

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:)	Docket Nos.
)	
DUKE POWER COMPANY, et al)	50-413
(Catawba Nuclear Station)	50-414
Units 1 & 2))	

COPY

I, Barbara V. Haas, Commissioner and Notary Public,
proceeded to take the deposition of A. E. Allum on the
twenty-ninth day of June, 1983, beginning at 1:15 o'clock
p.m. in the offices of Duke Power Company, South Church
Street, Charlotte, North Carolina.

DEPOSITION OF
A. E. ALLUM

* * * * *

Associated
Court Reporters

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P.O. Box 220187
Charlotte NC. 28222
704-364-3178

1 A. E. ALLUM, being first duly sworn, testified as follows:
2 EXAMINATION: (By Mr. Guild)
3 Q. Mr. Allum, would you state your full name and business
4 address for the record, please?
5 A. Arthur Allum, Duke Power, Post Office Box 223, Clover,
6 South Carolina.
7 Q. That is at Catawba Nuclear Station?
8 A. Yes, sir.
9 Q. What position do you hold with Duke Power, sir?
10 A. Technical Supervisor.
11 Q. Is that your formal title?
12 A. Yes, sir.
13 Q. Do you work in the Quality Assurance Department?
14 A. Yes, sir.
15 Q. Would your formal title be Quality Assurance Technical
16 Supervisor?
17 A. QC Technical Supervisor is the general title.
18 Q. Mr. Allum, my name is Robert Guild, and I'm counsel for
19 Palmetto Alliance. My clients are intervenors in the Catawba
20 operating license case. Are you aware, sir, that we have
21 raised questions concerning the adequacy of quality assurance
22 at the Catawba site?
23 A. I am.
24 Q. I want to show you a document that is dated December 31,
25 1982, and it's Duke Power Company's response to questions

1 that were asked by Palmetto Alliance on that subject. I
2 want to point out to you beginning at page three and extending
3 over to page four a quotation of the text of what has been
4 referred to as contention six which is this quality assurance
5 issue. Take a few moments, sir, and read that to yourself,
6 and I want you to familiarize yourself with it, if you would
7 please. While you are doing that, Mr. Allum, let's, if we
8 can reflect those present in the room. Again, my name is
9 Robert Guild and I'm counsel for Palmetto Alliance. With
10 me is Billy Garde of the Government Accountability Project,
11 Michael Lowe of Palmetto Alliance, Philip Jos of Palmetto
12 Alliance.

13 MR. JOHNSON: I'm George Johnson of the Nuclear
14 Regulatory Commission.

15 MS. CODDINGHAM: I'm Anne Coddington, counsel
16 for applicant.

17 MR. BELL: Glenn Bell, QA Department Duke.

18 MR. HENRY: Wayne Henry, Quality Assurance Department
19 Duke Power.

20 MR. McGARRY: Michael McGarry, representing the
21 applicants.

22 Q. Have you seen those contentions before, sir?

23 A. The contentions we have?

24 Q. What I have just showed you. Have you seen those before?

25 A. No, sir.

1 Q. No?

2 A. No, sir.

3 Q. Mr. Allum, I'm going to ask you a series of questions on
4 the subject of those contentions particularly as they relate
5 to your knowledge concerning quality assurance and welding
6 at Catawba, and what I'm trying to find out is information
7 that will help me gather evidence on the question for use
8 in this case. If I ask you a question, and you don't under-
9 stand a term I'm using or I'm just not being clear, just
10 stop me, please, and ask for clarification. I would like
11 to be as informal as we can, so I want to make sure we are
12 communicating effectively. If you don't, the transcript
13 that is going to be later produced of this deposition will
14 simply reflect your answer, and I will presume that you
15 understood the question the way it was asked and that your
16 answer was responsive. Relate, if you would, Mr. Allum, your
17 general work history with Duke Power; when did you go to
18 work for the company and what different jobs you have held
19 and when.

20 A. I have worked for them five years and ten months, and
21 I was formerly at Cherokee in the same position as I am now.
22 I have been at Catawba for two years.

23 Q. The position you held at Cherokee, what was the title?

24 A. Technical Supervisor.

25 Q. Over Quality Control?

1 A. Yes, sir.

2 Q. You work in the welding area?

3 A. I have worked in welding and in the welding area. I do
4 not presently work there.

5 Q. I'm sorry, you do not work in welding now?

6 A. Right.

7 Q. So, what area are you working in?

8 A. Mechanical.

9 Q. How about when you were at Cherokee?

10 A. Mechanical and welding.

11 Q. When did you come to Catawba, Mr. Allum?

12 A. May, 1981.

13 Q. What was the job that you took when you came to Catawba?

14 A. Technical Supervisor.

15 Q. In what craft, sir?

16 A. I had, at that time, the radiographers, the non-destructive
17 testing personnel, document control inspectors and receiving
18 inspectors.

19 Q. Did that include welding inspectors?

20 A. No, sir.

21 Q. When did you have responsibility, if you did, over
22 welding inspectors?

23 A. January, 1982.

24 Q. Did your job title change then, sir?

25 A. No.

1 Q. Just your responsibilities, area or responsibilities?
2 A. Right.
3 Q. How long did you have responsibility thereafter for
4 supervising welding inspection?
5 A. Until the thirteenth of this month.
6 Q. That's the month of June, 1983?
7 A. Right.
8 Q. How did your responsibilities change in June of this
9 year?
10 A. I just went -- took over mechanical group.
11 Q. Why did you change, sir?
12 A. Because it was a vacancy in that area.
13 Q. Promotion?
14 A. No, sir.
15 Q. Was it a demotion?
16 A. No.
17 Q. Just a straight lateral transfer?
18 A. Right.
19 Q. Did you get a pay increase?
20 A. No.
21 Q. Then, why did you make the transfer?
22 A. That was the job.
23 Q. Someone asked you to?
24 A. Yes.
25 Q. Who did that?

1 A. Joe Willis was my supervisor.
2 Q. What is Mr. Willis' position?
3 A. Inspection Superintendent.
4 Q. What is his responsibility?
5 A. He is responsible for all the QC inspection, QA inspection
6 personnel at Catawba.
7 Q. How long has Mr. Willis been in that position, do you
8 know?
9 A. September, 1982.
10 Q. What is your understanding of the reason why Mr. Willis
11 wanted you to transfer to mechanical?
12 A. Because he was being transferred and the person in the
13 mechanical slot was going to his slot, and he needed someone
14 with experience in mechanical.
15 Q. Mr. Willis was being transferred?
16 A. Yes, sir.
17 Q. Where was he transferred?
18 A. He is going to Nuclear Production QA.
19 Q. Let me understand. Mr. Willis was transferred in June
20 of '83 to Production?
21 A. Effective one July, he will be the Operations QA, Senior
22 QA Engineer at Catawba.
23 Q. Your position, you move then to mechanical?
24 A. Yes, sir.
25 Q. And, who will occupy or who does or will as of that date

1 occupy the position of Inspection Superintendent?

2 A. Jerry Goodman.

3 Q. Where did Mr. Goodman come from?

4 A. Mechanical Supervisor.

5 Q. You are going to take that position?

6 A. Yes, sir.

7 Q. Tell me about the circumstances, Mr. Allum, in which

8 you became Technical Supervisor with responsibilities over

9 welding inspection at Catawba?

10 A. The circumstances were I was assigned that duty. We

11 were making a reorganization changing responsibilities, and

12 I assumed responsibility for the welding inspection.

13 Q. Who had those responsibilities before you, sir?

14 A. Charles Baldwin.

15 Q. You came in over Mr. Baldwin?

16 A. Over him, no, sir. I relieved him. We swapped duties.

17 Q. What did Mr. Baldwin do?

18 A. He took over the NDE and Radiography Group and Document

19 Control Inspectors.

20 Q. The job that you held?

21 A. Yes, sir.

22 Q. Why did you swap jobs, Mr. Allum?

23 A. We are routinely broadening our areas. That is a good

24 way to do it.

25 Q. Is that a routine transfer?

1 A. Yes, sir.

2 Q. What was the reorganization that you had reference to
3 at that time?

4 A. We took the receiving inspectors and put them in a
5 separate area, and put the welding inspectors were in one
6 group and the document control, NDE and RT group were under
7 one area.

8 Q. How did that differ from the way they were organized
9 before?

10 A. We put receiving inspectors that had previously been
11 in my organization, and they went to the Civil QC Engineers'
12 organization.

13 Q. How about the welding inspectors?

14 A. They were -- became my responsibility.

15 Q. You got a new job. Was there any reorganization that
16 you are referring to that had affect on welding inspectors
17 aside from the change in jobs you had?

18 A. Just changing the organization as far as who had what
19 areas and who was responsible for what areas.

20 Q. But, otherwise no reorganization that affected the
21 welding inspectors?

22 A. No.

23 Q. Do you have background expnrience as a welder, Mr.
24 Allum?

25 A. Yes, sir.

1 Q. Give me just a brief description of what your experience
2 is in that area, sir.

3 A. In welding area, I was certified by the Navy as a
4 nuclear welder.

5 Q. What kind of work did you do, sir, for the Navy?

6 A. I was on a nuclear submarine for about twelve years as
7 an electrician, a welder responsible for NDE. I was
8 a Hull Repair Officer, Quality Assurance Officer, Nuclear
9 Systems Repair, Quality Assurance, NDT Officer on different
10 ships. I was the Director of the Navy's Non-destructive
11 Testing of Metals School in San Diego. I was Director of
12 the Navy's Ships Test Examiner Certification Agency in San
13 Diego.

14 Q. What kind of certification testing was that agency
15 responsible for?

16 A. We were responsible for certifying all of the people
17 who give certification examinations to certify non-nuclear
18 inspectors for work on shipboard applications.

19 Q. By non-nuclear, they didn't work on nuclear-related
20 systems?

21 A. We were responsible for the test examiners in non-nuclear.
22 We were responsible for training inspectors for nuclear and
23 non-nuclear areas, all areas in NDT, NDE.

24 Q. By NDT, you mean what, sir?

25 A. Non-destructive testing.

1 Q. NDE?
2 A. Non-destructive examination.
3 Q. What's the difference?
4 A. Same thing.
5 Q. What experience had you had -- did you have, Mr. Allum,
6 as a welder on nuclear power construction?
7 A. Nuclear power?
8 Q. Reactor construction?
9 A. I was a welder in the Navy in their nuclear power plant.
10 Q. What you just described?
11 A. Yes.
12 Q. Any civilian nuclear power reactor construction?
13 A. No.
14 Q. Are you certified to perform nuclear safety related
15 welding for work at Catawba.
16 A. No.
17 Q. At the time you became responsible for supervising the
18 welding quality control at Catawba, Mr. Allum, were any
19 of the welding inspectors that you supervised certified to
20 weld at Catawba?
21 A. No, sir.
22 Q. Had any of them been previously?
23 A. Yns, sir.
24 Q. How many welding inspectors did you supervise?
25 A. We had about thirty-four at that time.

1 Q. This is about January of '82, is that right?

2 A. Yes, sir.

3 Q. Thirty-four?

4 A. About thirty-four.

5 Q. Approximately how many of those had previously been

6 certified as welders at Catawba?

7 A. I don't know.

8 Q. Do you have any estimate at all. I will not hold you

9 to figures, but I would appreciate an estimate if you have

10 it.

11 A. I don't have that information.

12 Q. Half of them? Don't know?

13 A. No.

14 Q. Was it common that they would have been certified pre-

15 viously as welders?

16 A. At some time, the majority had been certified as welders.

17 Q. Mr. Allum, are you familiar with the reorganization that

18 took place some months before you became responsible for

19 the Catawba welding inspectors that resulted in the quality

20 control inspectors being reassigned for purposes of at least

21 administrative responsibility to the Quality Assurance Depart-

22 ment?

23 A. Yes, sir.

24 Q. Again, when did that happen, do you remember or know?

25 A. February 1, 1982, I believe. 1981.

1 Q. At that point in time, you had responsibility for NDE
2 and other inspection at Catawba?

3 A. At that time, I was at Cherokee.

4 Q. Was there a similar reorganization at Cherokee?

5 A. Yes, sir.

6 Q. What is your understanding why that reorganization took
7 place, Mr. Allum?

8 A. Well, the reason was, as I understand it, to have a
9 closer relationship with QA and to not have the inspection
10 and construction in different organizations.

11 Q. I'm sorry, to not have inspection and construction in
12 different organizations?

13 A. Right. Did you say not have?

14 Q. Yes.

15 A. To have.

16 Q. Separate the two functions, is that right?

17 A. Yes, in different organizations.

18 Q. Do you believe that was a positive goal?

19 A. Yes, sir.

20 Q. Why?

21 A. It put us in closer contact with the Quality Assurance
22 organization and the background of procedures requirements
23 and things of that nature.

24 Q. Did that reorganization have any affect on the performance
25 of the welding inspection function at Catawba?

1 A. No, sir. I wasn't at Catawba, again, when that reorgan-
2 ization took place. I was at Cherokee.

3 Q. You came to Catawba in May?

4 A. Yes, sir.

5 Q. And, you worked in supervising NDE and mechanical inspec-
6 tors?

7 A. NDE and radiography, receiving and document control.

8 Q. So, you had an opportunity to observe work at Catawba
9 beginning in May?

10 A. Yes, sir.

11 Q. You worked closely with welding craft?

12 A. Yes, sir.

13 Q. I'm asking you to express your opinion on that reorgani-
14 zation. I understand your testimony you weren't at Catawba
15 when the reorganization took place, but shortly thereafter;
16 and is your opinion still that it would have no affect
17 on the performance of the welding inspection function?

