, not qualified to make allegations
- Problems are properly corrected
- Volunteered on his own to come talk with us, also Beck did
- Don't know why they are complaining -some persuaded others in S/G area, they embarrassed the rest of us
- May be assuring themselves of jobs (whistle blowers get extra protection)
- Complainers (T-shirt people) boast about getting attention of Clements, NRC, etc.
- They, (T-shirt people) have been recently transferred to our group
- They are dragging all down-may be influencing other inspectors into erroneously feeling negative toward this job
- They are getting more attention then they deserve, QC getting bad name
- No quality/safety problems-very confident
- Some are afraid of talking to NRC

Comments: He appears to be an experienced inspector and is adamant in his opinion about complaining inspectors and quality of the plant.

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Interviewee: Jerry Back
Date Interviewed: 4/6/84
Background: Level II elec., QC-15 yrs., Comm. Peak - 7 yrs., Air Force - 26 yrs.

- Complainers (T-shirt people) are wrong
- They have blown problems way out of proportion
- Nothing wrong with this plant
- Would live here close
- Some QC people are blowing problems way out of proportion
- People are doing excellent job

Comments: He appears to be an experienced man with a strong opinion.

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Name Key and Additional Information for Appendix A Inspectors

A-1

Inspector Name: [redacted]

Date Interviewed: 4/12/84

General Background: [redacted]

A-2

Inspector Name: [redacted]

Date Interviewed: 4/12/84

General Background: [redacted]

Blank: Tolsen

A-3

Inspector Name: [redacted]

Date Interviewed: 4/5/84

General Background: [redacted]

First Blank: Vega

Second Blank: Barfield

A-4

Inspector Name: [redacted]

Date Interviewed: 4/12/84

General Background: [redacted]

Blank: Grier

FOIA-85-59

T/18

DO NOT DISCLOSE

A-5

Inspector Name: [redacted]

Date Interviewed: 4/6/84

General Background: [redacted]

A-6

Inspector Name: [redacted]

Date Interviewed: 4/4/84

General Background: [redacted]

A-7

Inspector Name: [redacted]

Date Interviewed: 4/4/84

General Background: [redacted]

APPENDIX A

Inspector Name: A-1

Date Interviewed:

General Background:

Interviewee Comments:

- Uncomfortable with less structured program for non-ASME versus ASME; e.g., seem to change dwg. when structure doesn't meet original, can add welds in field and he doesn't think it gets incorporated into dwg., QC lead can approve changes to travelers for non-ASME structures, not much QA involvement in this area.

- Specific: Procedure QIQP 1114-12, electrical mounting backfit, craft complained so procedure was revised to reduce number of inspections, 4 revisions made to delete requirements (bolt tightening, etc.)

- Has the impression that QA has been generally deficient at nuclear plants and QC has not been supported at Comanche Peak in the past.

- Indicated main problem is probably him being able to adjust to non-ASME work: is not aware of code violations taking place.

Inspector Name: A-2

Date Interviewed:

General Background:

Interviewee Comments:

- Has some concern with use-as-is NCR situations, use-as-is seems particularly prevalent when using Specification ES-100.

- Specific Technical Concern: NCR was written when cable damage occurred during Biso Seal removal using a threaded rod. This occurred in Auxiliary Building, elev. 832'. NCR said no damage was done to cable but some insulation had been scraped off by rod. Feel further evaluation may be in order for these cables and there may be similar problems elsewhere.

- Specific: Wrote 2 NCR's regarding traceability of fuse blocks. Blocks were not marked "Q". NCR said OK as-is because no non-Q blocks were purchased via order MS-605. Feels other similar non-Q blocks have been purchased via different purchase order and could have been installed as Q. Thinks this a possible paperwork problem.

- Specific: Wrote recent NCR (not yet evaluated) on GE Motor Control Centers. Compression lugs have bends as much as 180 degrees (more than normally done done by site construction). Don't think GE can violate requirements and may be a problem elsewhere in GE MCC's. Also have some broken wire strands which we are fixing as we find.

- Specific: Had previous paperwork conflict problem in solving rework of terminal blocks. 6 page RFIC involved and Proc. SAP-6 involved. Wrote 2 NCR's. NRC inspectors Creek and Johnson were aware, Creek told NRC inspector Taylor, Taylor told _____ to have an answer. Never got feedback as to results.

- Specific: Repaired a solenoid, shortly after coming to Comanche Peak in craft, without paperwork. Don't know if it was safety related. Not concerned with solenoid technically - did a good job.

Notes: The specific concerns were given verbally to the SRI - Construction on 4/12/84 for further followup. It was indicated during the interview he would get more specifics for SRI. MCC problem was still being evaluated. I suggest allowing the licensee to evaluate and then followup for adequacy of corrective action.

Inspector Name: A-3

Date Interviewed:

General Background:

Interviewee Comments:

- Generally concerned with finding numerous problems during past construction inspection and procedure being changed to delete inspection, e.g., loose terminations found in lighting.

