

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

In the Matter of:

DUKE POWER COMPANY, et al.

(Catawba Nuclear Station,  
Units 1 and 2)

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)  
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)  
)

Docket Nos. 50-413  
50-414

JULY 7, 1983  
10:18 A.M.

DEPOSITION OF:

C. NEAL ALEXANDER



## 1 APPEARANCES:

2 ROBERT GUILD, ESQ.  
3 Columbia, S. C.4 Counsel on Behalf of Intervenor, Palmetto Alliance  
5 Corporation6 RONALD L. GIBSON, ESQ.  
7 Charlotte, N. C.

8 Counsel on Behalf of Applicant, Duke Power Company

9 Also Present:10 George W. Grier  
11 Duke Power Company12 Roger Ouellette  
13 Duke Power Company14 Glenn H. Bell  
15 Duke Power Company16 Michael F. Lowe  
17 Palmetto Alliance18 Phil Jos  
19 Palmetto Alliance20 Betsy Levitas  
21 Carolina Environmental  
22 Study Group

23

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25 I N D E X26 WITNESS27 DIRECT28 CROSS

29 C. Neal Alexander

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EXHIBITS

<u>NUMBER</u>	<u>DESCRIPTION</u>	<u>PAGE</u>
Alexander Exhibit Number One	Four page handwritten notes of Alexander	28
Alexander Exhibit Number Two	Four page handwritten document entitled, "General Concerns" with two page graph attached	35
Alexander Exhibit Number Three	Two page typewritten document entitled, "General Concerns"	35
Alexander Exhibit Number Four	Non-technical Welding Inspector concerns, seven pages	43
Alexander Exhibit Number Five	Management Procedure, Harass- ment of Employees	44
Alexander Exhibit Number Six	7/15/82, memo	65

1           The Deposition of C. Neal Alexander is taken at the  
2 corporate offices of Duke Power Company, Charlotte, North  
3 Carolina, on this the 7th day of July, 1983, in the presence  
4 of Robert Guild, Attorney for the Intervenor; and Ronald L.  
5 Gibson, Attorney for the Applicant.

6           All formalities as to caption, certificate and trans-  
7 mission are waived. It is agreed that Lynn B. Gilliam, Notary  
8 Public in and for the State of North Carolina, may take said  
9 Deposition in machine shorthand and transcribe the same to type-  
10 writing.

11           Said Deposition is taken subject alone to testimony  
12 for competency, relevancy and materiality; and all objections,  
13 save as to the form of questions asked, are reserved until the  
14 Hearing.

15  
16           C. NEAL ALEXANDER, JR.,  
17 having been first duly sworn to tell the truth, was examined  
18 and testified as follows:

19  
20           DIRECT EXAMINATION

21 BY MR. GUILD:

22           Q     Mr. Alexander, would you state your name and business  
23 address for the Record, please?

24           A     C. Neal Alexander, Jr., Post Office Box 33189,  
25 Charlotte.

1 Q That is the general offices of Duke Power Company?

2 A Correct.

3 Q What capacity are you employed by Duke?

4 A Manager of Administrative Services in the Quality  
5 Assurance Department.

6 Q All right, sir; my name is Robert Guild. I am Counsel  
7 for Palmetto Alliance, Intervenor in the operating license pro-  
8 cedure for the Catawba Station.

9 Are you generally aware that Palmetto Alliance has raised  
10 questions about Quality Assurance in Construction at the Catawba  
11 Station?

12 A Yes.

13 MR. GIBSON: Pursuant to the Notice of Deposition  
14 at the beginning of Mr. Grier's Deposition, we identi-  
15 fied certain documents as follow up to Mr. Alexander's  
16 status memo written to Mr. Grier, the memo concerning  
17 the status of implementing the non-technical recommenda-  
18 tions.

19 A fair number of those documents could be describ-  
20 ed as coming from Mr. Alexander or Mr. Grier, depending  
21 on who you took first.

22 We want to make clear two items: One, you have the  
23 Step One recourse documents that were pulled together  
24 for people who work for Mr. Alexander.

