

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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GENERAL PUBLIC UTILITIES CORPORATION,
JERSEY CENTRAL POWER & LIGHT COMPANY,
METROPOLITAN EDISON COMPANY and
PENNSYLVANIA ELECTRIC COMPANY,

Plaintiffs,

80 CIV. 1683

(R.O.)

-against-

THE BABCOCK & WILCOX COMPANY and
J. RAY McDERMOTT & CO., INC.,

Defendants.

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Continued deposition of GENERAL PUBLIC
UTILITIES CORPORATION, by FREDERICK J. SCHEIMANN,
taken by Defendants, pursuant to adjournment, at
the offices of Davis Polk & Wardwell, Esqs., One
Chase Manhattan Plaza, New York, New York,
on Friday, April 2, 1982, at 9:45 a.m., before Nancy
A. Rudolph, a Shorthand Reporter and Notary Public
of the State of New York.

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ALSO PRESENT:

JONATHAN QUINN

DEBORAH JACOBS

ooo

F R E D E R I C K J . S C H E I M A N N ,

resumed, having been previously sworn by a Notary Public, and was examined and testified further as follows:

EXAMINATION (CONTINUED)

BY MR. WURTZ:

Q Mr. Scheimann, at the close of the session yesterday, we were on the subject of the PORV on the day of the accident. You testified that you understood as of the day of the accident that in a situation where you had low primary system pressure, a stuck open PORV was a possible cause, is that correct?

A Yes, sir, that could be one of the possible causes.

Q You understood on the morning of the accident and you knew that the primary system pressure was, in fact, low, is that correct?

A Yes, sir.

Q In view of those two facts, did you consider closing the block valve on the morning of the accident?

A No, sir.

Q Did you consider it during the first 30 minutes of the accident?

A Sir, I do not recall a time frame, but I

2 do not recall considering it until I had been requested
3 to do so.

4 Q You don't recall considering it during the
5 first hour of the accident, then?

6 A Sir, I do not recall a time frame.

7 Q Did you consider closing the block valve at
8 any time before Mr. Mehler arrived?

9 A No, sir. As best I recall, I do not recall
10 considering closing the block valve prior to Mr. Mehler's
11 appearance.

12 Q In view of the fact that you understood it was
13 a possible cause for the low pressure you were
14 experiencing, is there a reason why you did not consider
15 closing the block valve?

16 A Yes, sir, I had various conditions that could
17 also result in pressure remaining low.

18 Q In other words, you thought it might be
19 caused by other things also?

20 A Yes, sir, I recall believing that it could
21 have been caused by other things at that time.

22 Q But you did not know what was causing it, is
23 that correct? By "it," I mean the low pressure in the
24 primary system.

25 A Are you referring to the fact that I didn't

1

2 know the exact cause of the reason why it was low, sir?

3

Q That's right. You were not able to exclude
4 a stuck open PORV as the cause, were you?

5

A Sir, I don't have a recollection of
6 considering the PORV at that particular time.

7

Q Mr. Scheimann, before the accident, is it
8 correct that you knew that a stuck open PORV was a
9 possible cause of an increased PORV discharge pipe
10 temperature?

11

A Yes, sir, I knew it was a possible cause.
12 However, there were several other things that could give
13 you the same indication.

14

Q But a stuck open PORV was a possible cause,
15 is that correct?

16

A It was a possible cause, yes.

17

Q Did you know on the morning of the accident
18 that the PORV discharge pipe temperature was high, and
19 that the PORV discharge temperature alarm had gone off?

20

A I don't have a recollection of the alarm
21 going off, sir.

22

Q Did you know on the morning of the accident
23 that the PORV discharge pipe temperature was high?

24

A Yes, sir, I do recall being aware that the
25 PORV discharge temperature was high. However, we also

1
2 had the two code discharge temperatures that were high
3 at the same time.

4 Q Since you knew that a stuck open PORV was a
5 possible cause of a high PORV discharge temperature and
6 since you knew on the morning of the accident that you
7 had a high PORV discharge temperature, did you consider
8 closing the block valve?

9 A No, sir, I did not.

10 Q Did you consider closing the block valve at
11 any point in the accident before Mr. Mehler arrived in
12 the control room at approximate 6:15?