18 A. That's right.

19 Q. Help me understand a little, Mr. Allum, the layman's under-
20 standing of the distinction between the kind of work that
21 would be inspected by welding inspectors as compared and
22 contrasted with the kind of work that would be inspected by
23 the inspectors who were under your supervision when you first
24 came on the job; that is, the work for which you did radio-
25 graphic and non-destructive examination.

1 A. Welding inspection is a visual inspection. The non-
2 destructive testing is either magnetic particle or liquid
3 penetrate, ultrasonic or radiography.

4 Q. Non-destructive is broader class and includes radiography?

5 A. Yes, sir, we separate the two for organizational purposes.

6 Q. Give me that list again. Non-destructive, then, is
7 magnetic particle --

8 A. Liquid penetrate and ultrasonics.

9 Q. What is it that you are inspecting by those means, sir?

10 A. The integrity of the welds.

11 Q. You are also inspecting welds?

12 A. Yes, sir.

13 Q. Give me just a layman's understanding of what welds you
14 would inspect by visual means and therefore would be performed
15 by welding inspectors, and what weld you would inspect by
16 the non-destructive means?

17 A. All ASME welds receive visual inspection. ASME welds
18 require additional non-destructive examination.

19 Q. What is ASME welds mean?

20 A. Those are ones that are built to ASME code.

21 Q. What does ASME stand for?

22 A. American Society for Mechanical Engineers.

23 Q. What welds would be built to ASME code and what would not?

24 A. Primarily system welds would be ASME welds in a broader
25 category.

1 Q. Referring to primary cooling system in the reactor?
2 A. Yes, sir.
3 Q. Any other systems?
4 A. Lots of other systems.
5 Q. Is it fair distinction that safety-related welds, nuclear
6 safety-related welds are to ASME standards and non-safety
7 related welds are not?
8 A. Yes, sir.
9 Q. I was using that term as a layman's term of art. Is
10 there a term used on the job site that distinguishes ASME
11 code welds from non-ASME code welds?
12 A. No, there are designated with what class of weld they
13 are.
14 Q. What designation did you use or do you use on the job?
15 A. ASME welds, code welds.
16 Q. You call them code welds?
17 A. Yes.
18 Q. Would those be welds on pipe?
19 A. Yes, sir.
20 Q. Would it be welds on any other structures?
21 A. We do ASME -- no.
22 Q. I'm talking about ASME. That is mostly pipe welds?
23 A. Pipe welds.
24 Q. Exclusively piping welds?
25 A. Yes, sir.

1 Q. How about pipe hangars?
2 A. Yes, sir.
3 Q. Those are ASME code?
4 A. Parts of them.
5 Q. What parts of them roughly generally? Is there a general
6 rule of what part pipe hangar welds would be code welds and
7 which wouldn't?
8 A. I don't know that I can answer that in layman's terms.
9 Q. If you can, tell me why you can't?
10 A. We have code welds, code hangars, and we have construc-
11 tion hangars that are not -- somebody has put a temporary
12 construction hangar and it's not a code weld.
13 Q. I'm talking about pipe hangars now?
14 A. I'm talking about pipe hangars, too.
15 Q. If it's a pipe hangar, and it's a permanent pipe hangar,
16 and it's hanging a pipe that is safety-related, would that
17 hangar be safety-related as well?
18 A. Yes.
19 Q. And, the welds on that hangar would be safety welds?
20 A. Yes.
21 Q. And, they would be welded to code?
22 A. Yes.
23 Q. How about hangars that are over safety-related equipment?
24 Would they be code, required code welding?
25 A. I don't think I'm qualified to make that statement.

1 Q. The welds on code -- the welds which ASME code standards
2 are required, do I understand that they would be inspected
3 both visually by welding inspectors and by non-destructive
4 means by the NDE inspectors?

5 A. We have welds that fit both categories that do require
6 NDE as well as visual. All of them require visual inspection.

7 Q. Give me an understanding of the class of welds, the
8 type of welds that would require both?

9 A. I'm not sure that we made any that required RT. We
10 do have some that require NDE and PMPT.

11 Q. What does that last term mean?

12 A. Magnetic particle or liquid penetrate.

13 Q. Visual as well as magnetic particle or liquid penetrate?

14 A. Yes, sir.

15 Q. What kind of welds would that be?

16 A. As specified on one of our design drawings that we need
17 that inspection.

18 Q. Can you give me a layman's understanding of what type
19 of welds that might be?

20 A.. I don't guess I could.

21 Q. How about visual and radiographic?

22 A. Same criteria except we have some that require visual
23 and radiographic or visual and magnetic particle or liquid
24 penetrate, and we have those options available.

25 Q. Whatkind of welds typically would require both visual

1 and radiographic?

2 A. Our piping welds on safety-related piping.

3 Q. For those safety-related welds, welds on safety-related
4 piping, both inspectors would be required to perform inspec-
5 tions?

6 A. Right.

7 Q. During the period of time you have been at Catawba, what
8 were the systems or areas of the facility that were being
9 worked on that required visual welding inspection?

10 A. Most all of them.

11 Q. Let's start with when you, in May of '81, when you came
12 to the facility. What was the areas of work that were
13 requiring visual welding inspection?

14 A. All areas of welding.

15 Q. Welding was being performed on all the systems in the
16 plant in all areas of the plant in May of '81?

17 A. That was currently in construction. The list of which
18 ones were being worked on, I can't give you.

19 Q. I'm not asking for a detailed list. I'm only asking
20 you to answer generally question, Mr. Allum, to the best of
21 your knowledge and recollection; and I appreciate this goes
22 back in time, but I'm trying to get a feel for what parts
23 of the plant were being worked on at least in the safety-
24 related welding area, and can you give me a general under-
25 standing of where that kind of work was being done at that

1 time?

2 A. The entire plant.

3 Q. How would I find out specifically what areas of the plant

4 were being worked on at that time, sir?

5 A. I imagine process control sheets would give that and

6 the dates would be all I can tell you.

7 Q. In January of '82, when you took responsibility for super-

8 vising the welding inspectors, Mr. Allum, what areas of the

9 plant were they working in and what systems were they working

10 in, sir?

11 A. All areas and basically all systems that were under

12 construction at that time.

13 Q. What areas and what systems were under construction at

14 that time?

15 A. I can't tell you that. I don't know.

16 Q. You just don't remember?

17 A. Right.

18 Q. Were those welding inspectors under your supervisor working

19 in both Units 1 and 2?

20 A. Yes, sir.

21 Q. Were they working on safety-related systems?

22 A. Yes, sir.

23 Q. There were approximately thirty-four welding inspectors

24 at that time?

25 A. Yes, sir.

1 Q. Do you have more than thirty-four at any point before
2 or since then?
3 A. More since then.
4 Q. How many now approximately or how many at the maximum
5 and when would that have been?
6 A. I have about forty-five right now.
7 Q. Is that the maximum there would have been on the job?
8 A. I would think so.
9 Q. How many welders whose work they inspect now approximate-
10 ly?
11 A. I don't know.
12 Q. Would it be more than one hundred?
13 A. Yes, sir.
14 Q. Would it be several hundred?
15 A. I would only be guessing, four hundred, five hundred.
16 Q. An approximation?
17 A. Yes.
18 Q. Is that the maximum number of welders there have been
19 on the job?
20 A. I have no way of knowing.
21 Q. By comparison, when you became responsible for the welding
22 inspection function, Mr. Allum, in January of '82, were they
23 inspecting work of fewer welders or were there fewer welders
24 on the job then?
25 A. I don't know.

1 Q. You just don't know?

2 A. I would think there was, but I don't know.

3 Q. How many total quality control inspectors at Catawba

4 approximately?

5 A. Two hundred.

6 Q. Is that a maximum?

7 A. I don't know.

8 Q. You don't know if there have been more than that in the

9 past?

10 A. I doubt it. I don't know.

11 Q. How does that two hundred compare with the number at

12 Cherokee maximim?

13 A. Cherokee was never at this level.

14 Q. There werenever that many at Cherokee?

15 A. No.

16 Q. Were you familiar with the pay reclassification of welding

17 inspectors at Catawba?

18 A. Yes, sir.

19 Q. You were at Catawba when that reclassification occurred

20 in July of '81?

21 A. Yes.

22 Q. Describe for me generally your understanding of what

23 that reclassification consisted of?

24 A. I was a reassessment of the pay scale for inspector

25 personnel.

1 Q. By whom?
2 A. By our pay and allowance committee.
3 Q. Did you participate in that?
4 A. Not as such, no.
5 Q. Did you express your opinion about that or did they
6 solicit your views?
7 A. Yes.
8 Q. To whom did you make those known?
9 A. Mrs. Kit Summerlan.
10 Q. Do you have any idea how to spell her name?
11 A. Summerlan.
12 Q. What was hnr job?
13 A. She was the employee relations specialist or supervisor
14 at Cherokee.
15 Q. What was your opinion about that reassessment and re-
16 classification?
17 A. I thought they were classified according to the job they
18 were doing.
19 Q. Before the reclassification?
20 A. I thought the pay classification that was -- came out
21 of the committee was equitable for the job they was doing.
22 Q. So, you agreed with the reclassification?
23 A. Yes, sir.
24 Q. You still feel that way?
25 A. Yes, sir.

1 Q. Why was that reassessment and reclassification performed,
2 Mr. Allum?

3 A. Because the position analysis were rewritten, and the
4 pay review committee reviewed the position analysis and
5 the duties assigned on the position analysis, and it was
6 an evaluation made because of the duties they were required
7 to perform responsibilities.

8 Q. What changed from the former classification?

9 A. The requirement that the credit they were giving for
10 being former welders or mechanical inspectors or different
11 areas.

12 Q. The changes from what to what, Mr. Allum?

13 A. We had required them -- we had sometime as a welder before
14 they went into inspection.

15 Q. Before?

16 A. Yes.

17 Q. And, then after?

18 A. It's not a requirement.

19 Q. How much welding experience had you required previously
20 for welding inspector?

21 A. There was no formal position analysis report at that time.
22 What there was was a homespun requirement or guideline that
23 we have two years welding experience.

24 Q. Informal guideline for two years welding experience?

25 A. I believe that's correct.

1 Q. By that, you mean it wasn't stated specifically in a
2 written job description per se?

3 A. As far as I know there was not a written job description
4 for welding inspectors or any inspectors that had been
5 approved by the pay review committee prior to that time.

6 Q. Was there a written one that hadn't been approved?

7 A. Not that I know of.

8 Q. Just wasn't any written one at all that you know of?

9 A. No.

10 Q. What type of two years welding experience was generally or
11 customarily required of a welding inspector?

12 A. There was no specifics that was required.

13 Q. What was customary requirements?

14 A. I really can't tell you that. I don't know.

15 Q. Was it, you know, welding out on the street on somebody's
16 auto body shop or was it specific nuclear-related construction
17 experience?

18 A. I don't know.

19 Q. You just don't know?

20 A. No.

21 Q. The welding inspectors prior to the reclassification,
22 they all met this informal two years experience requirement?

23 A. No.

24 Q. Most of them did; the majority did?

25 A. Some of them did.

1 Q. When you became responsible for supervising welding
2 inspectors, did you have a working understanding of the
3 experience levels of the people you were supervising?
4 A. As related to welding inspection?
5 Q. Yes.
6 A. Yes, sir.
7 Q. Did you understand which ones have previous welding
8 experience generally and which ones didn't?
9 A. I knew their inspection experience.
10 Q. Didn't know anything about their other experience?
11 A. Well, I had come across it, but I never made a point
12 to look in and see what other inspection or what other
13 experience they had.
14 Q. So, you weren't familiar with their experience?
15 A. Not related to welding inspection. I was concerned
16 with their certification as welding inspector, and other
17 areas unless I was looking for someone to fill that type of
18 area, I wouldn't be looking at that type of record.
19 Q. So, at the point in time of the reclassification, a
20 written job description was approved for welding inspectors
21 that did not require previous welding experience?
22 A. Correct.
23 Q. What kind of experience, if any, did the reclassification
24 welding inspector job --
25 A. Quality control experience, QA experience, related construc-

1 tion experience.

2 Q. Slow down a minute. Quality control experience?

3 A. Right.

4 Q. That was mandatory?

5 A. Yes, sir.

6 Q. How would one establish quality control experience?

7 A. Could have been in another inspection area. Could

8 have been mechanical receiving document, control, any one

9 of a number of various --

10 Q. Did it require previous experience as an inspector?

11 A. No.

12 Q. Could it have been as a clerk, say, in another QC area?

13 A. Not normally.

14 Q. Not a clerk, not an inspector? What else?

15 A. Could be a QA analyst, someone that reviews records.

16 Q. Any other type person acceptable?

17 A. Construction related experience.

18 Q. That is second thing, right?

19 A. Right.

20 Q. That could be in place of QC experience?

21 A. Right.

22 Q. Construction-related experience?

23 A. Right.

24 Q. What would count as construction-related experience?

25 A. Welding, pipe-fitting.

1 Q. Any kind of craft work on a construction job?
2 A. Right.
3 Q. Any kind of construction job?
4 A. Yes.
5 Q. Office work on a construction job?
6 A. No.
7 Q. Actual craft work?
8 A. Craft work.
9 Q. What was the other type experience?
10 A. Related construction experience and that covers that
11 area.
12 Q. So, the new job description required quality control
13 experience or construction-related experience?
14 A. Yes.
15 Q. Any other requirements?
16 A. No, that would be it.
17 Q. Did the new welding inspector job description require any
18 specific training or examination?
19 A. Yes sir.
20 Q. In addition to the experience you have described?
21 A. Yes, sir, experience I just described was an entry level
22 one in order to be considered to be an inspector.
23 Q. In order to be eligible for training?
24 A. Right.
25 Q. I want to understand, Mr. Allum, how the training and

1 testing requirements for welding inspectors changed, if it
2 did, before and then after the reclassification?

