UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY & LICENSING BOARD

50-445 OL-2
50-446 OL-2

In the Matter of:	)	
	)	
TEXAS UTILITIES ELECTRIC	)	
COMPANY, et al	)	Docket Nos. 50-445
	)	50-446
(Comanche Peak Steam Electric	)	
Station, Units 1 and 2)	)	

DEPOSITION

OF

C. THOMAS BRANDT

DEPOSITION of C. THOMAS BRANDT, taken on the 16th day of August, 1984, in the above styled and numbered cause at Glen Rose Motor Inn, located at Highway 67 & FM Road 201, in the City of Glen Rose, County of Somerville and State of Texas before Marigay Black a Certified Shorthand Reporter in and for the State of Texas.

APPEARANCES:

BISHOP, LIBERMAN, COOK PURCELL & REYNOLDS
Attorneys at law
1200 Seventeenth Street, Northwest
Washington, D. C. 20036
By: Mr. Bruce Downey

APPEARING FOR APPLICANTS

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P R O C E E D I N G S:

Whereupon,

C. THOMAS BRANDT

resumed the stand and, having been previously duly sworn, was examined and testified as follows:

MR. DOWNEY: We're ready to resume the deposition of Thomas Brandt.

Mr. Brandt was originally called as a witness by CASE, the intervenor in this proceeding.

Mr. Brandt's deposition was adjourned following his cross examination and is now being recommenced, pursuant to the order of the ASLB.

Counsel for the other parties are not present at this deposition, but Mr. Brandt will be cross examined on the subject matter of his direct testimony at the hearing in this proceeding.

EXAMINATION

BY MR. DOWNEY:

Q. Mr. Brandt, I'd like to ask you some questions about specific allegations raised by Darlene Stiner in her testimony in this proceeding.

Are you familiar with the allegations Mrs. Stiner has made concerning certain meetings

that you attended in the summer and autumn of 1982?

A. They started in the summer of 1982, yes, sir.

Q. And do you recall participating in some of these meetings?

A. Yes, I do.

Q. Would you state for the record your recollection of how the first meeting was convened and the substance of that meeting?

A. The first meeting was a meeting between Ms. Stiner, Mr. Tolson and myself to encourage her to obtain a GED.

That meeting took place sometime, to the best of my recollection, in the spring of 1982.

Q. Why did you and Mr. Tolson meet with her to encourage her to earn a GED?

A. Mrs. Stiner had not completed high school. Reg Guide 1.58 had just been issued establishing new criteria for certifications of inspection personnel. One of the prerequisites for those certifications was going to be high school education or an equivalency certificate.

The Reg Guide made provisions for grandfathering previously certified inspectors who

did not meet the new requirements. Under the grandfather provision, Ms. Stiner could continue to work at Comanche Peak, but in the event that Ms. Stiner wished to be certified as an inspection person somewhere else, she would be required by the Reg Guide to have a high school education or a GED.

Q. So, it was your desire to encourage her to obtain this qualification; is that right?

A. Yes.

Q. Were there other inspectors that also didn't have a high school diploma at this time?

A. Yes, there were.

Q. Did you have similar meetings with them?

A. We had similar discussions with them.

As a result of the issuance of the Reg Guide, we did a background study on all personnel, verifying high school education and personnel who did not have a high school diploma were encouraged to obtain a GED.

Q. Was this meeting with Ms. Stiner about her obtaining a GED acrimonious in any way?

A. No.

Q. When was the meeting with Ms. Stiner concerning the GED?

A. Spring or early summer, to the best of my recollection.

Q. Was it in May or June 1982?

A. Approximately.

Q. When was the next meeting that you had with Ms. Stiner?

A. The next meeting was in July. Ms. Stiner had presented me with a note from her doctor, stating that due to pregnancy she was to avoid heavy lifting or stair climbing.

At that point, I removed her from field inspection activities because field inspectors are regularly required to climb scaffolding and stairs.

Within two or three days of receiving the note, Mr. Tolson and I decided to meet with her to discuss her pregnancy.

Q. Do you recall the substance of the note from her physician?

A. To the best of my recollection, it stated that she could continue to work until further notice, but she was to avoid heavy lifting and stair climbing.

Q. Do you recall how the meeting with Mr. Tolson, Ms. Stiner and yourself was convened?

A. Yes, I do.

Q. How was it convened?

A. Mr. Tolson and I decided to talk to her, and I sent for Mrs. Stiner.

Q. Where was the meeting held?

A. In Mr. Tolson's office.

Q. Why did you decide to meet with Ms. Stiner?

A. Mr. Tolson and I were concerned about Ms. Stiner's health. It had come to my attention that she had had a miscarriage in the past. That test, coupled with her doctor's note, raised a question in my mind about the possible consequences of her continuing to work. We just wanted to be sure that Mrs. Stiner was comfortable with her assignment and that she was satisfied that she could continue to work without any adverse consequeces to her health.

Q. What was the substance of the discussion at this meeting?

A. We discussed Mrs. Stiner's health and her plans for the future. She expressed a desire to continue working for the time being, but she asked us what her options were as far as both a reduction in force type layoff or a leave of

absence. I believe she also inquired as to unemployment compensation benefits and insurance benefits.

Q. And did you respond to her inquiries?

A. Yes, we did. We told her the decisions to continue working was hers to make. We also told her that, as far as Brown & Root's policies, neither one of us were sure, but we'd find out and get back with her.

Q. Let me be clear, Mr. Brandt.

Did Ms. Stiner indicate to you that she was interested in continuing her employment at that time? Is that right?

A. She was.

Q. Did you or Mr. Tolson try to pursuade Ms. Stiner to leave the site?

A. Absolutely not.

Q. Did you discuss with her the limits on her physical activities that had been imposed by her physician?

A. The only discussion that I recall on physical limitations had taken place in my office when I received the note from her.

Q. And it was prior to this meeting that you had removed her from field inspection?

A. Yes, it was, by one or two days.

Q. What kind of duties did you assign to Ms. Stiner when you removed her from the field?

A. She was assigned to the fab shop.

Q. What kind of work did she do at the fab shop?

A. She inspected fabrication of miscellaneous steel. She did no climbing, no lifting. She was working on a concrete floor.

Q. Is the fab shop a manufacturing facility on the site?

A. Yes.

Q. Was the second meeting with Ms. Stiner acrimonious in any way?

A. No.

Q. Do you recall any further meetings with Ms. Stiner over the course of the summer or autumn of 1982?

A. We met with her again shortly after the second meeting.

Q. This is shortly after the mid July meeting?

A. Right. We met with her and Mr. Yockey, who was Brown & Root's personnel services manager, to explain to Mrs. Stiner what her options were as

far as taking a leave of absence and what her insurance benefits would be if she quit.

Q. Was this a response to some inquiries that she had made at the meeting in early July or mid July?

A. Yes, it was.

Q. And did Mr. Yockey respond to her inquiries?

A. Yes, he did.

Q. Was this meeting -- let me pin this down, Mr. Brandt. This was sometime in late July; is that a fair approximation?

A. Mid to late July.

Q. Was this meeting acrimonious in any way?

A. No, it was not.

Q. At this meeting, did Ms. Stiner announce what her intentions were about continued employment at Comanche Peak?

A. Mrs. Stiner told us at that point she wanted to work as long as she could.

Q. Do you recall any other meetings with Ms. Stiner over the course of the summer or autumn of 1982?

A. Yes. In August, it came to my attention and to Mr. Tolson's attention, independently -- by

"independently," I mean it had come to Mr. Tolson's attention from someone other than I -- that Mrs. Stiner was requesting copies of NCR's that had nothing to do with what she was doing.

At that point, Mr. Tolson became concerned and asked me to bring Darlene to his office. We sat and talked to her, and Mr. Tolson explained that copying these particular NCR's was not within the scope of her responsibilities.

Mrs. Stiner stated that she needed certain documents to do her daily function. We assured her whatever documents she needed we would get for her.

Mr. Tolson also told her that she should not copy documents that she didn't need to perform her job, and I believe he commented that there were legal means for Mrs. Ellis to get what she wanted.

Q. Do you know what Mr. Tolson meant when he said that there were legal means through which Mrs. Ellis could obtain documents?

A. He was referring to the intervenor in the Comanche Peak licensing proceeding. And by "legal means," he was referring to discovery requests.

Q. Was it known to you that Ms. Stiner was to be a witness for the intervenors at this time?

A. Yes, it was. The subject of Mrs. Stiner's testimony in the September hearings was brought up during the session, and Mr. Tolson encouraged Darlene to tell the truth. I believe his statement was something to the effect of "I don't care whose side you're on, just tell the truth."

Q. And was this meeting acrimonious in any way?

A. Not really acrimonious. It was more of a information session. Mr. Tolson simply told Mrs. Stiner that he had no intentions of providing her with documents that were outside the scope of her job.

Q. After this meeting at which you discussed her document requests, did you have any further meetings with Ms. Stiner prior to the time she left the job site?

A. Sometime during that summer, and I'm real unclear as to when it was, Ms. Stiner came into my office and claimed that Ms. Ellis had been to her house to pick up an NCR that she supposedly found in a Tupperware package. The NCR had been

written by Mr. Atchison.

I had previously seen drawings which were attached to the NCR. I had not seen the body of the NCR itself, the NCR had never had a number obtained, but it had been drafted by Mr. Atchison.

Q. You say Ms. Stiner came to you? She in essence called this meeting; is that right?

A. She walked into my office, yes.

Q. And she said she found this NCR where?

A. In a package of Tupperware material. Not in a Tupperware container, but in advertisement type brochures for Tupperware. She claimed the NCR had inadvertently been slid in this package on her desk.

Q. Did she indicate that she had given a copy of this NCR to Mrs. Ellis?

A. Yes.

Q. Do you recall if this was before or after the meeting involving her -- before or after you received the note about the limits on her ability to work in the field?

A. I really don't recall.

Q. Mr. Brandt, you have testified about a meeting where you encouraged Ms. Stiner to get her GED, two meetings concerning her pregnancy and the

explanation of company policy about her leave options. You described a meeting about her copying documents which she didn't need to perform her duties and this meeting about the NCR that she found in the Tupperware literature.

Do you recall any other meetings with Ms. Stiner over the course of the spring, summer, fall of 1982?

A. No, none come to mind.

Q. Mr. Brandt, are you aware that Ms. Stiner contends that during the meetings you have described that you and Mr. Tolson conveyed to Ms. Stiner the strong impression that you wanted her off the site?

A. Yes, I am.

Q. Did you make any effort to convey such an impression to Ms. Stiner directly or indirectly during these meetings?

A. No, I did not.

Q. In your judgment, did Mr. Tolson directly or indirectly convey to Ms. Stiner the impression that he wanted her off the site during these meetings?

A. No.

Q. Mr. Brandt, are you aware that Ms.

Stiner has claimed that a large percentage of her job was making copies of documents?

A. Yes, I am.

Q. Were you her supervisor during the time that she worked at Comanche Peak?

A. Yes, I was.

Q. And was making copies a large part of her job?

A. For a short period prior to receiving the note -- excuse me -- for a short period of time between the time I received the note from her doctor and the time that I physically relocated her to an office immediately outside the fab shop, part of Ms. Stiner's duties was acting in somewhat of a clerical function for Mike Foote.

Q. When did Ms. Stiner work in this quasi-clerical capacity?

A. Early July 1982.

Q. How long did she serve in that capacity?

A. From the time that I received the note until the time I moved her to the fab shop.

Q. Do you recall how long a period that was? Was it longer than a week?

A. It could have been. It was less than a month.

Q. Was she performing in this quasi-clerical capacity at the time that you and Mr. Tolson met with her about copying documents that she didn't need to perform her job?

A. No, she was not. I might add, if in any event she had been in this clerical position, her clerical function was to support Mr. Foote's work. She would have had no reason to be copying the documents that she had requested.

Q. Mr. Brandt, are you aware that Mrs. Stiner has made certain allegations regarding the relocation of her office to the fab shop area?

A. Yes, I am.

Q. What is your understanding of the substance of her allegation?

A. She claims that she was harassed by the fact that we moved her, and using her own words, I believe, "all over the site."

Q. Do you know who made the decision to relocate Mrs. Stiner?

A. Yes, I do.

Q. Who made that decision?

A. I did.

Q. Why did you decide to, quote, relocate, unquote, Mrs. Stiner?

A. Mrs. Stiner was housed in a trailer immediately adjacent to mine when I received the note from her concerning the limitations on her ability to work. At the time, I was moving the entire group in which she worked to an area near the main construction entrance, which would have been approximately three-eighths to a half a mile from her new work area, which was going to be in the fab shop.

(Recess.)

Q. (BY MR. DOWNEY) Mr. Brandt, just before our break you testified that prior to the move of Ms. Stiner she was physically located -- her office was physically located in a trailer adjacent to yours; is that correct?

A. That's true.

Q. And that you were about to move all of the people in the trailer in which she was located to a different location; is that right?

A. That's true.

Q. At the time of this anticipated move, had you already assigned Ms. Stiner to the fab shop?

A. Yes, I had.

Q. How far is the fab shop from the office

she had been occupying?

A. Approximately a mile.

Q. How far was the fab shop from the office to which her group was moving?

A. Between three-eighths and half a mile.

Q. And how did Ms. Stiner get from her office to the fab shop?

A. She walked.

Q. And how would she have had to travel from the new office location of her group to the fab shop?

A. She would have to walk.

Q. Is the fab shop on a hill, is it higher than --

A. Yes, it's up an incline from where she was located.

Q. And perhaps you stated this, Mr. Brandt, but I want to make the record clear. What action did you take with respect to Ms. Stiner's office when you determined you were going to move her group to a different location?

A. I don't understand the question.

Q. What action did you take regarding Mrs. Stiner's office when you determined that you were going to move her entire group to a new location?

A. I called Ken Liford, who was the assistant general mechanical superintendent for construction and asked him if he had any space available surrounding the fab shop area, either in the fab shop or immediately outside the fab shop.

Q. What did Mr. Liford report to you?

A. He told me he'd check into it. He got back to me shortly thereafter and told me there was a building adjacent to the fab shop that he would clean out and make available to Ms. Stiner.

Q. Was this the kind of building that other inspectors used as offices on the site?

A. Yes, it is.

Q. How much time lapsed between your conversation with Mr. Liford and the time when Mrs. Stiner's group was moved?

A. I don't remember the exact sequence of dates. I talked to Liford one day. He got back with me the same day. The next morning I moved Mrs. Stiner. That afternoon, I believe, the rest of Mrs. Stiner's group started to move.

Q. Are you aware that Ms. Stiner has alleged that she was moved to four different locations?

A. Yes.

Q. Mr. Brandt, I would like to direct your attention to a document that we have got marked for identification as Brandt Exhibit 6.

A. Okay.

(Brandt Exhibit No. 6 was marked for identification.)

Q. (BY MR. DOWNEY) Mr. Brandt, can you identify Brandt Exhibit 6?

A. Yes, basically a site layout map.

Q. Mr. Brandt, would you mark the location of Ms. Stiner's office at the time she was moved with the Number 1?

A. (Witness complies).

Q. Would you please circle the number?

A. (Witness complies).

Q. Would you mark the location of the office she ultimately took near the fab shop?

A. (Witness complies).

With a two, I assume?

Q. No, with a four.

Now, is it your understanding that Ms. Stiner was placed in two temporary locations before she was moved into the office at location four?

A. At this point, yes, I am.

Q. When did you become aware that there were these intermediate moves?

A. Approximately a month ago.

Q. What is your understanding of these intermediate moves, Mr. Brandt?

A. She was -- I directed Mr. Foote to move her to this location immediately outside the fab shop early one morning. Mr. Foote went up to check to see if the building was cleaned out. It wasn't totally cleaned out. There was not an air conditioner in it.

Mr. Foote decided to move her temporarily to location in Ron Michels' trailer.

Q. How long did Ms. Stiner stay in this temporary location of Mr. Michel's trailer?

A. A couple of hours.

Q. Were her desk and her papers physically moved into his trailer?

A. There was no desk moved at all. To the best of my knowledge, her personal effects were moved into Mr. Michel's trailer.

Q. Would you indicate with the Number 2 the location on the map where Mr. Foote temporarily assigned Ms. Stiner?

A. (Witness complies).

Q. And what's your understanding of why Ms. Stiner moved out of that location?

A. Mr. Michels had made an error in how many people he had to occupy that office and he notified Mr. Foote that it wasn't going to be possible to leave her there.

Q. And did Mr. Foote then subsequently assign her to another location?

A. Mr. Foote at that time verified that the building still wasn't ready and told Randy Smith, who was Mrs. Stiner's immediate supervisor, that, for the time being, Mrs. Stiner would be moved into Smith's new office.

Q. So, when Mrs. Stiner could not stay in Mr. Michel's trailer, Mr. Foote had Ms. Stiner move in with Randy Smith; is that right?

A. Right. Mr. Smith had previously been with Ms. Stiner in location Number 1. As I stated earlier, his entire group was also moving. His group was in the process of occupying a new trailer and Ms. Stiner moved in with them temporarily.

Q. Would you mark with a Number 3 and circle in blue the location of Mr. Smith's new office with which Ms. Stiner shared with him for a

time?

A. (Witness complies).

Q. How long did Ms. Stiner remain in location three sharing an office with Mr. Smith?

A. Several hours.

Q. And then following that short time, was she again moved?

A. She was moved to location Number 4, where she had originally been intended to be.

Q. How far was location Number 4 from Ms. Stiner's work?

A. About 50 feet.

Q. And is that shack located on the main road?

A. No, it's not.

Q. Where is it located?

A. It's located basically under the potable water tank off a driveway that goes into the lay down area. Her office was immediately adjacent to another portable building which housed the ASME QC inspector for the fab shop.

Q. Mr. Brandt, did you consult with anyone about your decision to move Ms. Stiner to location Number 4?

A. No, I did not.

Q. Why did you move her there?

A. I had been presented with a statement that said she couldn't do any climbing or heavy lifting, and I assigned her to the fab shop to accommodate her situation. I thought that moving her to an office adjacent to her work area would be the easiest thing for her.

Q. Did you intend in any way to harass her in this move?

A. Absolutely not.

Q. Do you know if the office to which Ms. Stiner was assigned is now being occupied by anyone at the site?

A. Yes, it is.

Q. Who occupies that building, currently?

A. Mr. Jimmy McClain.

Q. And what is Mr. McClain's position?

A. He is the non-ASME inspector in the fab shop.

Q. Does he perform basically the same functions now that Ms. Stiner performed in the autumn of 1982?

A. Yes, he does.

Q. Mr. Brandt, have you physically looked -- strike that.

Mr. Brandt, have you inspected the office that Ms. Stiner was assigned to at location Number 4?

A. Yes, I have.

Q. What are its approximate dimensions?

A. It's approximately 8 by 12.

Q. And how large is your office?

A. 9 by 9.

Q. It's approximately the same size as your office?

A. It's a little larger than my office, yes, sir.

Q. How large is Ms. Stiner's office at location Number 1 where she was housed before this move?

A. She shared that office with about seven or eight inspectors, her lead inspector, and her supervisor. The building was a 10 by 40 foot trailer.

Q. She shared the office with a large number of people; is that right?

A. Right.

Q. Now with whom did she share the office at location Number 4?

A. No one.

Q. It was a private building?

A. Right.

Q. Mr. Brandt, are you aware of the allegations made by Ms. Stiner concerning problems with her air conditioner at the new location, location Number 4?

A. Yes, I am.

Q. What's your understanding of those allegations?

A. Mr. Foote called me and said, "The air conditioner up there isn't working, can we get a new one." I said, "Let me call the warehouse." I called the warehouse and found out none were available. I told Mr. Foote that he and/or Mr. Smith would have to get up with maintenance and get the one she had fixed.

I understand Mr. Smith called maintenance and was told that it would be two or three days before they could get to it as they were busy, whereupon Darlene called someone that she knew in electrical maintenance, an acquaintance of hers, and got the air conditioner fixed.

Q. Was it reported to you that the air conditioner did get fixed?

A. Yes, it was.

Q. And how soon after you received the report from Mr. Foote about the problem with the air conditioner -- strike that.

How much time elapsed from the time Mr. Foote reported to you the air conditioner didn't work until it was reported to you that it had been fixed?

A. Maybe a couple of days.

Q. Mr. Brandt, how long have you been employed at Comanche Peak?

A. Four years.

Q. How are the offices that you have occupied, how are they air conditioned?

A. Some are air conditioned by a central unit in the main administration building. All of the outbuildings are air conditioned by window air conditioning.

Q. Of your four years at Comanche Peak, how long have you worked in offices with window air conditions?

A. Of the four years I've been at Comanche Peak, about two-and-a-half years I've been in buildings with window units.

Q. Was your window unit similar to the kind

of window unit -- strike that.

Did Ms. Stiner have a window unit in location Number 4?

A. Yes, she did.

Q. Was her window unit similar to the kind of window units you had in the office buildings you occupied?

A. Yes, it was.

Q. Did your air conditioners break during the period you were in outbuildings?

A. Yes, they did.

Q. On how many occasions did they break down?

A. Three that I remember right offhand. On two occasions, it froze up to where it would not operate. On one occasion, the compressor went out on the air conditioner.

Q. What steps did you take to get your own air conditioning repaired?

A. I called electrical maintenance.

Q. And approximately how long did it take electrical maintenance to get these units fixed when they broke?

A. When the compressor broke, it was two days.

Q. When they froze, how long did that take?

A. They came in and thawed them out first and generally fixed them later the same day.

Q. Now your current office, Mr. Brandt, is that office air conditioned?

A. The current office I occupy is inside a 12 by 40 foot trailer. There are three private offices in the trailer, none of which have air conditioners within the private offices. There are two air conditioners in the trailer itself and air moves into and out of all three offices by passive air flow.