13 A Sir, I am not sure of what the time frame
14 was, but I had not considered it until Mr. Mehler had
15 mentioned it.

16 Q Since you understood that a stuck open PORV
17 was a possible cause of the high PORV discharge
18 temperature you were experiencing, is there a reason why
19 you did not consider using the block valve?

20 A At which time frame are you referring to
21 here, sir? Are you talking prior to or after or during?

22 Q I am talking about during the first two
23 hours, before the time when Mr. Mehler arrived, and I
24 am talking about the first 15 minutes, the first
25 minutes, the first hour, the first hour and a half, the

1

2 first two hours, at any point during that period.

3

A And the question was?

4

Q The question was since you understood that a stuck open PORV was a possible cause of a high PORV discharge temperature and since you were experiencing a high PORV discharge temperature, is there a reason why you did not consider closing the block valve?

9

A There were several things that would not necessarily have required me to take and close the block valve or that would not lead me to take and close the block valve.

13

Q Are you saying you excluded a stuck open PORV as a possible cause of the PORV discharge pipe temperature?

16

A Sir, I don't recall really thinking that a stuck open PORV at that particular time was the possible cause of my situation.

19

Q During the first two hours the possibility of a stuck open PORV did not cross your mind?

21

A Again, sir, I don't have a recollection of time frames, but until Mr. Mehler came in, I don't recall a stuck open PORV coming to my mind.

24

Q Mr. Scheimann, before the accident, is it correct that you understood that an increase in drain

25

1
2 tank pressure or temperature could be caused by a stuck
3 open PORV? In other words, that a stuck open PORV was a
4 possible cause of those drain tank conditions.

5 A Yes, sir, that among other things could
6 result in that same temperature increase.

7 Q But you understood that a stuck open PORV
8 was a possible cause of those conditions?

9 A Yes, sir, it would be a possible cause.

10 Q Did you know on the morning of the accident
11 that the drain tank temperature was high?

12 A I don't have a recollection of that knowledge,
13 sir.

14 Q Did you know that the drain tank temperature
15 alarm went off at approximately two minutes into the
16 accident?

17 A No, sir, I don't recall having known that.

18 Q Did you know on the morning of the accident
19 that at approximately four minutes into the accident a
20 second drain tank temperature alarm went off?

21 A No, sir, I don't recall having known that.

22 Q Did you know that for the first 15 minutes
23 of the accident the drain tank pressure was increasing?

24 A Sir, I don't have a recollection of knowing
25 at what particular point in time the temperature of the

2 drain tank was increasing or that the drain tank pressure
3 was increasing.

4 Q Did you know on the morning of the accident
5 that the rupture disk on the drain tank burst at
6 approximately 15 minutes into the accident?

7 A I don't recollect having a feeling of the
8 time, but I had heard sometime during the day that it
9 was suspected that the rupture disk had burst.

10 Q Did you become aware in the first hour of
11 the accident that it was suspected that the rupture
12 disk had burst?

13 A Sir, I don't have a recollection of when I
14 became aware of that.

15 Q Did you know that the drain tank temperature
16 stayed high during the first two hours of the accident?

17 A I don't have a recollection of the time or
18 the fact that the temperature stayed high.

19 Q Did you at any point go to Panel 8-A and look
20 at the meters or alarms for the drain tank?

21 A No, sir, I don't recall going to Panel 8-A.

22 Q Did you instruct either Mr. Frederick or Mr.
23 Faust to go back there to look at the panel and see what
24 the drain tank conditions were?

25 A I don't recall whether I did or did not, sir.

1
2 Q Do you know that, in fact, Mr. Frederick
3 did go back there and look at Panel 8-A?

4 A Sir, I don't have a recollection of the fact
5 that he did go back.

6 Q Were you ever told by Mr. Zewe, Mr. Frederick
7 or Mr. Faust that the drain tank temperature stayed high
8 and, at some point, the drain tank pressure and level
9 went to zero?