3 A. It didn't.

4 Q. Not at all?

5 A. No.

6 Q. Where would these former job qualifications for welding
7 inspectors be set out if it was anywhere, Mr. Allum?

8 A. The qualifications for welding inspector are contained
9 within our QA program certification of inspectors J-1.
10 I'm sorry. QA-140.

11 Q. That's a training and qualification policy?

12 A. That has all our procedures requirements for certifica-
13 tion, training.

14 Q. Of all inspectors?

15 A. Right with the exception of NDE and radiography.

16 Q. Where are the requirements for NDE and radiography?

17 A. In the NDE program manual.

18 Q. That same QA-140 had the provisions for the qualification
19 of welding inspectors before the reclassification?

20 A. No.

21 Q. Where would it have been before?

22 A. Well, I don't know that to be exact. I don't know what
23 the time frame of it were put in there, but there was no
24 change in that document relating to the reclassification.

25 Q. I hope you understand, I'm trying to understand where I

1 could find the job description.

2 A. You won't find a job description in either place.

3 Q. Neither has a job description?

4 A. No.

5 Q. Is there any other place that does have a job description?

6 A. The requirements for the certification of the job is

7 found in QA-140 or NDE-B, the NDE program manual. Job

8 descriptions in a personnel nature are in our personnel

9 department.

10 Q. Where would I find that? What document would have the

11 job descriptions?

12 A. I don't know there is a document with them.

13 Q. Have you ever seen it?

14 A. Yes.

15 Q. Can you give me an idea of what it's called?

16 A. I have seen a binder with them in it. I have seen

17 position analysis for individual inspectors.

18 Q. When did you see that?

19 A. Daily.

20 Q. You do see it daily. Tell me where you look to find it,

21 then.

22 A. In my drawer.

23 Q. I know you have one, then, right?

24 A. Yes.

25 Q. It's just called a position analysis for welding inspector?

1 A. Right.

2 Q. The document Qa-140 sets out certification procedures?

3 A. Right.

4 Q. As far as you know it was the same before and after the

5 reclassification?

6 A. Basically the same.

7 Q. Does that cover retraining?

8 A. Yes, sir.

9 Q. Do you know, Mr. Allum, whether or not that QA-140 pro-

10 cedure for certifying welding inspectors has been approved

11 by the NRC?

12 A. I'm sure it has. Well, I don't know that for a fact,

13 but I believe it has.

14 Q. Has that document as it relates to the standards for

15 certifying welding inspectors changed at all since construc-

16 tion began at Catawba?

17 A. I don't know.

18 Q. You just don't know. You are not aware of any changes?

19 A. There's been revisions to the procedure, but the signifi-

20 cant changes as far as welding inspectors go, the answer is

21 no.

22 Q. Are you aware of any audits of the qualification of

23 welding inspectors?

24 A. Yes, sir.

25 Q. By whom?

1 A. By the NRC, by our double two audit teams, by I don't
2 know who else.

3 Q. When was the most recent one?

4 A. I guess within the last six months.

5 Q. Are you aware of any findings by that audit?

6 A. There were no findings.

7 Q. Are you aware of any findings of the previous audits?

8 A. I don't know of any finding that has been found in that
9 area.

10 Q. That's as far back as you have been on Catawba site?

11 A. As far back as I can remember.

12 Q. Did the October, 1982, self-initiated evaluation include
13 a review of the certification for qualification of welding
14 inspectors?

15 A. I believe so. I don't know.

16 Q. Let me understand. Why do you believe they did?

17 A. There was an all-encompassing type audit when they did
18 it.

19 Q. Mr. Allum, what role, if any, does technical school
20 welding instruction have in the qualification or certifica-
21 tion of welding inspectors?

22 A. I don't understand what you are saying.

23 Q. Do the certification or qualification requirements give
24 any credit for tech school welding training?

25 A. No.

1 Q. What are the re-certification requirements for welding
2 inspectors?

3 A. Have to continue operating satisfactorily, and we give
4 a recertification exam at the end of every three-year period.

5 Q. How long has that requirement been in place as far as
6 you know?

7 A. As long as I know.

8 Q. Anybody ever flunked their certification exam?

9 A. Not that I know of.

10 Q. You are not aware of any welding inspector at Catawba
11 that failed to pass their certification, is that correct?

12 A. That's correct.

13 Q. Are you aware of any welding inspectors at Catawba that
14 in the initial tried and didn't pass the certification test?

15 A. Not that I'm aware of.

16 Q. Would the recertification procedure allow them to be
17 retested if they did?

18 A. After a period of time and additional training.

19 Q. If someone failed to pass a recertification exam, would
20 there be any requirement that the inspection work that that
21 inspector had performed be reviewed?

22 A. I never had that situation come up. I believe that
23 would happen.

24 Q. You believe there would be a requirement to go back and
25 look at that inspector's work?

1 A. As far as I know. I don't know that has ever happened.

2 Q. Mr. Allum, generally do you understand that the recerti-

3 fication -- I'm sorry. The reclassification of welding

4 inspectors resulted in reducing the pay grade of the welding

5 inspectors?

6 A. Yes, sir.

7 Q. In reducing the level of job requirements for the posi-

8 tion of welding inspector?

9 A. Yes, sir.

10 Q. By reducing this sort of informal requirement of prior

11 welding experience, two year welding experience?

12 A. Right.

13 Q. Were there new persons qualified for welding inspector

14 after that reclassification who had not previously worked

15 as either welding inspectors or welders at Catawba?

16 A. No, sir.

17 Q. No.

18 A. No.

19 Q. How about, to break that down a little bit, were there

20 persons who came on as welding inspectors after the reclassi-

21 fication that had not previously been welding inspectors?

22 A. No, sir.

23 Q. Wnre there any persons who had been welding inspectors

24 who would be terminated or transferred out of the welding

25 inspector position?

1 A. I need more information. What are you saying?

2 Q. Tell me what you don't understand? What am I not being

3 clear about?

4 A. Are you saying have there been people that have quit

5 since that time or who were transferred to other divisions?

6 A. First of all, I want to know who left the position of

7 welding inspector. First of all, the people who quit.

8 A. Not that I know of. I don't think so.

9 Q. How about people who transferred to other positions?

10 A. Yes.

11 Q. How many?

12 A. Two.

13 Q. What position did they transfer to?

14 A. They went back to the welding craft.

15 Q. Who were they, sir?

16 A. Vernon Godfrey and Gene Lawing.

17 Q. Are both of them still employed by Duke Power Company?

18 A. Yes, sir.

19 Q. Are they still both welders at Catawba?

20 A. Yes sir.

21 Q. Were Mr. Godfrey and Mr. Lawing among the thirty-four

22 welding inspectors who held that position when you took

23 responsibility for supervising them?

24 A. That's right, they were.

25 Q. You now have forty-five approximately, is that right?

1 A. Yes.

2 Q. Where did the others come from?

3 A. They were rehires, prople who had been laid off at
4 Cherokee or one that had previously quit at Catawba and was
5 rehired.

6 Q. Help me understand if I'm following that right now.
7 You had thirty-four and two -- Mr. Godfrey and Mr. Lawing --
8 went back to welding craft. That takes you down to thirty-
9 two, and --

10 A. I said originally that thirty-four was approximately.

11 Q. Yes, sir, and I'm not going to hold you to all that,
12 but just generally. Thirty-four and you lost two. They
13 went back to the craft and that's thirty-two, and you went to
14 forty-five, and that's thirteen more approximately. Now,
15 help me understand where the other thirteen more came from
16 approximately?

17 A. One of them was a rehire, a welding inspector who had
18 quit and reapplied for a position.

19 Q. Who was that, sir?

20 A. Eddie Femster.

21 Q. Does he still work there?

22 A. Yes, sir.

23 Q. When did Mr. Femster quit about?

24 A. I don't know.

25 Q. When was he rehired about?

1 A. October 5, '81. October something.
2 Q. Now, then the rest of them.
3 A. They were rehires from people who were laid off at
4 Cherokee, and people who were reclassified from NDE inspec-
5 tors and trained and classified as division inspectors.
6 Q. Let's break that down. How many approximately came
7 over from Cherokee?
8 A. Five, I guess.
9 Q. That five that came over from Cherokee, they had been
10 welding inspectors over there?
11 A. Yes, sir.
12 Q. Had they been welding inspectors at Cherokee prior to
13 the reclassification?
14 A. Yes, sir.
15 Q. So, they, too, had the approximately two years prior
16 welding experience?
17 A. Yes, sir.
18 Q. Is that right?
19 A. I believe that's right.
20 Q. So, about how many were reclassified former NDE inspectors?
21 There's about seven is what my math is. About that?
22 A. I guess. That's right, I don't know.
23 Q. Let's talk a little about them. Had you previously
24 supervised them when you supervised the NDE inspectors?
25 A. Yes, sir.

1 Q. Those seven, can you remember their names and how many
2 can we list here?

3 A. Rick Moore, Tom Barnes, Max Reep, Gary Moss, Tom Costello,
4 David Zimmerman, Stan Strauss, Keith Davis, Don Jolly.

5 Q. That adds up to nine. Good recall, Mr. Allum. Of the
6 nine that you have just mentioned, had any of them previously
7 worked in the welding craft at Catawba?

8 A. In the welding craft, no, sir.

9 Q. Describe the retraining and the recertification that
10 was performed for the former NDE inspectors?

11 A. We gave them formal classroom training, on-the-job
12 training, general, specific and practical examination.

13 Q. That's three different tests?

14 A. Yes, sir.

15 Q. Was this a special recertification that was designed for
16 them?

17 A. Well, this was not a recertification. This was an
18 initial certification in all but one case.

19 Q. I see, and which case was that?

20 A. Gary Moss had been previously certified as a welding
21 inspector.

22 Q. Then gone to NDE and then back again?

23 A. No, he was a welding inspector at Cherokee. HE was
24 rehired at Catawba as an NDE inspector and transferred over
25 to visual.

1 Q. For the rest of them, was this a tailor-made program
2 to retrain them from MDE to welding inspector?

3 A. No, this was the same certification that all welding
4 inspectors took.

5 Q. Let's talk about this test a little bit. Break those
6 down for me again.

7 A. A general test.

8 Q. Describe that for me.

9 A. General test on welding, different testing related subjects.
10 Metallurgy, pipe configuration, joint design, welding processes,
11 things of that nature.

12 Q. Was that test previously required for welding inspectors?

13 A. Yes, sir.

14 Q. When they had prior welding experience?

15 A. Yes.

16 Q. Help me understand this, Mr. Allum. It would just seem
17 common sense that someone who had worked for two years as
18 a welder would have a bit easier time passing a test on
19 welding and metallurgy and pipe configuration and welding
20 processes than someone who had never worked as a welder
21 unless that person who never worked as a welder was given
22 some other substantive source of information to help pass
23 the test.

24 A. It's one hundred percent incorrect.

25 Q. How does the person who has never worked as a welder

1 learn the information needed to pass the test?

2 A. Training.

3 Q. The training program does change them?

4 A. No, the training program has always assumed that the

5 person coming in had no knowledge whatsoever. We do not

6 rely on previous knowledge or assumed knowledge.

7 Q. So, the training didn't change at all?

8 A. No.

9 Q. Before and after the reclassification?

10 A. Right.

11 Q. That's the general test.

12 A. Right.

13 Q. That's a written test, oral test?

14 A. Yes, sir, written test.

15 Q. What kind of written test is it? True, false; multiple

16 choice; essay?

17 A. All types.

18 Q. Fill in the blanks?

19 A. A combination.

20 Q. Of what?

21 A. Multiple choice, completion and essay.

22 Q. Who administers that test?

23 A. That is administered by our training staff out of the

24 general office.

25 Q. That means here in Charlotte, corporate office?

1 A. Yes.

2 Q. Do they also perform the training?

3 A. Yes, sir.

4 Q. How about the other test that are performed?

5 A. Specific test as to a test of dealing with the various

6 procedures that they are inspecting to.

7 Q. Does that vary from one inspector to another or from

8 one time to time?

9 A. No, it does not vary.

10 Q. So, it is specific to the work of a welding inspector

11 at Catawba?

12 A. Right, a welding inspector period.

13 Q. What subjects does it include?

14 A. It covers various procedures; how -- what the different

15 things mean on procedure. How to do inspection by the pro-

16 cedure.

17 Q. All right, sir, does -- is that preceeded by training

18 on that subject?

19 A. Yes, sir.

20 Q. Has that test or that training changed since the reclassi-

21 fication?

22 A. No, sir.

23 Q. It has not?

24 A. No.

25 Q. Has it changed when the procedures have changed?

1 A. Yes.

2 Q. So, it has changed?

3 A. Only to update the questions and procedures are basically

4 the same.

5 Q. Any significant changes at all since the reclassification

6 in the training?