Q. The two window units keep your trailer cool?

A. No, not really.

Q. Mr. Brandt, are you aware of a certain allegation raised by Ms. Stiner concerning a problem with base metal defects?

A. Yes, I am.

Q. What's your understanding about her allegations, with respect to base metal defects problems?

A. She alleges that base metal defects were not properly reported.

Q. Do you understand the particulars of her

allegation?

A. I understand that she contends that she wrote NCR's on base metal defects which were voided and that this caused her to have second thoughts about writing more NCR's.

Q. Is it your understanding that she contends base metal defects should have been reported on NCR's?

A. Yes.

Q. Is that your understanding of the proper way to report base metal defects problems?

A. No.

Q. How are base metal defects to be reported, under the regulations? Under the procedures?

A. In the non-ASME QA program, base metal defects are to be identified on an inspection report, in accordance with QI QP 16.0-5.

Q. Mr. Brandt, I'd like to show you three documents that have been marked for identification as Brandt Exhibits 7, 8 and 9.

(Deposition Exhibit Nos. 7, 8 & 9 were marked for identification.)

MR. DOWNEY: I would like the record to reflect that Brandt Exhibit 7 is QI QP 16.0-5.

That's the procedure number. And it is Revision O dated March 5, 1982.

Brandt Exhibit 8 is the same procedure number, Revision 1, dated June 21, 1982.

And Brandt Exhibit 9 is the same procedure, Revision 2, dated August 31, 1982.

Q. (BY MR. DOWNEY) I would ask if you could identify those three documents?

A. Yes, I can.

Q. Would you describe those documents, for the record, please?

A. They're the non-ASME QA procedure. They're three revisions. The first three revisions are the same procedure -- excuse me. They are the initial issue and two subsequent revisions of the same procedure, which describes reporting of base metal defects on non-ASME items. It defines inspection criteria and the reporting mechanism. In all cases the reporting mechanism is the inspection report.

Q. Mr. Brandt, have you reviewed any of Ms. Stiner's inspection reports to see how she personally reported base metal defects?

A. Yes, I have.

Q. I would like to show you a document that

will be marked for identification as Brandt Exhibit 10 and ask you if you can identify it?

(Deposition Exhibit No. 10 was marked for identification.)

A. Yes, I can.

Q. (BY MR. DOWNEY) What is it?

A. It's an IR dated May 13th, 1982, IR number MS-0204. It is for an embedded weld plate. That was written by Ms. Stiner describing a defect whose deminsions are 1/16th inch deep by, 1/4 inch long, and up to an 1/8th of an inch wide defect in the 3/4 inch embedplate.

Q. Is this a base metal defect?

A. Yes, it is.

Q. How did Ms. Stiner report it?

A. On this IR.

Q. Was that the proper way to report it, under the procedures?

A. Yes, it is.

Q. Mr. Brandt, I neglected to ask you, with respect to Brandt Exhibits 7, 8 and 9, the three procedures that you identified, have there been subsequent revisions to those procedures?

A. Yes, there have.

Q. Have all such revisions, to your

personal knowledge, specified the reporting of base metal defects on inspection reports rather than NCR's?

A. Yes, they have.

MR. DOWNEY: Applicant moves that Brandt Exhibit 6, Brandt Exhibit 7, Brandt Exhibit 8, Brandt Exhibit 9 and Brandt Exhibit 10 be received in evidence.

(The documents previously marked for identification as Brandt exhibit numbers six through 10 were received into evidence.)

Q. (BY MR. DOWNEY) Mr. Brandt, do you know whether Ms. Stiner at any time wrote an NCR while she was at the fab shop on the issue of base metal defects?

A. Yes, I do. I know she did not.

Q. What did you do to verify that she had not?

A. I did a computer search for an NCR's written by Ms. Stiner on that subject. And I also verified the NCR log for the dates that she worked in the fab shop.

Q. And what were the results of these searches?

A. No NCR was found.

Q. If Ms. Stiner had written an NCR on base metal defects that was recorded, would that NCR have been identified on the NCR log that you reviewed?

A. Yes.

Q. We have had identified Brandt Exhibit 10, which is an inspection report written by Ms. Stiner reporting the problem with base metal defect.

How did you locate that inspection report?

A. Basically the same way. We did a computer search on both structural and Class V hanger IR's for an IR written by Ms. Stiner concerning a base metal defect.

Q. Was this the only IR that you found?

A. Yes, it is.

I should note I guess at this point that the IR is for an embedplate, which is embedded in concrete safeguard unit two, that it's not for anything that is in the fab shop.

Q. When did you first learn of Ms. Stiner's allegations concerning the reporting of base metal defects?

A. July 1984.

Q. How did that subject come to your attention?

A. In preparation for this deposition.

Q. You never heard this particular allegation before that?

A. Not that I recall.

Q. Mr. Brandt, are you aware of an allegation made by Ms. Stiner about an NCR that she wrote concerning the polar crane?

A. Yes, I am.

Q. What's your understanding of that allegation?

A. She thought the NCR was improperly handled.

Q. Mr. Brandt, I believe that NCR has been previously marked for identification and received in evidence in this proceeding as CASE Exhibit 667U.

I would like to have it, for purposes of this proceeding, marked as Brandt Exhibit 11.

(Deposition Exhibit No. 11 was marked for identification.)

Q. (BY MR. DOWNEY) I'd like you to review Brandt Exhibit 11 and see if you can identify it.

A. Yes, I can.

Q. What is that exhibit?

A. It's a non-conformance report prepared by Ms. Stiner on May 6th, 1981, on a bus box on the Unit 1 containment polar crane.

Q. Is this the NCR that she alleges was improperly voided?

A. Yes, it is.

Q. Have you reviewed the disposition of that NCR?

A. Yes, I have.

Q. Do you have a judgment about whether it was properly dispositioned?

A. Yes, I do.

Q. What is your judgment concerning the disposition of that NCR?

A. The way it was handled is proper.

Q. Why is it proper, in your judgment?

A. The bus box for the polar crane is not safety related, it's not seismic category two, and therefore it's clearly outside of the scope of the Comanche Peak QA program.

Q. It's your understanding that's the reason it was voided; is that right?

A. Right.

Q. Mr. Brandt, what is the date of the NCR on the polar crane bus box that's been marked for identification as Brandt Exhibit 11?

A. It is dated May 6th, 1981.

Q. What was your position at that time?

A. I was working as an advisor on Mr. Tolson's staff.

Q. And what were your responsibilities at that time?

A. Essentially a staff position, doing whatever was assigned by Mr. Tolson.

Q. Who dispositioned this NCR?

A. Bob Scott.

Q. Do you know Mr. Scott's position at that time?

A. He was the non-ASME Quality Engineering Supervisor.

Q. Was he authorized to disposition NCR's?

A. Yes, he was.

Q. Mr. Brandt, you used the phrase "outside the scope of the QA program."

What does that mean, in layman's terms?

A. That means the installation and procurement of that particular bus box is not a safety related item and therefore it does not fall

within the scope of 10 CFR 50, Appendix B requirements.

Q. Now, did Ms. Stiner bring her allegation with respect to the disposition of this NCR to your attention while she was employed at Comanche Peak?

A. No, she did not.

MR. DOWNEY: Applicant moves Brandt Exhibit 11 be received in evidence.

(The document previously marked for identification as Brandt Exhibit 11 was received in evidence.)

Q. (BY MR. DOWNEY) Mr. Brandt, are you familiar with the allegations made by Ms. Stiner regarding the inspection of the diesel generator skids?

A. Yes, I am.

Q. What's your understanding of that allegation?

A. Ms. Stiner alleged that she was improperly qualified for inspection on the diesel generator skid.

Q. And at what point did this allegation first come to your attention?

A. It was included in Ms. Stiner's original testimony filed in this proceeding.

Q. That's when you first learned that she alleged she was not properly trained for these inspections; is that right?

A. That's correct.

Q. Prior to that time, while she was employed at Comanche Peak, did you have reason to suspect that Ms. Stiner was not properly conducting inspections on the diesel generator skids?

A. Yes, I did.

Q. When did that problem come to your attention?

A. While she was working on the skids.

Q. Over what period of time did she work on the skids?

A. For a period of about 10 or 12 days during the summer of 1981

(Recess).

MR. DOWNEY: Back on the record.

Q. (BY MR. DOWNEY) Mr. Brandt, before our break, I recall you testified that Ms. Stiner worked on the inspection of the diesel skids for approximately a week to 10 days; is that right?

A. I believe I said 10 days to two weeks, somewhere in that neighborhood.

Q. Mr. Brandt, your testimony was that Ms. Stiner worked doing inspections on the diesel generator skids for 10 days to two weeks; is that right?

A. To the best of my recollection, Mr. Downey, it's in the neighborhood of 10 or 12 days.

Q. When did it come to your attention that there was some problem with her inspections of this area?

A. I was getting daily status reports because I was coordinating reinspections of the skids and it was becoming evident to me, just from watching Ms. Stiner's reports, that she was having an abnormal amount of difficulty with the drawings.

Q. What action did you take, in response to your observations about the problem she was having?

A. I talked to both Randy Smith and Harry Williams about the issue. Mr. Smith told me that, yes, my suspicions were true. Darlene was having an awful lot of trouble with the drawings. And I told Mr. Williams that if that was the case that

he should pull her off of it.

Q. Do you know whether he did pull her off of that inspection?

A. Yes, he did.

Q. Did he do so shortly after your conversation with him?

A. To the best of my recollection, yes.

Q. Subsequent to removing Ms. Stiner from the inspection of the diesel skids, was her work reinspected?

A. Yes, it was.

Q. And to clarify the record, Mr. Brandt, you were a non-ASME QA/QC supervisor at the time; is that right?

A. No, I was not.

Q. What was your position?

A. I was still a staff assistant to Mr. Tolson.

Q. Who was her supervisor?

A. Who was Ms. Stiner's supervisor at the time?

A. Harry Williams.

Q. It was Mr. Williams who directed her -- reassigned her from the diesel skids to some other area. Is that right?

A. Yes, he did, at my request.

Q. What were the results of the reinspections of Ms. Stiner's work?

A. Ms. Stiner's work was reinspected after repairs had occurred, if required. Whether her inspections were accurate or inaccurate is hard to say at this point.

Q. But all of the items and attributes she inspected were subsequently reinspected; is that right?

A. Yes, they were.

Q. Mr. Brandt, are you aware of Ms. Stiner's new allegation regarding the use of weld symbols on particular welds, on doors that she inspected in the fab shop?

A. Yes, I am.

Q. What is your understanding of that allegation?

A. Ms. Stiner was concerned about some of the missile shield doors. She felt that a welding symbol on the drawing was inaccurate. The fact that it indicated a single bevel groove weld, welded on both sides. In addition, she felt that there should be a symbol indicating a fillet weld on each end of a lug.

Q. And when did this allegation first come to your attention?

A. The allegation first came to my attention in preparation for this deposition. I was familiar with the incident, but I did not know that the inspector involved was Darlene Stiner.

Q. How did you know about the incident?

A. Randy Smith raised the question with me at the time it arose.

Q. And what did Mr. Smith report to you?

A. Mr. Smith told me that an inspector had a problem with a weld symbol, described the situation, drew a picture of the configuration on the board, and asked my opinion on the correctness of the weld symbol.

Q. And what was your judgment about the correctness of the weld symbol?

A. In my opinion, then and now, the weld symbol was adequate.

Q. And what's the basis for your judgment that the weld symbol was correct?

A. AWS D1.1-1975 requires that measures be taken to assure that groove welds are filled to the full cross section of a weld. It permits the use of run off tabs when necessary. However, in

this case, the run off tab was -- the use of a run off tab was impossible and they had wrapped the weld around the end of the lug to achieve the full cross sectional thickness of the weld.

(Off the record.)

Q. (BY MR. DOWNEY) Mr. Brandt, you testified, as I recall, before our break, that you resolved this problem involving the fab shop door by reference to AWS D-1.1-1975; is that correct?

A. Yes, I did.

Q. What specific provision, within that -- is that a regulation or a procedure?

A. AWS?

Q. Yes.

A. It's the American Weld Society Code for structural welding, which is referenced by both the Comanche Peak FSAR and the site-specific specification.

Q. And what particular provision within AWS do you use in resolving this issue?

A. Under 4.6, which is titled groove weld termination. It states that groove welds shall be terminated at the ends of a joint in a manner that will ensure sound welds. Whenever possible, this shall be done by the use of extension bars or run

off plates.

Q. Mr. Brandt, I would like you to review -- strike that.

MR. DOWNEY: I would like the court reporter to mark a copy of the page from AWS code from which you read as Brandt Exhibit 12.

(Deposition Exhibit No. 12 was marked for identification.)

Q. (BY MR. DOWNEY) So what was your specific response to Mr. Smith when he brought you this problem?

A. I told him it wasn't a problem. I didn't have any problem with it, that if need be I would go perform the inspection and I would sign the inspection report. I explained to him why I thought it wasn't a problem. Additionally, I later found that the lugs were not safety-related as is clearly indicated on the drawing.

Q. Would it have been proper for you to have done the inspection and signed the IR?

A. Yes.

Q. Why, in your judgment, would it have been proper for you to have performed the inspection?

A. Because I am now, and was then,

certified as a Level III Inspector.

Q. Mr. Brandt, I refer you to Brandt Exhibit 13 and ask you if you can identify that?

(Deposition Exhibit No. 13 was marked for identification.)

A. Yes, I can. It's a drawing for a typical type missile door, tornado missile barrier doors. These doors are for the east opening of the diesel generator building. The door is depicted on this drawing.

Q. Is Brandt Exhibit 13 is drawing of the doors where the weld symbol problem arose?

A. It's either these doors or doors like them, yes, though I don't recall exactly which doors were referenced. All the doors have lifting lugs on them.

Q. What is it that indicates this is a non-Q item?

A. There is a note --

Q. A note on the drawing itself?

A. In Section B-B, at the bottom of the drawing, that refers to the material as inch and-a-half plate. In parenthesis it says, A588. And then it's marked underneath NNS, which is non-nuclear safety related.

Q. So were these inspections outside the QA function at Comanche Peak?

A. We perform inspections on the welding of these non-Q items as they are welded to a safety related item. The door itself is safety related. The reason we inspect the welding is to ensure that no damage has occurred in the welding process to the door assembly itself.

Q. Was the weld symbol part of that inspection?

A. The weld symbol indicates the type weld that should be used to attach these lifting lugs to the door. As I stated earlier, it's a single bevel groove weld, welded on both sides of the lug.

Q. Mr. Brandt, would you circle -- on Brandt Exhibit 13 -- the location of the lugs on the drawing?

A. On this drawing, there are 12 lugs depicted. (Witness complies).

Q. When did you learn that this problem, involving the weld symbol, was a problem raised by Ms. Stiner?

A. In preparation for this deposition.

Q. Did Ms. Stiner write an NCR with respect

to this matter?

A. Not that we can find.

Q. Would you be able to find an NCR had she written one?

A. Had she obtained a number for an NCR, yes, we would be able to find the NCR.

Q. Mr. Brandt, I have one additional question for you on this issue.

How would the problem of the weld symbols raised by Ms. Stiner relate to the safety attributes being inspected with respect to these doors?

Do you understand my question?

A. Let me try to answer that question two ways. The welds were required to be inspected by procedure. The welds were required to be inspected using the same acceptance criteria as any welding safety related structural welding that would occur at Comanche Peak.

However, in the event that these lugs had been improperly welded -- for that matter, if the lugs would have even fallen off, it would have presented no safety concern, as the lugs are used only as lifting lugs to mount and dismount the doors. In normal operation, the doors were

closed.

Q. Are you familiar with Ms. Stiner's allegation concerning an NCR that she wrote on pipe support hanger welds?

A. Yes.

Q. What is your understanding of that allegation?

A. Ms. Stiner claims that she wrote an NCR on some weave welding that was occurring on a particular hanger. We searched for an NCR on this hanger. No NCR was written. Further, we produced an inspection report signed by Darlene Stiner herself, earlier in these proceedings, which indicated that she had inspected and accepted the welds, that she had not written an NCR on them.

Q. And when did this allegation first come to your attention?

A. Early 1984 or late 1983.

Q. This was after Ms. Stiner left the site?

A. Yes, it was.

Q. Mr. Brandt, are you familiar with the allegation made by Ms. Stiner that two women at the site threatened to beat her up because she testified at the ASLB proceeding?

A. Yes, I am.

Q. When did you become aware of that allegation?

A. In the proceedings itself.

Q. Do you know the identity of the two women that she --

A. Yes, I do.

Q. Who are those women?

A. Two women by the name of Leslie Sanchez and Phyllis May, M-A-Y.

Q. What action did you take in response to this allegation?

A. I called both Ms. May and Ms. Sanchez into my office and asked them if there was any truth to the allegation.

Q. What did they say?

A. They said, no, there was not.

Q. How long have you known Ms. May and Ms. Sanchez? Let's start with Ms. May. How long have you known her?

A. Two and-a-half years, approximately two and-a-half years.

Q. And approximately how long had you known her at the time of this conversation?

A. A year. Close to a year.

Q. How long have you known Ms. Sanchez?

A. Approximately two-and-a-half years.

Q. How long had you known her at the time of this conversation?

A. About a year.

Q. And having heard Ms. May and Ms. Sanchez, did you form a judgment about the accuracy of Ms. Stiner's report about their threatening her?

A. Yes, I did.

Q. What was your judgment?

A. I thought it was fabrication.

Q. And what led you to that conclusion?

A. Neither of the two women appeared to be a violent type, particularly Ms. May. Phyllis May is one of the easiest-going people I know, and Leslie Sanchez is much the same.

They have categorically denied that anything happened, that they had threatened Mrs. Stiner, and I believed them.

Q. And you were satisfied with the conclusion --

A. I was satisfied that neither of these women posed any threat to Ms. Stiner.

Q. Did you take any further action after these interviews?

A. No, I did not.

Q. Mr. Brandt, I would like you to review a document that has been marked for identification as Brandt Exhibit 14.

(Deposition Exhibit No. 14 was marked for identification.

Q. (BY MR. DOWNEY) I ask if you can identify this?

A. Yes, I can.

Q. What is Brandt Exhibit 14?

A. It's testimony prepared by myself for this deposition.

Q. Is the testimony, the written testimony provided in Brandt Exhibit 14, true and accurate, to the best of your knowledge and belief?

A. Yes, it is.

Q. And you adopt that testimony as your own, as if it were given orally at deposition?

A. Let's go off the record a second.

(Discussion off the record.)

THE WITNESS: Back on the record.

Q. (BY MR. DOWNEY) Mr. Brandt, during the short recess, you directed my attention to Page 6 of the prefiled testimony; that is, of Brandt Exhibit 14, where the word "new" is struck from

the sixth line of your answer to Question 8.

Is that an editorial change that you made in the draft?

A. Yes, it is.

Q. And it should read without the word "new" in that line; is that correct?

A. It should read: "The NRC branch technical position, "yes, sir.

Q. Would you please initial above the editorial change?

A. (Witness complies).

Q. With that change, do you adopt this Brandt Exhibit 14 testimony as your own?

A. Yes, I do.

Q. Mr. Brandt, were you a witness to an incident where Mr. Tolson had a discussion with certain QA auditors in the QA audit office about the way they were conducting their audit?

A. Yes, I was.

Q. What were the circumstances, if you know, that led to that meeting?

A. I caused the meeting to take place. The auditors were doing an audit on, to the best of my recollection, Class V supports. The auditors had found a weld on a particular Class V support which

they felt to be in question. As it just so happened, the package for that particular support was laying on my desk for a reason that I cannot now recall, and a representative of the construction department came in to get the package so they could write an IIRN.

Q. What is an IIRN?

A. An inspected item removal notice, to remove the package back from the vault.

I asked them at that point why the weld was being repaired, as it had been completed and accepted once by QC and they told me that the auditors had directed them that the weld was deficient, and rather than cause much to do about it, they were just going to go fix it.

I told the crafts person that was in my office that he needn't do that, that he should void the IIRN, if it was written, and that I would resolve the problem with the auditors.

Q. Do you recall this craftsman's name?

A. No, I don't.

Q. What did you do in response to what the crafts person had told you?

A. At that point, I went to Mr. Tolson's office, said, "We have a problem. The auditors

are directing the craft, making decisions that they are not really qualified to make." I then explained what the craftsmen had told me and Mr. Tolson said,"Let's go find the team leader."

Q. What did you understand to have occurred in the field that you thought was troublesome?

A. Well, the auditors were essentially directing construction activities.

Q. That was your understanding?

A. That was my understanding of what had happened. That's not an auditor's function. It causes mass confusion when things like that occur.

Q. What is your understanding of the proper way for a QA auditor to report a deficiency he perceives when he's in the field?

A. Actually, there's two options. The auditor could either write a non-conformance report or identify it as an audit finding in the audit report.

Q. I'm sorry for interrupting you, Mr. Brandt.

Mr. Tolson and you discussed this matter with the auditors; is that right?

A. Yes, we did. We walked from his office to the auditor's office.

Q. How far is that?

A. 20 yards down the hall.

Q. And what happened when you arrived at the auditor's office?

A. We walked in, and Mr. Tolson asked, "Who's the team leader?" There were two auditors in the office at the time. Both of them raised their hand. I can understand Mr. Tolson having a hard time with that, and I informed him who I understood the correct team leader to be.

Q. Who was that?

A. Mr. Larry Rillera, R-I-L-L-E-R-A.

Q. Who was the other auditor present?

A. Ron Cote.

Q. What happened after you initiated this conversation with the auditors, or Mr. Tolson initiated it?

A. Mr. Cote, who was standing closest to me, stood up, and in a boisterous way, for lack of a better phrase, proceeded to have a rather heated discussion with Mr. Tolson.

Mr. Tolson tried to explain to the two of them that he and Mr. Vega had an agreement for years that if they had hardware problems in the field, they would identify it to the site

organization. The site organization would handle the resolution of the hardware problem.

Q. When you say identify to the site organization, you are referring to the QA/QC on-site group; is that right?

A. That's right.

Q. And Mr. Tolson headed that group at the time?

A. Yes, he did.

Q. When you say identify it to the site group, do you mean identify by writing an NCR or including it as an audit finding?