10 MR. MacDONALD: Are you talking about on the
11 day of the accident?

12 MR. WURTZ: Yes, I am talking about the first
13 two hours of the accident before Mr. Mehler got
14 there.

15 MR. MacDONALD: O.K., that is where your
16 question is geared towards. O.K.

17 A I don't have a recollection of having heard
18 that, sir.

19 Q Now, on the morning of the accident, you
20 understood that, as you testified, high drain tank
21 temperature or pressure was a symptom of a stuck open
22 PORV, is that correct?

23 A Yes, sir, that would be one of the symptoms.

24 Q In fact, it was so identified in the Unit 2
25 pressurizer system failure procedure?

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A Yes, sir.

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Q You knew you had low primary system pressure and you knew that you had high PORV discharge temperature and that a stuck open PORV was a possible explanation for either one of those symptoms. So my question is: Did this cause you to make any inquiries regarding the conditions in the drain tank during the time period before Mr. Mehler arrived?

A Sir, in answer to your question, first, I was aware of a low pressure. I believe I testified that I don't recall when I became aware of the high tail pipe temperature in excess of the limit; you know, the alarm point. I did not take and send somebody to take a look at Panel 8-A.

Q Did you ask anybody about the drain tank conditions during the time period before Mr. Mehler arrived?

A I don't have a specific recollection of it, sir.

Q Before the time Mr. Mehler arrived, did you have any information at all, you personally, about the conditions in the drain tank?

A I don't have a recollection, sir.

Q You don't recall having any information about

1

2 the drain tank before the time Mr. Mehler arrived?

3 A I don't recall whether I did or I didn't, sir.

4 Q Before the accident, did you understand that
5 if the drain tank rupture disk burst, the drain tank
6 pressure would drop to ambient levels?

7 A I don't have a recollection of that, sir.

8 Q You mean you don't recall specifically
9 considering that?

10 A I don't have a recollection of it.

11 Q Now, I am not asking you whether you
12 specifically considered that question. What I am asking
13 is whether you understood that principle before the
14 accident?

15 A I don't have a recollection whether I did or
16 I didn't.

17 Q Well, what I am asking is: Does it sound
18 like a surprising result to you, a rupture disk burst,
19 that pressure would drop to ambient levels?

20 MR. MacDONALD: Just a second now. If you
21 are asking for his present impression, we are
22 not going to deal with that. If you are asking for
23 his recollection prior to the accident, fine. I
24 don't mind you asking if he has got a recollection
25 of it or whether he understood it or was aware of

1
2 it. It sounded like your question may be geared
3 towards what he may be thinking today.

4 MR. WURTZ: I am trying to make clear what
5 my question is. It is not do you recall a specific
6 time when you considered this specific question.
7 My question is, rather, did you understand the
8 principle that when you have a tank and you increase
9 the pressure in it and then you pop a hole in it,
10 that the pressure in that tank will go to ambient
11 levels.

12 Do you know what I mean by the word "ambient"?
13 I mean it will go to the level of the surrounding
14 reactor building.

15 A Yes, I know what you are referring to
16 there, but I don't have a recollection as to whether or
17 not I did have that understanding at that particular
18 time.

19 Q Did you understand before the accident that
20 in a situation where the drain tank temperature went high
21 and stayed high that that was an indication of a
22 continuing venting to the drain tank?

23 A Sir, I don't have a recollection of that
24 particular understanding.

25 Q You don't know whether you understood that

2 fact or that principle before the accident?

3 A I don't have a recollection of whether I
4 did or I did not.

5 Q You understood that there was a cooling
6 system for the drain tank, is that correct?

7 A Yes, sir, I understood there was a cooling
8 system.

9 Q And that cooling system worked by what means,
10 could you describe that?

11 A I don't at present have a recollection of
12 how it did work.

13 Q Was the water in the drain tank circulated
14 out through a heat exchanger?

15 A Sir, I don't have a recollection of how it
16 worked.

17 Q Did you know that the purpose of it was to
18 keep the drain tank temperature low?

19 MR. MacDONALD: The purpose of what now?

20 MR. WURTZ: The drain tank cooling system.

21 A Sir, I don't have a recollection of the
22 purpose of the cooling system.

23 Q Did you understand that the effect of the
24 drain tank cooling system was to lower the temperature of
25 the drain tank water in a circumstance where that water

2 temperature got increased?