25 In addition Mr. Alexander has brought from his  
files today his handwritten notes which I think we used

1 to prepare the July 15 memo, and may reflect some other  
2 items that you may want to question him about; but I  
3 will hand you four pages of handwritten notes from Mr.  
4 Alexander.

5 MR. GUILD: All right.

6 MR. GIBSON: And one other thing, it has been a  
7 practice to identify the persons in the room. During  
8 Mr. Grier's Deposition I don't think we did that.

9 The persons present from Duke at that time were  
10 Mr. Bell and Mr. Henry; and for this morning Mr.  
11 Ouellette from Licensing Division.

12 Present for Mr. Alexander's Deposition, Mr. Bell,  
13 Mr. Grier and Mr. Ouellette.

14 MR. GUILD: And with me with Palmetto Alliance is  
15 Phil Jos and Betty Levitas, and they were both present  
16 for Mr. Grier's Deposition both days.

17 MR. GIBSON: And we will proceed with the same  
18 stipulations regarding objections; that is all objections  
19 are deemed reserved except as to form.

20 MR. GUILD: Yes.

21 MR. GIBSON: All right.

22  
23 BY MR. GUILD:

24 Q Mr. Alexander, I will show you a document which is  
25 dated December 31st, 1982. It is Duke Power Company's Responses

1 to questions asked by Palmetto Alliance in Discovery regarding  
2 this contention.

3 I want you to review the text of Contention Six. That  
4 is the Contention regarding Quality Assurance at Catawba. It  
5 begins at the bottom of Page Three and goes on to Page Four.

6 If you would take a moment to review that I would  
7 appreciate it.

8 A You are talking about down to here (indicating)?

9 Q Yes, and on Page Four down to the end of that single  
10 spacing, down to the end of that quotation.

11 A I read that down to there.

12 Q All right, sir; have you seen the text of Contention  
13 Six before?

14 A Yes.

15 Q All right, sir; I will ask you some questions, Mr.  
16 Alexander, in order to learn some information regarding Contention  
17 Six for use in the operating license proceeding; and if I ask  
18 you a question and you are not clear in the way I am speaking  
19 or the terms I am using, ask me to clarify.

20 Otherwise when I read the transcript I will assume your  
21 answer is responsive to the question the way it is asked; so  
22 please interrupt me.

23 Would you relate your job history with Duke Power  
24 Company, please?

25 A I came to work June 5, 1967. I worked in a Field Party

1 for three years at Jocasee Hydro Station. In September of '70,  
2 I went into the Federal Department at Oconee.

3 I came to McGuire in May of '71, as Personnel Super-  
4 visor and stayed there until October 1st of '78, when I went  
5 into the General Office, Construction.

6 This is still, all this is in the Construction Depart-  
7 ment as Supervisor of Compensation and Testing. I stayed there  
8 until December 1st of '78, when I went to Station Support Divi-  
9 sion as Personnel Manager.

10 In January of 1981, I came on loan to Quality Assurance  
11 Department to help set up a personnel organization. I stayed  
12 there until July of '81, when I went back to McGuire as Personnel  
13 Manager.

14 In March of 1982, I came to Quality Assurance Depart-  
15 ment as Manager of Administrative Services, and that is the  
16 position I currently hold.

17 Q All right, sir; what are your duties as Manager of  
18 Administrative Services?

19 A I'm responsible for all administrative activities,  
20 including Employer Relations functions, employment, training--

21 Q Slow down a second; Employer Relations, employment,  
22 training--

23 A Employee safety.

24 Q Okay.

25 A Purchasing and related general administrative functions

1 as far as office equipment and office space, that type of thing,  
2 purchasing for the department.

3 Q And the other functions are department wide in the  
4 Quality Assurance Department?

5 A Yes, the only thing for the general office would be the  
6 office space and just that type of thing.

7 Q All right, and that responsibility in those other areas,  
8 other than the ones that are limited to the general office, would  
9 include all persons that work in the Quality Assurance Program,  
10 including in Construction at the Catawba Station?