A. Yes, I do. Sometimes the we were given preliminary notice of what the audit findings were to be. But the point that Mr. Tolson was trying to make was that any interface with the craft should be through the site organization.

Q. How long did this meeting last?

A. About five minutes.

Q. Did anyone else enter the meeting besides the four of you?

A. Yes. Debra Anderson walked in during the meeting.

Q. Mr. Brandt, in response to questions put to you by Mr. Roisman during your cross

examination, you testified about an incident involving Mike Foote. Do you recall that?

A. Yes, I do.

Q. What led to that situation? What information came to your attention involving Mr. Foote?

A. I assume you're talking about the situation between Mr. Foote and the night shift superintendent?

Q. Yes, I am.

A. I received a copy of the letter that the night shift superintendent had written to the general civil superintendent, essentially questioning Mr. Foote's supervisory abilities and questioning his certification to make inspection decisions in the protective coatings area.

Q. What action did you take upon receiving this memorandum?

A. I communicated with Mr. Billy Ward, the general superintendent to whom the letter had been written. I told him I had a problem with the letter and that he and I and Mr. Sandlin, who was the author of the letter, and Mr. Foote needed to sit down and work out whatever there was to work out. I established that we would meet in my

office at 5:00 o'clock that day.

Q. This was the day following the receipt of this letter; is that right?

A. And the letter was written on night shift. I received it the next morning. The meeting took place the same day that I received the letter.

Q. What was the substance of the discussion at this meeting?

A. I informed Mr. Ward that, Number 1, evaluating Mr. Foote's supervisory abilities was my responsibility, not his, or any of his people's. And that secondly, Mr. Foote was certified as a Level III civil inspector, which included protective coatings. That his certification was in the vault for review when anybody needed to review it. And that essentially Mr. Foote's inspection decisions as a Level III were valid. That he needn't concern himself further with it.

I also told him that I perceived the letter writing episode as kind of a mud slinging episode at QC, and that if he wished to continue the letter writing episode, letter writing contest I believe is what I told him, I'd be glad to get

into the contest at any time if he wished. But I thought communications between us or his people and my people could be more effectively handled than by writing nasty letters back and forth.

Q. What was the approximate date of this incident?

A. Fall 1983. I believe it was in October.

Q. Mr. Brandt, did you discuss the resolution of the matter concerning the letter with Mr. Foote?

A. Yes. Mr. Foote was sitting in the meeting.

Q. Did you have any subsequent conversation with him about the resolution of the matter?

A. Just in idle talk. Mr. Foote and I are personal friends.

Q. Do you have any reason to believe that he was dissatisfied with the resolution?

A. Absolutely not.

Q. Do you have any reason to think he was happy with the resolution?

A. He thought it was a vote of confidence on my part on his performance.

Q. Mr. Brandt, do you recall a former Brown & Root employee named Robert Hamilton?

A. Yes, I do.

Q. Do you recall a colleague of his, Joe Krolak?

A. Yes.

Q. And another colleague, Mr. Shelton?

A. Sherman Shelton. Yes.

Q. While they were employed at Comanche Peak, did any of those gentlemen ever raise any safety concerns with you?

A. Safety with the plant?

Q. Yes.

A. No.

Q. Did any of those gentlemen complain to you about harassment or intimidation on the job while they were employed at Comanche Peak?

A. No.

Q. Did they raise any problems with you concerning their job?

A. Mr. Krolak and Mr. Shelton did not but I had many conversations with Mr. Hamilton on a wide range of subjects. I remember specifically talking to Mr. Hamilton about the procedures when I was rewriting them in late 1981.

Q. Did Mr. Hamilton make suggestions about the procedures?

A. Yes. He told me about some problems he perceived with the procedure and offered some suggestions for improvement.

Q. Did you consider these conversations about the procedures constructive?

A. Some of them.

Q. Did you adopt some of his suggestions?

A. Yes, I did.

Q. Were these discussions with Mr. Hamilton acrimonious in any way?

A. Absolutely not.

Q. Did Mr. Hamilton, Mr. Shelton, or Mr. Krolak prior to the day of their termination, raise any safety concerns about the safety of the workers at the plant?

A. Not that I recall -- and not with me.

Q. Do you have any reason to believe that Mr. Hamilton was a more rigorous inspector than his colleagues?

A. No, I don't.

Q. Do you have any reason to believe that Mr. Krolak or Mr. Shelton were more rigorous inspectors than their colleagues?

A. No, I don't.

Q. Did you ever receive any complaints

about any of those three inspectors being overly zealous in their inspections?

A. I know that one member of the craft didn't particularly like Mr. Hamilton, but I don't recall that the craft ever complained about him being over zealous in his inspections.

Q. Do you recall the basis for disagreement between Mr. Hamilton and the craftsman you mentioned?

A. It appeared to be more of a personality conflict between Bobby Lockamy, who was the protective coating construction superintendent, and Mr. Hamilton.

Q. Now, do you recall the date on which these gentlemen were terminated?

A. March 9th, 1982.

Q. How did the problem that lead to their termination first come to your attention?

A. Construction had signed up for an inspection. Mr. Hamilton had refused to go and said his people wouldn't go. Construction then called their supervisor. Harry Williams, their second level supervisor, learned of the situation and he described the problem to me.

I sent Mr. Williams, along with Mr. Mike

Foote, to inspect the area that they had refused to go to.

Q. Would you describe the inspection that they refused to conduct?

A. The inspection they refused to conduct was an inspection which would have required them to walk on a containment access, rotating platform rail that's approximately 100 to 105 feet above the first floor level below that.

Q. Did Mr. Williams and Mr. Foote report back to you?

A. Yes, they did.

Q. And what was their report?

A. That it was safe. They said they had walked completely around the circumference of the containment on the rail that Krolak, Hamilton and Shelton had refused to walk, and that it was safe.

Q. And you sent Mr. Foote and Mr. Williams to inspect the rail, is that right?

A. Right.

Q. And they reported back to you?

A. Right, that it was safe, that they had no problem. I might add that I thought that this report was particularly significant because I knew Harry Williams was scared to death of heights.

Q. Mr. Brandt, did you take any other action to assure that the inspection was safe to conduct?

A. At approximately the same time I sent Mr. Foote and Mr. Williams out, I called Sam Hoggard, who was Brown & Root's senior safety representative.

Q. And what did Mr. Hoggard -- what did you ask him to do?

A. I asked him if the rail was safe.

He said, yes. We've been up there. There's a life line, three-eights inch steel cable tied to the containment liner that they can hook off to immediately upon getting off the ladder.

He said, in order to make sure conditions haven't changed, that he would send someone up to re-evaluate the condition.

Q. Did he report back on the conditions at the rail?

A. Yes, he did.

Q. What was his report?

A. He told me as far as the Safety Department was concerned, the rail was safe to walk on.

Q. Where did the painters and inspectors

stand when they were working in this area?

A. On scaffolding between the rail and the liner plate. The only time workers used the rail was to walk from the ladder to their work area. In this case, I believe the painters had been there preparing the area. I don't believe the area was painted when they called for the inspection.

Q. I see. But the painters had walked on the rail?

A. Yes. The painters had to walk along the rail to get to the area where they had been working previous to the Construction's request for the inspection.

Q. Following reports from Mr. Williams, Mr. Foote, and Mr. Hoggard, what action did you take?

A. By this time, it was about lunch.

I went to lunch, came back, and I saw Mr. Britton. I said --

Q. Who's Mr. Britton?

A. Mr. Britton at that time was Mr. Hamilton's supervisor -- immediate supervisor.

And I asked Neal, who is Mr. Britton, what had happened.

He said, Hamilton still refuses to go.

I said, Did they all refuse to go? He said, everybody in the field refuses to go.

Q. Who was everybody in the field?

A. At that time, on that shift, everybody in the field, was Shelton, Krolak and Hamilton.

I told Neal to go get them and bring them to my office.

Subsequent to talking to Mr. Britton, I called Gordon Purdy, told him I had a problem, told him what it was. All three were Brown & Root employees. I wanted Mr. Purdy present when they arrived in my office.

They arrived in my office, walked in, sat down and I started a conversation, explaining what I knew of the situation, asked if they had any comments.

Mr. Hamilton's only comment was that they had built a scaffolding in unit one, and he thought there ought to be a scaffolding built in unit two.

I explained to Mr. Hamilton and the others that I had determined, through two independent means, that the work area in Unit 1 was safe. I then informed them that they would either go perform the inspection or I would have

to terminate them.

All three of the inspectors still refused to go perform the inspection and they were terminated in my office.

Q. Who actually terminated these three gentlemen?

A. Mr. Purdy.

Q. Why did Mr. Purdy, rather than yourself, terminate these employees?

A. Mr. Purdy is the Brown & Root QA manager. As such, he was, he was administratively responsible for any Brown & Root employees working in QA.

The counseling form that was prepared describing the situation and recommending termination is signed by both Mr. Purdy and myself.

Q. Mr. Brandt, would you please describe the document that has been marked for identification as Purdy Exhibit 15, and identify it, if you can?

A. It is a copy of the counseling report prepared at the time Mr. Hamilton was terminated.

Q. When did you first become aware that Mr. Hamilton was alleging that there were safety

problems at the plant? "Safety" in terms of plant operations, not safety in terms of personal safety.

A. We were notified that Mr. Hamilton intended to testify on behalf of the intervenors -- I believe in June 1982.

Q. That was how long after his termination?

A. Three months. From reading the transcript of the deposition of Mr. Hamilton taken before the ASLB, I learned that he thought there were safety concerns.

Q. Did he raise any of these concerns with you prior to the time he was terminated?

A. No, he did not.

Q. Mr. Brandt, in response to questions put to you by Mr. Roisman on cross examination you testified as to an incident involving an inspector named Wade. Do you recall that?

A. Yes, I do.

Q. Since the deposition, have you undertaken some research to fill out details that you couldn't recall at the time of your earlier testimony?

A. Yes, I do. And some of the details are contrary to what I reported to Mr. Roisman.

Q. First let me ask you, What research did you undertake to clarify the situation?

A. I discussed the incident over the telephone with Randy Smith. Randy reminded me of the situation, clarified some details, and told me there were letters regarding the subject that he and Mike Foote had written.

At that point, I had some of the people at the site get with George Bunt to see if George Bunt had copies of the letters, and the letters were provided by Mr. Bunt to myself.

Q. Who is Mr. Bunt?

A. Mr. Bunt is the construction superintendent who supervised the general foreman involved in the original issue with Mr. Wade?

Q. And Mr. Brandt, I'll show you two documents marked for identification as Brandt Exhibits 15 and 16 and ask if you can identify them? First Brandt Exhibit 15.

(Deposition Exhibit No. 15 & 16 were marked for identification.)

A. Yes, this is a speed letter written by Mike Foote concerning the incident. It's a copy of a copy which was provided to George Bunt describing the resolution of -- as Mr. Foote

titled it and the subject of the memo, possible threats to QC.

Q. And that's Brandt Exhibit 15. Do you recognize Mr. Foote's handwriting?

A. Yes, I do.

Q. Is that written in his hand?

A. Yes, that's his signature at the bottom of the letter.

Q. Mr. Brandt, I'd like you now to review Exhibit 16 and ask you if you can identify it.

A. Yes, I can. It's a letter from Randy Smith to Mr. Mike Foote requesting an investigation of the incident which involved a pipe support foreman and Mr. Wade.

Q. After reviewing these documents, Mr. Brandt, is your recollection now refreshed as to the details of the incident that you mentioned briefly in cross examination?

A. Yes, sir. I think the two inconsistencies between my original testimony and what actually happened was I had placed the dispute in the fab shop. At this time Mr. Wade was not in the fab shop, he was in the field. And I had the supervisor involved being Mr. Cappy Lawrence. In reality, the supervisor involved was

Mr. Mike Foote.

I previously stated we removed Mr. Wade from the fab shop at his request after this incident. As a matter of fact, Mr. Wade was not in the fab shop at this time.

Q. Did this incident take place before or after Mr. Wade worked in the fab shop?

A. Before.

Q. Subsequent to this incident, he was transferred to the fab shop; is that right?

A. Right.

Q. Did you have occasion to discuss this matter with Mr. Wade?

A. No, I have not. Not this particular matter. This was resolved at a level under me. I was made aware of the situation, I was copied on the original letter from Mr. Smith to Mr. Foote. I was copied -- I was provided a copy of the letter from Foote to include in the personnel file for Wade. I concurred with Mr. Foote's judgment that the issue was dead, and I believed that the actions that had been taken were sufficient.

Q. Mr. Brandt, since your testimony on cross examination from Mr. Roisman, do you now recall any other incidents of complaints of

harassment being brought to your attention while you were supervising QC inspectors at Comanche Peak?

A. Subsequently I have found a three-part memo documenting a complaint involving Mr. Cory Allen.

Q. Would you describe those circumstances, please, the circumstances surrounding his complaint?

A. His complaint essentially states that he felt that he was being ordered to perform something by a Brown & Root paint foreman. He felt that the Brown & Root paint superintendent had complained to Mr. Allen's supervisor Harry Williams that he had refused to follow the foreman's instructions. He felt the craft was complaining to Harry Williams that he was writing NCR's on CZ-11 that had out lived its pot life. He also complained about some arguments that he'd had with different Brown & Root paint foreman. He didn't think it was handled in a professional manner. He felt that he was being picked on by the paint department. I guess that was the bottom line.

Q. What action did you take in response to

Mr. Allen's complaint?

A. I convened a meeting --

Q. By the way, when did you receive his complaint from him?

A. His complaint is dated 6/25/83.

MR. DOWNEY: I'd like the court reporter to mark that complaint as Brandt Exhibit 17.

(Deposition Exhibit No. 17 was marked for identification.)

A. It's dated 6/25/83. I don't recall when I received it. I would assume I received it the same day or the day after Mr. Allen wrote it.

My response is dated 6/29/83, which leads me to believe it was probably over an intervening weekend. What I did after receipt of it was to convene a meeting between the Brown & Root construction coatings superintendent, Mr. Haley; Mr. Allen's supervisor, Harry Williams; a coatings general foreman, Jim Brackin; and a coatings foreman, Wayne Remington -- I believe his first name is Wayne -- and Mr. Allen and myself.

And we had a discussion of all the incidents described in Mr. Allen's complaint as stated in my response to Mr. Allen that the

context of the conversation with construction was that this type of conduct must cease. I believe those were the exact words I used. Junior Haley assured me that he would take care of the problem, and that he would implement corrective action as necessary immediately.

The meeting adjourned and everyone left except Mr. Allen and myself. I told him, Cory, this is the way I would like to see this handled. I said, If you continue to have problems, please get back with me.

In the last line I state, As we discussed verbally, if the situation does not improve, please notify me again.

Q. (BY MR. DOWNEY) Did Mr. Allen bring a subsequent complaint to your attention along these lines?

A. No, he did not. As a matter of fact, I had occasion in late September to ask him specifically how things were going. Mr. Allen said that they were working long hours, and would like to see that changed. I then asked him if he was having problems with people harassing him and he said he was not.

Q. And what is the date of your response to

Mr. Allen?

A. 6/29/83.

Q. That's four days after the date of his original complaint; is that right?

A. Right.

Q. It's your recollection it was an intervening weekend; is that right?

A. To the best of my recollection, it would be easily discernable upon seeing a calendar. I do believe that I convened the meeting on the first work day on which everyone involved was at the job site.

EXAMINATION

BY MR. WATKINS:

Q. Mr. Brandt, are you familiar with the spent fuel pool in the transfer canal associated with the spent fuel pool?

A. Yes, I am.

Q. Could you briefly describe the basic function of the spent fuel pool and the transfer canal?

A. The transfer canal is used in transferring both new fuel from the new fuel pool to the reactor vessel during fueling operations and is used to transport spent fuel from the

reactor to the spent fuel pool dur..g refueling operations. The spent fuel pool is used to store spent fuel.

Q. Are you familiar, Mr. Brandt, with the liner plates associated with the transfer canal and the spent fuel pool?

A. Yes. They're stainless steel plates welded together to form a canal or in the case of a spent fuel pool to form a pool.

Q. Is welding on these liner plates an ASME item or a non-ASME item?

A. It's non-ASME.

Q. Are the welds on the stainless steel liner plate in the transfer canal or the spent fuel pool safety related welds?

A. Yes, they are.

Q. In what sense?

A. They're considered by the design engineer to be safety related.

Q. Mr. Brandt, are the welds on the stainless steel fuel pool liner plate or the transfer canal structural welds?

A. No.

Q. What is the purpose of the welds in the liner plate?

A. The purpose of welds between adjacent liner plates is to form a continuous liner to preclude the possibility of the irradiated water from seeping out of the liner into the concrete which surrounds the liner.

Q. Essentially, therefore, the welds are simply designed to ensure that the spent fuel pool and the transfer canal hold water; is that correct?

A. Yes. In fact, the design specification for these welds requires only that the welds be made, that they be smooth enough to allow decontamination, that they be liquid penetrant tested to give some assurance that the surface is smooth enough to allow decontamination, and that they be vacuum box tested to assure that they're water tight.

Q. Mr. Brandt, are these welds in any way directly related to the operation of the nuclear reactor?

A. They in no way affect either the safe operation of the nuclear reactor or the safe shut-down of the nuclear reactor.

Q. Mr. Brandt, do you recall a time in 1983 in connection with stainless steel liners in which

a QC inspector or inspectors were asked to sign traveler hold points based on NDE chits?

A. Yes, I do.

Q. Would you explain your recollection of that event?

A. It was during the time of the fuel building turnover that we realized that some of the Unit 2 liner plate travelers were incomplete in that the fit-up inspection hold point on the traveler itself was not signed and yet the weld was completed. This activity during the time frame in which the travelers were generated was performed by ASME QC inspectors. At the time of the fuel building turnover, a box of documents was brought to my office and it was explained to me that since it was a non-ASME activity now and that my inspectors performed this inspection, that I should address the unsigned fit-up hold points.

Q. For the record, Mr. Brandt, would you state the capacity in which this box of documents was brought to you.

A. At that time, I was the non-ASME QA/QC supervisor.

Q. What was in this box of documents?

A. The travelers for the Unit 2 liner.

Q. What was your response?

A. I responded to Mr. C. C. Randall that he should go get with Ted Blixt and Jim Ragan as the activity had been an ASME activity and that the ASME QC people should resolve the problem.

Q. What position did Mr. Blixt hold at that time?

A. It was -- Blixt was the Quality Engineering Supervisor.

Q. And what job did Mr. Ragan hold at that time?

A. Mr. Ragan was the ASME QC supervisor for night shift.

Q. What did Mr. Randall do pursuant to your instruction?

A. Mr. Randall, I assume, discussed the matter with Mr. Blixt. To expedite the resolution, I offered George Willis to Mr. Blixt to assist in the review. At the time the travelers were generated, Mr. Willis was the ASME QC superintendent.

Q. And what happened?

A. Travelers were reviewed, where possible inspection chits were located for the missing inspections, the travelers were signed off noting

that they were a late entry, the signature was based on the existence of an NDE chit for that inspection which had been signed by a certified inspector and the chit was attached to the traveler.

Q. Mr. Brandt, in the circumstance that you described, is it appropriate for a QC inspector to sign a hold point based on an NDE chit signed by another inspector?

A. Yes, provided that it's clearly indicated that the inspector is signing not for the inspection but for a verification that evidenced that the inspection was performed by a certified inspector. I have no problem with that practice.

Q. How would the inspector signing the hold point on the basis of other documentation indicate that that inspector had not actually performed the inspection?

A. The inspector would indicate that the entry was a late entry based on the existence of an NDE chit and attach the chit to the traveler.

Q. Mr. Brandt, do you know whether a non-conformance report was written with respect to the travelers and accompanying chits that you have

described?

A. Yes, it was.

Q. I show you a copy of a two-page document marked for identification as Brandt Exhibit 18, and ask you if that is the NCR to which you refer?

A. Yes, it is.

Q. Mr. Brandt, do you know whether that NCR went through a subsequent revision?

A. Yes, it did.

Q. Mr. Brandt, I show you another two-page document marked as Brandt Exhibit 19 and ask you if that is Rev. 1 of the original NCR that you have identified?

A. Yes, it is.

Q. Mr. Brandt, who wrote those NCR's?

A. Revision 0 was written by Randall Smith and Clair Randall.

Q. Is that C. C. Randall?

A. Yes, it is. Revision 1, although it indicates reported by Randall Smith and C. C. Randall, was a revision to delete the word "random", and the revision was made by George Willis.

Q. As you understand it, Mr. Brandt, what was the nature of the non-conforming condition

identified in these NCR's?

A. There was some question in Mr. Smith and Mr. Randall's minds as to whether the inspection chits was for the fitup of the weld between the seam caused by the fitup of the two plates or whether the inspection chit was for the fitup of the backing strip to the two plates. For this reason, it was reported that the fitup can't be verified as being performed.

Q. Was that NCR subsequently dispositioned?

A. Yes, it was.

Q. What was the basis for the disposition?

A. The disposition reads, "Subject welds are seam welds utilized to provide leak tightness of the liner. Acceptability of the welds shall be based on vacuum box and hydrostatic tests." Essentially, what this is indicating, what I had earlier stated, the welds are non-structural, their only purpose is to provide a leak-tight barrier between the irradiated water and the concrete. And acceptability of the welds was to be based solely on the satisfactory performance of vacuum box and hydrostatic tests.

Q. Mr. Brandt, does your signature appear on either of these documents?

A. Yes, it does.

Q. On which does it appear?

A. It appears on Revision 0 as authorizing the NCR under the block entitled QE review or approval, and also under disposition verification and closure. On Revision 1, it appears under QE review and approval of the disposition.