3 A Sir, I don't recall at present whether I
4 knew that was what the effect was or not.

5 Q Well, what did you understand a drain tank
6 cooling system was to do?

7 A Sir, I don't have a recollection at present.

8 Q Did you read the FSAR section concerning the
9 drain tank in the course of your training and in the
10 course of preparing for your CRO and SRO examinations?

11 A Sir, at various times I have read parts of
12 the FSAR. I can't recall if I had read that particular
13 section or not.

14 Q But it is your testimony today that you don't
15 recall whether you understood before the accident that
16 the purpose and the effect of the drain tank cooling
17 system was to cool the drain tank water?

18 THE WITNESS: Could I have that one more
19 time; please?

20 (Question read)

21 A Yes, sir, that's what I said. I don't recall
22 whether I had that understanding or not.

23 Q Mr. Scheimann, I would like you to look at
24 page 2 of Exhibit 305, which is the pressurizer system
25 failure procedure for Unit 2.

1
2 Do you see that this procedure on page 2
3 lists two symptoms of a stuck open PORV? One is in
4 paragraph 3 and one is in paragraph 4. The one in
5 paragraph 3 is a PORV discharge line temperature above
6 the 200-degree alarm point, and the one in paragraph 4
7 is drain tank temperature and pressure above normal.

8 MR. MacDONALD: The question is: Does he
9 see those two paragraphs?

10 Q Yes, do you see that procedure provides two
11 symptoms for diagnosing a stuck open PORV?

12 MR. MacDONALD: Are you asking for his
13 recollection now?

14 Q Yes, was that your understanding? Let me
15 ask it again.

16 Do you understand here on page 2 that this
17 pressurizer system failure procedure gives the operator
18 two symptoms for diagnosing a stuck open PORV?

19 A No, sir, actually I see three symptoms
20 there for a possible stuck open PORV.

21 MR. MacDONALD: He didn't ask you what you
22 see, Mr. Scheimann; he asked you for your
23 understanding prior to the accident.

24 Q Well, what is the third symptom you see?

25 A Sir, the third one I see is that RC system

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2

pressure is below 2205 and RC-R2 fails to close.

3

Q Now, on the morning of the accident, you

4

knew that the reactor coolant system pressure was below

5

2205, is that correct?

6

A Yes, sir.

7

Q You knew that the PORV discharge line

8

temperature was above 200 degrees Fahrenheit?

9

A Yes, sir, at some time.

10

Q Well, did you know that PORV discharge pipe

11

temperature alarm occurred at one minute into the

12

accident?

13

A I don't have a recollection of the alarm

14

itself coming in, no, sir.

15

Q You never looked back at the vertical panel

16

on the computer to see the alarm, to see that the alarm

17

was in? At any time before Mr. Mehler arrived, let's

18

leave it at a broad time period. The record shows that

19

he arrived at approximately 6:15.

20

A No, sir, I did not.

21

Q But you did know the temperature was above

22

200?

23

A At some point in the morning, I had heard

24

that.

25

Q How did you learn it?

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A I have a recollection of somebody saying something about the temperature being above 200.

3

4

Q Who?

5

A I don't have a recollection of who it was, sir.

6

7

Q Was it said to you?

8

A I don't have a recollection of whether it was directed to me.

9

10

Q What do you recall was said?

11

A As best I can recall, I can recall hearing that the temperature was up above 200. I don't recall a specific number.

12

13

Q What did you do when you heard that?

14

A Are you referring to based on hearing that?

15

Q Yes.

16

A I don't have a recollection of doing anything based on hearing that particular piece of information.

17

18

Q Did you ask for more information?

19

A I don't have a recollection of doing so.

20

Q Did you hear this in the first five minutes into the accident?

21

22

A Sir, I don't have a recollection of when I heard it.

23

24

Q Did you hear it before the time you turned

25

2 off the first two reactor coolant pumps?

3 A Sir, I don't have a recollection of when
4 in the day I heard that particular piece of information.

5 Q Do you know that you heard it before the
6 time that Mr. Mehler arrived?

7 A Sir, I don't have a recollection of when I
8 heard it.

9 Q Were you aware that the PORV discharge line
10 temperature was requested by one of the operators on
11 the utility printer?