11 A Including the Quality Assurance people at Catawba. I  
12 am referring to Quality Assurance personnel.

13 Q And that presently includes Quality Control Inspectors?

14 A That's correct.

15 Q All right, sir; your responsibilities with regard to  
16 personnel and administrative functions, were they the same with  
17 respect to Quality Control Inspectors prior to the reorganization  
18 of the department to include Quality Control Inspectors under the  
19 Quality Assurance Department?

20 Do you follow that?

21 A No, sir.

22 Q I will try and make another stab at it: You are aware  
23 of reorganization of the assignments of Quality Control Inspectors?

24 A Yes, I participated in that reassignment.

25 Q And I want to understand before and after what the

1 differences were in your responsibilities with regard to per-  
2 sonnel matters dealing with Quality Control Inspectors?

3 A The first time that I was in QA?

4 Q No, sir; well, I mean help me understand what responsi-  
5 bilities you had, if any.

6 A The responsibilities as far as from the QC Inspectors who  
7 were in Construction is the same then as it would be now. It is  
8 just a different department.

9 They are in a different department now. The relation-  
10 ship would be the same.

11 Q Did you have personnel responsibility with regard to the  
12 Quality Control Inspectors before they were transferred into the  
13 Quality Assurance Department?

14 A Repeat that?

15 Q Sure; were you responsible for personnel matters for  
16 Quality Control Inspectors?

17 A Right, when I was at McGuire.

18 Q How about with regard to Quality Control Inspectors at  
19 Catawba?

20 A No.

21 Q But you do now?

22 A Yes.

23 Q And when were the Quality Control Inspectors assigned  
24 to the Quality Assurance Department? When did that change?

25 A February 9, I believe, of 1981; maybe a week or so there,

1 but that is February of '81.

2 Q All right, sir; now you are responsible for responding  
3 to concerns expressed by Welding Inspectors in late 1981, and  
4 early 1982?

5 A Yes, but for technical.

6 Q Describe the nature of your responsibility, please.

7 A My responsibility was to review the concerns and address  
8 the concerns in a manner that would correct the situation that  
9 had arisen.

10 Q Did you do that?

11 A Yes.

12 Q Tell me how you were assigned that responsibility.

13 A I was assigned that responsibility by the Corporate QA  
14 Manager.

15 Q Who was that?

16 A George W. Grier.

17 Q And when did that happen, sir?

18 A That was in the last of February, first part of March  
19 of '82.

20 Q Was it after you became Manager for Administrative  
21 Services?

22 A No, I was asked to come and give him some assistance  
23 prior to that, which was just a couple, three weeks prior to  
24 that.

25 Q That was when you were still at McGuire as Personnel

1 Manager?

2 A Yes, right.

3 Q All right, you worked with Mr. Grier before that?

4 A Yes, I had.

5 Q In what manner or capacity?

6 A He was the Principal Engineer at McGuire and I was the  
7 Personnel Supervisor.

8 Q And what were your instructions from Mr. Grier?

9 A I what regard?

10 Q In regard to this matter, to responding to the Welding  
11 Inspector concerns?

12 A To take the concerns of the Welding Inspectors, to  
13 identify the non-technical concerns that needed to be addressed  
14 and develop and investigate those, and to make recommendations  
15 to correct those situations.

16 Q When did you receive those instructions from Mr. Grier?

17 A The last of February, first of March.

18 Q Was it in a written document?

19 A Verbal.

20 Q You and he met face to face?

21 A Yes.

22 Q Describe the meeting.

23 A As I said, it was the last of February, first of March.  
24 He explained the situation at Catawba.

25 Q What did he say? Let me stop you there.

1           A     I can't remember every word; he just said that there  
2 were concerns, that Welding Inspectors had given me the history  
3 of what had happened, and that they had asked, the Welding  
4 Inspectors had been asked to turn in all concerns that they had.

5                     They had done that, and a lot of these were technical  
6 in nature, and that work had gone on--that some of these were  
7 non-technical; and he wanted those addressed as the technical  
8 were being addressed.

9                     We did not want to let anything go unanswered, that we  
10 were concerned not only about technical but also the other work-  
11 ing relationships that the employees had down there with super-  
12 visors and management there.

