

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

IN THE MATTER OF)

COMMONWEALTH EDISON COMPANY)

(Byron Station, Units 1 and 2))

Docket Nos. 50-454

50-455
Docketing & Ser.
Branch

JOINT INTERVENORS' BRIEF IN SUPPORT OF MOTION
TO ADMIT TESTIMONY OF JOHN HUGHES

I. Introduction

In its Memorandum and Order dated May 12 the Board announced its intention to consider whether to allow into the hearing record the testimony of John Hughes, as given in the Board-conducted deposition of Mr. Hughes in Rockford, Illinois on May 26, 1983. This ruling was entered only after the Board, during the May 10 conference call on the same issue, had ruled that the matters sworn to by Mr. Hughes in his handwritten statement dated April 25, did indeed meet the standard for reopening the record. In fact, it offered Edison and the staff wide latitude in cross-examination, but upon Edison's objection, determined intervenors must meet some greater standard. (Mem. at 5.) The Joint Intervenors submit that under the appropriate standards, Mr. Hughes' testimony should, indeed must, be considered by this Board in reaching its decision on the Quality Assurance/Quality Control contention in this operating license proceeding.

II. Standard for Admission of Testimony

Although the record on QA/QC has not been closed in this

proceeding, the Board indicated its intention to apply, in a relaxed manner, the standards for reopening a closed record. This decision was based on Vermont Yankee Nuclear Power Corp. (Vermont Yankee Station), ALAB-138, 6 AEC 520, 523 (1973).

In Vermont Yankee, an analogy was drawn to a summary disposition proceeding, wherein the proponent of a motion for summary disposition bears a heavy burden of showing the absence of an issue of triable fact. With due respect to the Board, a careful review of the NRC decisions coming after Vermont Yankee make clear that the standard imposed by the Board is not appropriate here.

In none of the cases dealing with a motion to reopen the record is the summary disposition analogy of Vermont Yankee considered. Indeed, in no opinion of the Commission or the Appeal Board is a burden tantamount to summary disposition put on the proponent of newly-discovered evidence. The burden which the Board has placed on Intervenor is "to respond as if defending against a motion for summary judgment" (Mem. at p.6), while the case law contemplates only the raising of a significant safety issue. If the Board's ruling were literally applied, it would shift the burden in the operating license hearing from the Applicant, where it clearly belongs, to the Intervenor, where it clearly does not.

Thus, it does not appear that the Board has "relaxed" the standards which it has ruled are applicable here.*

*/ During the May 10 conference call concerning Mr. Hughes' testimony, the Board initially ruled that indeed a significant safety issue was raised. It chose to reverse that ruling, however, upon Edison's complaints. (See Mem. at pp. 7-8.)

In ruling upon Intervenor's April 27 written motion to allow Mr. Hughes to testify, it is suggested that the Board keep in mind the relaxation of standards it has ruled shall apply in deciding whether the newly-discovered evidence "reasonably might affect the outcome of the proceeding." (Mem. at p. 5; emphasis in original).*/ To apply a standard more stringent than whether Mr. Hughes' testimony raises significant safety issues is to rule on the merits of intervenors' evidence without having that evidence in the record, an anomolous and unfair result.

The Board must also keep in mind in ruling on this motion the limited resources available to intervenors in developing the facts for this showing.*/ For example, intervenors have no access to Commonwealth Edison's records, nor to the records of its contractors, nor to Edison employees, nor to the staff members who purport to have investigated Mr. Hughes' allegations. Indeed, as shown below, and in the testimony of Mr. Hughes and other intervenors QA witnesses, as well as staff witnesses, employees at Byron have every incentive not to speak with intervenors, the public or the NRC regarding their knowledge of faulty construction practices.

*/ The other aspects of the test for reopening a closed record, set forth in Kansas Gas and Electric Co. (Wolf Creek Unit No. 1), ALAB-422, 7 NRC 320, 338 (1978) and similar cases--timeliness and potential to affect the result--have already been ruled on by the Board. Accordingly, the safety significance issue is the only remaining factor to be satisfied.

*/ See Mem. at p. 6; 10 CFR §2.749(c).

Thus, Intervenors are necessarily handicapped in this situation. As illustrated more fully below, Intervenors (and the Board) are at the mercy of Edison with respect to whether documents substantiating Mr. Hughes' testimony are made available. Indeed, because of their adverse posture, it may reasonably be inferred that only those documents helpful to any attempt to discredit Mr. Hughes' testimony were disclosed.*/

Therefore, the appropriate standard which the Board should apply to Mr. Hughes' testimony is whether on its face, significant safety questions are raised. Any purported resolution of those safety questions should have no relevance here.