12 A I don't have a recollection of having known
13 that.

14 Q How many times did you hear that the PORV
15 discharge line temperature was over 200 degrees?

16 A I don't have a recollection of how many
17 times I might have heard it.

18 Q Was it more than one time?

19 A I don't have a recollection, sir. I would
20 like to take about a couple of minutes break.

21 (Recess taken)

22 BY MR. WURTZ:

23 Q Mr. Scheimann, before the break, you
24 testified that you did not recall how many times you
25 heard that the PORV discharge pipe temperature was over

1

2 200 degrees.

3

4

Did you hear during the accident that, in fact, it was 285 degrees?

5

6

A Sir, I don't recall that I heard a specific temperature.

7

8

9

Q Did you know that on the morning of the accident you had a number of means available for trending the PORV discharge pipe temperature?

10

11

12

13

A Yes, sir.

Q Did you know that you could use the digital

readout on the computer to have the PORV temperature displayed at all times?

14

15

16

17

A Yes, sir.

Q Did you know that you could trend a PORV discharge pipe temperature on the CRT screen on the computer?

18

19

A Yes, sir. It would have to be put into a group, but it could be done.

20

21

Q Did you know that you could also trend it as a signal point on the CRT screen?

22

23

A Yes, sir, if it was assigned to a group and no other points were put on that group.

24

25

Q Did you understand that you could trend the PORV outlet temperature on any one of the four analog

1
2 trend recorders or strip charts that you had available
3 on the computer?

4 A Yes, sir.

5 Q You understand that you could trend the PORV
6 outlet temperature on the utility printer?

7 A Yes, sir.

8 Q When you learned that the PORV discharge
9 pipe temperature was over 200 degrees, did you consider
10 putting the PORV temperature on any one of these
11 trending devices available to you?

12 A No, sir, I don't recall having considered
13 that.

14 Q Though you knew the discharge pipe temperature
15 over 200 degrees was a symptom of a possible stuck open
16 PORV, you did not consider using any of these trending
17 devices to get more information on the discharge pipe
18 temperature?

19 A No, sir.

20 Q You did not ask any more questions of the
21 person who gave you this information about the PORV
22 discharge temperature?

23 A No, sir, I don't recall having done so.

24 Q Now, looking again at page 6 of the
25 pressurizer system failure procedure, did you understand

2 before the accident that in a situation where you had
3 primary pressure below 2205, where you had a discharge
4 line temperature above 200 degrees and where you had
5 drain tank pressure and temperature above normal, that
6 this procedure required that you close the block valve?

7 A No, sir, I was not under that understanding.

8 Q What did you understand this procedure told
9 you to do in the event you had those symptoms which
10 included all of the symptoms listed on the procedure as
11 stuck open PORV symptoms?

12 A My understanding was that if I had those
13 symptoms and I could verify that they were not being
14 caused by some other problem and I could verify that it
15 was a stuck open pilot operated relief valve, then I
16 would perform my manual actions.

17 Q You mean then you would close the block
18 valve?

19 A Yes, sir.

20 MR. WURTZ: Would you read the answer before
21 this one back, please?

22 (Answer read)

23 Q So the way you understood this procedure
24 before the accident, even in a case where you had all
25 of the symptoms identified in the procedure as being

1
2 indications of a stuck open PORV, you would still not
3 at that point close the block valve, is that correct?

4 A No, sir, I would not close the block valve
5 at that point if I did have a reason to believe those
6 symptoms came from some other cause.

7 Q So before closing the block valve, you would
8 go and check every other possibility, is that correct?

9 A No, sir, I would not necessarily have
10 checked every possibility. If I would have found the
11 cause before I got through all the possibilities, then
12 I wouldn't have proceeded any further.

13 Q But instead of closing the block valve, you
14 would go and check first to see if there was some other
15 cause other than a stuck open PORV, is that correct?

16 A Yes, sir, I would have.

17 Q As you understood this procedure only in a
18 case where you could not prove that it was something
19 else, would you decide it was the PORV and close the
20 block valve, is that right?