Q. What does your signature on the QE review and approval mean?

A. It indicates that the disposition is both technically satisfactory and meets all QA and regulatory requirements.

Q. Mr. Brandt, what is a vacuum box test?

A. A vacuum box test is performed by applying a soap solution to a weld, covering the weld with a box called a vacuum box, hooking the box up to a vacuum pump and applying a vacuum to the box. If the weld has any leaks in it to where air can pass from one side of the weld to the other, it will draw air through the weld causing the soap film to bubble.

Q. Mr. Brandt, referring again to the two NCR's, would you define the location of the liner plate for which the non-conforming condition was identified?

A. It states Unit 2 reactor building.

Q. Can you be more specific?

A. It's talking about the refueling cavity in the reactor Unit 2.

Q. Mr. Brandt, did the NCR or the travelers to which the NCR's relate in any way involve the spent fuel pool?

A. No. Not to my knowledge.

Q. Did the NCR's or the travelers to which they relate refer in any way to the transfer canal?

A. Yes, they did.

Q. Mr. Brandt, is the transfer canal the same thing as the refueling cavity?

A. Yes, it is.

Q. And is the refueling cavity that to which this NCR relates?

A. Yes, it does.

Q. Going back to vacuum box testing, Mr. Brandt, have vacuum box tests been performed on the vacuum box liner plate welds?

A. They've been performed on some of the welds in the Reactor 2 cavity. I don't believe they've been performed on all welds as of this date.

Q. Will they be eventually performed on all welds?

A. Yes, they will.

Q. Mr. Brandt, what is hydrostatic tests with reference to the liner plate welds?

A. In this reference, the hydrostatic tests refers to filling the cavity with water and examining the cavity for leaks.

Q. Have hydrostatic tests been performed on the liner plate to which these NCR's relate?

A. No, they have not.

Q. Will they be performed?

A. Yes, they will.

Q. Mr. Brandt, were vacuum box and hydrostatic tests tests that were specifically imposed to respond to these NCR's?

A. No, they were part of the original specification.

Q. Mr. Brandt, do you know who signed the travelers associated with these liner plate welds based on the NDE chits that you earlier discussed?

A. Sue Ann Neumeyer did a lot of them.

Q. In signing those hold points, was she performing an inspection function?

A. No, she was not.

Q. What function was she performing?

A. Document review function.

Q. In your judgment, would it have been necessary for the person signing the hold point on the basis of the NDE chits to have been a Level II inspector?

A. Only to the extent to interpret that the NDE chit was for the weld in question. If it was clear that the weld reflected on the NDE chit was the same as the weld on the traveler, no, it's a clerical function.

MR. WATKINS: That will conclude my examination of Mr. Brandt. The Applicant now moves that Brandt Exhibits 18 and 19 be recieved in evidence.

EXAMINATION

BY MR. DOWNEY:

Q. Mr. Brandt, in response to questions put to you by Mr. Roisman on cross examination, you testified about your meetings -- or meeting with Jack Pitts on the day of the T-shirt incident. Do you recall that testimony?

A. Yes, I do.

Q. Is Mr. Pitts still employed at Comanche Peak?

A. No, he is not.

Q. Is he still employed by Ebasco?

A. Yes, he is.

Q. Do you know where he's now employed?

A. Yes, I do.

Q. Where?

A. He's employed at the Clinton Power Station, Clinton, Illinois.

Q. Do you now how Mr. Pitts came to accept the position the Clinton?

A. Yes, he was offered a transfer by me. Ebasco had signed a contract for providing electrical QC personnel, with Baldwin Associates, which is the prime contractor at Clinton Power Station.

I was called by my boss in New York, Mr. Jerry Hoops, and asked if we had anybody that could be made available to go to Clinton. I said I didn't know, but I would check it out.

At the time at Comanche Peak, Ebasco had two electrical inspectors, Mr. Pitts and one other inspector. I was aware of Mr. Pitts' capabilities and felt quite confident that he would do a good job at Clinton.

I was also aware of the fact that Mr.

Pitts felt quite uncomfortable in that he felt that he was receiving a great deal of peer pressure because he was the only Ebasco employee in a group of all Brown & Root employees, and that transferring might be something he would be interested in doing.

I discussed the matter with Mr. Pitts. I told him basically what the job was at Clinton, what he would be doing. It was a brand new contract for Ebasco. I told him it was an opportunity for him to start out on the ground floor and whatever he made for himself he would be making along with 14 or 15 other people.

Mr. Pitts asked if he was being directed to go to Clinton and I responded in the negative, stating there were several options available to him if he didn't want Clinton. He asked me what those options were. I told him one certainly was remaining at Comanche Peak, that absolutely no one had requested his removal from Comanche Peak. And the other was to wait for an opening at South Texas and transfer to the South Texas project.

I explained the economic considerations of going to Clinton. I told him benefits at Clinton more closely related to what Mr. Pitts

received at Comanche Peak than the benefits he would receive at South Texas.

Mr. Pitts asked if he could have time to discuss the matter with his wife. I said, Of course. I said, I do need to know as soon as possible, as Ebasco is under a deadline for staffing the job and I need to know if you're going to be available or not.

He came back to me either the next day or the day after and said he had decided to go to Clinton.

Q. Did your offer to transfer Mr. Pitts to the Clinton site in any way relate to the T-shirt incident?

A. Only in that Mr. Pitts made it quite clear to me in the discussion we had on the morning of the T-shirt incident that he felt like he was an outsider and he was having a hard time fitting in with his co-workers.

Other than this consideration, absolutely not.

Q. Mr. Brandt, do you recall an inspector who worked in the non-ASME coating area named Joe Krolak?

A. Yes, I do.

Q. Are you aware that Mr. Krolak has alleged that NCR's that he wrote while at Comanche Peak were, quote, squashed, close quote?

A. Yes, I am.

Q. What's your understanding of the substance of Mr. Krolak's allegation about the NCR's that he wrote?

A. The only NCR that I am aware that Mr. Krolak alleged that was, quote, squashed, close quote, was an NCR involving the use of Kelly heaters to accelerate cure on coatings on some electrical supports in the -- what's called a tunnel, which is actually a quonset hut, outside Reactor Unit 1.

Q. Mr. Brandt, have you reviewed the file of NCR's written in the coatings area to identify the NCR's written by Mr. Krolak?

A. Yes, sir, I have.

Q. How many NCR's did Mr. Krolak write while he was employed at Comanche Peak?

A. I was able to find two.

Q. And are all NCR's kept in the file in which you conducted your search?

A. The file that I searched was a comprehensive listing of all nonconformance

reports in the coatings area generated from 1980 to present. It's a file of NCR's kept by the Engineering Department. I have additionally searched the log --

Q. By the log you mean the NCR log?

A. Yes, I do. -- for NCR's that Mr. Krolak might have written, and was able to identify two NCR's.

(Whereupon Deposition Exhibits (No. 20 and 21 (was marked for identification.

Q. (BY MR. DOWNEY) Mr. Brandt, I would like you to review two exhibits that have been marked for identification as Brandt Exhibits 20 and 21.

I would ask you to identify those exhibits, if you can?

A. All right.

Q. What is Exhibit 20, Mr. Brandt?

A. Exhibit 20 is NCR C-82-0060.

Q. And by whom --

A. Original issue and Revision 1.

Q. And by whom was it prepared?

A. Joe Krolak.

Q. Mr. Brandt, can you identify Brandt

Exhibit 21?

A. Yes, I can.

Q. What is that exhibit?

A. It's NCR C-82-00083.

Q. And by whom was that NCR prepared?

A. Joe Krolak.

Q. Mr. Brandt, is Brandt Exhibit 20 the NCR about which you testified just a few moments ago?

A. By the NCR that I testified to a few moments ago I assume you mean the one written by Mr. Krolak that was supposedly squashed.

Q. Yes.

A. Yes, sir, it is.

Q. What was the disposition of that NCR?

A. To solvent wipe the coatings on the hangers. If conteminantes are visibly present after wiping, the area should be sanded slightly until removal of discoloration is complete. After completion the repair the area should be checked for dry film thickness. The coatings on the shim plates are to be used as is, due to the small amount of exposed painted surfaces after placement of the shim.

Q. In your judgment, as a Level III coatings inspector, is that a proper disposition

of that NCR?

A. Yes, it is.

Q. Mr. Brandt, what is the date of the NCR which has now been marked for identification as Brandt Exhibit 20?

A. January 20th, 1982.

Q. Mr. Brandt, with respect to Brandt Exhibit 21, is that the second NCR you found that was written by Mr. Krolak?

A. Yes, it is.

Q. And what was the subject matter of that NCR?

A. Some shim plates to be used with electrical hangers were coated with a zinc enriched coating from a spray can; and that the shim plates contained no unique identification number.

Q. And in preparing this NCR was Mr. Krolak asserting that these two items were improper?

A. Yes, he was.

Q. What was the disposition of that NCR, Mr. Brandt?

A. Use as is, based on the fact that CCP-30 and QI-QP 11.4-1 do not apply to galvanized surfaces. And Section 2.9 of ES-100, which is the

Electrical Installation Spec, states in part the damages to galvanized surfaces shall be repaired within 24 hours using Galvanox paint or approved equal.

The coating that Mr. Krolak had referred to in his description of non-conformance was a, quote, zinc enriched coating, close quote, was this Galvanox paint.

Q. Mr. Brandt, was this coating a non-Q coating?

A. Yes, it is.

Q. And was the non-Q coating properly used in this case?

A. Yes, it was.

Q. And did the fact that this was a non-Q coating form a basis for the disposition of the NCR?

A. The coating was required to be used. Mr. Krolak had inappropriately applied requirements of an inspection procedure and construction procedure for application of service Level I Q-coatings to the application of this zinc enriched Galvanox coating used to repair galvanized surfaces.

Q. So the disposition of this NCR was,

quote, use as is, close quote?

A. Yes, it is.

Q. Mr. Brandt, who closed out this NCR?

A. Bob Scott. Bob Scott signed for final closure of the NCR. The NCR was closed with an inspection report dated February 12th, 1982 signed by Joe Krolak which states the non-conforming condition is in accordance with ES-100 CCP 30 and QI-QP 11.4-1 do not apply to galvanized surfaces, hold tags have been removed, and non-conforming items will be used as is.

Q. In fact, these were not non-conforming items, isn't that right?

A. That's right.

Q. In your judgment was this NCR properly dispositioned?

A. Yes, it is.

Q. And does Mr. Krolak's inspection report indicate that he was made aware of the basis for the disposition of the NCR?

A. Yes, it does.

Q. Mr. Brandt, are you aware that Mr. Krolak has alleged that Harry Williams somehow threatened Mr. Bob Hamilton's job during a colloquy between them which allegedly involved

proposed changes to the IR form, the inspection report form?

A. I'm aware of the allegation, yes, sir.

Q. Mr. Brandt, are you aware of the particular point that Mr. Krolak alleges was the basis for the dispute between Mr. Williams and Mr. Hamilton?

A. Yes, I am.

Q. What is your understanding of that dispute?

A. Mr. Krolak states that he and Mr. Hamilton and essentially implies that the group, the protective coatings QC group, thought the IR form was improper in that it did not allow for identification of location of the inspected item.

Q. When you say, the IR, do you have reference to the proposed IR which Mr. Krolak alleges Mr. Williams was preparing?

A. That's true.

Q. Mr. Brandt, how many IR forms, basic forms have been used in the non-ASME area at Comanche Peak since you came to the site?

A. Each different inspection instruction has its own inspection report, or in many cases inspection reports, attached to the procedure

itself. These inspection reports have inspection attributes typed on them varying with the discipline and type of inspection involved.

Q. Are there certain common elements for this form?

A. The basic form is a preprinted form on which the top part is preprinted. All of the preprinted forms are identical. All forms contain the same information throughout the form.

Q. And does this preprinted portion of the form indicate the location of the item to be inspected?

A. It has a block titled: System/Structure designation. The location of each inspection is recorded in this space.

Q. Mr. Brandt, I observe when you answered my last question that you made reference to a page in Brandt Exhibit 21, is that correct?

A. Yes, just to refresh my memory I've turned to page three of Brandt Exhibit 21, which is an inspection report numbered PC 43571, sheet one of one, signed by Mr. Krolak.

Q. And Mr. Brandt, what part of that form is preprinted in the way that you've described? Would you describe it please, for the

record, the portion of the form that's preprinted?

A. This, in fact, is the preprinted form. Everything on this inspection report that's not handwritten by Mr. Krolak is preprinted.

Q. And how long has that preprinted form been in use at Comanche Peak?

A. As long as I've been at Comanche Peak which is since September 1980. It was not used in the coatings area, however, prior to the rewrite of the procedure in October of 1981. Prior to that the coatings group used several check lists. They did not use an inspection report, as such.

Q. At the time the procedure was rewritten, was Mr. Williams assigned the responsibility for preparing an inspection report form?

A. No, I was, and I adopted the reprinted form.

Q. During the time you have been at Comanche Peak did the preprinted form have a blank in which the inspectors were to identify the location of the inspection being made, isn't that right?

A. Yes, it is.

Q. Mr. Brandt, are you aware of any time when Mr. Williams was asked to prepare new

inspection reports in the coatings area?

A. To change the preprinted format?

Q. Yes.

A. No, I'm not.

Q. Did Mr. Williams have the authority to change the inspection report form used by coating inspectors?

A. No.

Q. As long as the preprinted format was not being changed there would be a place to indicate the location of the inspection, is that right?

A. Yes, there would be.

EXAMINATION

BY MR. DOWNEY:

Q. Mr. Brandt, are you aware of certain allegations made in this proceeding that inspectors were directed not to write NCR's?

A. Yes, I am.

Q. Have you ever directed inspectors not to write NCR's?

A. Yes, I have.

Q. Under what circumstances have you issued that directive?

A. I have directed inspectors not to write NCR's in written instructions complying with the

requirements of the procedures. Several procedures state nonconformances shall be reported on on site inspection reports or NCR's as directed by the non-ASME QA/QC supervisor. As that was the position I held, I was providing direction to my inspectors on how I wished non-conforming conditions to be reported.

Q. Did you ever in any way discourage inspectors from identifying nonconforming additions?

A. Absolutely not, to the contrary I encouraged them in all cases to follow procedures and all procedures require reporting of discrepant conditions on one form or another.

Q. In your direction about not using NCR's -- was your direction not to write NCR's and to use IR's in compliance with the procedures?

A. Yes. The direction I gave was to use inspection reports rather than nonconformance reports to identify nonconforming conditions. I've never given instructions to anyone to not report nonconforming conditions.

Q. Were your instructions simply to clarify the manner in which nonconformances were to be reported?

A. The form on which they were reported, yes.

Q. Mr. Brandt, what kind of encouragement do quality control inspectors receive at Comanche Peak to report deficiencies?

A. It's part of their training. They are procedurally required to do it. It is not a bonus-type activity, something that they are rewarded for doing. It's something that is procedurally described and mandated that they do as part of their job. Procedures themselves actually direct inspectors to report nonconforming conditions on the appropriate form. So the first point is that the inspectors are required to report descrepant conditions. Additionally, myself and other non-ASME supervisors frequently encourage inspectors to do their jobs to the best of their ability, which, of course, included identifying discrepant conditions. We provided such encouragement through casual conversations, in performance evaluations, in group meetings and the like.

Q. Mr. Brandt, did you provide instructions to the inspectors who worked in your department as to how they should raise concerns they had at the

job site?

A. Yes, I did.

Q. What were those instructions?

A. I instructed them in several group meetings if they had problems I desired for them to discuss their problems initially with their immediate supervisor as it's difficult to manage a group of people firsthand if you don't know what their problems are. I also emphasized this policy to my supervisors and asked them to convey it to the line inspectors. I also stated on numerous occasions that if they felt that they did not get resolution at that level they could continue on up the chain as high as they wished to go including past me, if they wished to.

Q. Did inspectors raise problems with you from time to time?

A. Yes, I had a reasonably good rapport with most inspectors. I think most inspectors felt that if they had a problem they could come to me and talk about it.

Q. Can you think of some instances where problems were raised with you, whether they relate to harrassment or other issues?

A. Inspectors often stopped by to talk with

me. Usually it was just to shoot the bull or ask technical questions. They also freely discussed whatever concerns were on their minds. It would be impossible to list all of the different subjects that we discussed.

Q. Is it fair to say a large number of inspectors stop by your office?

A. A large number of inspectors, yes, sir.

Q. Just generally what types of problems came to your attention during these sessions?

A. Everything from soup to nuts. They didn't like the bathroom policy. They were supposed to use the bathrooms in the field and they thought they should be able to use the restrooms in the administration building. They didn't like the parking lot situation. And I might add, neither did I. They didn't like having to walk the cattle shoot on their way to work. They didn't like the hours. Some of them didn't think that they were getting enough overtime. Some of them thought they were getting too much overtime. A multitude of issues.

Q. Was there ever a time when you refused to see an inspector about a problem he wanted to raise with you?

A. There were occasions when I was headed to a meeting that I had to go to that I would explain to the inspector or whoever wanted to see me that I was going somewhere and that I would be back shortly, or that I wouldn't be back for the rest of the day. I think that's normal in the course of the construction business.

It was not only inspectors. There were construction people regularly waiting to talk to me, engineering people and others. If I had previous commitments I tried to make those commitments. But I indicated that if people needed to talk to me they could come back, I would be glad to talk to them.

Q. Mr. Brandt, did you implement an open door policy during the time you were the non-ASME QC supervisor?

A. Yes.

Q. How did you convey that policy to the inspectors who worked in your group?

A. Group meetings, personal conversations and through my supervisors. I was frequently in the field and in the inspectors' offices for various reasons and I took these opportunities to speak with inspectors in an informal setting.

Additionally, each inspection group held periodic meetings, and I often dropped by to see what was happening and to answer questions. On numerous occasions during these meetings I informed the inspectors of my policy and I tried to convey my personal interest in their concerns.

I want to add that I can't think of a day when I didn't meet with one or more inspectors on an individual basis in my office and the majority of these meetings were initiated by the inspectors.

Q. Mr. Brandt, did you have a policy about the way in which you wanted disputes between craft and QC resolved?

A. Yes, sir. I made it clear to all non-ASME inspectors and supervisors that whenever a difference of opinion arose between craft and QC during an inspection, the inspector had the last word.

I also made it clear that the QC supervisors, including myself, were available to assist in resolving any disputes that arose.

Q. Mr. Brandt, did there come a time when you conducted a survey of your inspectors to ascertain their attitudes about certain things?

A. Yes, I did.

Q. When did you conduct this survey?

A. Early summer, 1983.

Q. How did you decide -- how did you come to conduct the survey?

A. I was concerned on what people thought of their own job, how they perceived the job they were trying to do. One of the guy's that worked for me at the time, a fellow by the name of Mike Warner, came up with the idea of the anonymous white paper survey. I think it's called the White Paper Report, giving them an opportunity to voice their complaints, what they thought of their job, what they thought of Comanche Peak, what they thought of their supervisor, what they would do to change their job, if they could. Those type of questions.

Mr. Warner prepared the survey for my review.

Q. Did you distribute the survey questionaire?

A. Yes, I did. I distributed the questionaire to every non-ASME QC inspector.

Q. You say they were anonymous; is that right?

A. They were anonymous in the sense that I can't tell who wrote them, other than in some cases, I can tell by individuals' handwriting whose responses it is. They are geared so that there is minor word changes in a couple of key questions to where I can tell which group or which supervisors or inspectors were answering the survey.

Q. How long after you distributed the surveys did you get responses back?

A. I would say I got the responses back between a month and six weeks later. I received them. They were turned back in, to the best of my recollection, about two weeks after they were sent out.

Q. Were the results then compiled for your review?

A. Right.

Q. Mr. Brandt, did you review the responses to the survey?

A. Yes, I did. I spent more time concentrating on the narrative portion at the end. I think the last question was comments. I reviewed every one of those, and I reviewed the summaries that were prepared for me. I reviewed

other portions of the surveys at random. I don't believe I could honestly say I've read every line of every survey even at this stage.

Q. Mr. Brandt, what action did you take in response to the survey?

A. I made some supervisory chances.

Q. And what were those?

A. Let me make clear, before I even answer your question, Mr. Downey, that the survey was a contributing factor. To say the survey alone caused anything other than expenditure of several hours preparing it, distributing it, tabulating it, and evaluating it, it's probably not true.

Q. It was a contributing factor?

A. It was a contributing factor to some of the personnel decisions I made, one of which was the removal of Harry Williams, one of which was the transfer of Mr. Foote to night shit and the return of Mr. Randall to the day shift, and Mr. Lawrence receiving some additional responsibility.

Q. Starting with the additional responsibilities given to Mr. Lawrence, what in the survey responses -- how did that contribute to that?

A. Mr. Lawrence's group responded in a way

that I would have expected an ideal supervisor's group to respond. They were very positive, which indicated to me that there was a clear line of communication and understanding and respect between Mr. Lawrence and his troops.

Q. You say you assigned Mr. Randall to the day sift and Mr. Foote to the night shift after the survey, is that right?

A. Right.

Q. How did the survey contribute to that change?

A. Mr. Randall is -- to use probably an often over-used term, was burned out in the fact that he had been on night shift for well over a year. It was causing him some personal problems.

Q. I've worked night shift myself and you tend to lose contact with the people that you met on day shift. You sometimes lost feeling for what's actually going on.

After I moved him from night shift to day shift, he came in and personally thanked me for it. He never formally requested that he be removed from night shift, but he did come in, after the fact, to thank me for getting him off night shift.

Q. Now, Mr. Foote, why did you move him to night shift?

A. When I moved Mr. Randall off night shift, I had to replace him with someone. Mr. Foote had kind of stagnated where he was at. He was supervising an electrical support installation inspection. At the time, the activity with the most craft people and inspection people was the coating area.

Mr. Foote was Level III in coatings. I deemed that Mr. Foote was a good chase because he was the only one of my supervisors who had any experience at all with coatings. And it improved the organization, I think, by the fact that I had someone who could answer technical concerns on night shift in the coatings area.