III. Analysis of Testimony

Mr. Hughes' testimony may be grouped into four subject areas: training and certification, welding quality, welding of a brace to a pressure pipe, and corporate attitude toward QA/QC. These subjects, and the applicant and staff responses, are set forth below, and a fair consideration of the testimony shows that significant safety issues are raised, and therefore Mr. Hughes' testimony should be considered by the Board in this proceeding.

A. Training and Certification

Mr. Hughes was certified as a Level II electrical hanger inspector within two weeks of reporting for work at Byron, with training consisting of reading procedures, testing and two hours of classroom instruction (Tr. at 7055). No on the job training

*/ The staff appears to have followed the same practice. (See Tr. at 7058 and discussion infra.)

was received, and indeed the amount required by Hatfield (see Applicant's Exhibit 28) could not possibly have been accomplished by the date of certification. Although Edison attempted to show that his certification came on October 29 (for both hanger, and pan, inspections), Edison offered no proof on this fact, and none was aduced from the witness. It would thus appear that if documents exist which support Edison's position, they are being withheld by Edison (See Tr. at 7172).*/

According to Applicant's Exhibit 28, in order for Mr. Hughes to be certified, a minimum of 120 hours of on the job training were required. Given the fact that, as Mr. Hughes repeatedly testified, he was certified within two weeks of coming on site on October 1, clearly Hatfield did not follow its own certification program. Further evidence of its failure to follow its own program is apparent from the requirements of, eg., eight hours of classroom training, also not received prior to certification.

There can be no basis for an assumption that Mr. Hughes was treated any differently than other PTL and Hatfield employees when it came to training and certification. In fact, the reinspection program (see Teutken affidavit at ¶3) implies that this failure to properly train and certify inspectors has been widespread. Edison and the staff will agree that failure to adequately train and certify inspectors can assuredly effect the safety

*/ Edison attempted to tie the date of certification to the date of Applicant Exhibit 38 (GED Certificate). Mr. Hughes testified that he was certified within a day or two of taking his GED test, (Tr. at 7168) and Edison's failure to produce the documents substantiating Mr. Hughes' date of certification (see Tr. at 7201-02) should be considered also. Exhibit 38 shows he took the test in mid-October.

of the plant. As the Teutken affidavit states, the program was necessitated by the violations uncovered nearly a year and a half ago in I&E 82-04. The fact that Edison and its contractors were still running the same slipshod training and certification program in October of 1982 proves that the noncompliance identified in 82-04 is far from resolved. .

B. Welding Quality

Mr. Hughes has had ample experience as a welding inspector to identify faulty welds. (Tr. at 7032, 7068-69) He testified about three different types of weld problems at Byron: uneven profile, excessive undercut, and peening.

He described welds with profiles so uneven he did not even need tools to measure it. (Tr. at 7068-69) Many welds had undercut (which can weaken the structure because it removes the base metal) in excess of 1/32 of an inch, and even in excess of 1/16 of an inch (Tr. at 7071). Peening of welds was also noted. (Tr. at 7071-72) If a weld has been peened, it is simply impossible to inspect it. (Id.)

Mr. Souders and Mr. Ogsbury substantiated this allegation. Although both expressed confidence that the weld problems were "generally" corrected (Ogsbury Stipulation at p.3), neither had knowledge of any specific correctional actions taken. Also notable is the lack of any suggestion in Mr. Ogsbury's testimony that each faulty weld pointed out to him by Mr. Hughes resulted in a DR or NCR or was in any way reacted to by Hatfield.

Mr. Hughes testified that some of the faulty welds were field welds by Hatfield employees, but that most were on equip-

ment supplied by vendors. (Tr. at 7188) The vendor-supplied items were provided by Systems Control Corporation (SCC) (Ogsbury stipulation at p.2). SCC-fabricated equipment installed at Byron was also made of undersized steel. (Ogsbury Stipulation at p.2) The testimony during March and April on the QA/QC contention has made clear that Edison knew, at least as early as 1977, of serious and substantial defects in equipment supplied by SCC, and in spite of this knowledge, Edison waived QA inspection of SCC-manufactured equipment. Mr. Ogsbury's and Mr. Hughes' testimony thus establish that, in spite of this long history of knowledge of poor quality work by SCC, Commonwealth Edison continues to knowingly install this faulty equipment at the Byron plant. Neither Edison nor the staff offered absolutely no evidence to rebut this fact.