21 THE WITNESS: Could you say that again for
22 me, sir?

23 Q Yes, I am trying to get clear what you
24 understood this procedure required you to do as an
25 operator, and, as I understand it, you have testified

2 that even in a situation where all of the symptoms in
3 a procedure for a stuck open PORV were present, you
4 would not at that point automatically close the block
5 valve, is that correct?

6 A Yes, sir, there are several causes that I
7 could attribute to several of the symptoms.

8 Q So before closing the block valve, you
9 would go and check the other possible causes of the
10 symptoms, is that correct?

11 A Yes, sir.

12 Q At what point would you close the block
13 valve?

14 A At the point I was convinced that it wasn't
15 due to some other problem.

16 Q Did you understand that a stuck open PORV
17 was a form of loss of coolant or involved a loss of
18 coolant?

19 A Yes, sir.

20 Q Did you understand before the accident that
21 a loss of coolant accident was the most serious
22 accident you could have in a nuclear reactor?

23 A Sir, I don't recall whether I had an
24 understanding of that or not.

25 Q Did you understand that if a loss of

1
2 coolant was not treated that the loss of coolant could
3 eventually lead to core damage?

4 MR. MacDONALD: Are you asking him for any
5 loss of coolant accident?

6 MR. WURTZ: Yes.

7 A No, sir, I don't recall having that
8 understanding.

9 Q What did you understand the consequences of
10 an untreated loss of coolant to be?

11 A Sir, it would depend on the severity of the
12 accident as to whether it would be a possibility of
13 core damage. In the event where the makeup system could
14 handle the leak, you would not even see symptoms
15 necessarily.

16 Q In a situation where the leak was big
17 enough so the makeup system could not handle it and
18 where no water was being added through HPI, did you
19 understand that the loss of coolant would eventually
20 lead to core damage, core uncovering and core overheating?

21 A I understood that that was theoretically
22 possible.

23 Q Did you understand that in the situation
24 where you were investigating to see if some other
25 cause was producing the symptoms identified in the

1
2 pressurizer system failure procedure that there could
3 be a loss of coolant going on out through the PORV?

4 A No, sir, I do not recall having that
5 understanding because the normal cycle of the valve
6 would reflect the same symptoms.

7 Q Would they stay there?

8 A Some of them would stay there for a period
9 of time.

10 Q Well, we will get to that question, but
11 what I want to focus on now is a situation where you
12 know a stuck open PORV was a possible cause of the
13 symptoms.

14 During the time you were investigating
15 other possible causes, did you understand that there
16 could be a loss of coolant through the stuck open PORV?

17 THE WITNESS: Could I have that again,
18 please?

19 (Question read)

20 A No, sir, I did not have that understanding
21 because if I had other indications that would possibly
22 tell me it was another cause, I would not at that
23 particular time think that I had a stuck open PORV until
24 I could verify it by it not being one of the other
25 situations.

1
2 Q Well, I understand that and the situation
3 I am describing to you is a situation where you
4 understand that a stuck open PORV is a possibility, and
5 the reason you think it is a possibility is that all of
6 the symptoms identified in the pressurizer system
7 failure procedure are present, and what I am asking is:
8 Did you understand that during the time when you were
9 investigating all the other possible causes that since
10 a stuck open PORV was a possibility, you could be losing
11 coolant during the time that you were conducting this
12 investigation?

13 MR. MacDONALD: Are you talking about prior
14 to the accident now, right?

15 MR. WURTZ: Yes.

16 A No, sir, I would not have had that
17 understanding based on the day of the accident. I did
18 not consider the PORV until a later point in time.

19 Q You mean when Mr. Mehler came in?

20 A Yes, sir, as best I recall.

21 Q Well, I am not now talking about the day of
22 the accident; I am talking about your understanding
23 before the accident of how you were to apply this
24 procedure, pressurizer system failure procedure.

25 Now, in a situation where you know that a

2 stuck open PORV is a possibility and you know that
3 certain other causes are a possibility, your testimony
4 is that you would not automatically close the block
5 valve. Instead, you would investigate the other
6 possible causes until you could convince yourself that
7 the symptoms were not due to one of these other causes.
8 And my question is: Did you understand that during the
9 time you were doing this investigation, there was a
10 risk of a loss of coolant going on during that time,
11 possibly through the stuck open PORV?