Q. You mentioned that following the survey you replaced Mr. Williams, is that right?

A. That's true.

Q. Would you describe more fully the circumstances that lead to that decision?

A. There were a number of factors that occurred during the summer of 1983. One was the survey, one was day-to-day observation of job performance, including personal conversations I

had with Mr. Williams and Mr. William's inspectors, conversations with construction, conversations with engineering, inspector interviews I conducted after talking to Mr. Dunham in June.

In essence, all the factors lead me to believe that Mr. Williams had lost effectiveness as a supervisor.

Q. So the White Paper Report was a contributing factor to this judgment, is that right?

A. Yes, it was. I wouldn't say it contributed any more or any less than anything else. It was one of a number of factors that contributed to my decision that Mr. Williams had to be replaced.

Q. Apart from the supervisory changes that you made following the survey, as to which the survey results were a contributing factor, did the survey results contribute to any other action that you took outside of this area, outside of the area of supervisory assignments?

A. As a result of the survey itself, no, not that I recall.

Q. Did you pass the survey along to your

supervisors?

A. I discussed generally the results of the survey with my supervisor, Mr. Tolson. I discussed the supervisory changes I was about to make.

Past that point, no, sir, I didn't.

Q. Why didn't you pass the entire survey along to others in your chain of command?

A. It was a report that was essentially authored by myself. The idea was mine or my people's. It was done for my benefit, not done at anyone's direction. And other than passing on the general results of the survey, I didn't feel I had any obligation to pass the survey on.

Q. Did you see any need to do that?

A. No. It was a day-to-day supervisory evaluation of people I had working for me, more than anything else, and what I could try to do to quite frankly make the QC inspector's job easier for him.

MR. DOWNEY: The applicant moves that Brandt Exhibits 12, 13, 14, 18, 19, 20, 21 be received in evidence.

The documents previously marked plant exhibits no, sir 12, 13,

14, 18, 19, 20 and 21 for identification were received in evidence.

MR. DOWNEY: And the Applicant moves that Brandt Exhibits 15, 16 and 17 be received in evidence for the limited purpose of establishing the nature of the complaints that were brought to management's attention by QC inspectors and managements response to those complaints.

The documents previously marked Brandt Exhibit Numbers 15, 16 and 17 for identification were received in evidence limited in scope as noted above.

(Whereupon the deposition of Mr. Brandt was adjourned.

I, C. THOMAS BRANDT, have read the foregoing deposition and hereby affix my signature that same is true and correct, except as noted herein.

_____

C. THOMAS BRANDT

SUBSCRIBED AND SWORN to before me this the _____ day of _____, 1984.

_____
NOTARY PUBLIC IN AND FOR THE
STATE OF TEXAS

My commission expires: _____

STATE OF TEXAS)
COUNTY OF DALLAS)

I, Marigay Black, RPR, Certified Shorthand Reporter in and for the State of Texas, do hereby certify that there came before me on the 16th day of August, A. D., 1984, at the Glen Rose Motor Inn, Glen Rose, Texas, the following named person, to-wit: C. THOMAS BRANDT, who was by me duly sworn to testify the truth and nothing but the truth of his knowledge touching and concerning the matters in controversy in this cause; and that he was thereupon examined upon his oath and his examination reduced to writing; same to be sworn to and subscribed by said witness before any Notary Public.

I further certify that I am neither attorney or counsel for, nor related to or employed by, any of the parties to the action in which this deposition is taken, and further that I am not a relative or employee of any attorney or counsel employed by the parties hereto, or financially interested in the action.

In witness whereof, I have hereunto set my hand and affixed my seal this 16th day of August, A.D., 1984.

License Expires:

December 31, 1984
CSR No. 351

MARIGAY BLACK, RPR, CSR
IN AND FOR THE STATE OF TEXAS
1226 Commerce, Suite 411
Dallas, Texas 75202
(214) 742-3035

DOCUMENT/ PAGE PULLED

ANO. 8408230408

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TEXAS UTILITIES GENERATING CO. CPSES	INSTRUCTION NUMBER	REVISION	ISSUE DATE	PAGE
	QI-QP-16.0-5	0	MAR 5 1982	1 of 3

REPORTING OF BASE METAL DEFECTS	PREPARED BY: [signature] 3/4/82 DATE
	APPROVED BY: C. T. Brandt 3/4/82 DATE
	APPROVED BY: B C Datt 3/4/82 DATE

1.0 REFERENCES

1-A CP-QP-18.0, "Inspection Reports"

1-B CP-QP-16.0, "Nonconformances and Deficiencies"

2.0 GENERAL

2.1 PURPOSE

The purpose of this instruction is to provide the criteria for reporting base metal defects incurred on non-ASME items.

2.2 SCOPE

Base metal defects reportable in accordance with this procedure are, but are not limited to, the following:

a. Base metal damage

b. Minimum wall violations

c. Arc strikes

3.0 INSTRUCTION

3.1 REPORTING

When it has been determined that a base metal defect is present the inspector shall report it on Attachment 1 in accordance with Reference 1-A.

The following shall be included on the IR:

a. Sketch showing location and orientation of defect on member

b. Component identification or location

c. Defect dimensions (width, length and depth)

d. Member description:

1. Outside diameter

2. Wall/plate thickness

3. Material type/grade

Additionally, the inspector shall circle the defect on the member with a site approved marker.

3.2 DISTRIBUTION

The inspector shall return the IR to the appropriate file custodian and a copy will be transmitted to Welding Engineering for corrective action.

3.3 CLOSURE

Upon completion of repair the inspector shall reinspect the area, and if the defect has been satisfactorily repaired, he shall close the IR in accordance with Reference 1-A. Any RPS(s) issued shall be referenced in the Remarks section of the IR, and the inspector shall verify the RPS has been properly completed.

3.4 NONCONFORMANCES

In the event a defect is repaired without proper documentation an NCR shall be issued in accordance with Reference 1-B.

ATTACHMENT 1

COMANCHE PEAK STEAM ELECTRIC STATION

INSPECTION REPORT

SHEET ___ OF ___ NO.

ITEM DESCRIPTION 2 | IDENTIFICATION NO. 3 | SYSTEM / STRUCTURE DESIGNATION 4

SPEC. NO. N/A 5 | REV. N/A 6 | REF Q.C. DOC. & REV. & CHANGE NO. QI-QR-16.0-5, Rev. ___ 7 | MEASURE OR TEST EQUIP. IDENT. NO. 8

☐ IN PROCESS INSPECTION ☐ PRE INSTALLATION VERIFICATION ☐ INSTALLATION INSPECTION ☐ FINAL INSPECTION ☐ PRETEST INSPECTION 9

INSP. RESULTS

☐ INSPECTION COMPLETED, ALL APPLICABLE ITEMS SATISFACTORY

☐ INSPECTION COMPLETED, UNSATISFACTORY ITEMS LISTED BELOW

QC INSPECTOR _____ DATE 10

ITEM NO. 11	INSPECTION ATTRIBUTES 12	SAT	UNSAT	DATE	QC SIGNATURE 13
1.	Defect Identification				
	☐ Base Metal Damage				
	☐ Minimum Wall Violation				
	☐ Arc Strike				
	☐ Other: ___				
	Defect Dimensions:				
	Material Type/Grade:				
	Wall/Plate Thickness				
	Outside Diameter:				

REMARKS (DWGS, SPECS, ETC.) RPS NO. ___ 14

RELATED NCR NO. 15 | I.R CLOSED ☐ | DATE | SIGNATURE ___ QC INSPECTOR 16

TEXAS UTILITIES GENERATING CO. CPSES	INSTRUCTION NUMBER	REVISION	ISSUE DATE	PAGE
	QI-QP-16.0-5	1	JUN 21 1982	1 of 3

REPORTING OF BASE METAL DEFECTS

PREPARED BY: [signature] DATE 6/18/82

APPROVED BY: [signature] DATE 6/18/82

APPROVED BY: [signature] DATE 6/18/82

1.0 REFERENCES

1-A CP-QP-18.0, "Inspection Reports"

1-B CP-QP-16.0, "Nonconformances and Deficiencies"

2.0 GENERAL

2.1 PURPOSE

The purpose of this instruction is to provide the criteria for reporting base metal defects incurred on non-ASME items.

2.2 SCOPE

Base metal defects reportable in accordance with this procedure are, but are not limited to, the following:

a. Base metal damage

b. Minimum wall violations

c. Arc strikes

3.0 INSTRUCTION

3.1 REPORTING

When it has been determined that a base metal defect is present the inspector shall report it on Attachment 1 in accordance with Reference 1-A.

The following shall be included on the IR:

a. Sketch showing location and orientation of defect on member

b. Component identification or location

c. Defect dimensions (width, length and depth)

d. Member description:

1. Outside diameter

2. Wall/plate thickness

3. Material type/grade

Additionally, the inspector shall circle the defect on the member with a site approved marker.

3.2 CLOSURE

Upon completion of repair the inspector shall reinspect the area and the following non-destructive examination shall be performed to determine the acceptability of the repair:

a. Liquid Penetrant or Magnetic Particle Testing for surface defects.

b. Ultrasonic Thickness Measurement for minimum wall deficiencies.

If the defect has been satisfactorily repaired, he shall close the IR in accordance with Reference 1-A. If not, the inspector shall return the IR to the appropriate file custodian and a copy will be transmitted to Welding Engineering for corrective action. Any RPS(s) issued shall be referenced in the Remarks section of the IR, and the inspector shall verify the RPS has been properly completed.

3.3 NONCONFORMANCES

In the event a defect is repaired without proper documentation an NCR shall be issued in accordance with Reference 1-B.

ATTACHMENT 1

COMANCHE PEAK STEAM ELECTRIC STATION

INSPECTION REPORT

SHEET ___ OF ___

ITEM DESCRIPTION	CERTIFICATION NO.	SYSTEM / STRUCTURE DESIGNATION

SPEC NO.	REV.	REF Q.C. DOC. & REV. & CHANGE NO.	MEASURE OR TEST EQUIPMENT NO.
N/A	N/A	QI-QR-16.0-5, Rev. ___	

☐ IN PROCESS INSPECTION ☐ PRE INSTALLATION VERIFICATION ☐ INSTALLATION INSPECTION ☐ FINAL INSPECTION ☐ PRETEST INSPECTION

INSP. RESULTS

☐ INSPECTION COMPLETED, ALL APPLICABLE ITEMS SATISFACTORY

☐ INSPECTION COMPLETED, UNSATISFACTORY ITEMS LISTED BELOW

QC INSPECTOR — DATE

ITEM NO.	INSPECTION ATTRIBUTES	SAT	UNSAT	DATE	QC SIGNATURE
1.	Defect Identification				
	☐ Base Metal Damage				
	☐ Minimum Wall Violation				
	☐ Arc Strike				
	☐ Other: ___				
	Defect Dimensions:				
	Material Type/Grade:				
	Wall/Plate Thickness				
	Outside Diameter:				

REMARKS (DWGS, SPECS, ETC.)

RPS NO. ___

RELATED NCR NO. ___ I R CLOSED — DATE ___ SIGNATURE ___ QC INSPECTOR

REPORTING OF BASE METAL DEFECTS

PREPARED BY: Mark Welch 8/20/82
DATE

APPROVED BY: William Hartshorn 8-30-82
DATE

APPROVED BY: R.B.C. Scott 8/31/82
DATE

1.0 REFERENCES

1-A CP-QP-18.0, "Inspection Reports"

1-B QI-QP-11.18-1, "Liquid Penetrant Examination"

1-C QI-QP-11.18-3, "Ultrasonic Thickness Examination"

1-D CP-QP-16.0, "Nonconformances and Deficiencies"

2.0 GENERAL

2.1 PURPOSE

The purpose of this instruction is to provide the criteria for reporting base metal defects incurred on non-ASME items.

2.2 SCOPE

Base metal defects reportable in accordance with this procedure are, but are not limited to, the following:

a. Base metal damage

b. Minimum wall violations

c. Arc strikes

NOTE: This instruction does not apply to weld undercut.

3.0 INSTRUCTION

3.1 INSPECTION

Base metal indications shall be acceptable provided the following conditions are met:

a. The damaged/defect area ground to remove the imperfection is well faired without abrupt changes in contour and shows no visual indication of being previously repaired.

b. The depression produced by grinding will not exceed the following:

1. Area ground is 2 inches or less in diameter.

2. Structural Shapes

a) 1/32 inch, for material less than 3/8 inch in thickness

b) 1/16 inch, for material 3/8 to 2 inches inclusive in thickness

c) 1/8 inch, for material over 2 inches in thickness

3. Plate

a) 7% under plate thickness for plate 3/8 inch and less

b) 7% under the plate thickness over 3/8 inches, but, in no case, more than 1/8 inch

See Chart below for percentage conversions:

PLATE THICKNESS	7% OF PLATE THICKNESS (Thousandths)	SAMPLE DECIMAL EQUIVALENTS
		1/64 = .015
1/2	35	1/32 = .031
3/4	43	1/16 = 0.62
1	70	1/8 = .125
1 1/2	105	
1 3/4	122	
Over 1 3/4	125	

3.2 REPORTING

When it has been determined that a base metal indication is relevant the inspector shall report it on an Inspection Report (Attachment 1) in accordance with Reference 1-A.

The following shall be included on the IR:

a. Sketch showing location and orientation of defect on member

b. Component identification or location

c. Defect dimensions (width, length and depth)

d. Member description:

1. Outside diameter

2. Wall/plate thickness

3. Material type/grade

Additionally, the inspector shall circle the defect on the member with a site approved marker.

A copy of the Unsat IR shall be sent to the involved craft and/or Engineering group for repair.

3.3 CLOSURE

Upon completion of repair the inspector shall reinspect the area per the RPS. If defect is considered minor by Engineering and no RPS is issued, the inspector shall visually reinspect per Paragraph 3.1 and contact Quality Engineering for any additional NDE.

If the defect has been satisfactorily repaired, he shall close the IR in accordance with Reference 1-A. If not, the inspector shall return the IR to the appropriate file custodian and a copy will be transmitted to the involed

Engineering or craft group(s) for corrective action. Any RPS(s) issued shall be referenced in the Remarks section of the IR, and the inspector shall verify the RPS has been properly completed.

3.4 NONCONFORMANCES

In the event a defect is repaired without proper documentation an NCR shall be issued in accordance with Reference 1-D.

ATTACHMENT 1

COMANCHE PEAK STEAM ELECTRIC STATION

INSPECTION REPORT

SHEET ___ OF ___ NO.

ITEM DESCRIPTION (2)	IDENTIFICATION NO. (3)	ST. EN./STRUCTURE DESIGNATION (4)

SPEC. NO. (5)	REV. (6)	REF. Q.C. DOC. & REV. & CHANGE NO. (7)	MEASURE OR TEST EQUIP. IDENT. NO. (8)
N/A	N/A	QI-QR-16.0-5, Rev. ___	

☐ IN PROCESS INSPECTION ☐ PRE INSTALLATION VERIFICATION ☐ INSTALLATION INSPECTION ☐ FINAL INSPECTION ☐ PRETEST INSPECTION (9)

INSP. RESULTS

☐ INSPECTION COMPLETED, ALL APPLICABLE ITEMS SATISFACTORY

☐ INSPECTION COMPLETED, UNSATISFACTORY ITEMS LISTED BELOW

QC INSPECTOR - DATE (10)

ITEM NO. (11)	INSPECTION ATTRIBUTES (12)	SAT	UNSAT	DATE	QC SIGNATURE (13)
1.	Defect Identification				
	☐ Base Metal Damage				
	☐ Minimum Wall Violation				
	☐ Arc Strike				
	☐ Other:				
	Defect Dimensions:				
	Material Type/Grade:				
	Wall/Plate Thickness				
	Outside Diameter:				

REMARKS (DWGS, SPECS, ETC.) RPS NO. ___ (14)

RELATED NCR NO. (15) | I.R. CLOSED ☐ | DATE | SIGNATURE ___ QC INSPECTOR (16)

COMANCHE PEAK STEAM ELECTRIC STATION

INSPECTION REPORT

REPORT NO. NSCC314

ITEM DESCRIPTION	IDENTIFICATION NO.	SYSTEM/STRUCTURE DESIGNATION
	Type A-36	SC #1 / 849'-6"

SPEC. NO.	REV.	REF. Q.C. DOC. & REV. & CHANGE NO.	MEASURE OR TEST EQUIP. IDENT. NO.
N/A	N/A	QI-QP-16.0-5, Rev. 0	N/A

☐ IN PROCESS INSPECTION ☐ PRE INSTALLATION VERIFICATION ☐ INSTALLATION INSPECTION ☑ FINAL INSPECTION ☐ PRE TEST INSPECTION

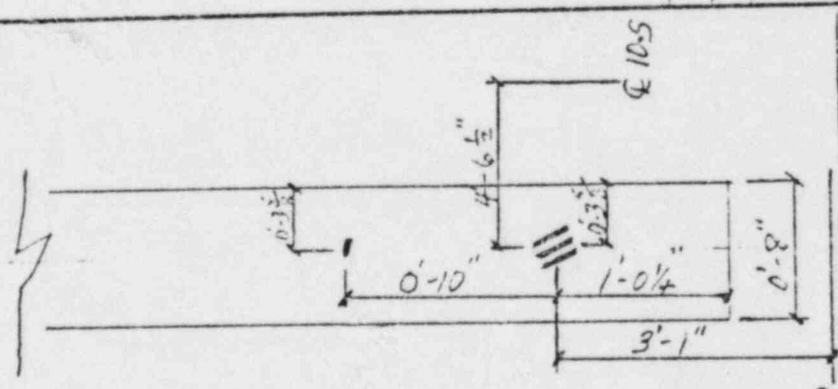
INSP. RESULTS

☐ INSPECTION COMPLETED, ALL APPLICABLE ITEMS SATISFACTORY

☑ INSPECTION COMPLETED, UNSATISFACTORY ITEMS LISTED BELOW

QC INSPECTOR: [signature] DATE: 5-13-82

ITEM NO.	INSPECTION ATTRIBUTES	SAT	UNSAT	DATE	QC SIGNATURE
1.	Defect Identification				
	☑ Base Metal Damage	N/A		5-18-82	[signature]
	☐ Minimum Wall Violation	N/A			
	☐ Arc Strike	N/A			
	☐ Other:	N/A			
	Defect Dimensions: [illegible]				
	Material Type/Grade: Carbon Steel / A-36				
	Wall/Plate Thickness 3/4"				
	Outside Diameter: 8" wide				



PLAN-VIEW-LOOKING SOUTH

CEILING ELV. 849'-6"

REMARKS (DWGS, SPECS, ETC.)

52-796

RPS NO. 67911

FOR INFORMATION ONLY

DEPOSITION EXHIBIT Brandt 10

ARMS INDEXED

RELATED NCR NO.	I.R. CLOSED	DATE	SIGNATURE
N/A	☑	5-18-82	[signature] QC INSPECTOR

INSTALLATION TO BE IN ACCORDANCE WITH PROCEDURES REFERENCED IN CPM-6.11

REPAIR PROCESS SHEET

WCC Serial No. _____

Drawing No. 6[illegible]

Weld No. EMBEDED WELD PLAT

R-1

DESCRIPTION OF DEFECT (SKETCH)

IRMS-0204

DEPTH OF REPAIR NOT TO EXCEED 30% OF BASE METAL THICKNESS

*EXCAVATIONS VARY APPROX. FROM $\frac{1}{32}$" TO $\frac{1}{8}$" DEEP X $\frac{5}{16}$" TO $\frac{9}{16}$" WIDE X $\frac{1}{8}$" TO $1\frac{11}{16}$" LONG by 5-14-82

MT/PT # 6352

* RECORD DIM'S

OPER. NO.	OPERATION	HOLD POINTS WT	HOLD POINTS QC	HOLD POINTS ANI.	CON	"S" or "U"	INSPECTION RESULTS (SIGN AND DATE) QC or WT	NDE CERT LEVEL	ANI
R-1	BASE METAL		REPAIR						
A	LAYOUT	X	NA	NC		S	[illegible] 5-14-82		
B	GRIND	X	NA	NC		S	[illegible] 5-14-82		
C	PT CAVITY	NA	✓	NC		S	[illegible] 5/14/82	II	
* D	EVALUATE								
	EXCAVATION	X	NA	NC		S	[illegible] 5-14-82		
E	CLEAN	NA	✓	NC		S	[illegible] 5/14/82	II	
F	PREHEAT	NA	✓	NC		S	[illegible] 5/14/82	II	
G	WELD: 11032 B/O	NA	NA	NC					
H	FINAL VT	NA	✓	NC		S	[illegible] 5-17-82		
	PREP: [illegible]				5/14/82				
	REVIEW: [illegible]				5-14-82				

WE	QC	ANI	G&H

Approval signatures shall be affixed on line immediately below the last step in each repair sequence.
Base metal repair - WE, QC, G&H, ANI
Weld metal repair - WE, QC, ANI

BROWN & ROOT, INC.
CPSES JOB # 85-1195

INSTALLATION TO BE IN ACCORDANCE WITH PROCEDURES REFERENCED IN CPM-6.11

WELD DATA CARD

WDC Serial No. NA

Drawing No. NA

Weld No. N/

LINE #		WPS # / REV#/ICN#	FABRICATION CODE & CLASS/ACC. STD. ASME III
			CPM-6.9

BASE MATERIAL
HT # NA to HT# NA
PC # NA to PC# NA
P # NA to P # NA

POSTWELD HEAT TREATMENT
TIME NA Hrs., TEMP. NA °F
HEATING RATE NA °/Hr. NA
SPECIFICATION WPS/CPM 6.9D

QI-QAP/REV	VT/ 11.1-26	PT/10.2-1	MT/10.2-2	RT/10.2-3	UT	

MR#(S) _____ M.&T.E. CALIB. DUE DATE QC

QC VERIF. _____
DATE: _____

WELD FILLER MATERIAL REQUIRED

ROOT CLASS
FILL CLASS
CLASS
CLASS

NOTES: (1) Applicable QC/ANI hold points shall be indicated by checkmark ✓.
(2) ANI inspection points indicated by (X).
(3) Denote Satisfactory inspection by an "S"; Unsatisfactory inspections by a "U".