In Mr. Hughes opinion, the welding on the hangers at Byron is sloppy. (Tr. at 7073) He also testified of statements made to him by Mr. Ogsbury about the overall quality of the welding at Byron. Examples include:

- Tr. at 7073 ("a total mess" and he wanted to get out of it);
- Tr. at 7154 (Mr. Ogsbury was having a very difficult time and welding was generally in a bad state. He was not getting quality work done; some of the welds had been there three to four years without correction).
- Tr. at 7155-56 ("shoddy welding in the field" upon Mr.

Ogsbury's departure; he was glad to get out of the mess). The portion of Mr. Ogsbury's stipulated testimony which might be interpreted as inconsistent with some of the above statements is

understandable, since he is still employed in the nuclear industry. Mr. Hughes, in contrast, has nothing to loose by being absolutely honest in his public statements of the quality of the welding at Byron.

If in fact each welding problem was documented or otherwise disposed of, as Edison may predictably assert, the applicant has not chosen to offer any proof of correction. Mr. Teutken's affidavit relies entirely on the partial reinspection program. But even assuming hypothetically that Mr. Ogsbury routinely corrected each faulty weld brought to his attention by Mr. Hughes, the fact remains that, because Mr. Hughes only spent limited time in the field, he would have had occasion to observe only a very small fraction of the total welds at Byron. Because what he did observe was done in the ordinary course of his work, and not specifically aimed at identifying faulty welds, his observances can fairly be viewed as representative of the overall

quality of electrical work at Byron. It is thus predictable that only a tiny portion of the faulty welds at Byron were observed by Mr. Hughes. In fact, Hatfield QA manager Mr. Buchanan stated "the whole system is a mess." (Tr. at 7179)

The staff response to Mr. Hughes' welding allegations is nonsensical. When Mr. Hughes and two co-workers went to the NRC, according to the staff (Affidavit at ¶10), the others provided more specific allegations than he did. Therefore, the staff argues, what Mr. Hughes has to say is of no significance (although the affidavit is mysteriously silent as to the safety significance of the allegations given by the others). In other

words, the staff asserts that Mr. Hughes' testimony should be disregarded because someone else knows more about this serious problem than he does. The staff thus appears to abdicate its regulatory responsibilities to bolster its litigative position.

C. Welding of Brace to Pressure Pipe

Mr. Hughes testified, and Mr. Souders' stipulated testimony shows, that they observed a brace which had been welded to a pressure pipe, and Mr. Hughes explained that the heat from this process would change the grade of the metal from which the pipe is made (Tr. at 7073-74). Although Mr. Souders would testify that he recalled that the pipe was in the turbine building and Mr. Hughes, after repeatedly stating he did not recall the location of the pipe, supposed that it was "possible" (Tr. at 7147) the location of this pipe in the turbine building is highly unlikely. Both inspectors dealt exclusively with Category I matters and therefore would have no reason to be in a non-Category I building. Further, the occurrence was so remarkable to the witnesses that it is unlikely they would have made a mental note of the problem if it had not been of safety significance. In fact, Mr. Hughes reported it to Mr. Ogsbury, who also would have been concerned only with Category I items.

The staff response to this issue is indicative of the staff's attitude toward uncovering and substantiating safety problems in the context of this hearing. Instead of attempting to ascertain the location and disposition of the pipe, it purposefully misconstrues Mr. Hughes' handwritten statement to indicate that he actually saw the welding being done, and then goes

on at great length to chop down the straw man it has created.

(Staff affidavit at ¶8)

D. Corporate Attitude

Joint Intervenor's QA/QC contention states that Edison and its contractors lack the ability and willingness to maintain an effective QA program. Edison, of course, retains the ultimate responsibility for the programs of each of its contractors. The overall thrust of Mr. Hughes' testimony clearly demonstrates the attitude of Hatfield Electric Company--an attitude also attributable to Edison--with respect to its quality assurance program.

The facts testified to by Mr. Hughes amply illustrate that neither Edison nor Hatfield have adhered to their QA commitments. To the contrary, the corporate posture encourages concealment of QA problems results in certification procedures for inspectors contrary to stated policies; inhibits inspectors from reporting defects both within the company reporting system and to the NRC; and fails to take appropriate action once a defect is suspected or detected.