7 A. In training?

8 Q. On this subject?

9 A. No.

10 Q. Who administers that test and who trains?

11 A. The same people.

12 Q. They train them on that subject as well?

13 A. Yes, sir.

14 Q. Any other testing?

15 A. Practical examination.

16 Q. Tell me about that a little bit.

17 A. The inspectors are -- prospective inspectors are given

18 samples of welds and they are to go through the inspection

19 technique they would use to evaluate that weld along with

20 the procedures and evaluate it and present a report.

21 Q. Written report?

22 A. Yes, sir, it's an inspection document.

23 Q. Essentially a facsimile of the document they would use

24 actually in the field?

25 A. It's the inspection document they would use.

1 Q. How is that examination evaluated?

2 A. It's against a known check sheet to see if all areas have

3 been covered and all of it, any or all indications have been

4 noted in the weld or material to evaluate it.

5 Q. Is there a standard piece of work that is the subject

6 of the practical exam?

7 A. Yes, sir.

8 Q. The same for everybody?

9 A. Yes, sir, there is tests -- they may not take the exact

10 same test specimen. We have numerous test specimens that

11 they test, but it's all the same type of test.

12 Q. This is random which one they get. They get one of a

13 number of specimens?

14 A. Yes, they get several.

15 Q. They get several. Who evaluates that test?

16 A. The same people.

17 Q. They train them on that subject?

18 A. Yes.

19 Q. Are there any other tests?

20 A. No.

21 Q. Is it possible to fail one part of the test and still be

22 certified?

23 A. No.

24 Q. What happens if you do fail one part of the test?

25 A. You have to be retrained.

1 Q. And, retested on that part?

2 A. Yes, sir.

3 Q. What are the requirements for retraining and retesting?

4 A. I'm not aware of anyone that has required it, but there

5 is a time frame that they have to be retained and have an

6 additional test, and what that time frame is, I don't know.

7 Q. You know of nobody that has flunked the test?

8 A. No.

9 Q. As far as you know, no one has?

10 A. As far as I know, no one has.

11 Q. With respect to the practical part of the exam, practical

12 exam, are the candidates tested on procedure to be

13 followed when they find a problem?

14 A. Yes, sir.

15 Q. Describe that, how they are tested on that?

16 A. Well, they accept or reject the inspection that they

17 are doing, the piping or whatever the test sample might be.

18 They explain to the examiner, "I have rejected this and here's

19 why I rejected it."

20 Q. Does the specimen that's used or specimens that are used

21 in the specific test -- I'm sorry, the practical exam, test

22 them and under the circumstances in which they would non-

23 conform a weld?

24 A. No.

25 Q. How about the circumstances in which they would write

1 u. some other deficiency?

2 A. They would reject it. They have a reject or would just
3 not accept it, either one of the two.

4 Q. As a matter of process control?

5 A. Right.

6 Q. But, not as a matter of NCI?

7 A. The NCI situation requirements would not be met at this
8 time.

9 Q. How about the R-2 requirements?

10 A. What about them?

11 Q. Are they tested in circumstances that would test them
12 for identification of a weld that would call for employing
13 the R-2 procedure?

14 A. They are trained in Q-1 and R-2 on how to handle a situation
15 and to use those documents.

16 Q. I'm asking of the testing now.

17 A. Do they make out an R-2A or make out QA?

18 Q. Yes.

19 A. As part of the practical exam.

20 Q. Simply using process control documents?

21 A. Right.

22 Q. Did any of the other tests you have described include
23 testing on recognition of deficiencies that should be pro-
24 cessed under either procedure R-2 or Q-1?

25 A. That's included in all training.

1 Q. How about testing?

2 A. A separate test on what that procedure covers is

3 covered in the specific --

4 Q. That's what I want to understand. Help me understand which

5 tests include that and describe --

6 A. The specific examination. It deals with the procedures

7 that you are working to.

8 Q. Describe for me how the specific exam includes testing

9 on use of procedure Q-1 and R-2?

10 A. There are questions and situations involved in testing.

11 Question like how to use them, what they apply to, what they

12 are for.

13 Q. What are those questions?

14 A. I don't know.

15 Q. Have you ever seen those questions?

16 A. I have seen the examples.

17 Q. Have you seen the part of the exam that included questions

18 on how and when to employ procedure Q-1 and R-2?

19 A. I have seen those.

20 Q. Describe the best you can what -- how the subject is

21 covered on the test.

22 MR. McGARRY: I believe the witness said he didn't

23 know.

24 Q. Do you know at all?

25 A. I have seen the exam. That's all, and, you know, I have

1 not read them for that type of information.

2 Q. But, you recall that those two subjects were included?

3 A. I have seen the subjects included.

4 Q. You can't tell me anything about the way they are in-

5 cluded?

6 A. No.

7 Q. These tests are preceeded by formal classroom training

8 on the subjects on which they are then tested, is that right?

9 A. They have a classroom examination or classroom training

10 on general and specific and factual.

11 Q. Then, they are tested on the specifics?

12 A. Yes.

13 Q. You said in order to get certified, they also have on-

14 the-job training?

15 A. Right.

16 Q. Describe what on-the-job training consists of.

17 A. That is working with a certified inspector going out and

18 witnessing inspections. At times doing inspections prior

19 to the other inspector going to and doing the inspection

20 for signature.

21 Q. What is the specific OJT requirements?

22 A. Six months on-the-job training.

23 Q. Prior to testing and certification?

24 A. Yes, sir.

25 Q. What other duties would a candidate inspector perform

1 when he is undergoing on-the-job training?

2 A. That is the primary duty.

3 Q. What other duties though?

4 A. That is it. That is his duty.

5 Q. That is it period?

6 A. It's on-the-job training.

7 Q. Would he serve as an assistant to a welding inspector

8 in the welding area?

9 A. That's how he gets his on-the-job training.

10 Q. As an assistant?

11 A. He is not authorized nor can he make an inspection. All

12 he does is go out and be with the inspector at the time he

13 places inspection, makes a separate inspection that he

14 concurs or talks with the certified inspector about what he

15 found and see if he understands this program.

16 Q. He doesn't walk around with his hands empty. I mean, he

17 is expected to work at the time he is getting on-the-job

18 training?

19 A. That is his assignment.

20 Q. What is that work.

21 Q. Be with that certified inspector and follow him around,

22 bird dog him.

23 Q. Does he perform any productive function other than learning?

24 A. No.

25 Q. Nothing?

1 A. No.

2 Q. Does that six month OJT requirement, has it been the
3 same before and after the reclassification?

4 A. Yes.

5 Q. No changes there?

6 A. As far as I know or can remember.

7 Q. Mr. Allum, you generally are familiar with the concerns
8 that were raised by a number of welding inspectors at
9 Catawba in late 1981 or '82?

10 A. I'm familiar with the items that were generated, yes.

11 Q. And, the work and reports of the Catawba Welding Task
12 Force that resulted from those concerns?

13 A. I'm familiar with it.

14 Q. And, the implementation of the recommendations of the
15 Task Force?

16 A. Yes, sir.

17 Q. Describe, sir, the changes in use of non-conforming
18 items and procedure R-2 that occurred subsequent to the
19 concerns being expressed on the work by the Task Force?

20 A. Repeat that.

21 Q. I want to understand your description of how the use of
22 the procedure Q-1 for non-conforming items in R-2 for
23 construction deficiencies in the welding area changed sub-
24 sequent to the time when those welding inspectors expressed
25 those concerns and the Welding Inspector Task Force did its

1 work.

2 A. The basic change was in definition of what we was
3 classifying as non-performance item or R-2A.

4 Q. Describe that change.

5 A. The R-2A was something that was part of a pre-planned
6 inspection that would be considered an R-2A and Q-1 was
7 something that was found after the final inspection was
8 through or a procedure type violation.

9 Q. After the final inspection was through?

10 A. Right.

11 Q. Or, I'm sorry. I missed that.

12 A. Something in the procedure that we needed to change
13 the procedure or had a question with procedure.

14 Q. Or for a procedural question?

15 A. Uh huh.

16 Q. What was the policy with respect to non-conforming items
17 with R-2A's before the change?

18 A. It was really the same, but just a better definition was
19 forthcoming that clarified any areas.

20 Q. So, things were less clear before the change?

21 A. Yes.

22 Q. Before the change, when things were less clear, how
23 were things done differently than after the definition?

24 A. Q-1A's were written for items that were found in inspec-
25 tion that were readily correctible without additional input.

1 Q. What kind of items?
2 A. Some applying to surface on a weld, an undercut.
3 Q. Irregular surface, give me the second thing.
4 A. Undercut.
5 Q. Slag? What about slag?
6 A. That would be --
7 Q. Inclusion, is that what you said?
8 A. Inclusion.
9 Q. Others come to mind?
10 A. That's the general type of thing.
11 Q. Spattering?
12 A. Weld spatter would be there.
13 Q. Anything else that comes to mind typical?
14 A. Those are typical examples of what was there.
15 Q. How about others if they come to mind. I'm trying to
16 understand the type of thing.
17 A. That's basically the type.
18 Q. How about markings?
19 A. We did have markings that were on NCI's.
20 Q. Is that an example of something that would have been
21 found in the normal course of pre-planned inspection and
22 producing an NCI before but shouldn't now under the new
23 definition?
24 A. That's right. Now, you must clarify markings because
25 if there's an incorrect marking on there the same criteria

1 would be involved. If there's a pencil mark or something
2 of that nature.

3 Q. Help me understand the difference.

4 A. If there's a pencil mark on there or something that
5 would be readily repairable, that would not be an NCI situa-
6 tion.

7 Q. Either before or after?

8 A. But, we had written them up as NCI's previously.

9 Q. They had been written up?

10 A. Yes, sir.

11 Q. But, a markings for control of materials?

12 A. That would definitely be an NCI.

13 Q. Before and after?

14 A. Yes, sir.

15 Q. How about cleanliness?

16 A. That was written up on NCI's previously.

17 Q. Not now?

18 A. No.

19 Q. R-2A now?

20 A. Possibly.

21 Q. Maybe not even that?

22 A. Possibly.

23 Q. If not that then what?

24 A. Withholding his signature until it meets the cleanliness
25 requirement.

1 Q. Process control?

2 A. Yes.

3 Q. How about failure to follow hold points?

4 A. That's NCI.

5 Q. That's NCI before?

6 A. Yes, sir.

7 Q. After?

8 A. Yes.

9 Q. How about misalignment?

10 A. That was NCI before.

11 Q. How about after?

12 A. That would not be. That would be process control.

13 Q. Would be resolved by process control?

14 A. Right.

15 Q. Does it require judgment on the part of the welding

16 inspector to get determine under the new procedure when

17 to do an NCI, when to do an R-2 or whnn to resolve the matter

18 through process control?

19 A. Everything requires judgment to a point.

20 Q. I'm asking about those specifics; those require judgment?

21 Those decisions?

22 A. They know that they have an R-2A situation if it cannot

23 be readily corrected. If it's a pre-planned inspection, it

24 is going to be an R-2A. If it's not, it would be an NCI.

25 Q. There have been fewer NCI's since the definitions have

1 been changed?

2 A. Yes, sir.

3 Q. The welding area, Mr. Allum, give me an idea of what

4 the effect has been on the number of NCI's.

5 A. There has been a significant affect.

6 Q. A significant affect?

7 A. Yes.

8 Q. Meaning fewer NCI's?

9 A. Fewer NCI's.

10 Q. Give me an idea of the numbers. How many fewer as best

11 you can.

12 A. We have or don't have a number readily available to

13 me where we stand, but I would say probably seventy percent.

14 Q. Seventy?

15 A. Seventy percent reduction.

16 Q. In NCI's?

17 A. In NCI's.

18 Q. Give me a rough idea of numbers now. Any which way you

19 generally use them. You do a trend analysis of NCI's?

20 A. I don't.

21 Q. Someone does?

22 A. Someone does.

23 Q. Who does that?

24 A. That's done by our QA people.

25 Q. Mr. Davison, his staff do a trend analysis?

1 A. I don't know who actually performs it.

2 Q. But, it's done and it is done in the welding inspection
3 area?

4 A. Yes.

5 Q.. Do you see the trend analysis reports?

6 A. No.

7 Q. Are you informed about the results of those reports
8 generally?

9 A. No.

10 Q. Is there some other source of information that you have
11 that would report the -- Does QC provide you the information
12 on how many NCI's there are or just generally few or more?

13 A. No.

14 Q. How do you get your information?

15 A. What information?

16 Q. The information on whether there are significant increases
17 or decreases in NCI's.

18 A. When I was reviewing NCI's doing technical review I knew
19 at that time because they they come across my desk.

20 Q. That was at the time when you were supervising welding
21 inspectors?

22 A. Right.

23 Q. You would have to see the NCI when it was written?

24 A. Right.

25 Q. Now, roughly then the point where you were supervising

1 the welding inspectors, before the procedures were changed,
2 how many NCI's were you getting, say, in a month in welding?
3 A. That's hard to say.
4 Q. What is the highest you remember a week or month or
5 whatever period of time sticks in your mind?
6 A. I would say ten or twelve a day.
7 Q. How many were you getting when you last were responsible
8 for supervising welding?
9 A. Very few, less than one a day.
10 Q. If I were going to try to approximate the average number
11 of NCI's over a period of time but substantial welding work
12 was going on at Catawba, before the change, would it be
13 in the neighborhood of more than one a day?
14 A. I don't know.
15 Q. What do you think?
16 A. I don't know.
17 Q. Just don't know?
18 A. No.
19 Q. Let's talk about the R-2A's. Did you have R-2A's before
20 the procedure changes?
21 A. We did not use R-2A's in welding inspection at that time.
22 Q. What were they used for then?
23 A. They were used in other inspection areas.
24 Q. Like what for instance?
25 A. Mechanical, electrical.