PRODUCTION RELEASE

Prepared By:

OPER. NO.	OPERATION	HOLD POINTS WT	HOLD POINTS QC	HOLD POINTS ANI	CON	SAT. or UNSAT.	INSPECTION RESULTS (SIGN AND DATE) QC or WT	NDE CERT. LEVEL	ANI
	WE			QC			ANI		

Approval signatures shall be affixed on the line immediately below the last step in each sequence.

COMANCHE PEAK STEAM ELECTRIC STATION

INSPECTION REPORT

SHEET ___ NO. MS-D?0?

ITEM DESCRIPTION	CERTIFICATION NO.	SYSTEM/STRUCTURE DESIGNATION
[illegible]	Type [illegible]	SG #2 / 849'6"

SPEC. NO.	REV.	REF. Q.C. DOC. & REV. & CHANGE NO.	MEASURE OR TEST EQUIP. IDENT. NO.
N/A	N/A	QI-QP-16.0-5, Rev. 0	N/A

☐ IN PROCESS INSPECTION ☐ PRE INSTALLATION VERIFICATION ☐ INSTALLATION INSPECTION ☑ FINAL INSPECTION ☐ PRETEST INSPECTION

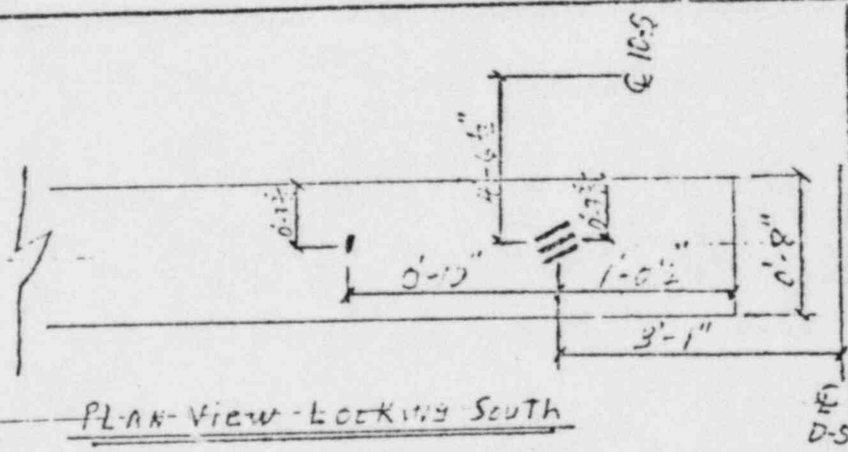
INSP. RESULTS

☐ INSPECTION COMPLETED, ALL APPLICABLE ITEMS SATISFACTORY

☑ INSPECTION COMPLETED, UNSATISFACTORY ITEMS LISTED BELOW

QC INSPECTOR: [signature] DATE: 5-13-82

ITEM NO.	INSPECTION ATTRIBUTES	SAT	UNSAT.	DATE	QC SIGNATURE
1.	Defect Identification		✓		
	☑ Base Metal Damage				
	☐ Minimum Wall Violation	N/A			
	☐ Arc Strike	N/A			
	☐ Other:	N/A			
	Defect Dimensions: East side [illegible]				
	Material Type/Grade: Carbon Steel / A-36				
	Wall/Plate Thickness 3/4"				
	Outside Diameter: 8" wide				



PLAN-View-Looking South

Ceiling ELV. 849'-6"

52-796

DWG

REMARKS (DWGS, SPECS, ETC.) RPS NO.

FOR INFORMATION ONLY

RELATED NCR NO.	I.R. CLOSED ☐	DATE	SIGNATURE QC INSPECTOR

11032

WELD FILLER MATERIAL LOG

WELD NO.	DATE	SIZE/CLASS	WELDER SYMBOL	WPS/ICN #	HEAT/LOT # or CODE #	AMT. ISS.	AMT. RT'D.	ISSUANCE APPROVAL
N/A	5/4/82	3/32 E7018	AKC	11032 8-0	412P5132 02163637	10	5	[illegible] P-228

WPS # 11032

NSC Serial No. _____

Drawing No. 52-796

WELD FILLER MATERIAL LOG Weld No. EMBEDED WELD PLATE

WELD NO.	DATE	SIZE/CLASS	WELDER STENCIL	WPS/ICI #	HEAT/LOT # or CODE #	AMT. ISS.	AMT. RT'D.	ISSUANCE APPROVAL

FOR INFORMATION ONLY

Brown & Root, Inc.

QUALITY ASSURANCE DEPARTMENT

MT/PT REPORT

PROJECT: COMANCHE PEAK JOB NO. 35-1195 UNIT 2 PAGE 1 OF 1

MT ☐ PT ☑

WDC/Traveler # 679115

Drawing 52-796 System EMBEDED WELD PLATE Class AWS

Welds/Item # WELD EMBED PLATE Location CEILING EL 849'6" 4'6" N of 105/3'1" E

Mfg Stage IN-PROCESS (EXCAVATION) NDE Procedure No. QI-QAP 10.2-1 Rev. 1

Equip/Mat'ls Mfg. MAGNAFLUX Acceptance Std. AWS D1.1

Penetrant Batch # 81L007 Cleaner Batch # 82A125 Developer Batch # 81J098

AC Yoke ☐ DC Prods ☐ N/A Model # N/A M&TE IRC # N/A

Mat'l Type A588 Mat'l Thickness 3/4" Diameter ☐ Length ☐ N/A

Sketch & Comments ID ☐ OD ☐

FOR INFORMATION ONLY

Inspector [signature] Certification Level II Date 5/14/82 Results Accept ☑ Reject ☐

GENERATING CO [illegible] NONCONFORMANCE REPORT NCR NO. M-81-00144

CASE EXHIBIT 567 U-1

UNIT	STRUCTURE/SYSTEM	ITEM/COMPONENT	TAG/ID NUMBER	LOCATION OR ELEVATION	RIR NO.
1	Containment #1/	Bus Box Polar Crane	Polar Crane	Above 905' Cont. #1 Approx. only 90° N-Ladder	N/A

NONCONFORMING CONDITION

Bus. box is burned extensively and burned into.

The damaged area is large; however it is confined to the box only.

Hold tag applied.

REFERENCE DOCUMENT: CP-QAP-16.1 (Ref. ANSI-45-210) REV 3 PARA 3.1
CP-CPM-14.1 REV 0 PARA 2.2.1

REPORTED BY: Darlene Kaye Stiner DATE: 5 , 6 , 81

QE REVIEW/APPROVAL: SIA DATE: / /

ACTION ADDRESSEE: DEPARTMENT:

DISPOSITION:

REWORK _____ REPAIR _____ USE AS IS _____ SCRAP _____

NCR VOIDED:

Justification: Polar Crane bus box is Non-Q and therefore, is outside the scope of the QA Program.

ENG. REVIEW/APPROVAL N/A DATE: / /

QE REVIEW APPROVAL: SIA B.C Dutt DATE: 5,8,81

DISPOSITION VERIFICATION APPROVED: SIA D.L. Dutt DATE: 5,8,81

COMMENTS:

REPORTING PERSONNEL

QE

ACTION ADDRESSEE

QE

AWS D1.1-75

The ambient environmental temperature may be below 0 °F but a heated structure or shelter around the area being welded could maintain the temperature adjacent to the weldment at 0 °F or higher.) When the base metal is below the specified minimum temperature, it shall be preheated so that the parts on which weld metal is being deposited are at or above the specified minimum temperature for a radius equal to the thickness of the part being welded, but not less than 3 in. (76.2 mm) in all directions from the point of welding. Preheat and interpass temperatures must be sufficient to prevent crack formation, and temperatures above the specified minimum may be required for highly restrained welds. In joints involving combinations of base metals, preheat shall be as specified for the higher strength steel being welded.

4.3 Heat Input Control for Quenched and Tempered Steel

When quenched and tempered steels are welded, the heat input shall be restricted in conjunction with the maximum preheat and interpass temperatures required (by reason of base metal thicknesses). The above limitations shall be in strict accordance with the steel producer's recommendations. The use of stringer beads to avoid overheating is strongly recommended. Oxygen gouging of quenched and tempered steels is not permitted.

4.4 Arc Strikes

Arc strikes outside of the area of permanent welds should be avoided on any base metal. Cracks or blemishes caused by arc strikes shall be ground to a smooth contour and checked to ensure soundness.

4.5 Weld Cleaning

Before welding over previously deposited metal, all slag shall be removed and the weld and adjacent base metal shall be brushed clean. This requirement shall apply not only to successive layers but also to successive beads and to the crater area when welding is resumed after any interruption. It shall not, however, restrict the making of plug and slot welds in accordance with Appendix A.

4.6 Groove Weld Termination

a joint in a manner that will ensure sound welds. Whenever possible, this shall be done by the use of extension bars or run-off plates.

4.6.2 In building construction, extension bars or run-off plates need not be removed unless required by the Engineer.

4.6.3 In bridge construction, extension bars and run-off plates shall be removed upon completion and cooling of the weld, and the ends of the weld made smooth and flush with the edges of the abutting parts.

4.7 Groove Weld Backing

4.7.1 Groove welds made with the use of steel backing shall have the weld metal thoroughly fused with the backing. On bridge structures, steel backing of welds that are transverse to the direction of computed stress shall be removed and the joint shall be finished smooth or ground. Steel backing of welds that are longitudinal with the direction of stress or are not subject to computed stress need not be removed, unless so specified by the Engineer.

4.7.2 Steel backing of welds used in buildings or tubular structures need not be removed unless required by the Engineer.

4.7.3 Steel backing shall be made continuous for the full length of the weld. All necessary joints in the steel backing shall be complete joint penetration butt welds meeting all workmanship requirements of Section 3 of this code.

4.8 Caulking

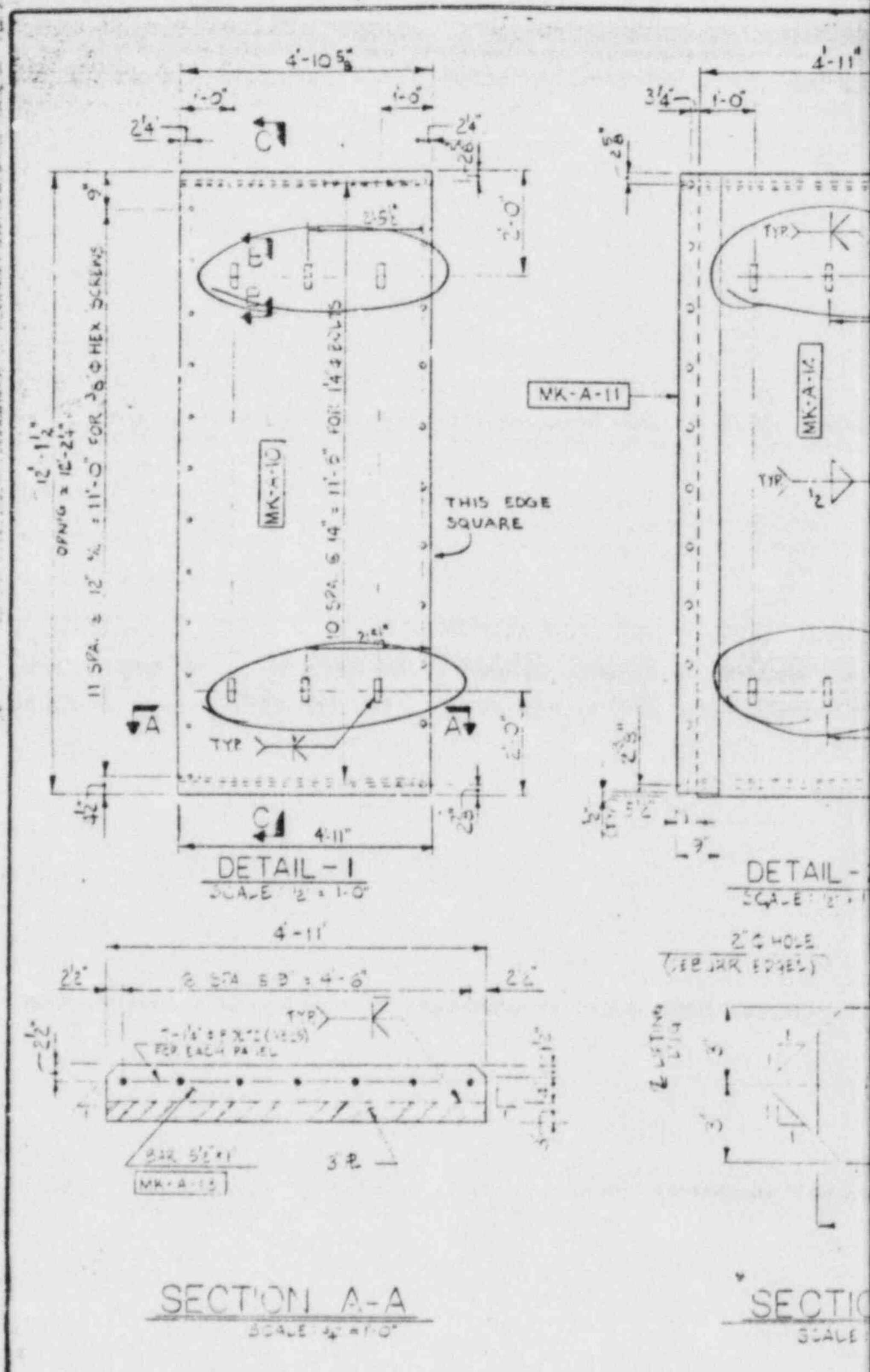
Caulking of welds shall not be permitted.

Part B
Shielded Metal Arc Welding

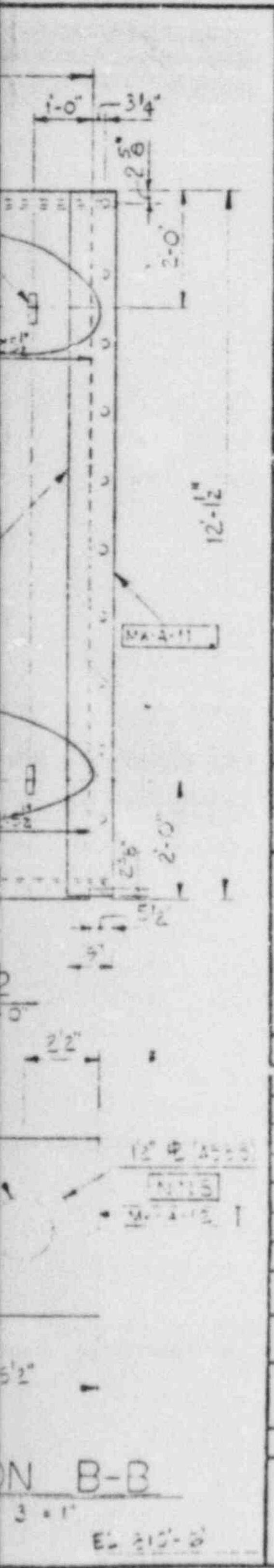
4.9 Electrodes for Shielded Metal Arc Welding

4.9.1 Electrodes for shielded metal arc welding shall conform to the requirements of the latest edition of AWS A5.1, Specification for Mild Steel Covered Arc Welding Electrodes, or to the requirements of AWS A5.5, Specification for Low-Alloy Steel Covered Arc Welding Electrodes.

4.9.2 All electrodes having low hydrogen coverings conforming to AWS A5.1 shall be purchased in [illegible] containers or shall be dried for at least two hours between 450 °F (230 °C) and 500 °F (260 °C) before they are used. Electrodes having low hydrogen coverings conforming to AWS A5.5 shall be



4'-10 5/8"
1'-0"
2 1/4"
MK-A-10
THIS EDGE SQUARE
TYP
4'-11"
DETAIL - 1
SCALE: 1/2" = 1'-0"
8 SPA @ 9" = 4'-6"
FOR EACH PANEL
MK-A-13
3 ℓ
SECTION A-A
MK-A-11
MK-A-12
DETAIL -
2" ⌀ HOLE
(SEE 3RR EDGES)
SECTIO



SHOP BILL							
ASSEM NO	PC NO	NO REQ	SHAPE	LENGTH FT.	INS	WT	REMARKS MAT SPECS.
	TORNADO MISSILE BARRIER ASSEMBLY						
A			ASSEMBLY	A			ONE ASSY LISTED ONE ASSY REQ'D
	10	1	℞ 3"×59"	12	1½		ASTM A-514 GRADE "Q"
	11	2	℞ 1¼"×9"	12	1		ASTM A-588 GRADE 'A'
	12	18	℞ 1½"×5½"	0	6		ASTM A-588 GRADE 'A'
	13	6	BAR 5½×1"	4	11		ASTM A-588
	14	1	℞ 3"×59"	12	1½		ASTM A-514 GRADE "Q"

FOR OFFICE AND ENGINEERING USE ONLY

NOTES / DESIGN SPECS / PAINT
USE G+H SPEC. SI-17, USE B+R WFS110042
G+H SI-0635 REV 2
EAST OPENING

REV. PER DCA 10,617 + 11,561 FE-3249

NO	DATE	REVISION	BY	CKD
0	12-4-81	REL FOR FAB TUF-3269 (G+H SI-0635 REV 2)	ADA	JDC
1	1-29-82	REVISED SHOP BILL	JKG	JDC

SAFETY RELATED ■ NNS ☐

Brown & Root, Inc.

TITLE TORNADO MISSILE BARRIER ...
OWNER TEXAS UTILITIES SERVICES INC
LOCATION OF PROJECT C.P.S.E.S. GLEN ROSE, TEXAS
DRAWN BY A.D. ABDAPA CHECKED JDCRIM APPROVED CDBoston DATE 12-4-81

JOB NO	DRAWING NO	SHEET
35-1195	MSB-0635-00J	ONE OF

8408230408-02

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	
TEXAS UTILITIES ELECTRIC COMPANY, et al.	)	Docket Nos. 50-445 and 50-446
	)	
	)	
(Comanche Peak Steam Electric Station, Units 1 and 2)	)	(Application for Operating Licenses)

TESTIMONY OF C. THOMAS BRANDT
REGARDING INSPECTION AND TESTING
OF NON-ASME COMPONENTS AND SYSTEMS

Q1. Please state your full name, residence, and educational and professional qualifications.

A1. My name is C. Thomas Brandt. I reside in Fort Worth, Texas. I am employed by Ebasco Services, Inc. at Comanche Peak Station. A description of my educational background and professional qualifications has been previously received into evidence as Applicants' Exhibit 141D.

Q2. What is the purpose of your testimony?

A2. The purpose of my testimony is to describe the various inspection, verification, and testing programs which exist at Comanche Peak Station for non-ASME components.

Q3. Please summarize your testimony.

A3. There are three parts to my testimony. The first part discusses the QC inspection program for non-ASME components and systems at Comanche Peak. This program involves numerous instances of multiple inspections and verifications

which provide assurance that construction discrepancies are identified by QC inspections and corrected in a timely manner. My testimony highlights examples of this QC inspection process.

The second part of my testimony discusses further inspections and tests which are performed after installation of non-ASME components which further assure the proper function and overall quality of the equipment. These inspections and tests are in addition to the multiple QC inspections. Again, my testimony highlights several specific examples.

The third part of my testimony describes independent audits, inspections, and investigations conducted by outside sources to assure QC inspection program compliance and acceptability of installed components and systems.

Q4. How do these multiple inspections and tests provide assurance of the acceptability of installed systems and components?

A4. All inspection attributes will be directly inspected at least once during the QC inspection process. In addition, in many instances multiple inspections and tests of the same components provide additional opportunities for discrepant conditions to be detected. These cumulative inspections and tests provide a high level of assurance that such conditions

will be identified and corrected prior to operation of Comanche Peak even if they had not been detected in the initial QC inspection.

Q5. Please describe the non-ASME QC inspection program.

A5. The non-ASME QA program requires a series of QC inspections which are described in intricate detail in inspection procedures and instructions. The attributes for these inspections are outlined on Inspection Reports. The program includes numerous in-process inspections, and post construction acceptability inspections and acceptance testing.

The non-ASME QC inspection program covers four major disciplines:

(1) Civil -- which includes concrete, soils, Hilti bolts, and protective coatings.

(2) Electrical - which includes all electrical activities.

(3) Mechanical -- which includes mechanical instrumentation and Radwaste Management System piping.

(4) Supports -- which includes cable tray and conduit supports, pipe whip restraints, and Class V pipe supports.

In each of these disciplines, the QC inspection program provides multiple opportunities to detect unacceptable conditions which may have eluded detection in earlier inspections.

Q6. Please provide an example from the Civil discipline where QC inspections subsequent to initial inspections provide an additional opportunity for identifying previously undetected discrepancies.

A6. A good example in the Civil discipline is protective coatings. The nature of the QC inspection process allows unacceptable conditions which have been undetected on initial inspection to be detected on subsequent inspections. All coating systems consist of multiple applications of coating material, each of which is inspected. Unacceptable conditions are likely to be observed in subsequent coats, as each subsequent application is applied and inspected. For instance, an unacceptable condition (e.g., surface contamination) on the bare steel substrate not detected in the inspection of the substrate may also be observed and identified during inspection of the prime coat.

Q7. Please provide examples from the Electrical discipline where QC inspections subsequent to the initial inspection provide an additional opportunity for identifying previously undetected discrepancies.

A7. Any electrical system is a multi-component system. It typically consists of electrical equipment, electrical instrumentation, cable and its associated termination hardware, and conduit and cable tray and its associated hardware. As the "system" is constructed in a defined sequence, there is ample opportunity for discrepant conditions not initially identified for any single component to be identified during subsequent installation of other associated components.