Although the Board ruled from the bench that it was not convinced that Hatfield's practice of reviewing a failed test by providing the answers in writing, and immediately giving the identical test with the correct answers available for reference, was unreasonable as applied to this witness (Tr. at 7211-12), it also stated that it "may not be the best procedure (Tr. at 7211-12). Because the testing practice is relevant to Edison's and Hatfield's corporate QA attitudes, which are undeniably significant to the safety of the plant, the evidence is pertinent and must be considered on the issue of Hatfield's and Edison's

corporate attitude.* /

Hatfield's (and therefore Edison's) certification and testing process emphasized the answers to tests rather than the procedures which are to be tested. In addition to describing his own testing experience, Mr. Hughes stated that he overheard discussions with other individuals concerning the tests they had failed (Tr. at 7059. In fact, the testing environment was guaranteed to allow inspectors, if they wished, to cheat on exams. Indeed, it was even encouraged in Mr. Hughes' case.

Further indicia of Hatfield's perfunctory attitude toward testing and certification is found in Mr. Coca's statement that that an inspector should not get a perfect score. (Tr. at 7169) Perfect scores would, of course, let NRC personnel know that inspectors were provided with answers to the exams.

A second aspect of Hatfield's corporate attitude is found in its attempt to inhibit inspectors from going to the NRC. For example, shortly after Mr. Hughes was hired, PTL employee Greg Casson suggested to him that a suspected NRC "informant" was known to the company and would not be around much longer. (Tr. at 7038-39)

Later, at an inspectors' meeting, Hatfield QA manager Jim Buchanan exhibited hostility when informing the inspectors of

*/Two inferences are possible from the fact that Edison did not produce the failed test and answers: either the document was destroyed contrary to Hatfield procedures (see Tr. at 7059) or, because it substantiated Mr. Hughes' claim, it was wilfully withheld from Intervenor and the Board by both Edison and the staff (see Tr. at 7058).

their right to go to the NRC. (Tr. at 7166) Indeed, an inspector who goes to the NRC, should that fact become public, has "had it if the word gets out." (Tr. at 7139)

Mr. Hughes did not feel a need to keep from co-workers at Byron the fact that he had gone to the NRC in reference to problems at Zimmer, confident that Edison would not retaliate against him at Byron for responsibly exercising his rights at Zimmer. However, that confidence proved misplaced; Hatfield offered only a transparent excuse for terminating him ("lack of productivity and poor corporate attitude," according to Interveners' Exhibit 22). Productivity is, of course, not a QA concern. (Tr. at 7086)

Hatfield's corporate posture encourages inspectors to keep confidential information about substandard work and unresolved safety problems. In the four-plus years of his involvement in nuclear power plant inspection work, Mr. Hughes never had problems finding a suitable position. At the time Mr. Hughes was laid off, PTL was hiring inspectors in areas where he had been certified, yet Mr. Hughes was not among those hired. (Tr. at 7087). By this time, of course, Hatfield, PTL, and Edison knew that Mr. Hughes was not someone who would go along with a system of falsified records, shoddy workmanship, and refusal to resolve safety issues, and that he would not hesitate to go to the NRC in an attempt to see to it that these practices came to a halt. Since being terminated at Byron, he has diligently searched for work but in each instance has been met with silence after inquiry from a particular job site. (Tr. at 7089-91). The implication is clear: given the knowledge (and the NRC's which, as one of the

recent conference calls illustrated, is not always carefully guarded) that Mr. Hughes was willing to share his knowledge of wrongdoing and shoddy work at Byron, he is now labeled as a "whistleblower". Of course, Mr. Hughes' allegations to the NRC, as well as to the public, were made only after he made repeated and unsuccessful attempts at working within the system.

Inhibiting inspectors from initiating discrepancy reports (DRs) also is illustrative of Hatfield's and Edison's corporate attitude. For example, Mr. Hughes and Mr. Souders had conclusive evidence that a tray had been welded without protective measures being taken to prevent damage to the cables. (Tr. at 7075) It took them four to five hours of arguing with Hatfield management to even allow a DR to be written, without which they would not be allowed to inspect the cables for damage. (Tr. at 7076) Fortunately, no damage was discovered, but no inspection would have been allowed in the first instance had Hatfield management had its way. In fact, Hatfield management insisted that the DR be rewritten a number of times. (Tr. at 7078)

The incident of welding without adequate cable protection was not the only evidence indicating Hatfield's desire to keep DRs to a minimum. Indeed, it was only in circumstances where it was impossible to deny that a DR was mandated that no inhibition was felt. (Tr. at 7218) Although Mr. Hughes was conscientious and firm about pushing Hatfield management when a DR was required, the same cannot be said for other inspectors. (Tr. at 7212-13).