1 Q. All other craft areas besides welding?
2 A. Inspection areas.
3 Q. All other inspection areas besides welding?
4 A. Not all. No, I would not say all. I would say mechanical
5 and electrical and civil.
6 Q. Why weren't they used in welding before?
7 A. Because we were procedure dictated where you would order
8 a Q-1A.
9 Q. Non-conforming item?
10 A. Right.
11 Q. After the procedure change and the definition change,
12 R-2A's became used in welding inspection?
13 A. Right.
14 Q. The welding inspectors used the R-2A?
15 A. Yes, sir.
16 Q. Give me an idea of numbers by comparison to the frequency
17 with which NCI's would be used?
18 A. I do not review R-2A's. I don't have that figure.
19 Q. Did you review R-2A's when you supervised welding inspec-
20 tions?
21 A. No.
22 Q. Why not?
23 A. They wasn't part of my responsibility.
24 Q. Who did it?
25 A. It was an issue reviewed by the technical supervisor and

1 went up to our organization to be reviewed.

2 Q. You weren't a technical supervisor?

3 A. Supervising technician, I'm sorry. First line supervisor
4 verified them and sent them up to our process or number
5 identification program to get a serial number on them and
6 get them logged in in the system.

7 Q. It didn't come through you?

8 A. No.

9 Q. Help me follow that again. Welding inspectors immediate
10 supervision -- first line supervision?

11 A. Right.

12 Q. What is the first line supervision for a welding inspec-
13 tor?

14 A. A supervising technician.

15 Q. Called supervising technician?

16 A. Right.

17 Q. Who are the supervising technicians in welding inspection
18 at Catawba now?

19 A. Today?

20 Q. Yes.

21 A. Pat Sifford, Stanley Ledford, Bob Harris, Beau Ross,
22 Bill Deaton.

23 Q. Was there the position of supervising technician at the
24 time prior to the time of the reclassification of the welding
25 inspectors?

1 A. Yes, sir.

2 Q. Did all these gentlemen hold that position then?

3 A. Yes, sir.

4 Q. Any others?

5 A. No.

6 Q. Any changes at all in those people?

7 A. Pat Sifford is just new on that one, Catawba.

8 Q. He has come on since then?

9 A. Yes.

10 Q. How long has Mr. Sifford been there in that position

11 approximately?

12 A. Days.

13 Q. Just came on?

14 A. Yes.

15 Q. Where did Mr. Sifford come from?

16 A. McGuire.

17 Q. What job did he have over there?

18 A. Same job.

19 Q. So, the first line supervision, the supervising technicians,

20 reviewed the R-2A's and then where do they go?

21 A. They go up and get a number for certification number.

22 Q. Where do they get the number?

23 A. We have an organization that keeps logs of them, keeps

24 track of them.

25 Q. They work out of the QC office?

1 A. No, in our construction management office.

2 Q. What specific construction management office would you

3 go to to get an R-2A number issued?

4 A. Unit one process, unit one status coordinator's office.

5 Q. Who is the person by title and name who is responsible?

6 First of all Unit 2 is another place?

7 A. Yes, they are handling them all out of one office.

8 Q. Both Unit 1 and 2 come out of Unit 1 status coordinator

9 office?

10 A. I believe that's correct.

11 Q. Who by name and title is responsible for issuing the

12 R-2A numbers?

13 A. There's a clerk in that office. I don't know the name

14 or title.

15 Q. Is there a supervisory level person in that office who

16 has to sign off before they issue that number?

17 A. No.

18 Q. It's a function that the clerk does?

19 A. The clerk puts a number on it and it goes through distri-

20 bution.

21 Q. And, logs it in?

22 A. Yes.

23 Q. Does the supervising technician have to approve the

24 origination of the R-2A by the inspector?

25 A. He does not have to formally approve it, no. He looks at

1 it to keep him advised of the status of the work.

2 Q. But, the welding inspector has to advise the supervising

3 technician before he originates an R-2A?

4 A. Not before. He shows it to him after he has written it,

5 and he shows it to the supervising technician to keep him

6 aware of the status and what is going on.

7 Q. So, he has originated the R-2A?

8 A. That's right.

9 Q. He has written it up?

10 A. Right.

11 Q. And, then he has to show it to the supervising technician?

12 A. Right.

13 Q. But, before a number is issued?

14 A. There is no requirement either way. There is no procedure

15 requirement for him to show it to the supervising technician.

16 Q. There is no procedure requirement that he show --

17 A. No.

18 Q. But, that is the requirement?

19 A. That's the way we do business.

20 Q. That's the way we do it. I want to understand how you

21 do it. So, he shows it to the supervising technician and,

22 again, tell me how you do it. They show it to the supervising

23 technician to advise them of what they are doing, but then

24 they go get the number issued?

25 A. Uh huh.

1 Q. And, log it in?

2 A. It could be either way right now. There are no set ways

3 they have to do that.

4 Q. But, typically it would go to the supervising technician

5 first and then to the construction manager's office to get

6 the number?

7 A. Right.

8 Q. Does the supervising technician have the authority to

9 instruct the welding inspector the technician supervisor, to

10 resolve the deficiency by other than an R-2A?

11 A. Repeat that.

12 Q. Sure, does the supervising technician have the authority

13 to tell the welding inspector this ought to be resolved in

14 some other fashion than writing up an R-2A?

15 A. He can instruct them it needs to be a Q-1A. He can

16 recommend to him it should be something that can be done

17 readily correctible and can be done by process control. He

18 can ask those questions, yes.

19 Q. He can, as the supervisor of the welding inspector, he

20 can direct that the welding inspector handle it in a way

21 other than an R-2?

22 A. No, we do not do that.

23 Q. Does he have the authority to do that?

24 A. No.

25 Q. Does not have the authority to do that?

1 A. No.

2 Q. Do you know of any instance when the supervising techni-
3 cians or other supervision have exercised their supervisory
4 authority to the welding inspectors to direct them to handle
5 it in a way other than R-2A?

6 MR. MCGARRY: I want to interject an objection.
7 I think that question assumes that the supervising technician
8 has the authority to direct, and I think the witness just
9 indicated that the supervising technician doesn't have
10 the authority to direct.

11 Q. Do you know of any instance where supervising technicians
12 have told welding inspectors not to issue an R-2A?

13 A. No.

14 Q. Do you know of any instance when welding inspectors
15 have complained that supervision has instructed them not to
16 issue an R-2A?

17 A. No.

18 Q. Do you know of any instances of, Mr. Allum, where welding
19 inspector has originated an R-2A and written one up and before
20 a number has been issued for that R-2A and before it's logged
21 in that that inspector has consulted their welding technician
22 and that the R-2A has been voided?

23 A. No.

24 Q. Could that have happened?

25 A. Anything could happen. I say I don't know of it happening.

1 and I don't think it happened.

2 Q. How about instances -- do you know of any instances
3 where welding inspector has originated an R-2A and that R-2A
4 has been destroyed before a number has been issued or it has
5 been logged in?

6 A. No.

7 Q. Do you know any complaints or allegations that that has
8 occurred?

9 A. No.

10 Q. So, the R-2A then is originated, shown to the technician,
11 number gets issued, it gets logged in, you don't see it. Who
12 does?

13 A. It goes to the people who are responsible for resolving
14 it.

15 Q. Who are they, sir?

16 A. Technical support organization or quality assurance organ-
17 ization.

18 Q. Or quality assurance?

19 A. Right.

20 Q. When would it be technical support and when would it be
21 quality assurance?

22 A. Procedure, it would be QA. If it was work problem, it
23 would be tech support.

24 Q. So, a materials problem or construction problem, is
25 that what you said?

1 A. Right.

2 Q. Tech support reports to construction?

3 A. Yes.

4 Q. QA is quality assurance department?

5 A. Right.

6 Q. If it's procedure problem, it goes to QA and this involves

7 a weld, we are talking about welding at Catawba. Who would

8 be responsible for reviewing it?

9 A. Someone within the QA tech support organization.

10 Q. First of all I'm talking about QA now.

11 A. Yes.

12 Q. Procedure problem, I had some people -- identify some

13 people to me by title and name if you know in welding.

14 Who would be assigned the responsibility for handling the

15 R-2A?

16 A. Joe Shopshire would have the final say on it.

17 Q. What is Mr. Shopshire's job?

18 A. He is the QA Engineer.

19 Q. Would somebody working under him review it first?

20 A. Yes.

21 Q. Who would that be? Who works under him that would handle

22 the stuff?

23 A. It would be Bill Gillespie, I think at this point in time.

24 Q. What is Mr. Gillespie's job?

25 A. He is a QA Specialist.

1 Q. Anybody hold that position or done that work before
2 Mr. Gillespie after this procedure changed?
3 A. Yes.
4 Q. Who was that?
5 A. Rick Rouse.
6 Q. Same job?
7 A. Yes.
8 Q. Where is Mr. Rouse?
9 A. He is in our surveillance group.
10 Q. Transferred?
11 A. Yes.
12 Q. Now, if it were materials or construction problem, it
13 would go to tech support and construction?
14 A. Right.
15 Q. Who would be responsible for its resolution there?
16 A. Whatever organization went to -- in there, whatever group
17 head is responsible.
18 Q. Help me understand how that would work. We are talking
19 about welding now. Let's say a welder did a bad welding
20 work and it was of such significance that it is written up
21 as an R-2A, who would that go to?
22 A. When you say poor welding work, you have to be more
23 specific.
24 Q. Maybe you can give me an example that fits because I
25 don't know much about welding. I'm just trying to learn.

1 Help me find -- use an example, if there is one, that is
2 appropriate that would fit the circumstances that you
3 described. An R-2A that gets written up and it involves
4 workmanship or construction and materials and therefore
5 would go to the construction people. What kind of problem
6 would fall in that category?

7 A. Any material type problem would go to that area.

8 Q. Give me an example of a workmanship type problem in
9 welding that would follow that route if there is any?
10 Can you give an example?

11 A. I don't know of one off hand.

12 Q. How about excessive porosity?

13 A. That probably wouldn't be handled as an R-2A.

14 Q. How would that be handled?

15 A. In process control.

16 Q. And re-work?

17 A. Yes.

18 Q. Sign off again?

19 A. No, not sign off again. Sign off period.

20 Q. Reject the first time around and accept the second time
21 around if it's done right?

22 A. Approximately.

23 Q. Let's say the weld is a poor weld. Let's say that it is
24 not -- it's not long enough according to the specifications
25 for that particular piece of work. Would that be an R-2A?

1 A. No.

2 Q. How would that be handled?

3 A. Correct it. Make it right, fix it.

4 Q. That would be process control?

5 A. That is withholding signature from the process control.

6 Q. Let's say that it's two pieces of pipe that are not

7 aligned properly according to specification.

8 A. Fix it.

9 Q. Not R-2A?

10 A. No.

11 Q. Not an NCI?

12 A. No.

13 Q. How about just not enough weld material in the joint?

14 A. Fix it.

15 Q. Same answer?

16 A. Yes.

17 Q. No documentation?

18 A. No.

19 Q. Let's say they use the wrong welding rods.

20 A. NCI.

21 Q. Give me an example of the circumstances where the wrong

22 welding rods would produce an NCI?

23 A. You gave me the example.

24 Q. I mean how would that occur? I'm not saying it has

25 occurred or would occur. Give me an example if it's plausible

1 example, give me an example of how wrong welding rods could
2 be used if you know?

3 A. It doesn't happen. I don't know of it happening off the
4 top. If that were a problem identified in the weld, it
5 would be written up as an NCI.

6 Q. Let's say that different kinds of welding rods used for
7 different kinds of welds, different kinds of material?

8 A. Yes.

9 Q. Let's say the wrong kind of welding rod issued for a
10 weld that needs to be performed. It's an error. That could
11 happen, couldn't it. I'm not asking you to say it has or
12 will or likely or unlikely will. I'm sayin as an example
13 that could happen, couldn't it?

14 A. The wrong rod was issued for that weld?

15 Q. Yes, sir, for the type material. for the type weld.

16 A. Okay.

17 Q. Not according to specification. There are different
18 kinds of welding rods used in different kinds of jobs, right?

19 A. Right.

20 Q. Someone mixed them up. The welder welded with it.

21 A. NCI.

22 Q. It becomes an NCI, not an R-2A?

23 A. No.

24 Q. Why not an R-2A?

25 A. Because that's something that has been completed.

1 You violated the material requirements. We are going to
2 go back and fix it. We are going to cut out the weld.

3 Q. Let's say that the inspector finds that while it's in
4 progress. The weld hasn't been done yet, but walks up and
5 the welder is working on it and the welding inspector notes
6 that the wrong kind of welding rod is being used. What
7 happens then?

8 A. If it's in process inspection, it's going to be an R-2A.

9 Q. It would be an R-2A?

10 A. If it's an in process inspection.

11 Q. If that's an example, a welding inspector writes it up
12 as an R-2A. Does work stop?

13 A. Yes.

14 Q. Checks with his tech supervisor, a number gets issued for
15 the R-2A and logged in and then who reviews that example
16 for resolution?

17 A. The welding tech support.

18 Q. Who would that be?

19 A. Tom Robinson's group.

20 Q. What is his job?

21 A. He is civil welding construction engineer.

22 Q. Is there anybody that works under Mr. Robinson who would
23 be responsible for handling an R-2A that came up that way?