For example, conduit that was installed incorrectly (e.g., size, number and flattening of bends, interior cleanliness) could be identified by subsequent QC inspection such as during the cable pulling activities for that particular conduit. Cable which was installed incorrectly (e.g., type, size, identification, or separation) could be identified during various QC inspection points such as separation inspection, termination inspection, or during meggering (insulation resistance testing) activities. Similarly, inadequately installed cable trays (e.g., incorrect identification, damage, color coding) may also be identified during separation or cable pulling inspections or meggering activities. Additional assessments of the adequacy of installation of electrical equipment and

instrumentation are provided by the post construction verification inspection, and testing, discussed below in A13.

Q8. Please provide examples in the Mechanical discipline where QC inspections subsequent to the initial inspection provide an additional opportunity for identifying previously undetected discrepancies.

A8. Both elements of the Mechanical discipline (Radwaste Management System (RWMS) piping and mechanical instrumentation) receive in-process inspections and multiple final inspections by QC inspectors. RWMS piping was originally inspected visually by Welding Engineering. Subsequently, in order to satisfy the NRC's ~~new~~ Branch Technical Position ET-SB-11-1, a QC inspection program was developed in addition to the original inspection by Welding Engineering to assure compliance with the Branch Technical Position. This program included visual inspection of all pipe welding, welded attachments to piping, and support location. Also, subsequent to these QC inspections, QC performed a walkdown inspection of the system prior to hydrostatic testing.

Mechanical instrumentation receives numerous in-process QC inspections during the fabrication process. For example, QC monitors tube bending operations, installation of Swagelok fittings, and material identification.

Additionally, upon initial completion of an instrument run QC performs a final inspection of that installation in which all quality attributes are verified (e.g., support span, configuration, and location, tubing size, color coding). Subsequent to this inspection, QC performs walkdown inspections prior to hydrostatic testing and again prior to system turnover to Startup. Attributes such as proper bend radius, tubing size and color coding and tubing support may be observed and discrepancies noted at any point in these inspections.

Q9. Please provide examples in the Supports area where QC inspections subsequent to the initial inspections provide an additional opportunity for identifying undetected discrepancies.

A9. Conduit and cable tray supports are installed using a Construction Operation Traveller. These travellers are prepared by Construction defining the step-by-step fabrication and installation processes. QC hold points are established by Quality Assurance on each traveller -- describing the QC inspections required at each interval of the fabrication and installation process -- prior to release to Construction. These travellers contain an average of 20 QC inspection hold points for conduit supports and an average of 12 QC inspection hold points for cable tray supports. The nature of the traveller itself allows for

identification of discrepant items during each stage of the inspection process even though they may have previously been inspected and accepted. Additionally, conduit supports receive a final inspection in which support span and capacity are verified as acceptable for each support on the entire run of conduit. Attributes for which such inspections have previously been performed may also be observed and deficiencies identified during this final inspection.

Pipe whip restraints are also installed utilizing the Construction Operation Traveller. However, in this case, the traveller is prepared by the Civil Engineering Department prior to establishment of QC inspection hold points by Quality Assurance. The fabrication and installation of these structures employ welded construction to the maximum extent possible. On a typical pipe whip restraint weld, QC verifies fit-up, cleanliness, and preheat prior to commencement of welding, and performs visual examination of all welds. QC also performs non-destructive examination (i.e., PT, MT, or UT) on the majority of the welds. Thus, the QC inspection process for pipe whip restraints also provides multiple opportunities for identification of discrepant conditions by QC.

Q10. Will the same QC inspectors perform these cumulative inspections?

A10. Not likely. There are numerous QC inspectors in each non-ASME discipline, and in most cases inspections performed after the initial inspection for a specific QC attribute are performed by QC inspectors different from the one who performed the initial inspection. Moreover, in most cases, inspectors who perform inspections subsequent to the initial inspection are qualified to identify discrepancies that may not have been identified in the initial inspection. In sum, there is a high level of assurance that discrepancies that may not have been identified in the initial QC inspection because of the particular inspector involved will be detected by another inspector in one of the later QC inspections.

Q11. Are there means other than the non-ASME in-process QC inspection program described above by which overall product quality and safe system operability are assured?

A11. Yes. The measures which provide additional assurances vary with each of the four disciplines I have previously discussed. These include additional inspections and testing of components and systems.

Q12. Please provide examples of these measures for the Civil discipline.

A12. In addition to the cumulative QC inspection process described previously with respect to protective coatings, the majority of the protective coatings applied prior to

November, 1981, were reinspected utilizing destructive testing to assure their integrity. Also, a final walkdown visual inspection of the coatings is performed by Engineering prior to turnover to Operations.

Q13. Please provide an example of additional inspections or tests which are performed for the equipment in the Electrical area.

A13. For all electrical installations, there are several separate inspections and/or tests in addition to the QC inspections previously discussed. This applies to all cable installations, all electrical equipment installations, and all conduit and cable tray installations.

First, all electrical installations are verified to be acceptable (e.g., separation, bend radius, damage, hardware in place) immediately prior to turnover during a post-construction verification inspection by QC. Second, subsequent to this post construction verification inspection, each component receives prerequisite testing by Startup to verify component functionability. This testing does not go to specific QC inspection attributes, but demonstrates proper and safe operability of the installation. Third, each electrical system also receives further preoperational or acceptance testing by Startup. This testing confirms system operability.

Q14. Please provide an example of additional inspections or additional tests which are performed on equipment in the Mechanical area.

A14. Non-ASME mechanical components (RWMS piping and mechanical instrumentation) are all subjected to three additional layers of confirmatory testing.

First, RWMS piping and mechanical instrumentation are subjected to hydrostatic (pressure) testing. The requirements for these pressure tests are described in the ASME Code for mechanical instrumentation and in ANSI B31.1, "Power Piping," for RWMS pipe. During these pressure tests QC visually examines every weld that has not previously been hydrostatically tested, every high stress point, and all base metal repairs.

Secondly, both RWMS piping and mechanical instrumentation are subjected to prerequisite testing to assure that each component functions as intended.

Finally, RWMS piping systems and mechanical instrumentation systems undergo preoperational or acceptance testing by Startup to assure system operability. The preoperational tests for mechanical instrumentation include the hot functional testing program.

Q15. Please provide an example of additional inspections or tests which are performed on equipment in the Supports area.

A15. An example of an additional inspection in the Supports area is the case of Class V pipe supports. Subsequent to the original QC inspection, the location and configuration of those Class V supports within the scope of the IE Bulletin 79-14 As-Built Program were verified by Technical Services Engineering. Any necessary corrective action resulting from this as-built verification is completed prior to system turnover to Operations.

Additionally, a large number of Class V supports, including all on the diesel generators and in the fuel building, were reinspected by QC to verify adequacy of the original QC inspection, and to verify that no damage or unauthorized modifications had occurred to the support after its initial inspection. Also, all skewed fillet welds on Class V supports have been reinspected.

Finally, the design function and operability for many of the Class V supports have been verified by Design Engineering and Startup during the hot functional testing program.

Q16. Has the non-ASME program and QC inspection process at Comanche Peak ever been reviewed or audited by any independent organizations?

A16. Yes. Numerous independent organizations have conducted inspections, audits and investigations of the adequacy of the non-ASME QA program. During the last two years alone, the following audits, inspections and investigations have been conducted:

-- an INPO audit and field inspection;

-- an NRC CAT field inspection and audit;

-- two complete building turnover inspections by NRC Region IV;

-- an NDE audit and field inspection by NRC Region I;

-- audits, surveillances, and field inspections conducted by TUGCO QA;

-- audits and field inspection conducted by Cygna;

-- a continuing field inspection and investigation process implemented by NRC Region IV and Region IV RRI.

Q17. What is the significance of all of these independent audits, inspections, and investigations?

A17. These additional independent audits, inspections, and investigations have provided a further opportunity by which construction discrepancies not identified by original QC inspections could be detected.

Q18. Does this complete your testimony?

A18. Yes

Speed Letter.

To H. WADE — From M FOOTE, QC SUPV.

Subject RE: POSSIBLE THREAT TO QC

Date 9/16 1982

MESSAGE

HAVING DISCUSSED THE INCIDENT DESCRIBED IN IOM SMITH TO FOOTE 9/15/82 WITH H. WADE AND K. McDONALD IT APPEARED THAT THERE WAS A GENERAL MISSUNDERSTANDING. BOTH PARTIES SHOOK HANDS. NO FURTHER ACTION NECESSARY

cc G. BRANT
K. SMITH.

Signed [signature]

Date ______ 19__

REPLY

INTEROFFICE MEMO

TO: Mike Foote; Structural QC Supervisor DATE: Sept. 15, 1982

FROM: Randall Smith, Structural Supports Lead

SUBJECT: Report of Threat to QC Inspector, Hal E. Wade

At approximately 11:05 a.m., this date, I received a report of a threat being directed at QC Inspector Hal Wade. Information received from Wade, and reported witness Daniel Hanke, indicate that Pipe Support Foreman, Ken McDonald, acted in a threatening manner both verbally and physically.

Wade related that a dispute over material orientation, on Hanger #H-VA-X-AB-023-006-5, started when Wade initiated the NCR process on stated hanger; for which McDonald is the responsible foreman. McDonald reportedly began shouting at Wade and continued this in Wade's office, as McDonald followed Wade to the office. As the raised voice dispute continued, Wade was seated at this time, McDonald reportedly was "shaking his fist" in front of Hal Wade's person.

I proceeded to talk to Craft personnel, Ed Haliford, Steve Curlee, and George Bunt to ascertain additional information. All three agreed that the dispute got out of hand, but didn't know of the reported threat. Haliford said he will deal with the foreman, in hopes to prevent a recurrence of this type activity.

I then asked Wade if he interpreted McDonald's actions as a threat. Wade stated "Yeah, I think it was (a threat)." It was at that point when I contacted you with regard to this matter.

Witnesses: Daniel Hanke, QC Inspector
Randall Shields, NDE Technician
Daniel Cox, NDE Technician

I hereby request a thorough investigation be conducted concerning this matter.

Randall D. Smith
Structural Supports Lead

RDS/ls

To TOM BRANDT

From CORY ALLEN

Subject COMPLAINT AGAINST B&R PAINT FOREMAN

MESSAGE

Date 6/25 1983

ON 6/24/83 WHILE PERFORMING A HOLIDAY DETECTION TEST DURING A FINAL INSPECTION I WAS INTERRUPTED BY PAINT FOREMAN WAYNE WILLIAMS. HE INSTRUCTED ME TO CLIMB BACK UP SCAFFOLDING TO REINSPECT A TAPED OFF 4"x4" GROSS DISCONTINUITY SO AS TO PROVE TO HIM THAT IT WAS AN UNSATISFACTORY AREA. IT WAS NOT AN INTERROGATIVE REQUEST BUT AN IMPERATIVE COMMAND FOR ME TO OBEY. THIS IS A BLATANT EXAMPLE OF A B&R PAINT FOREMAN ORDERING A QC INSPECTOR TO PERFORM. TO HIGHLIGHT THIS EXAMPLE, MR. WILLIAMS HAD B&R PAINT SUPERINTENDENT HALEY COMPLAIN TO HARRY O. WILLIAMS THAT I REFUSED TO FOLLOW THE FOREMAN'S INSTRUCTIONS AND RETEST THE AREA — WHICH IN FACT WAS INCORRECT. I TOLD THE FOREMAN AT THAT TIME THAT I WOULD RETURN TO THE AREA WHEN I WAS

Signed Cory Allen

REPLY

Date 19

As discussed w/ Construction (Haley, Williams, Bracken, Remington) AND your supervision (H. Williams) and yourself, this lack of management must cease. Construction has assured us that they will implement corrective action (as necessary) immediately. As we discussed verbally, if situation does not improve, please notify me again.

6/25/83

Signed

DEPOSITION EXHIBIT Brandt 17

Wilson Jones Company

RECIPIENT—RETAIN WHITE COPY, RETURN PINK COPY

To TOM BRANDT From CORY ALLEN

Subject

MESSAGE Date 6/25 1983

FINISHED WITH THE ENTIRE AREA (CONSISTING OF 873 FT^2).
ANOTHER EXAMPLE OF PAINT DEPARTMENT HARASSMENT OCCURRED DAY BEFORE YESTERDAY, 6/23/83. GENERAL FOREMAN C. LAFAYETTE COMPLAINED TO HARRY D. WILLIAMS THAT I WAS WRITING NCR'S ON EXPIRED CZ-11 THAT HAD BEEN APPLIED BY W. REMINGTON'S CREW. THIS WAS AN OUTRAGEOUS FALSIFICATION. ALL I DID WAS SIMPLY WRITE AN UNSAT PRIMER REPAIR, WHICH WOULD REQUIRE STRIPPING THE CZ-11 (WHICH I EXPLAINED TO W. REMINGTON AT THAT TIME). WRITING A NCR NEVER ENTERED MY MIND UNTIL HARRY D WILLIAMS QUESTIONED ME ABOUT IT BEFORE I EVEN HAD A CHANCE TO FINISH WRITING THE IR.

Signed Cory Allen

REPLY Date 19

Signed

Wilson Jones Company

RECIPIENT—RETAIN WHITE COPY, RETURN PINK COP

Speed Letter.

To TOM BRANDT

From CORY ALLEN

Subject

Date 6/25 1983

MESSAGE

LAST WEEK I HAD THREE DIFFERENT SHOUTING MATCHES DURING INSPECTIONS WITH THREE DIFFERENT B&R PAINT FOREMAN WHO TRIED TO ARGUE THEIR WAY OUT OF UNSAT COATINGS. OBVIOUSLY, I ALWAYS EXPLAIN TO THE PAINT FOREMAN AND JOURNEYMAN PAINTER THE RESULTS OF MY INSPECTION INCLUDING THE AZIMUTHS, ELEVATIONS, AND IR NUMBER. INEVITABLY, AN ARGUMENT FOLLOWS WITH COMPLAINTS TO HARRY O WILLIAMS IF THOSE RESULTS ARE NEGATIVE.

I FEEL UNCOMFORTABLE ABOUT HAVING TO DEFEND MYSELF AGAINST ALLEGATIONS MADE BY A B&R SUPERINTENDENT TO MY SUPERVISOR! THIS HAS BECOME A DAILY OCCURRANCE FOR CORY ALLEN. I WOULD SUGGEST A NEW FORMAT FOR RECEIVING COMPLAINTS FROM THE PAINT DEPARTMENT

Signed Cory Allen

Date 19

REPLY

Signed

Wilson Jones Company

RECIPIENT—RETAIN WHITE COPY, RETURN PINK CO

To TOM BRANDT

From CORY ALLEN

Subject

MESSAGE

Date 6/25 19 83

AGAINST A CERTIFIED INSPECTOR FOR INSTANCE, REQUIRE THE PAINT DEPARTMENT REPRESENTATIVE TO MAKE THE COMPLAINT IN PERSON WITH THE INSPECTOR PRESENT SO THAT HE CAN DEFEND HIMSELF, OR FOR THE PAINT DEPARTMENT TO PUT IT IN WRITING, SUCH AS I HAVE DONE.

Signed Cory Allen

REPLY

Date _____ 19 ____

Signed

RECIPIENT—RETAIN WHITE COPY, RETURN PINK COPY

AS UTILITIES
NERATING CO.

COMANCHE PEAK STEAM ELECTRIC STATION
NONCONFORMANCE REPORT (NCR)

NCR No. M-83-00795

UNIT	STRUCTURE/SYSTEM	ITEM/COMPONENT	TAG/ID NUMBER	LOCATION OR ELEVATION	RIR NO
II	RB s/s Liner T/O 4000	s/s Reactor Cavity Liner	NA	Top at 860'-0"	NA

NONCONFORMING CONDITION

A random review of stainless steel liner travelers, for Reactor II Cavity Liner Welds, has found required fit-ups/cleanliness inspections of inside (waterside) welds can not be verified as being performed.

Quality of welds indeterminate.

See attached sheet for welds randomly reviewed.

5 Hold Tags Applied

REFERENCE DOCUMENT: QI-QP-11.14-6 REV 2 PARA Attach. I Step 5

REPORTED BY: Randall D. Smith/Clair C. Randall DATE: 3/17/83

QE REVIEW/APPROVAL: William Laurence / C. C. Randall DATE: 3/18/83

ACTION ADDRESSEE: J. B. George/Kissinger DEPARTMENT: Const/Engineering

DISPOSITION:

REWORK _____ REPAIR _____ USE AS IS XXX SCRAP _____

Subject welds are seam welds utilized to provide leak tightness of the liner. Acceptability of welds shall be based on vacuum box and hydrostatic tests.

DEPOSITION EXHIBIT Brandt-18

ENG. REVIEW/APPROVAL C.F. Hooton DATE: 3/22/83

QE REVIEW/APPROVAL [illegible] DATE: 3/22/83

DISPOSITION VERIFICATION & CLOSURE C. C. Randall DATE: 3/25/83

COMMENTS:

REPORTING PERSONNEL

ACTION ADDRESSEE

NCR # M-8300795

3/17/83

ATTACHMENT

WELD #	WELD #	WELD #
1225	330	209
1145	299	200
729	291	192
709	288	
700	285	
699	282	
695	281	
353	280	
351	278	
349	277	
348	274	
347	271	
346	263	
345	261	
344	257	
341	252	
338	251	
337	250	
336	248	
335	246	
334	236	
333	235	
331	210	

TEXAS UTILITIES GENERATING CO

COMANCHE PEAK STEAM ELECTRIC STATION
NONCONFORMANCE REPORT (NCR)

NCR No. M-83-00795 R1

UNIT	STRUCTURE SYSTEM	ITEM/COMPONENT	TAG ID NUMBER	LOCATION OR ELEVATION	RIR NO.
II	RB s/s Liner T/O 4000	s/s Reactor Cavity Liner	N/A	Top at 860'-0"	N/A

REPORTING PERSONNEL

NONCONFORMING CONDITION

A review of stainless steel liner travelers, for Reactor II Cavity Liner Welds, has found required fit-ups/cleanliness inspections of inside (waterside) welds can not be verified as being performed.

Quality of welds indeterminate.

See attached sheet for welds reviewed.

5 hold tags applied.

REFERENCE DOCUMENT: QI-QP-11.14-6 REV 2 PARA Attach. I Step 5

REPORTED BY: Randall D. Smith/Clair C. Randall DATE: 3/17/83

QE REVIEW/APPROVAL: William Laurence DATE: 3/28/83

ACTION ADDRESSEE: J. B. George/Kissinger DEPARTMENT: Engineering

ACTION ADDRESSEE

DISPOSITION:

REWORK ____ REPAIR ____ USE AS IS XXX SCRAP ____

Subject welds are seam welds utilized to provide leak tightness of the liner. Acceptability of welds shall be based on vacuum box and hydrostatic tests.

original in pkg. FW1225

DEPOSITION EXHIBIT Brandt-19

ENG. REVIEW/APPROVAL C.R. Hooton DATE: 3/29/83

C. C. Randall DATE: 4/4/83

QE

DISPOSITION VERIFICATION & CLOSURE DATE: / /

COMMENTS: Revision 1 issued to change nonconforming condition.

NCR # M-8300795

Reviewed with / Alan C. Randall
3/17/83

ATTACHMENT

WELD #	WELD #	WELD #
1225	330	209
1145	299	200
729	291	192
709	288	
700	285	
699	282	
695	281	
353	280	
351	278	
349	277	
348	274	
347	271	
346	263	
345	261	
344	257	
341	252	
338	251	
337	250	
336	248	
335	246	
334	236	
333	235	
331	210	

FOR INFORMATION ONLY

TEXAS UTILITIES GENERATING CO.

COMANCHE PEAK STEAM ELECTRIC STATION
NONCONFORMANCE REPORT (NCR)

NCR No. C-82-00060 R-1

UNIT	STRUCTURE/SYSTEM	ITEM/COMPONENT	TAG/ID NUMBER	LOCATION OR ELEVATION	RIR NO.
1,2	Reactor Bldg./Elec. Supports & Misc. Steel	Phenoline 305 Finish Coat	See Attached list	Field Curing Tunnel @ RB#1	N/A

REPORTING PERSONNEL

NONCONFORMING CONDITION

Contamination of "in-cure" finish coat

Contrary to referenced documents listed below, parts listed on attached sheet were force cured with the use of Kelly Heaters for the purpose of producing a 48-hour final cure at approximately 110°-115°F. Consequently, this type heater expelled an oil based soot and fume while in a "tacky" state.

Therefore, the overall integrity is at this time indeterminate.

QA RECORD I

RTN. L QA REVIEW GM 7-13-83

FILE NO. 15.1

SUBFILE NO. NCR NO.

ARMS INDEXED

DATE:

REFERENCE DOCUMENT: CCP-30, R-9, Para. 4.4.2.1 — REV 9 — PARA 4.4.2.1
QI-QP-11.4-5, R-7, Para. 3.5.1 — REV 7 — PARA 3.5.1

REPORTED BY: Joe Krolak — DATE: 1/20/82

QE

QE REVIEW/APPROVAL: Harry O. Williams — DATE: 6/16/83

ACTION ADDRESSEE: J. T. Merritt/R. Kissinger — DEPARTMENT: Engineering

ACTION ADDRESSEE

DISPOSITION:

REWORK ______ REPAIR ______ USE AS IS XXX SCRAP ______

Coatings on hangers listed shall be solvent (thinner) wiped. If contaminantes are visually present after wiping, the areas should be sanded lightly until removal of discoloration is complete. After completion the repair areas shall be DFT checked. Due to the small amount of exposed painted surface of shims after placement and that shims require rework of exposed coatings after installation; the coating on the listed shims shall be used as is.