Mr. Hughes also testified that pressure was put on him in

the performance of his duties. Although Mr. Souders' assertion that he had sufficient time to check on inspectors doing field work, (Souders stipulation at p.2), Mr. Hughes was clear that there simply was not time to verify the work of the persons supplying him information: 4 or 5 workers were doing the field inspections, and there was pressure to complete work on the system by January 1. (Tr. at 7068) Mr. Souders' stipulation is devoid of any mention of how much time he actually did spend in the field and his testimony, like Mr. Ogsbury's, must be read in light of the fact that he remains employed in the nuclear industry.

Mr. Hughes took issue with a Hatfield form (HP-91-A, attached to the staff's affidavit) which he was to sign, because it required him to certify that he himself had "completed" an inspection when, in fact, he had not done the inspection at all. (Tr. at 7064-65). Even after repeated discussions with Hatfield and PTL (purportedly an independent inspection contractor) and an admission by PTL QA supervisor Marvin Tallent that the form was misleading and a promise to correct it (Tr. at 7066), neither was the form changed, nor was there any attempt to clarify its meaning (Tr. at 7067). Although the staff purports to portray this as only a question of semantics (Staff Affidavit at ¶7), it goes to some length to justify the representation on the form. The "over-inspections" mentioned by the staff are, of course, beside the point, for Mr. Hughes was clear that they were only done in extreme circumstances, due to the press of time. The staff's unfamiliarity with the actual practices of Hatfield's QA/QC program is further underscored by its description of the

signatures on the form (see Staff Affidavit at ¶7), which is contrary to Mr. Hughes' unchallenged description (Tr. at 7183).

The staff and Edison declined to introduce evidence to rebut Mr. Hughes' testimony. Indeed, the staff is of the view that a current reinspection program is capable of handling any problems. (Tr. at 7225) Unfortunately, the staff has had regulatory authority over construction at Byron since the plant's inception, but obviously has failed to ensure that Edison and its contractors have abided by their commitments to quality assurance.

IV. The credibility of Mr. Hughes' testimony

Mr. Hughes testified that he has had over ten years of inspection work, nearly half of that being at nuclear plants. Indeed, at other plants where he has worked, he has attempted to bring to the attention of appropriate authorities safety issues which he has had occasion to observe. For example, while working at the Surry plant, upon notification to management of cracks in the welds of a boroscope hole, he was transferred to another position with less authority. (Tr. at 7030-32) At Zimmer, he went to the NRC with allegations of welding deficiencies, and since that time safety-related construction at that plant has been halted. */ Upon his resignation, Mr. Hughes' supervisor at

*/ To the extent that Edison attempted to paint Mr. Hughes as one who "tattles" to the NRC upon leaving a plant construction site, Mr. Hughes' testimony was clear that he intended to go to the NRC whether or not he resigned his position at Zimmer. (Tr. at 7156). Even if Edison's theory were true, it says nothing about the validity of Mr. Hughes' allegations. Zimmer apologized and called him an "outstanding" inspector but a

political victim. (Tr. at 7033-34, 7035) In sum, Mr. Hughes is an experienced, honest and concerned worker, committed to insuring the quality of every plant he has been associated with, who has no motive other than to assure the safety of the Byron plant.

Edison insinuated (see Tr. at 7098-101) that Mr. Hughes willfully submitted a falsified resume on two occasions. However, the testimony is clear that he honestly answered any employer's questions and would have volunteered the information had it been pertinent (which it was not) to any job for which the resumes were submitted. (Tr. at 7704) The additions to Mr. Hughes' resumes were neither initiated nor acquiesced in by him; they were added by well-meaning secretaries, and he simply had no time to correct them. In fact, as to Applicant Exhibit 26 ("Zimmer resume") there was no testimony that that resume had ever been used to obtain a job. (See Tr. at 7197) Further, as to the resume used at Byron, Mr. Tallent knew Mr. Hughes' background (see Tr. at 7037-38) and hired him on the basis of his prior work experience under Mr. Tallent. In short, PTL hired Mr. Hughes either knowing his resume was inaccurate in some respect (with apparent indifference to those inaccuracies), or with complete abrogation of any responsibility for pre-employment screening.