24 A. Several people.

25 Q. Their names?

1 A. Bill Sams would be one of them. Jim Kinnard, Terry
2 Huffstetler. I think that's the primary ones.
3 Q. What are their jobs?
4 A. They are on the staff of welding tech support.
5 Q. In the welding area?
6 A. Yes.
7 Q. They have been in that position since the time this pro-
8 cedure changed?
9 A. I don't know.
10 Q. You just don't know?
11 A. No.
12 Q. How about Mr. Robinson. He has been there?
13 A. Right.
14 Q. Mr. Allum, are you familiar with the requirements of
15 10CFR Part 50 Appendix B?
16 A. Yes.
17 Q. Quality Assurance Criteria?
18 A. Yes.
19 Q. Your lawyer has a copy of it for you. Look at page 457
20 of my version of the Bible here. I direct your attention to
21 Criterion 16, corrective action. Would you take a look at
22 that and refresh your recollection
23 MR. MCGARRY: Let the record reflect that we are
24 looking at different editions here. You perhaps have the
25 '83 edition.

1 Q. The first time that I have a more up-to-date copy of
2 anything the company does. I think the text is identical.
3 It's probably on a different page, but why don't you check
4 it. The corrective action criteria.

5 SHORT RECESS (4:00 p.m.)

6 CONTINUING EXAMINATION: (By Mr. Guild) (4:10 p.m.)

7 Q. Mr. Allum, are you familiar with the provisions of that
8 criteria with respect to that corrective action?

9 A. Yes, sir.

10 Q. I want to understand in the circumstances where after
11 the procedures have changed we have talked about here,
12 the circumstances where construction deficiencies are
13 handled not through procedure issuing an R-2A and not
14 through Q-1 issuance of NCI, but through means of process
15 controll. Tell me in the welding area at Catawba how
16 effective corrective action is taken and the causes of those
17 deficiencies, the route causes of those deficiencies identi-
18 fied.

19 A. I'm not sure I understand your question.

20 Q. Help me. Tell me what you do not understand.

21 MR. McGARRY: Are you interested in now exploring
22 process control?

23 Q. I'm interested in trying to have the witness answer that
24 question.

25 MR. McGARRY: I'm confused by that question, and

1 I think the witness is. If you could just repeat the
2 question.

3 Q. You told me that a number of things that formerly were in
4 the welding area that used to result in NCI's now are handled
5 through means of process control, is that true?

6 A. This is true.

7 Q. Where welding inspector would initiate an NCI in the
8 past, he now is authorized under procedure to have the craft
9 rework the weld, one example, and reinspect and accept, if
10 acceptable, as a matter of process control?

11 A. Yes sir.

12 Q. I want to understand how items construction deficiencies
13 that are handled through the process control devise that
14 you have described or how the root cause of those deficiencies
15 are identified and how effective corrective action is taken
16 in compliance with that quality assurance criteria, that
17 being 16, corrective action.

18 A. Criterion 16 is items are identified on an NCI and there-
19 fore are taken care of in the non-conformance situation and
20 in that process.

21 Q. That only relates to NCI's in your opinion?

22 A. Right.

23 Q. Does not relate to R-2A's?

24 A. No.

25 Q. Or to deficiencies that are identified and resolved

1 through process control?

2 A. Right.

3 Q. Where do you get that understanding, Mr. Allum? Is

4 that Duke policy at Catawba as you understand it?

5 A. I have never seen a policy that says reading corrective

6 action in criterion 16. 10CFR 50 implies that to me.

7 Q. It does?

8 A. Yes.

9 Q. Were you trained in that policy by Duke Power Company?

10 A. Yes, sir.

11 Q. That is consistent with your training as you understand

12 it?

13 A. Yes, sir.

14 Q. Let me ask you as an example, Mr. Allum, if significant

15 construction deficiencies occurred in welding and, let's

16 say, the root cause of those construction deficiencies in

17 welding is due to a lack of training of welders doing bad

18 welds because they weren't trained right. All of the welds

19 that were done bad were noted by welding inspectors and

20 corrected through process control. That's possible, isn't

21 it. I'm going to ask you to accept all the rest of that --

22 A. I'm not sure I follow your train of --

23 Q. Welding inspectors note bad welds, and they see that the

24 welds are corrected through process control.

25 A. Right.

1 Q. They don't write up an R02A or NCI.
2 A. They do occasionally if it falls in the proper category.
3 Q. I'm asking you to take the situation where I understood
4 you to say that the weld isn't done right -- it's too short.
5 A. Yes.
6 Q. Not enough fill?
7 A. Right.
8 Q. So, those two examples, it's corrected in process.
9 A. Right.
10 Q. Accepted after it's inspected and found acceptable.
11 A. Right.
12 Q. But, the problem did occur the first time the welding
13 inspector looked at the work, right?
14 A. True.
15 Q. I'm asking you to accept hypothetically that the route
16 cause of that problem was a lack of training of the welders.
17 They just didn't put enough fill or running the welds long
18 enough according to specifications, and what I want to
19 understand, Mr. Allum, is how the pattern of recurring problems
20 whose cause was as I just described would be documented and
21 therefore identified and therefore allow appropriate correc-
22 tive action to be taken in the circumstance where no NCI or
23 R-2A's were written up.
24 A. Appropriate corrective action is taken with an acceptable
25 weld.

1 Q. I want to show you a document. This is a list which
2 includes a number of documents that was provided to me by
3 the company in discovery, Mr. Allum, and the list is
4 entitled, "Handwritten notes from QC and QA Inspectors,"
5 which set forth their specific problems and concerns, and
6 it's a list of names, and I want to ask you to identify
7 these people. I believe they are welding inspectors at
8 Catawba. Take a look at the list first and then, if you
9 hand it back to me, I will go through the list and ask you
10 some questions about those people.

11 A. I know them all.

12 Q. You know them all?

13 A. Yes, sir.

14 Q. These gentlemen are welding inspectors you have been
15 responsible for supervising at Catawba?

16 A. Yes.

17 Q. Do you know Dean Bentley?

18 A. Yes.

19 Q. Is he a welding inspector at Catawba?

20 A. Yes, sir.

21 Q. He has been for some time?

22 A. Yes, sir.

23 Q. What is your opinion of Mr. Bentley's work?

24 A. Good inspector.

25 Q. How has Mr. Bentley been evaluated?

1 A. Evaluated how?
2 Q. I mean has he been evaluated as competent?
3 A. Yes, sir.
4 Q. Better than competent?
5 A. We don't have a competent, better than competent evalua-
6 tion system.
7 Q. You have a rating of competent?
8 A. We have.
9 Q. Help me understand what the rating is?
10 A. We have satisfactory or unsatisfactory evaluation.
11 Q. Has Mr. Bentley been rated satisfactory?
12 A. Yes.
13 Q. Never unsatisfactory?
14 A. Not that I know of.
15 Q. Are you aware of any criticism of Mr. Bentley?
16 A. What kind of criticism?
17 Q. Any criticism.
18 A. Of what?
19 Q. Mr. Bentley?
20 A. No.
21 Q. Are you aware of any adverse action against Mr. Bentley?
22 A. No.
23 Q. Do you know T. A. Gardner?
24 A. Yes, sir.
25 Q. Is Mr. Gardner a welding inspector?

1 A. Yes, sir.

2 Q. He has been there for some time?

3 A. Yes, sir.

4 Q. What is your opinion of Mr. Gardner's work?

5 A. A good inspector.

6 Q. Mr. Gardner's rating evaluation?

7 A. Satisfactory.

8 Q. Ever less than satisfactory?

9 A. Not that I know of.

10 Q. You aware of any criticism of Mr. Gardner?

11 A. I have a problem when you say criticism. Your definition;

12 where is the criticism coming from?

13 Q. I want to understand. I want to ask the question, and

14 if I can, Mr. Allum, in a way that you can tell me what you

15 understand as criticism if there is any. If you know of

16 any, tell me.

17 A. I don't know of any criticism.

18 Q. Are you aware of any adverse action against that gentle-

19 man?

20 A. No.

21 Q. Mr. William H. Burr.

22 A. Yes, sir.

23 Q. Mr. Burr a welding inspector?

24 A. Yes.

25 Q. Been there for a while?

1 A. Yes, sir.

2 Q. What is your opinion of Mr. Burr?

3 A. He is a good inspector.

4 Q. How has Mr. Burr been rated, evaluated?

5 A. Satisfactory.

6 Q. Ever heard of any criticism of Mr. Burr?

7 A. No.

8 Q. Mr. Boyce Kaufman.

9 A. Yes.

10 Q. An inspector at Catawba?

11 A. Yes.

12 Q. Been there for some time?

13 A. Yes, sir.

14 Q. Your opinion of his work?

15 A. He is a good inspector.

16 Q. Evaluation?

17 A. Good, satisfactory.

18 Q. You are not aware of any criticism of Mr. Kaufman?

19 A. No.

20 Q. Any adverse action against him, are you aware of any?

21 A. No.

22 Q. C. D. Crisp.

23 A. Yes.

24 Q. Inspector at Catawba?

25 A. Yes.

1 Q. Been there for some time?
2 A. Yes.
3 Q. Your opinion of his work?
4 A. Good.
5 Q. His evaluation?
6 A. Good, satisfactory.
7 Q. You aware of any criticism of Mr. Crisp?
8 A. No.
9 Q. Any adverse action against him?
10 A. No.
11 Q. B. Deaton?
12 A. Yes.
13 Q. He has been an inspector for some time there?
14 A. He is a supervisor.
15 Q. He is a supervisor?
16 A. Yes.
17 Q. Has he been a supervisor for some time?
18 A. Yes, sir.
19 Q. What is Mr. Deaton's position?
20 A. He is a welding inspector supervisor or supervising tech-
21 nician.
22 Q. Has he served as a welding inspector before?
23 A. Yes.
24 Q. I'm sorry, the position is --
25 A. Supervising technician.

1 Q. When did he become a supervising technician?
2 A. I don't know.
3 Q. Was he a welding inspector when you came -- when you
4 took over the responsibility of supervising welding inspec-
5 tors?
6 A. No, he was a supervisor.
7 Q. Your opinion of Mr. Deaton's work.
8 A. Good.
9 Q. His evaluation?
10 A. Satisfactory.
11 Q. Any criticism you know of Mr. Deaton?
12 A. No.
13 Q. Any adverse action against him?
14 A. No.
15 Q. Harold Eubanks.
16 A. Yes.
17 Q. Been an inspector for a while?
18 A. Yes.
19 Q. Your opinion of his work.
20 A. Good.
21 Q. Evaluation?
22 A. Satisfactory.
23 Q. Any criticism you are aware of?
24 A. No.
25 Q. Any adverse action against him?

1 A. No.

2 Q. Mr. A. S. Ghant?

3 A. Yes.

4 Q. Has been an inspector for a while?

5 A. Yes.

6 Q. Your opinion of his work?

7 A. Very good.

8 Q. Better than good?

9 A. Good.

10 Q. Same as the rest of the gentlemen you mentioned?

11 A. Yes.

12 Q. His evaluation.

13 A. Good, satisfactory.

14 Q. Any criticism of that gentleman?

15 A. No.

16 A. Any adverse action you are aware of?

17 A. No.

18 Q. How about B. C. Godfrey?

19 A. I know him.

20 Q. Has he been an inspector for some time?

21 A. Yes.

22 Q. Your opinion of Mr. Godfrey's work?

23 A. He is not currently an inspector.

24 Q. What does Mr. Godfrey do now?

25 A. He is in welding craft.

1 Q. He transferred back to welding craft?
2 A. Yes.
3 Q. When did Mr. Godfrey transfer back?
4 A. January, 1981, February, 1981, somewhere around there.
5 Q. Are you aware of Mr. Godfrey's work?
6 A. No.
7 Q. As a welder?
8 A. Yes.
9 Q. What is your opinion of his work as a welder?
10 A. Strictly opinion, it is good.
11 Q. You are not aware of his work as a welding inspector?
12 A. I had no interface with him as a welding inspector.
13 Q. So, you have no opinion of his work as a welding inspec-
14 tor?
15 A. No.
16 Q. Do you know what evaluation Mr. Godfrey had as either
17 a welder or welding inspector?
18 A. Satisfactory as a welding inspector. I don't know about
19 his welding.
20 Q. Are you aware of any criticism of Mr. Godfrey as a
21 welder or welding inspector?
22 A. No.
23 Q. Any adverse action against Mr. Godfrey?
24 A. No.
25 Q. How about Larry Jackson?

1 A. Yes.
2 Q. Is he a welding inspector?
3 A. Yes.
4 Q. Been there for a while?
5 A. Yes.
6 Q. Your opinion of Mr. Jackson's work?
7 A. Good.
8 Q. His evaluation?
9 A. Satisfactory.
10 Q. Any criticism you are aware of Mr. Jackson?
11 A. No.
12 Q. Any adverse action against him?
13 A. No.
14 Q. Richard Jones.
15 A. Yes.
16 Q. He has been an inspector for a while?
17 A. Yes.
18 Q. Your opinion of his work?
19 A. Good.
20 Q. Any evaluation of him?
21 A. Satisfactory.
22 Q. Any criticism you are aware of?
23 A. No.
24 Q. Any adverse action against him?
25 A. No.

1 Q. Kenneth Carriker?

2 A. Yes.

3 Q. He has been a welding inspector for some time?

4 A. Yes.

5 Q. Your opinion of his work?

6 A. I haven't had a lot of interface with him, but as far as

7 I know it's good.

8 Q. Why not Mr. Carriker?

9 A. He was not in my organization long and transferred to

10 another crew and at a later time and I had him for about

11 eight months, I guess. His performance was good at that

12 time.