12 A No, sir, I do not recall having that
13 understanding.

14 Q Well, you knew that in a situation where
15 the symptoms in the pressurizer failure system procedure
16 were present that a stuck open PORV was a possibility,
17 is that correct?

18 A Yes, sir.

19 Q You knew that a stuck open PORV was the
20 LOCA?

21 A Yes, sir.

22 Q You knew that until you closed the block
23 valve that LOCA would continue?

24 A Yes, sir.

25 Q Well, doesn't it follow then, as a matter

2 of logic, that you knew that during the time you were
3 investigating the other causes, you knew that there was
4 a possible LOCA going on through the stuck open PORV?

5 MR. MacDONALD: I object to the form as a
6 matter of logic. He is not here to testify what
7 is logical or what makes it appear logical to
8 him today, but what his recollection is; and if
9 you are asking him based on those three things,
10 does he recall prior to the accident, and then
11 your question, fine. I don't want to get caught
12 up on what he may think today as logical as
13 opposed to what he recalled about these particular
14 circumstances prior to the accident.

15 MR. WURTZ: Well, I am assuming that his
16 understanding before the accident has some
17 relationship to logic, and I think it is a correct
18 question. I will take that word out of there if
19 that will help things.

20 Could you read back the question?

21 (Question read)

22 BY MR. WURTZ:

23 Q I am going to modify the question.

24 Isn't it a fact that you understood during
25 the time you were investigating the other possible

causes, that it was possible that there was a LOCA going on through the possible stuck open PORV?

A Yes, sir, it would be possible. However, the time involved was taking and making the determination that it might be due to another cause. It would not necessarily be an extended period of time. You might know right away, looking at the panel, yes, I have got this situation existing.

Q Did you understand that you had a time limit on how much time you were to spend investigating before you closed the block valve?

A No, sir, I don't recall a time limit based on how long I could investigate before I had to close the block.

Q Did you have a limit that you understood? I see there is not one written in the procedure.

Did you have one that you used as a guideline?

A Are you referring to a time limit again?

Q Yes, for investigating before you closed the block valve, in a case where symptoms of a stuck open PORV are present.

A I don't have a recollection of a particular time limit.

Q Did you understand that in some circumstances

1
2 it could take you a longer period of time to verify that
3 it was not some other cause?

4 THE WITNESS: Could I have that again?

5 (Question read)

6 A Sir, when you are referring to "a longer
7 period of time," just what in particular are you
8 referring that to?

9 Q Well, how long did you understand it would
10 take to investigate the other possible causes of the
11 symptoms? You testified earlier that it wouldn't take
12 that long.

13 A I don't have a recollection of the specific
14 timing it would take to find those other causes.

15 Q Well, I am trying to get some idea of what
16 period of time you were referring to there.

17 MR. MacDONALD: Are you asking him by his
18 answer whether there was one set period of time
19 that he was referring to in his answer?

20 MR. WURTZ: Well, I don't expect it was a
21 set period of time to the second; I expect some
22 time range, and I would like to know what time
23 range you had in mind when you earlier stated that
24 it wouldn't take that long to investigate the
25 other possible causes.

2 A Sir, I don't recall that there would be a
3 set time range.

4 Q Well, what time period did you have in
5 mind when you gave your earlier answer?

6 A Sir, I didn't have a specific time frame in
7 mind.

8 Q We don't seem to be communicating here.
9 When you use the word "specific, I don't
10 know what meaning you attach to that. I am trying to
11 get some feel for what time period you had in mind.

12 Can you tell me that? Are you talking a
13 few minutes, a few hours, a few days?

14 A Sir, I can't recall whether it would be in
15 terms of any of those that you mentioned to me.

16 Q Well, when you answered earlier that it
17 wouldn't take that long to investigate it, I assumed
18 you were not talking about hours or days. Was I
19 incorrect, you could have been referring to a period of
20 time that long?

21 A Sir, I don't have a recollection of what
22 the time frame would have been. We might have seen it
23 as we were seeing the symptoms come in. It might have
24 been at some period of time after that.