13                    We provided them a copy of the concerns. I went through  
14 the concerns, and I identified the non-technical concerns and  
15 started from there.

16           Q     In what manner did he provide you with a copy of the  
17 concerns?

18           A     A xerox copy.

19           Q     Of what?

20           A     Of the concerns that the Welding Inspectors had turned  
21 in.

22           Q     Help me understand what document it was that Mr. Grier  
23 made available to you. What were the concerns stated, what  
24 documents?

25           A     They were stated in letters or memos that the inspectors,

1 themselves, had turned in.

2 Q Are those the letters or memos that are contained now  
3 in Volume Two of the Catawba Welding Task Force report, the  
4 Technical Task Force report?

5 A I haven't seen that, but I would assume they were the  
6 same documents.

7 Q I want to understand exactly what documents.

8 A If you have a copy of them, I will be glad to identify  
9 them for you.

10 MR. GIBSON: That was Volume Two.

11 MR. GUILD: Let's try Volume Two of the Task Force  
12 report.

13 THE WITNESS: I see some species in here that  
14 appear to look like part of it. All this information,  
15 there is another piece that looks familiar.

16 There is another piece that looks familiar. I had  
17 the entire set; I didn't have it, it was not cut up  
18 like this when I got it.

19 Q What I want to understand is what it was that you had  
20 at different points in time to work from?

21 A I had a copy of the original letters turned in by the  
22 Welding Inspectors at Catawba in order to review and bring out  
23 the information that needed to be brought out as far as dealing  
24 with the non-technical concerns of the Welding Inspectors at  
25 Catawba.

1 Q You didn't have all the information that is in that  
2 volume? Is that what you are telling me?

3 A No, sir; most of this is where technical evaluations  
4 have been made of technical concerns. This appears to me to be  
5 the result of what has taken place in dealing with one of the  
6 concerns which wouldn't have been completed at the time I was  
7 getting a copy.

8 Q So it wasn't a copy of the Task Force that was made  
9 available to you when you met with Mr. Grier?

10 A Oh, no; the Welding Inspectors, themselves, write down  
11 on a piece of paper or had typed out their individual concerns,  
12 and they signed and dated them, and I had a copy of those con-  
13 cerns.

14 Q All right, sir; flip through that document, if you would.  
15 You are looking at forms and those forms were not what was avail-  
16 able to you at that time?

17 A That's correct, it appears to be a piece here that  
18 appears to be a part of that. Here is another piece here  
19 (indicating).

20 I can go through here and identify what appears to be,  
21 but what I got was in complete tact.

22 Q What I'm trying to understand is what the form was.

23 MR. GIBSON: Do you want me to help you in terms  
24 of saving time, Mr. Guild?

25 MR. GUILD: That would be great.

1 MR. GIBSON: We made available attached to his  
2 July 15, 1982, memo, a set of the documents that Mr.  
3 Alexander worked from.

4 I think in terms of your questions, it might be  
5 better to hand him this packet. If you want to look at  
6 that for a second rather than Volume Two, which has  
7 some of the same items in it.

8 MR. GUILD: Counsel, what I have here appears to  
9 be the same thing as I believe it is Item Number--it  
10 appears to be identical to Item Number Ten of Attachment  
11 One to your April 12, '83, letter to me transmitting  
12 further documents.

13 MR. GIBSON: That may be the same document. I  
14 believe it was transmitted to you, but I'm not sure  
15 exactly when.

16 MR. GUILD: Well, it is identified there by you  
17 as handwritten notes from QC and QA Inspectors which  
18 set forth their specific problems and concerns; and it  
19 is Item Ten, Attachment One to the April 12 letter that  
20 appears to be in this bound stack of materials; but it  
21 is certainly not the entire set of materials.

22 What I would like to do, I can through you or Mr.  
23 Alexander, get him to identify which specific materials  
24 were available to him.

25 MR. GIBSON: Why don't we have him do that? Just

1 take time, Mr. Alexander, and look through that and see  
2 if you can identify what was available to you.

3 And if something else was available that is not  
4 there, we will try to find that. If it is all there,  
5 let us know as you look through it.