- Some NCR's are answered simply that the problem is not addressed in Specification ES-100.

- Recent NCR written because restraint cable (lighting) crimp gages were worn & therefore, inspection was inadequate. This is still being evaluated.

- Wires of two different gages were terminated at some lugs and many terminations are loose.

- Have more pressure not to write NCR's during turnover.

- Found loose LB's (elbow termination fittings) @ East & South ends of Unit 1 Diesel Generators, wrote two NCR's, was accepted as is.

- Found cables not trained (routed) in workmanlike manner in Unit 1 Cable Spread Room @ junction boxes 1058 and 1059. NCR said OK because cable radius was OK but did not admit workmanship problem.

- Feels post construction inspectors were transferred to Unit 2 as retaliation for finding problems.

- Heard second hand that IR's (inspection reports) were being written falsely (without reinspection) to clear IIRN's (discrepancy report) on cable trays. Heard from lady in Paper Flow Group (PFG) and lady in vault. Said he would get back to NRC with more specifics.

Notes: Some review of the lighting termination issue and post check procedure was conducted by team member Ruff. The site inspector indicated he had told _____ of most of these issues and QA was evaluating. I forwarded concern relative to 1058 & 1059 junction boxes to RIV: Martin and he indicated he inspected these boxes and sees no technical problem. Resident Inspector: Smith participated in most of the interview and indicated he was aware of the D/G loose fittings and sees no technical problem. I evaluated reasons why 6 personnel including _____ were transferred to Unit 2 and this move does not appear to be discriminatory.

Inspector Name: A-4

Date Interviewed:

General Background:

Interviewee Comments:

- Uncomfortable with some use-as-is situations, e.g., cable separation problem found in fuel building during walkdown did not meet procedure but was evaluated as use-as-is. He can show someone where it is.

- Wrote NCR on lack of 5-thread engagement on a conduit fitting - poor evaluation in that they simply said that couldn't see it; a second NCR was written on this area for cable damage, seemed to be looking for a way to buy this area off, took two tries to get everything evaluated. _____ knows about this but didn't get back to him on fact that NCR's were poorly handled, i.e., non-technical aspects.

- Feels discriminated against in that he was transferred to Unit 2 where there is no overtime. Got grilled on cable damage NCR at the same time as being counseled on a personnel issue so it appeared that his transfer had something to do with NCR. Management is aware of this concern.

Note: I did not review this person's transfer situation.

Inspector Name: A-5

Date Interviewed:

General Background:

Interviewee Comments:

- Had problems with post check, e.g., loose lighting terminations and junction boxes. Took lighting out of procedure and made it more difficult to look at junction boxes. Management was made aware of these concerns. (Has no significant safety concern)

- More tendency toward use-as-is when pressure is on (safety requirements are being met, however)

- Has had some fear of talking with NRC, didn't think reporting on-site would ever get off-site, doesn't have NRC RIV phone number

- Feels discriminated against by being transferred to Unit 2

- Some NCR evaluations are inaccurate or unclear, e.g., statement that workmanship was not compromised when in fact workmanship was poor but the item was technically acceptable

Notes: I reviewed the transfer situation; appears to be reasonable but not as clear as reasoning on other 5 transfers. NRC Form 3 appears well posted so I'm not sure why he doesn't have the number. He does not appear to fear talking with NRC now. Although, he stated he does not have significant safety/quality concerns, his comment on NCR answers is interesting. Similar general comments were received from other inspectors and this could indicate a need for better answers on NCR's. An example would be that if a workmanship question was not addressed properly then perhaps needed retraining of personnel as preventive action would not get performed. Perhaps the licensee needs to improve in this area.

Inspector Name: A-6

Date Interviewed:

General Background:

Interviewee Comments:

- Added higher sides to some cable trays to keep cables in trays
- Also there may be cable density/compaction problem in this area
- It's tough to keep people off trays to keep from damaging them
- Have had problems with clearance of pipe and cables, have to notch insulation, place metal between insulation and trays
- There is alot of rework to get proper separation

Notes: This man was questioned primarily to get input for RIV review of cable spread room as to where there could be problems. He personally has little problem with plant quality. RIV - Martin was at the interview and verbal feedback on the first two items indicated that the situations were acceptable.

Inspector Name: A-7

Date Interviewed:

General Background:

Interviewee Comments:

- Had problems with Paper Flow Group (PFG), when first implemented, with completeness of packages. Getting better and does not know of safety problem involved

- Some inaccurate NCR answers

- Site has problem with lost records, 2 people are assigned full time in the vault, NCR's are not written on lost records, reinspect when record is lost but this reinspection may be very difficult or very impractical. He has no evidence that reinspections are not getting done. This problem could relate to competance of PFG people, i.e., maybe they lost records.

Note: Various special team members looked quite extensively at records. Results are in the team report.