FOR INFORMATION ONLY

ENG. REVIEW/APPROVAL: CR Hooton — DATE: 6/16/83

QE

QE REVIEW/APPROVAL: M E [signature] — DATE: 6/17/83

DISPOSITION VERIFICATION & CLOSURE: [signature] — DATE: 7/12/83

COMMENTS: R-1 issued to revise dispostion

DEPOSITION EXHIBIT Brandt 20

ITEMS IN BLASTING TUNNEL AWAITING FINISH COAT CURE 1/20/82

16 Each Electrical Hangers

C-14Y30536-6 QP00329
C-14Y13416-2 QP00041
C-13Y06912-7 QP00032 (C-13Y06912-7 Lot 8-30-83)
C-12K04488-11 QP00377
C-16B09456-2 QP00316
C-16B09456-3 QP00328
C-14Y13417-7 QP00414 (C-13B09456-2 Lot 8-30-83)
2-13G07401-8 QP00321
C-14R13096-2 QP00412
C-14R13096-3 QP00412
C-14B30551-1 QP00412
C-14Y13417-5 QP00414
C-14Y13417-6 QP00414
C-14Y13417-7 QP00414
C-14W30547-1 QP00381
JB-1C385-R QP00324

51 Each Electrical Shims

16 ea. QP00411
17 ea. QP00321
5 ea. QP00414
1 ea. QP00412
2 ea. QP00321
2 ea. QP00405
2 ea. QP00329
2 ea. QP00410
1 ea. QP00321
3 ea. QP00404

FOR INFORMATION ONLY

COMANCHE PEAK STEAM ELECTRIC STATION

SHEET 1 OF 1

INSPECTION REPORT

NO. PC 122702

ITEM DESCRIPTION	IDENTIFICATION NO.	SYSTEM / STRUCTURE DESIGNATION
PROTECTIVE COATINGS	SEE ATTACHED	RCR #1 & 2

SPEC. NO.	REV.	REF. Q.C. DOC. & REV. & CHANGE NO.	MEASURE OR TEST EQUIP. IDENT. NO.
AS 31	1	QI-QP 11.4-5	N/A

☐ IN PROCESS INSPECTION ☐ PRE INSTALLATION VERIFICATION ☐ INSTALLATION INSPECTION ☑ FINAL INSPECTION ☐ PRETEST INSPECTION

INSP. RESULTS

☑ INSPECTION COMPLETED, ALL APPLICABLE ITEMS SATISFACTORY

☐ INSPECTION COMPLETED, UNSATISFACTORY ITEMS LISTED BELOW

Harry D. Williams 7/7/83
QC INSPECTOR DATE

ITEM NO.	INSPECTION ATTRIBUTES	SAT	UNSAT.	DATE	QC SIGNATURE
1.	PER DISPOSITION OF NCR C82-00060 R-1 THE HANGER WERE REINSPECTED SEE ATTACHED INSPECTION REPORTS. SHIMS WERE ADDRESSED AS "USE AS IS"	✓			
2.	NO HOLD TAGS APPLIED	✓			
3	THIS INSPECTION REPORT CLOSES NCR C82-00060 R 1	✓			

FOR INFORMATION ONLY

REMARKS (DWGS, SPECS, ETC.)

RELATED NCR NO.	I.R. CLOSED	DATE	SIGNATURE
N/A	N/A ☐	N/A	N/A QC INSPECTOR

TEXAS UTILITIES GENERATING CO.

COMANCHE PEAK STEAM ELECTRIC STATION
NONCONFORMANCE REPORT (NCR)

NCR No. C-82-00060

UNIT	STRUCTURE/SYSTEM	ITEM/COMPONENT	TAG/ID NUMBER	LOCATION OR ELEVATION	RIR NO.
1 & 2	Reactor Bldg./Elec. Supports & Misc. Steel	Phenoline 305 Finish Coat	See Attached List	Field Curing Tunnel @ RB#1	N/A

REPORTING PERSONNEL

NONCONFORMING CONDITION

--Contamination of "in-cure" finish coat--

Contrary to referenced documents listed below, parts listed on attached sheet were force cured with the use of Kelly Heaters for the purpose of producing a 48-hour final cure at approximately 110-115°F. Consequently, this type heater expelled an oil based soot and fume while in a "tacky" state.

Therefore, the overall integrity is at this time indeterminate.

REFERENCE DOCUMENT: CCP-30, Rev. 9, Para. 4.4.2.1 / QI-QP-11.4-5, Rev. 7, Para. 3.5.1 — REV 9/7 — PARA 4.4.2.1 / 3.5.1

REPORTED BY: Joe Krolak — DATE: 1/20/82

Q

QE REVIEW/APPROVAL: Harry D. Williams — DATE: 1/20/82

ACTION ADDRESSEE: J. T. Merritt/R. Kissinger — DEPARTMENT: Engineering

ACTION ADDRESSEE

DISPOSITION:

REWORK ____ REPAIR XXX USE AS IS ____ SCRAP ____

Affected surfaces shall be solvent (thinner) wiped. If contaminantes are visually present after wiping the areas should be sanded lightly until removal of discoloration is complete. After completion of the repair areas shall be DFT checked.

FOR INFORMATION ONLY

ENG. REVIEW/APPROVAL: C.R. Hooton — DATE: 1/22/82

E

QE REVIEW APPROVAL: Harry D. Williams / R. A. Cummings Jr — DATE: 1/22/82

DISPOSITION VERIFICATION & CLOSURE: — DATE: / /

COMMENTS:

ITEMS IN BLASTING TUNNEL AWAITING FINISH COAT CURE 1/20/82

16 Each Electrical Hangers

C-14Y30536-6 QP00329
C-14Y13416-2 QP00041
C-13YØ06912-7 QP00032
C-12K04488-11 QP00377
C-16B09456-2 QP00316
C-1G809456-3 QP00328
C-14Y13417-7 QP00414
2-13G07401-8 QP00321
C-14R13096-2 QP00412
C-14R13096-3 QP00412
C-14B30551-1 QP00412
C-14Y13417-5 QP00414
C-14Y13417-6 QP00414
C-14Y13417-7 QP00414
C-14W30547-1 QP00381
JB-1C385-R QP00324

51 Each Electrical Shims

16 ea. QP00411
17 ea. QP00321
5 ea. QP00414
1 ea. QP00412
2 ea. QP00321
2 ea. QP00405
2 ea. QP00329
2 ea. QP00410
1 ea. QP00321
3 ea. QP00404

FOR INFORMATION ONLY

COMANCHE PEAK STEAM ELECTRIC STATION

INSPECTION REPORT

SHEET 1 OF 1

NO. PC 47097

ITEM DESCRIPTION 2	IDENTIFICATION NO. 3	SYSTEM / STRUCTURE DESIGNATION
SEE BELOW	SEE BELOW	RCB - common

SPEC. NO.	REV. 6	REF. Q.C. DOC. & REV. & CHANGE NO. 7	MEASURE OR TEST EQUIP. IDENT. NO.
QI-QP-11.4-5 5	12	NCR-C-82-00060	N/A

☐ IN PROCESS INSPECTION ☐ PRE INSTALLATION VERIFICATION ☐ INSTALLATION INSPECTION ☐ FINAL INSPECTION ☐ PRETEST INSPECTION

INSP. RESULTS

☒ INSPECTION COMPLETED, ALL APPLICABLE ITEMS SATISFACTORY

☐ INSPECTION COMPLETED, UNSATISFACTORY ITEMS LISTED BELOW

L Heaton — QC INSPECTOR

9-27-82 — DATE

ITEM NO. 11	INSPECTION ATTRIBUTES 12	SAT	UNSAT	DATE	QC SIGNATURE
	THE FOLLOWING ELECTRICAL SHIM PLATES CANNOT BE				
	TRACED DUE TO LACK OF UNIQUE NUMBERS, AS DESCRIBED				
	ON NCR-C-82-00060				
	16 ea - QP00411	N/A			
	17 ea - QP00321	N/A			
	5 ea - QP00414	N/A			
	1 ea - QP00412	N/A			
	2 ea - QP00321	N/A			
	2 ea - QP00405	N/A			
	2 ea - QP00329	N/A			
	2 ea - QP00410	N/A			
	1 ea - QP00321	N/A			
	3 ea - QP00404	N/A			

FOR INFORMATION ONLY

REMARKS (DWGS, SPECS, ETC.)

RELATED NCR NO. 15	I.R. CLOSED ☐	DATE	SIGNATURE QC INSPECTOR
C-82-00060			

COMANCHE PEAK STEAM ELECTRIC STATION

INSPECTION REPORT

SHEET 1 OF 1

NO. PC 47082

ITEM DESCRIPTION 2	IDENTIFICATION NO. 3	SYSTEM / STRUCTURE DESIGNATION 4
SEE BELOW	SEE BELOW	RCB-1

SPEC. NO. 5	REV. 6	REF. Q.C. DOC. & REV. & CHANGE NO. 7	MEASURE OR TEST EQUIP. IDENT. NO. 8
QI-QP-11.4-5	12	NCR-C-82-00060	2169 2162

☒ IN PROCESS INSPECTION ☐ PRE INSTALLATION VERIFICATION ☐ INSTALLATION INSPECTION ☐ FINAL INSPECTION ☐ PRETEST INSPECTION 9

INSP. RESULTS

☒ INSPECTION COMPLETED, ALL APPLICABLE ITEMS SATISFACTORY

☐ INSPECTION COMPLETED, UNSATISFACTORY ITEMS LISTED BELOW

L H Green — QC INSPECTOR — 9-23-82 — DATE 10

ITEM NO. 11	INSPECTION ATTRIBUTES 12	SAT	UNSAT.	DATE	QC SIGNATURE 13
(1)	CONDUIT SUPPORT C14R13096-2, NO VISABLE CONTAMINANTS,				
	DFT = MIN 9.0 MAX = 10.5	✓			
(2)	CONDUIT SUPPORT C14R13096-3 NO VISABLE CONTAMINANTS,				
	DFT = 9.0, MAX = 11.0	✓			
(3)	CONDUIT SUPPORT C14B30551-1, NO VISABLE CONTAMINANTS,				
	DFT = MIN 7.0 MAX 9.0	✓			
(4)	CONDUIT SUPPORT C14Y13417-6, NO VISABLE CONTAMINANTS,				
	DFT = MIN 7.0 MAX 8.0	✓			
(5)	CONDUIT SUPPORT C14Y13416-2, NO VISABLE CONTAMINANTS,				
	DFT = MIN 9.0 MAX 11.0	✓			
(6)	CONDUIT SUPPORT C13Φ06912-7, NO VISABLE CONTAMINANTS,				
	DFT = 7.0 MAX 10.0	✓			
(7)	CONDUIT SUPPORT C13B09456-2, NO VISABLE CONTAMINANTS,				
	DFT = 7.0, MAX = 11.0	✓			
(8)	CONDUIT SUPPORT C16B09456-2, NO VISABLE CONTAMINANTS,				
	DFT = 7.0, MAX = 11.0	✓			

FOR INFORMATION ONLY

REMARKS (DWGS, SPECS, ETC.)
INSPECTION PERFORMED PER PARA. 3.6.3 of Q.I-Q.P.-11.4-5, Rev. 12 14

ELATED NCR NO. 15	I.R. CLOSED	DATE	SIGNATURE / QC INSPECTOR 16
N/A	☒	9-23-82	L H Green

NCR-C-82-00060

COMANCHE PEAK STEAM ELECTRIC STATION

INSPECTION REPORT

SHEET 1 OF 1

NO. PC 46996

ITEM DESCRIPTION (1)	IDENTIFICATION NO. (2)	SYSTEM / STRUCTURE DESIGNATION (3) (4)
PROTECTIVE COATINGS	C14Y13417-6	RCB-1

SPEC. NO. (5)	REV. (6)	REF. Q.C. DOC. & REV. & CHANGE NO. (7)	MEASURE OR TEST EQUIP. IDENT. NO. (8)
AS-31	1	QI-QP-11.4-5, Rev. 12	N/A * (SEE REMARKS)

(9)

☐ IN PROCESS INSPECTION ☐ PRE INSTALLATION VERIFICATION ☐ INSTALLATION INSPECTION ☑ FINAL INSPECTION ☐ PRETEST INSPECTION

INSP. RESULTS

☑ INSPECTION COMPLETED, ALL APPLICABLE ITEMS SATISFACTORY

☐ INSPECTION COMPLETED, UNSATISFACTORY ITEMS LISTED BELOW

L. Gleason — QC INSPECTOR

9-17-82 — DATE

(10)

ITEM NO. (11)	INSPECTION ATTRIBUTES (12) FINISH COAT FINAL ACCEPTANCE	SAT	UNSAT	DATE	QC SIGNATURE (13)
1.	Verify curing is per CCP-30 or 30A and para. 3.6.1.	N/A			
2.	Perform Visual Inspection of Coated Surface per para. 3.6.2.				
3.	Perform DFT on coated surface as per para. 3.6.3 (For multiple items indicate Min. Spot, Max. Spot and Average DFT with corresponding QP & ID No's for each item in "Remarks").				
	Coating System Spot Test Minimum:				
	Coating System Spot Test Maximum:				
	Average DFT Coating System:	N/A			
4.	Perform continuity inspection per para. 3.6.4.	✓			

FOR INFORMATION ONLY

REMARKS (DWGS, SPECS, ETC.)

CONTINUITY INSPECTION, HOLIDAY DETECTOR S/N 8319. AZ: 60° ±, EL 858' ±.

QP00321 Ref. PC# 46449 for items #1, 2 & 3 above

(14)

RELATED NCR NO. (15)	I.R. CLOSED	DATE	SIGNATURE (16)
NCR-C-82-00060	☑	9-17-82	L. Gleason QC INSPECTOR

COMANCHE PEAK STEAM ELECTRIC STATION

SHEET 1 OF 2

INSPECTION REPORT

NO. PC46449

ITEM DESCRIPTION (2)	IDENTIFICATION NO. (3)	SYSTEM / STRUCTURE DESIGNATION
SEE BELOW	SEE BELOW	RCB-1

SPEC. NO.	REV. (6)	REF. Q.C. DOC. & REV. & CHANGE NO. (7)	MEASURE OR TEST EQUIP. IDENT. NO. (8)
CP-QP-11.4-5	10 L Gleason 8-18-82	NCR-C-82-00060	2169, 1813

☑ IN PROCESS INSPECTION ☐ PRE INSTALLATION VERIFICATION ☐ INSTALLATION INSPECTION ☐ FINAL INSPECTION ☐ PRETEST INSPECTION (9)

INSP. RESULTS (10)

☑ INSPECTION COMPLETED, ALL APPLICABLE ITEMS SATISFACTORY

☐ INSPECTION COMPLETED, UNSATISFACTORY ITEMS LISTED BELOW

L Gleason — QC INSPECTOR — 8-18-82 — DATE

ITEM NO. (11)	INSPECTION ATTRIBUTES (12)	SAT	UNSAT.	DATE	QC SIGNATURE
1.	Conduit Support C12K04488-11: No visable Contaminants,				
	DFT: min. 9.0, max: 11.0	✓		7-19-82	L. Gleason
2.	Conduit Support C14Y30536-6: No visable contaminants,				
	DFT: min. 8.0; max: 11.0	✓		7-19-82	L Gleason
3.	Junction Box JB-1C385: No visable contaminants,				
	surface inaccessiable for D.F.T. verification	✓		7-19-82	L. Gleason
*4.	Conduit Support C-14Y13417-5: No visable contaminants,				
	No D.F.T.'s taken, Due to size and configuration (14"x2"x1")	✓		7-19-82	L. Gleason
*5.	Conduit Support C-14Y13417-7: No visable contaminants				
	No D.F.T.'s taken, Due to size and configuration (14½"x2"x1")	✓		7-19-82	L Gleason
	*Ref. Para 3.1.1c, QI-QP-11.4-5 Rev 10			FOR INFORMATION ONLY	
6.	Conduit Support C-16B09456-3 QP00328 No visable contaminants	✓			
	DFT: min 8.0 max 11.0, Avg: 9.0				
*7.	Conduit Support C-13G07401-8, QP00321 No visable	✓			
	contaminants, No DFT's taken, Due to size and configuration.				

REMARKS (DWGS, SPECS, ETC.)

RELATED NCR NO. (15)	I.R. CLOSED ☑	DATE	SIGNATURE
C-82-00060		8-18-82	L Gleason QC INSPECTOR

COMANCHE PEAK STEAM ELECTRIC STATION

INSPECTION REPORT

SHEET 2 OF 2

NO. PC 46449 1

ITEM DESCRIPTION	IDENTIFICATION NO.	SYSTEM/STRUCTURE DESIGNATION
SEE BELOW 2	SEE BELOW 3	RCB-1 4

SPEC. NO.	REV.	REF. Q.C. DOC. & REV. & CHANGE NO.	MEASURE OR TEST EQUIP. IDENT. NO.
QI-QP-11.4-5	~~10~~ 11 6 (L Gleason 8-18-82)	NCR-C-82-00060 7	2169, 1813 8

☒ IN PROCESS INSPECTION ☐ PRE INSTALLATION VERIFICATION ☐ INSTALLATION INSPECTION ☐ FINAL INSPECTION ☐ PRETEST INSPECTION 9

INSP. RESULTS

☒ INSPECTION COMPLETED, ALL APPLICABLE ITEMS SATISFACTORY — L Gleason, QC INSPECTOR — 8-19-82, DATE

☐ INSPECTION COMPLETED, UNSATISFACTORY ITEMS LISTED BELOW 10

ITEM NO. 11	INSPECTION ATTRIBUTES 12	SAT	UNSAT.	DATE	QC SIGNATURE 13
8.	Conduit Support C-14W30547-1, QP00381 no visable contaminates, no D.F.T.'s taken due to size and configuration.	✓			

FOR INFORMATION ONLY

REMARKS (DWGS, SPECS, ETC.)

14

RELATED NCR NO.	I.R. CLOSED	DATE	SIGNATURE
C-82-00060 15	☒	8-19-82	L Gleason, QC INSPECTOR 16

TEXAS UTILITIES GENERATING CO.

COMANCHE PEAK STEAM ELECTRIC STATION
NONCONFORMANCE REPORT (NCR)

NCR No. C-82-00085

UNIT	STRUCTURE/SYSTEM	ITEM/COMPONENT	TAG/ID NUMBER	LOCATION OR ELEVATION	RIR NO.
1	Reactor Bldg.	Protective Coating	See Attached	See Attached	N/A

REPORTING PERSONNEL

NONCONFORMING CONDITION

Contrary to below noted procedures, "Shim plates" have been installed in connection with the electrical hangers listed on attaced (Sheet 2 of 2) with a zinc enriched coating from a spray can and no unique identification number.

Hold tags applied.

REFERENCE DOCUMENT: CCP-30/QI-QP-11.4-1 REV 9/7 PARA 1.3.1/3.2.3

REPORTED BY: Joe Krolak DATE: 1/27/82

QE

QE REVIEW/APPROVAL: Harry O. Williams DATE: 1/28/82 1

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

ACTION ADDRESSEE

DISPOSITION:

REWORK ____ REPAIR ____ USE AS IS XXX SCRAP ____

Section 2.9 of ES-100 states in part that damages to galvanized surfaces shall be repaired within 24 hours using Galvanox paint or approved equal. The shim plates listed under the above nonconforming condition are galvanized plate which were drilled for installation. When the plates were drilled the galvanizing was damaged and was reparied using Galvanox paint. The above listed nonconforming condition is in accordance with the 2323-ES-100 specification. CCP-30 and QI-QP-11.4-1 do not apply to galvanized surfaces. Therefore the listed nonconforming items shall be used as is.

ARMS INDEXED

FOR INFORMATION ONLY

QA RECORD

RTN.	QA REVIEW
L	02 2-1-82

FILE NO. 15.1

SUBFILE NO. NCR-C-82-00085

ENG. REVIEW/APPROVAL: R M Kissinger DATE: 2/12/82

QE REVIEW APPROVAL: K A Cummings Jr DATE: 2/12/82

DISPOSITION VERIFICATION & CLOSURE: L A Scott DATE: 2/15/82

2-15-82

COMMENTS:

DEPOSITION EXHIBIT Brandt 21

C14K04773-1 Elv 838 Az 341°

C12808110-4 Elv 832 Az 16°

C14R13094-15 Elv 846 Az 32°

C14R13095-2 Elv 844 Az 35°

C-14B13122-8 Elv 848 Az 31°

C-12Ø08110-15 Elv 834 Az 22°

FOR INFORMATION ONLY

BRUNSWICK NUCLEAR STEAM ELECTRIC STATION

INSPECTION REPORT

SHEET 1 OF 1
NO. PCH3571

ITEM DESCRIPTION	IDENTIFICATION NO.	SYSTEM / STRUCTURE DESIGNATION
1 SHIM PLATES	2 SHIM PLATES / AS STATED PER NCR	3 RB A1 4

SPEC. NO.	REV.	REF. Q.C. DOC. & REV. & CHANGE NO.	MEASURE OR TEST EQUIP. IDENT. NO.
2323A531 5	1 6	CCP-30/QI-QP-11.4-1 7	N/A 8

☐ IN PROCESS INSPECTION ☑ PRE INSTALLATION VERIFICATION ☐ INSTALLATION INSPECTION ☐ FINAL INSPECTION ☐ PRETEST INSPECTION 9

INSP. RESULTS

☐ INSPECTION COMPLETED, ALL APPLICABLE ITEMS SATISFACTORY

☐ INSPECTION COMPLETED, UNSATISFACTORY ITEMS LISTED BELOW

Joe Krolak 2-12-82
QC INSPECTOR DATE 10

ITEM NO. 11	INSPECTION ATTRIBUTES 12	SAT	UNSAT.	DATE	QC SIGNATURE 13
		✓			
	In Regards to Disposition (Ref NCR C-82-00085) stating the Non-Conforming Conditions is in Accordance with 2323-ES-100 Spec and that CCP 30 and QI-QP-11.4-1 Do Not Apply to Galvanized Surfaces Hold Tags Have Been Removed and Non Conforming Items Will Be Used as is				

FOR INFORMATION ONLY

REMARKS (DWGS, SPECS, ETC.)

N/A 14

RELATED NCR NO. 15	I.R. CLOSED	DATE	SIGNATURE QC INSPECTOR 16
C-82-00085	☑	2-12-82	Joe Krolak