13 Q. Where did Mr. Carriker transfer to?

14 A. He is still in welding inspection, but he is in another

15 area.

16 Q. Why not under your supervision?

17 A. Because I no longer had Bill Deaton as a supervisor under

18 me.

19 Q. So, this crew were people under you and under Deaton.

20 A. Right, every one mentioned so far has been in Beau Ross'

21 group except Carriker.

22 Q. Mr. Carriker was not under Beau Ross' crew?

23 A. No.

24 Q. During the time you did supervise and you knew of his

25 work, your opinion was good?

1 A. Yes.

2 Q. Mr. Carriker's evaluation?

3 A. Satisfactory.

4 Q. Any criticism of Mr. Carriker you know of?

5 A. No.

6 Q. Any adverse action against him?

7 A. No.

8 Q. Ronald Kirkland?

9 A. Good.

10 Q. He has been a welding inspector for some time?

11 A. Yes.

12 Q. Satisfactory evaluation?

13 A. Yes.

14 Q. Any criticism?

15 A. No.

16 Q. Any adverse action you know of?

17 A. No.

18 Q. John McCoy?

19 A. Yes.

20 Q. He has been around as an inspector for a while?

21 A. Yes.

22 Q. What is your opinion of him?

23 A. Good.

24 Q. His evaluation?

25 A. Satisfactory.

1 Q. Any criticism?
2 A. No.
3 Q. Any adverse action you know of?
4 A. No.
5 Q. John Rockholt.
6 A. Yes.
7 Q. Been an inspector for some time?
8 A. Yes.
9 Q. Your opinion of his work?
10 A. Satisfactory.
11 Q. His evaluation?
12 A. Satisfactory.
13 Q. Would you evaluate his work as good?
14 A. Yes.
15 Q. You hesitate. Do you weigh Mr. Rockholt's work any
16 less satisfactory than the others?
17 A. No.
18 Q. His evaluation?
19 A. Good, satisfactory.
20 Q. Consistently satisfactory as far as you know?
21 A. Yes.
22 Q. Any criticism you are aware of Mr. Rockholt?
23 A. No.
24 Q. Any adverse action against Mr. Rockholt?
25 A. No.

1 A. No.
2 Q. Ransom Sims?
3 A. Yes.
4 Q. Been an inspector for a while?
5 A. Yes.
6 Q. Your opinion of his work?
7 A. Good.
8 Q. His evaluation?
9 A. Satisfactory.
10 Q. Any criticism you know of?
11 A. No.
12 Q. Any adverse action against Mr. Sims?
13 A. No.
14 Q. Mickey Standridge?
15 A. Yes.
16 Q. Been an inspector for a while?
17 A. Yes.
18 Q. Your opinion of his work.
19 A. Good.
20 Q. His evaluation?
21 A. Good satisfactory.
22 Q. Any criticism?
23 A. No.
24 Q. Any adverse action?
25 A. No.

1 Q. Lindsey Hovis?
2 A. Lindsey Harris?
3 Q. It says Hovis. Would that be Harris?
4 A. Yes.
5 Q. How about Mr. Harris, has he been an inspector?
6 A. Yes.
7 Q. Your opinion as to his work.
8 A. Good.
9 Q. His evaluation?
10 A. Satisfactory.
11 Q. Any criticism of Mr. Harris?
12 A. No.
13 Q. Any adverse action against him you are aware of?
14 A. No.
15 Q. Beau Ross.
16 A. Yes.
17 Q. Mr. Ross been a supervisor for some time?
18 A. Yes.
19 Q. Your opinion of Mr. Ross' work?
20 A. Marginal.
21 Q. Marginal?
22 A. Yes.
23 Q. Less than good?
24 A. Yes.
25 Q. What is the basis for your opinion of Mr. Ross' work as

1 less than good?

2 A. Failure to communicate with his people.

3 Q. Tell me what you mean by that. By his people, do you

4 mean the people who he supervises or on the list down here?

5 A. Yes.

6 Q. What do you mean by failure to communicate with those

7 people?

8 A. He wasn't carrying the information he gave them on what

9 was told to him.

10 Q. He didn't communicate from his supervision effectively

11 to them?

12 A. Right.

13 Q. By that you mean from you to them?

14 A. In some cases, yes.

15 Q. You were his supervisor?

16 A. Yes.

17 Q. What cases do you mean he failed to do that?

18 A. Various interpretation changes when we would request a

19 change where we were doing business organization-wise and do

20 it this way, that way, the other way. It was not affectively

21 communicated to his people.

22 Q. Can you be specific about what you mean?

23 A. I don't believe that some of the personnel policies

24 were affectively communicated to his people so that they had

25 the understanding of what they should have had.

1 Q. What personnel policies do you mean?

2 A. Transfer policies, things of that nature.

3 Q. I'm asking if you would be as specific as you can. What

4 are you talking about transfer policies?

5 A. Well, what the basis are for approving transfers and what

6 the criteria are and things of that nature.

7 Q. Speaking of transfers of welding inspection to the craft?

8 A. Not particular welding inspection. Inspection to site

9 representative.

10 Q. What does that reference mean? What specific factual

11 setting are you talking about? What does Mr. Ross do that

12 you think is wrong?

13 A. His people felt the transfer policy was not communicated

14 to them properly as it applied. They had many questions

15 on it. That he either evidentially couldn't answer or couldn't

16 support, didn't feel comfortable with.

17 Q. Transfer as applied to who?

18 A. His people.

19 Q. They wanted some kind of -- they wanted a transfer. They

20 were interested in a transfer?

21 A. They would like to go to operations area of QA or basically

22 that's where they wanted to go, different sites.

23 Q. When did this failure on Mr. Ross' part in your opinion

24 occur?

25 A. I guess the last time we had a transfer policy change or

1 the last six months, I guess.

2 Q. Within the last six months?

3 A. Yes.

4 Q. Do you have any basis, do you have an opinion as to Mr.

5 Ross' work in the period of time from before this recent

6 experience, before the last six months, earlier than that?

7 If so, what is it? What was his work -- what's your opinion

8 of Mr. Ross' work before this instance?

9 A. He is a supervisor and does a good job of supervising

10 people, getting them to the right place at the right time,

11 and getting the work done. He is affective in that area.

12 Q. It's good?

13 A. Yes.

14 Q. This is the instance in which you think it's less than

15 good?

16 A. Yes.

17 Q. It has to do with transfer from construction QC to

18 operational QC within the last six months?

19 A. Yes.

20 Q. Anything else?

21 A. Organization changes. Putting NDE out of the people

22 that do the welding inspection crews having NDE people in

23 those crews.

24 Q. What about that?

25 A. He didn't like the idea and didn't support it, I don't

1 believe.

2 Q. That's the business about the new welding inspectors
3 you have drawn from retraining the NDE people, is that
4 right?

5 A. Yes.

6 Q. He didn't support retraining the NDE people as visual
7 inspectors?

8 A. Right.

9 Q. Anything else?

10 A. That is the main ones.

11 Q. Those are the main ones?

12 A. Yes.

13 Q. Are you aware of any other criticism of Mr. Ross?

14 A. No.

15 Q. So, are you aware of any adverse action against Mr. Ross?

16 A. No.

17 Q. Are you ware of any criticism of Mr. Ross by Larry
18 Davison?

19 A. No.

20 Q. Have you ever criticized Mr. Ross?

21 A. I have told him things we needed to improve on. Yes, I
22 have done that.

23 Q. On matters other than the two areas you just tole me about?

24 A. I'm sure there have been.

25 Q. Anything of significance that you know of?

1 A. I couldn't give you specifics.

2 Q. In general areas, if it's significant.

3 A. Personnel matters primarily.

4 Q. What sort?

5 MR. MCGARRY: I'm going to interpose an objection
6 if it has to do with personnel matters as opposed to quality
7 control and quality assurance at Catawba. I think that's
8 fair game, but to get into personnel matters, I interpose
9 an objection.

10 Q. I would like Mr. Allum to answer the question. I'm really
11 not interested primarily of matters of personnel or a person-
12 nel nature, but to the extent they reflect an adverse opinion
13 by Mr. Allum on Mr. Ross' work or Mr. Ross' credibility is
14 an issue or may be an issue, I would like your witness to answer
15 the question so I can have as complete a picture as possible.

16 MR. MCGARRY: To the extent they go to his work,
17 that is a fair question.

18 Q. You can, Mr. Allum, tell me anything else that is a basis
19 for your opinion you have expressed about Mr. Ross.

20 A. I thought I told him one time I thought he was too
21 critical on his people as far as how they get to the gate on
22 time and things of that nature.

23 Q. Pushes them too hard?

24 A. Yes.

25 Q. Too particular about small details?

1 A. No.

2 Q. What is your understanding of the opinion of those welding
3 inspectors that Mr. Ross does and has supervised of Mr.
4 Ross and his work?

5 A. Would you repeat that?

6 Q. What do you understand Mr. Ross' people to think about
7 him in his work?

8 MR. MCGARRY: I will object to that. I think it's
9 about two steps removed from hearsay. One step I won't
10 object to, but we are getting pretty far-fetched.

11 Q. Would you have any reason, Mr. Allum, to disagree with
12 the characterization that the people whom Mr. Ross supervises
13 think highly of him?

14 A. I need you to ask the question again.

15 Q. Sure. Do you know anything to the contrary or do you
16 know any basis for thinking otherwise that the welding inspec-
17 tors that Mr. Ross supervises think highly of him?

18 A. Are you asking me do I know that people do not think
19 highly of him?

20 Q. Yes.

21 A. Yes.

22 Q. Who?

23 A. Several on that list.

24 Q. Tell me if you know, please?

25 A. I would say Rick Jones, Rick Moore, Richard Mills, Carl

1 Soussa.

2 Q. I don't believe I'm familiar with Mr Soussa's name.

3 A. You are not.

4 Q. Is he one of the welding inspectors of Mr. Ross?

5 A. Yes.

6 Q. Is he a recent welding inspector to come under Mr. Ross?

7 Recent by comparison to the list of names I have read you

8 so far, the last six months.

9 A. Yes.

10 Q. The rest of those people you mentioned as well?

11 A. They worked for him a long time.

12 Q. Mr. Soussa is one of the former NDE inspectors?

13 A. Yes.

14 Q. Any others?

15 A. John Jolly, Scott GHant, Lindsey Harris. I guess that's

16 about the best I can come up with off the top of my head.

17 Q. What is the basis for your belief that they don't think

18 highly of Mr. Ross?

19 A. My communications with them.

20 Q. How do you understand that they have that opinion of him?

21 Have they told you that or have you seen it in writing or

22 just give me an idea of what your source of information is.

23 A. They told me that.

24 Q. Have they ever put that in a written evaluation?

25 A. No.

1 Q. Ever solicited or are you aware of any written evaluation
2 of Mr. Ross by his people?
3 A. No.
4 Q. Have you ever communicated those opinions to any of your
5 supervision?
6 A. I don't know.
7 Q. You just don't remember?
8 A. Right.
9 Q. You told Mr. Henry here?
10 A. No.
11 Q. You ever discuss Mr. Ross with him?
12 A. No.
13 Q. I have one more name on this list and that's J. R. Bryant.
14 A. Yes.
15 Q. Do you know Mr. Bryant?
16 A. Yes.
17 Q. Has he been a welding inspector for some time?
18 A. Yes.
19 Q. What is your opinion of his work?
20 A. Good.
21 Q. Mr. Bryant's evaluation?
22 A. Satisfactory.
23 Q. Are you aware of any criticism of him?
24 A. No.
25 Q. Any adverse action against him?

1 A. No.

2 Q. I'm going to show you a document of several pages in
3 length and ask if you can identify it. Let's see if we can
4 mark it first. I will identify this as Exhibit Twelve, and
5 we don't need to take too much time with it. Tell me, if
6 you can identify that? Have you ever seen that before. I
7 don't believe there's any name attached to it.

8 Q. Mr. Allum, you have had a chance to look at that document?

9 A. Yes.

10 Q. Do you recognize it?

11 A. Have I seen it before?

12 Q. Yes, have you seen it before?

13 A. Yes.

14 Q. Have you -- do you recognize the handwriting?

15 A. Yes.

16 Q. Whose handwriting is that?

17 A. John Bryant.

18 Q. Mr. Bryant one of the welding inspectors?

19 A. Yes, sir.

20 Q. First of all, what is an M-4?

21 A. That's a procedure we deal with.

22 Q. What is it?

23 A. ASME code material, welding material.

24 Q. That specifies how you perform welds on ASME code?

25 A. Yes.

1 Q. Are there any other procedures which describe how you
2 do welding on code welding?
3 A. Not on that particular subject, no.
4 Q. Are there any others though?
5 A. We have procedures for most anything you want.
6 Q. What is M-4?
7 A. That's ASME code material.
8 Q. Code welding?
9 A. Yes.
10 Q. I guess my question I was trying to understand was are
11 there any other procedures that describe how you to ASME
12 code welding?
13 A. No.
14 Q. That's it, M-4?
15 A. There's modifiers, but that's it.
16 Q. Sub-procedures or related procedures?
17 A. There's things that work in conjunction with M-4.
18 Q. Mr. Bryant writes some questions and these are question
19 in Mr. Bryant's handwriting and see if you know the answers
20 to any of these. What impact did Mr. Lee have on the wage
21 evaluation? Do you have any understanding or information on
22 that?
23 A. No.
24 Q. Was his, same question, same paragraph, was his source
25 of information compiled by Jim Wells (QC non-support)? Do

1 you know?