25 Q How long did you understand it would take

1
2 to investigate the other possible causes of the symptoms?

3 A Sir, I don't recall what I understood at
4 that particular time for the length of time it would
5 take to explore the other possible causes.

6 Q Did you understand that it could take more
7 than five minutes?

8 A Sir, I don't recall whether it would have
9 taken more than five minutes or a specific time.

10 Q Well, isn't it correct that you might have
11 been able to investigate the other causes immediately
12 within the first minute on one hand; but, on the other
13 hand, it might have taken 30 minutes or an hour?

14 MR. MacDONALD: Are you asking him now for
15 his recollection, not to speculate?

16 Q Yes, what was your understanding? Didn't
17 you understand that it could take anywhere from 30
18 seconds to an hour or more to investigate the other
19 possible cause of symptoms in the case where a stuck
20 open PORV was one possible cause?

21 A Sir, I do not recall understanding that
22 there was a time frame such as five seconds to 30
23 minutes in which it would take us to find the other
24 symptoms.

25 Q Based on the fact that you had a senior

2 reactor operator's license and you have been in training
3 and operating units 1 and 2 at Three Mile Island for six
4 years as of the day of the accident, and you had no
5 understanding that it could take anywhere from 30
6 seconds to an hour to several hours to investigate the
7 other possible causes?

8 THE WITNESS: Could I have that again?

9 (Question read)

10 MR. MacDONALD: I object to the form of the
11 question.

12 A Sir, I don't believe I understand what you
13 are asking me there.

14 Q Well, all I am asking is whether you
15 understood before the accident that investigating the
16 other possible causes of the symptoms could take little
17 or no time on one hand or could take a lot of time on
18 the other hand, and I had suggested a little time as
19 being a minute or two and a lot of time as being maybe
20 longer than an hour.

21 A Sir, I don't have a recollection of what
22 my understanding had been about the time frame involved.

23 Q Before the accident, did you understand that
24 in a case where your investigation of the other possible
25 causes took longer than five minutes, you should

1
2 automatically close the block valve?

3 A Sir, I do not recall having an understanding
4 that dealt with the length of time, a specific length of
5 time such as five minutes, to take and determine whether
6 I had to close the block or not.

7 Q Did you understand that if your investigation
8 of other causes took longer than 15 minutes, you should
9 close the block valve?

10 A Sir, I do not recall having an understanding
11 that if the investigation required more than 15 minutes,
12 I would be required to close the block valve.

13 Q Did you understand that if the investigation
14 took longer than an hour, you were required to close the
15 block valve?

16 A Sir, I do not have a recollection of having
17 an understanding that if my investigation were to take
18 an hour or any specific time, I was told to close the
19 block valve.

20 Q You had no such understanding even though
21 you knew that there was a possible LOCA going on for
22 that hour and continuing?

23 A Sir, I do not recollect having that
24 understanding.

25 Q Did you understand you were required to

close the block valve when you knew a stuck open PORV was a possible cause of the symptoms and when you did not know what the cause, in fact, was of those symptoms?

THE WITNESS: Let me have that again.

(Question read)

A Sir, I don't recollect having had or not had that particular understanding.

MR. MacDONALD: Off the record.

(Discussion off the record.)

(Luncheon recess: 12:00 p.m.)

(Time noted: 1:45 p.m.)

FREDERICK J. SCHEIMANN

Subscribed and sworn to
before me this day
of , 1982.

CERTIFICATE

STATE OF NEW YORK)
 : ss.:
COUNTY OF NEW YORK)

I, NANCY A. RUDOLPH, a Notary
Public of the State of New York, do hereby
certify that the continued deposition of
FREDERICK J. SCHEIMANN was taken before
me on Friday, April 2, 1982 consisting
of pages 520 through 555;

I further certify that the witness had
been previously sworn and that the within
transcript is a true record of said testimony;

That I am not connected by blood or
marriage with any of the said parties nor
interested directly or indirectly in the matter
in controversy, nor am I in the employ of any
of the counsel.

IN WITNESS WHEREOF, I have hereunto set my
hand this 9th day of April, 1982.

Nancy A. Rudolph
NANCY A. RUDOLPH