6 THE WITNESS: This is what was made available to  
7 me by Mr. Grier.

8

9 BY MR. GUILD:

10 Q All right, sir; by "this" you are indicating a stack.  
11 This was handwritten notes from Welding Inspectors at Catawba?

12 A Yeah, there are a few typed ones in there.

13 Q This is a reproduction of an index prepared by your  
14 Counsel that I believe reflects those handwritten notes? The  
15 title is "Handwritten Notes of Welding Inspectors," et cetera.

16 Look through this list (indicating). It has listed  
17 Inspectors by name with letters "A" through "T". It begins with  
18 Dean Bentley and ends with J. R. Bryant in order.

19 Tell me, Mr. Alexander, whether or not that is the  
20 extent of the documents reflecting concerns that was available  
21 to you?

22 A In order to do that I have to compare every one of them.

23 Q Well, sir, whatever it takes, you can track through my  
24 stack here, but I would like a clear understanding of the extent  
25 of information available to you.

1 MR. GIBSON: Would it be sufficient if we turned  
2 both at the same time, or do you want him to look at  
3 each one?

4 MR. GUILD: I would like him to feel comfortable  
5 with an answer these are them or not them.

6 MR. GIBSON: Let me go through your stack at the  
7 same time and help him.

8 MR. GUILD: That would be fine; take a few minutes  
9 off the Record to confirm those are the same set. I  
10 believe it is.

11 MR. GIBSON: Let's disregard the notes attached  
12 and just look at the documents.

13 MR. GUILD: Okay. Are you ready to go?  
14

15 BY MR. GUILD:

16 Q Mr. Alexander, you have had a chance to examine the  
17 handwritten with some typewritten mixed in, but the notes from  
18 QC and QA Inspectors reflecting their specific problems and  
19 concerns. Is that the same set of documents that reflected the  
20 concerns that you had to work with when you did your investigation?

21 A Right, plus I had a printout of some of what they call  
22 non-technical concerns that were identified by the Technical  
23 Task Force.

24 Q But before you get into that, hold one second, here.  
25 This was an index prepared by Counsel, and there may be a couple

1 of misspellings or names that are not correct.

2 MR. GIBSON: Excuse me, that is a transcription  
3 from an index. That may be a portion that is not the  
4 document that was submitted from Counsel.

5 MR. GUILD: Right, it is a transcription from what  
6 Counsel presented. If you will confirm that the notes  
7 from the following individuals were included in the  
8 documents that you examined and were available to you--  
9 Dean Bentley?

10 A Yes.

11 Q T. A. Gardner?

12 A That is Bumgardner.

13 Q T. A., it should be Bumgardner; and he is a Welding  
14 Inspector at Catawba, was a Welding Inspector?

15 A Yes.

16 Q William H. Burr, B-U-R-R.

17 A Am I just saying those are in there?

18 Q Yes.

19 A I don't remember that one particularly, but if it is in  
20 the stack, yes; I looked at it.

21 Q I want to confirm you have Mr. Burr's in there, and  
22 that you had it available to you.

23 MR. GIBSON: What we did, Mr. Guild, is take the  
24 two stacks of notes and documents and compared them,  
25 the stacks are the same.