V. Positions of Edison and the Staff

Edison's affidavit of Mr. Tuetken, submitted in response to Intervenor's motion, can be easily summarized. After complaining that Mr. Hughes' allegations were too non-specific for a res-

ponse, Mr. Teutken asserts that, to the extent problems may exist, they will be identified and resolved appropriately. (Teutken Affidavit at ¶1,2). This philosophy is apparently what put Edison in the present position of being required to engage in an extensive reinspection program^{*/} due to its inability or unwillingness to monitor and control the Hatfield QA program (as well as those of its other contractors) initially.

The general thrust of the staff's affidavit is that: Mr. Hughes' past allegations to the NRC were not sufficiently specific; even though those allegations have not been acted upon, the fact that the staff is already aware of them somehow makes them inconsequential to plant safety; and, in any event, Edison is already engaged in a reinspection program. (Staff Response to Joint Intervenor's Motion at pp.4-5) Therefore, it argues, nothing Mr. Hughes has to say has any safety significance.

With respect to Mr. Hughes' November 1982 allegations to the NRC, the staff merely asserts that they are being "processed". (Staff Affidavit at p.2) It does not say how, nor does it

^{*/} Unfortunately, the reinspection program only appears to cover one-fifth of the inspectors, and then only for the first few months of that inspector's work. It appears from the affidavit, however, that because of the faults uncovered in this minimal program, it will need to be expanded. It is notable that there appears to be no contemplation of complete reinspection. How all problems can be "identified" in a sampling process such as this is difficult to imagine.

account for the fact that six months have elapsed without resolution. With respect to Mr. Hughes' experience when being tested prior to certification, the staff admits that it has been referred to another division because of "wrongdoing" (Staff Affidavit at p.3) but takes the incredible position that wrongdoing has no significance to plant safety.

The staff affidavit must also be read with consideration that, although the staff investigation is the very basis for its findings of lack of safety significance, the affidavit is devoid of information about exactly what the staff has done in its investigation. Further, little basis is given for the assertions in the affidavit; e.g., the assertion that the welding of cable trays without protective measures for the cables happened only one time during Mr. Hughes' employment (although it had happened several times prior) is obviously based on hearsay (See Affidavit at ¶9) but no indication is given as to who made those statements.

The staff does not appear to have investigated with the goal of uncovering and resolving extant problems, but rather with the goal of downplaying the significance of serious construction problems at Byron.

In sum, both the staff and Edison have taken the position that nothing Mr. Hughes has to say has any safety significance whatsoever, either because they do not know precisely what weld, or what hanger, or what cable tray he saw; or because surely someone else will find the problem and resolve it.

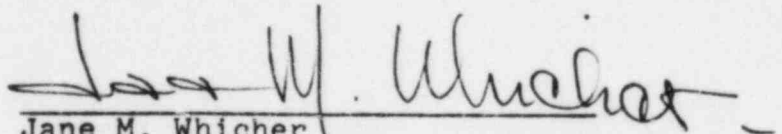
The Board should remember that Intervenors have no access to staff or Edison documents or witnesses; no opportunity to cross-

examine Mr. Teutken, Mr. Hayes and Mr. Connaughton on their affidavits; and no way to develop evidence short of anything volunteered by Edison or the staff.

VI. Conclusion

On the basis of the evidence presented in Mr. Hughes' testimony in the Board-supervised deposition, the Board should rule that Intervenors have raised serious and significant safety issues concerning the quality of work at the Byron plant. Accordingly, Mr. Hughes' testimony should be considered by the Board in ruling on Joint Contention 1A.

Respectfully submitted,

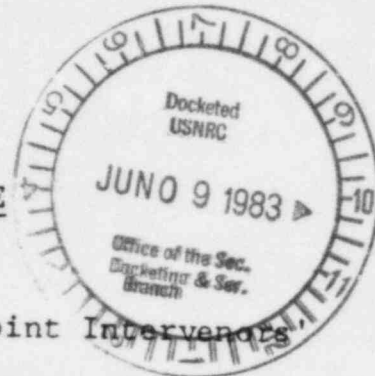
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CERTIFICATE OF SERVICE



I certify that I served copies of Joint ~~Intervenor's~~
Brief in Support of Motion to Admit Testimony of John Hughes
on each person on the attached service list as indicated on
the attached Service List, on June 7, 1983.

Jane M. Whicher

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