2 A. No.

3 Q. Larry Davison, same parenthetical (QC non-support).

4 A. No.

5 Q.. Was there anyone to offer Mr. Lee the full scope of
6 responsibilities who is QC oriented?

7 A. No.

8 Q. Are you aware of the concerns that are reflected in this
9 question?

10 A. Yes.

11 Q. Have you heard those expressed by Mr. Bryant and others
12 before?

13 A. Yes, sir.

14 Q. Do you know whether those concerns have been -- whether
15 corrective -- whether those concerns have been addressed
16 and corrective action has been taken?

17 A. What corrective action?

18 Q. Any, if you know of any. Do you know of any?

19 A. I'm not sure I know what the question is. What corrective
20 action?

21 Q. Well, do you know whether those concerns have been
22 addressed?

23 A. I can't answer that. I don't understand the question.

24 Q. Well, what about it don't you understand. I can rephrase
25 it try again. What I want to know if you have heard those

1 concerns expressed. My question is do you know of any --
2 whether those concerns have been addressed?
3 A. The answer to the question one is I don't know that Bill
4 Lee was addressed with this problem.
5 Q. Say again.
6 A. I don't know that Bill Lee was part of the answer to
7 this question, and number two, if I don't know that, then
8 I don't know the answer to the other ones.
9 Q. You don't know whether those concerns have been addressed
10 or not?
11 A. No.
12 Q. Why was Charles Baldwin removed as QC Welding Supervisor?
13 Is Art Allum, you, qualified to effectively oversee the QC
14 Section program? Why was Beau Ross overlooked for this job
15 position? Should not Larry Davison and Jim Wells also be
16 removed from their positions? That's another little box of
17 questions. Are you aware of those questions before being
18 asked and those concerns being expressed by Mr. Bryant and
19 others?
20 A. No.
21 Q. Let's take them one at a time. Why was Charles Baldwin
22 removed as QC Welding Supervisor?
23 A. I don't think he was.
24 Q. He wasn't?
25 A. He was rotated. We were rotated.

1 Q. How as his position changed if it wasn't -- if h e
2 wasn't removed, was it changed?
3 A. We swapped jobs.
4 Q. You and he did?
5 A. Yes.
6 Q. What did Mr. Baldwin do?
7 A. He took over radiography and NDE and receiving inspection,
8 document control.
9 Q. He no longer fulfilled the position of QC Welding Supervisor?
10 A. Right.
11 Q. You did in his place?
12 A. Yes.
13 Q. Do you know the answer to the question of why?
14 A. No. We normally rotate or do rotate.
15 Q. Is ART Allum qualified to affective oversee the QC inspec-
16 tion program? Your opinion?
17 A. Hell, yes.
18 Q. You aware of that concern being expressed by Mr. Bryant
19 and others?
20 A. No.
21 Q. Your qualification to do that.
22 A. Do they know my qualification?
23 Q. No, are you aware of that concern being expressed before?
24 A. No.
25 Q. This is the first time you have heard that being expressed?

1 A. Yes.

2 Q. Why was Beau Ross overlooked for this job position?

3 A. I don't know.

4 Q. Was Mr. Ross in a position where it would have been the
5 next step in progression for him to have taken the position
6 that you occupy?

7 A. If we were going to promote someone, he would be one of
8 many choices.

9 Q. I mean he would have been -- the position you hold is
10 the position next above the position that he held at the
11 time you came into that job?

12 A. Yes.

13 Q. You supervise him directly now?

14 A. I do not.

15 Q. You did until you changed your job?

16 A. Yes.

17 Q. So, do you know why he -- he is one of a few people whose
18 progression would have next taken him into a position you hold?

19 MR. MCGARRY: I believe the witness said no, he was
20 one of several people.

21 Q. Several. Not many, several, is that right?

22 A. Yes, sir.

23 Q. Then, the question is, why wasn't Mr. Ross promoted into
24 that position?

25 A. It was not a promotion made, it was a lateral transfer.

1 Q. For you?
2 A. Yes.
3 Q. Do you know whether or not Mr. Ross was considered for
4 that position?
5 A. I don't believe a promotion was being made. No promotion
6 was made.
7 Q. You just don't know whether he was considered or not?
8 Can you say affirmatively he was not considered?
9 A. No.
10 Q. You just don't know?
11 A. It wasn't my job.
12 Q. Are you aware of anyone ever expressing the question or
13 concern why Mr. Ross wasn't put in that position?
14 A. No.
15 Q. That's the first time you have heard it expressed in
16 this question?
17 A. Yes, sir.
18 Q. What about the last point. Should not Larry Davison and
19 Jim Wells also be removed from their position?
20 A. I think we have said -- I don't believe that Charles
21 was removed from his position to start with nor do I believe
22 that Larry Davison or Jim Wells should be removed.
23 Q. Are you aware of anyone expressing that question or those
24 concerns why Mr. Davison and Mr. Wells should not be removed?
25 A. No.

1 Q. Never heard that phrase till now?
2 A. No.
3 Q. Do you know whether or not the concerns expressed in
4 that group of questions there have been addressed?
5 A. No.
6 Q. Next one is why is construction involved in resolving
7 the QC inspectors concerns and construction caused many of
8 the concerns? Are you aware of that concern being expressed,
9 that question being expressed?
10 A. No.
11 Q. Never heard that before?
12 A. No.
13 Q. Do you have an opinion of that question and answer to
14 that question?
15 A. I believe that the Task Force was made up of the most
16 qualified people from all areas to do the work.
17 Q. They included construction people?
18 A. Yes, sir.
19 Q. Do you know whether or not that concern has been addressed?
20 A. No.
21 Q. Why do we have QA procedures in design drawing requirements
22 if construction in QA upper management feel they can verbally
23 override them? Are you aware of that concern being expressed
24 by Mr. Bryant or others?
25 A. No.

1 Q. Never heard anybody raise the question about verbal over-
2 rides of QA procedure?

3 A. No.

4 Q. Do construction -- does construction still have the
5 authority to verbally override QA procedures?

6 A. No, never did.

7 Q. Never did?

8 A. No.

9 Q. How about QA upper management. Do they still have the
10 authority to verbally override QA procedures?

11 A. No.

12 Q. Did they ever?

13 A. No.

14 Q. Do you know whether or not that concern has been addressed?

15 A. No.

16 Q. What is the significance of a QC welding inspector's
17 job with Duke Power? Have you ever heard anybody raise
18 that concern by Mr. Bryant or others?

19 A. No. I don't understand the question, but I never heard
20 it.

21 Q. Never heard it?

22 A. As stated.

23 Q. You don't know whether anyone has ever addressed that
24 concern or whether that concern has been addressed?

25 A. I don't know that it is a concern.

1 Q. It's my understand and what I read that to say Mr. Allum
2 is -- you know, when we talked about the reclassification of
3 the welding inspector jobs and I have seen documents that raise
4 questions concerning whether or not that represented, shall
5 we say, devaluation of the welding inspector function with
6 Duke Power. In that light, do you understand the question?
7 A. No.
8 Q. You never heard anybody raise that concern? These are
9 stated the way this question is posed?
10 A. I haven't heard that question.
11 Q. Why is it that welding and mechanical technicians are
12 found to have more responsibility and their services more
13 valuable to Duke than the welding inspectors?
14 A. I don't know that is true.
15 Q. You disagree with that?
16 A. What am I agreeing to or disagreeing to?
17 Q. Is that an accurate statement that this raises a ques-
18 tion? I mean is there a factual error in the question that
19 you know of?
20 A. I don't know that there is any factual -- anything factual
21 to it. I don't know whether there is a difference or not.
22 Q. Are you aware of that question or concern being raised
23 by Mr. Bryant or others?
24 A. No.
25 Q. Are you aware of that concern being addressed by Duke

1 Power?

2 A. No.

3 Q. Upper supervision wants QC inspector to perform their
4 jobs in trust for them and disregard the QA procedures and
5 specific design requirements. Are you aware of that concern
6 or question being asked by Mr. Bryant or others?

7 A. No.

8 Q. Aware of that concern being addressed?

9 A. No.

10 Q. I'm going to show you another document which I'm marking
11 as Exhibit Thirteen, and ask if you can identify that.

12 A. Yes, sir.

13 Q. What is that?

14 A. It's a note that I found on my desk one morning from
15 Mr. Ross.

16 Q. Has a notation, this is a copy of a note. You got the
17 original, Mr. Allum?

18 A. I don't think so.

19 Q. You got this -- this appears to be the note you got?

20 A. Yes.

21 Q. At the bottom is circled, it says, "no reply." The note
22 asks, "Art, please see if you can get me a copy of federal
23 regulations concerning harrassment or intimidation of
24 inspection personnel. I would like to have a copy of federal
25 regulations concerning treatment of employees who have expressed

1 concerns about nuclear fabrication. I would like to have
2 a copy of Duke Power's policy concerning above. I would like
3 for you to find out what recourses are available if an employee
4 does not agree with his evaluation and thinks the evaluation
5 is retaliatory in nature." It has no reply written at the
6 bottom. Did you reply to Mr. Ross?
7 A. Yes.
8 Q. How did you reply to him?
9 A. I verbally replied to him.
10 Q. What did you tell him?
11 A. I told him we did not have a set procedure at that time
12 for addressing appraisals that people felt were unjust or
13 unfair or whatever.
14 Q. Do you have one now?
15 A. Yes.
16 Q. What is that?
17 A.. We have a harrassment procedure.
18 Q. Harrassment procedure?
19 A. Recourse procedure.
20 Q. Recourse procedure?
21 A. Yes.
22 Q. That recourse procedure was not in existence on June 2,
23 1982, when this note was written?
24 A. I don't believe so.
25 Q. You don't know of it, if it was? You told him you didn't

1 know of one?

2 A. Right.

3 Q. What about his request with regard to federal regula-

4 tions regarding harrassment or intimidation of inspection

5 personnel?

6 A. I brought him that information.

7 Q. You provided him that information?

8 A. Yes.

9 Q. What did you provide him?

10 A. I told him we had 10 CFR 51. We had the regional charts

11 that show what various regions are in our jurisdiction,

12 and there's a statement on there concerning harrassment

13 or retaliation.

14 Q. Is that Form Four?

15 A. I think it is.

16 Q. Is it posted on the bulletin board or some place?

17 A. Yes, sir.

18 Q. Where is that?

19 A. In all of the inspection areas throughout the job,

20 several areas.

21 Q. Several?

22 A. Uh huh.

23 Q. On a bulletin board?

24 A. Yes.

25 Q. That's what you told him to look at the poster?

1 A. That and another document that was a letter that was
2 written by Mr. Bob Dick saying that what the construction
3 policy was with regard to people who had concerns about quality.
4 Q. Did you give him a copy of that letter?
5 A. Yes, sir. I showed it to him. I didn't give him a copy.
6 It was on the bulletin board.
7 Q. It's posted as well?
8 A. Yes, sir.
9 Q. That's about persons that have concerns about work?
10 A. Yes, sir.
11 Q. Safety on the nuclear job?
12 A. Yes, sir.
13 Q. Counsel, maybe you can help. Has that been identified
14 and produced in discovery, do you know?
15 MR. McGARRY: I don't know.
16 Q. Do you have a copy of that letter with you, Mr. Allum?
17 A. No, sir.
18 Q. Counsel, we request that a copy of that letter be made
19 available.
20 MR. McGARRY: I don't have a copy of it now.
21 Q. Perhaps your people could help make it available.
22 MR. McGARRY: We don't have that. Our recollection
23 is that you did not request such information in discovery and
24 the information that we have just reviewed is discovery infor-
25 mation.

1 Q. My recollection, counsel, is that I asked for policies
2 that would cover any such -- I mean what I understood the
3 witness' description of the letter to be, and that is recourse
4 for complaints about safety in construction. Be that as it
5 may, we ask that you make that available. I don't want to
6 prolong Mr. Allum's deposition. I certainly would like to
7 be able to ask Mr. Dick about it and perhaps between now and
8 then, it could be produced. I would appreciate it. Mr. Allum,
9 has there been any further notice from either Duke Power
10 Company or the Nuclear Regulatory Commission concerning the
11 protections available under federal regulations for persons
12 complaining about possible safety concerns at Catawba?

13 A. At Catawba, no.

14 Q. You are not aware of any new notice or letters from Duke
15 Power that have been posted?

16 A. No.

17 Q. Would you know if such a notice had been posted recently
18 at Catawba?

19 A. I would probably get a copy of it. Most likely, I would.

20 Q. You haven't gotten a copy of any such thing?

21 A. Not that I can recall.

22 Q. Mr. Allum, thank you very much. I appreciate you being
23 present and that's all the questions I have for you, sir.

24

25

A. E. ALLUM

1 STATE OF NORTH CAROLINA)
2 COUNTY OF MECKLENBURG)

CERTIFICATE

3
4
5 I, the undersigned Commissioner and Notary Public,
6 in and for the State of North Carolina, do hereby certify
7 that A. E. Allum was duly sworn prior to the taking of
8 his deposition.

9 I do further certify that the foregoing one hundred and
10 twelve pages constitute a true and accurate transcript of
11 the evidence given by the said witness as taken down and
12 transcribed by me.

13 This theeleveth day of July, 1983.
14

15
16 BARBARA V. HAAS
17 Commissioner and
Notary Public

18 My Commission Expires:
19 April 23, 1987
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