1 BY MR. GUILD:

2 Q I want to know whether or not Mr. Burr's concerns were  
3 available to you.

4 A Yes.

5 Q Boyce Courthen?

6 A Yes.

7 Q Crisp?

8 A Yes.

9 Q Denton Eubanks?

10 A Yes.

11 Q S. A. Gantt?

12 A Yes.

13 Q V. C. Godfrey?

14 A Yes.

15 Q Larry Jackson?

16 A Yes.

17 MR. GIBSON: I think Mr. Jackson was one that is  
18 out of order. Look toward the end, Mr. Alexander.

19 MR. GUILD: I think we had them in order.

20 MR. GIBSON: Ours, I think, is different from yours  
21 in order.

22 THE WITNESS: Okay, Jackson.

23

24 BY MR. GUILD:

25 Q Okay, Richard Jones?

- 1 A Yes.
- 2 Q Kenneth A. Carr?
- 3 A Yes.
- 4 Q J. Kirkland?
- 5 A Yes.
- 6 Q John McCoy?
- 7 A Yes.
- 8 Q John Rockholt, Ray Simmons?
- 9 A Yes.
- 10 Q All right, sir; Mickey Standridge?
- 11 A Yes.
- 12 Q Lindsay Hobus?
- 13 A Harris.
- 14 Q Lindsay Harris?
- 15 A (The Witness nodded his head affirmatively.)
- 16 Q Beau Ross?
- 17 A Yes.
- 18 Q And J. R. Bryant?
- 19 A Yes.
- 20 Q Now those documents were given to you by Mr. Grier when
- 21 he asked you to take on this task?
- 22 A That's correct.
- 23 Q Now you are beginning to tell me about another set of docu-
- 24 ments, a printout that you had?
- 25 A Yes, the Technical Task Force had done some preliminary

1 work in identifying some things that were non-technical; and  
2 they provided me a list of what they had begun working on, which  
3 was not complete.

4 Q What was the source, if you know, of the identification  
5 of non-technical concerns provided you by the Task Force?

6 A The source or the person that gave them to me?

7 Q First, where did they get those concerns from, if you  
8 know?

9 A They were identified out of this stack that we just  
10 got through going through.

11 Q The same documents?

12 A That's correct.

13 Q Who provided that printout? Where did you get that from?

14 A I don't know, just a member of the Task Force.

15 Q Did it come from Mr. Grier?

16 A No, from a member of the Task Force.

17 Q All right now, why, when the concerns segregated into  
18 technical and non-technical--

19 A The Technical Task Force had the expertise in addressing  
20 the technical concerns from a technical viewpoint. They were not  
21 experienced in personnel related activities.

22 That is my area of expertise, and that is why they were  
23 provided, so they could be addressed thoroughly and we could  
24 identify things that needed to be done that were non-technically  
25 related.

1 Q And just rough shorthand description, as you used it,  
2 technical, those relating to engineering matters; and non-technical,  
3 those relating to personnel matters?

4 A Technical would be relating to concerns that the Welding  
5 Inspectors, themselves, had identified with concerns with the  
6 actual work, the welding.

7 I don't know that you would classify it all as engineering.

8 Q All right, you talked about engineering expertise.

9 A I realize I did.

10 Q So if there is a better definition, give me one. What  
11 was your definition of technical and your definition of non-  
12 technical as employed in the way you did your work, sir?

13 A The definition of non-technical were situations such  
14 as communications, recourse, those type things that would,  
15 could not be addressed by the Technical Task Force because they  
16 did not have expertise in those areas.

17 Technical would be as it relates to the Welding  
18 Inspectors going out and inspecting a weld or something that  
19 would be related to that.

20 Q Is there a written definition of technical and non-  
21 technical that you can point me to, Mr. Alexander?

22 A Not that I'm aware of.

23 Q All right, sir; now your Counsel made available a copy  
24 of four pages of handwritten notes; and tell me where those  
25 came from and what the circumstances were for their preparation.

1           A     After we completed the work on the Task Force and made  
2 the communication of the results of the Task Force, both the  
3 technical and non-technical, we met with the inspectors and re-  
4 viewed their concerns individually; and these were the notes  
5 of those meetings.

6                     They are very rough and very sketchy, and they were  
7 used to draw the final conclusions of the July 15 memo. I  
8 believe that is correct.

9           Q     All right, and there are some dates on there that reflect  
10 meetings that occurred when?

11          A     March 31st, April 2nd, April 19.

12          Q     All right, sir; and with whom did you meet?

13          A     With the individuals listed and their supervisor.

14          Q     Did you meet individually with them?

15          A     And their supervisors, yes.

16          Q     One person at a time?

17          A     Yes.

18          Q     The list of names of inspectors that we went through  
19 just a minute ago, you met with each of those?

20          A     No, only the ones that had non-technical concerns.

21          Q     I see; and who were they?

22          A     Ken Bentley, Mickey Standridge, Larry Jackson--

23          Q     Bentley, Standridge, Jackson?

24          A     Yes, Karriker--

25          Q     All right, sir.

1 A Denton, Kirkland, McCoy, Jerry Standridge--the other  
2 one was Mickey.

3 Q All right, sir.

4 A Jack Bryant, Beau Ross, Boyce Courthen, Rick Jones.

5 Q R. A. Jones?

6 A Yeah, Lindsay Harris.

7 Q All right, sir.

8 A J. E. Hansen, V. C. Godfrey, John Rockholt.

9 Q Yes, sir; is that it?

10 A That is all.

11 Q How about John Peeler?

12 A No, sir.

13 Q Cindy--Cummings?

14 A No, sir.

15 Q Who is Cindy Cummings?

16 A She is an employee in the QA Department.

17 Q What does she do?

18 A She was in the, I don't know exactly what her job was  
19 at that time. I believe she was a Technician, maybe.

20 Q All right, and John Peeler?

21 A He was a Welding Inspector, I believe.

22 Q You didn't meet with him?

23 A No.

24 Q I am looking at the last page of your notes.

25 A Right.

1 Q And was that those notes of your conversation with Mr.  
2 Rockholt? Does that follow Mr. Rockholt's interview?

3 A Yes.

4 Q What are the references to Peeler and Cummingner?

5 A I believe Cummingner was promoted into a Technician job  
6 that Rockholt felt he should have had or Peeler should have had.

7 Q Is that the one Peeler should have had; is that your  
8 recollection?

9 A No, I said that he was concerned about a promotion that  
10 Cindy Cummingner got that he, Rockholt, should have had or Peeler  
11 should have had.

12 Q I see, either one?

13 A Right.

14 Q All right, did you meet with "L-R-D?" Is that Larry  
15 Davison?

16 A No.

17 Q How about Pat Childers?

18 A No.

19 Q Who is Pat Childers?

20 A Pat Childers was an Employee Relations Assistant in the  
21 Quality Assurance Department and also an Employee Relations  
22 Assistant prior to that time at the Cherokee Station.

23 Q Okay, did you meet with Mr. Lee?

24 A No, sir.

25 Q How about Mr. Wells?

1 A No.

2 Q Tell me what you did then. You got the raw notes and  
3 memos from the identified Welding Inspectors, and you got the  
4 printout that represented a partial analysis of non-technical  
5 concerns by the Technical Task Force; and what did you do then?

6 A I went through the inspectors' notes and identified  
7 areas of non-technical concerns that they had identified.

8 Q All right, do any of the markings of the documents on  
9 those notes indicate any assignment of yourself, for instance,  
10 assignment of letters to statements made, or is that from some-  
11 one else?

12 A No, those are all.

13 Q Let's take the first document in my stack here. This  
14 appears to be Mr. Bentley's on my stack, Ken Bentley.

15 A Okay, just a minute, let me get to it.

16 Q Do you see Mr. Bentley's?

17 A Yes.

18 Q It has a "-A" at the top.

19 A Right.

20 Q Who put that marking on there, if you know?

21 A Well, I probably put a "-A" on there, but I don't know.  
22 The other document I did not, I think this was a code that was  
23 used by the Technical Task Force, and they just put it on there  
24 so we could correlate between the technical and non-technical.

25 Q Okay, the coding was done by the Technical Task Force;

1 is that right, the letter coding?

2 A Right.

3 Q All right, sir; the note at the top says, "Discussed  
4 3/31/82."

5 A That is my handwriting; it corresponds with my memo of  
6 3/31/82, where I discussed that. The Technical Task Force also  
7 met with each of those, I believe.

8 Q Now you prepared an analysis of the identification of  
9 non-technical concerns?

10 A (The Witness nodded his head affirmatively.)

11 Q And where is that analysis contained?

12 MR. GIBSON: You need to speak, to give your ans-  
13 wer, Neal, instead of nodding.

14 THE WITNESS: Okay, I haven't given an answer to  
15 that one yet. From that a list was made of the general  
16 concerns which are non-technical concerns, and they  
17 were then categorized by individual and broken down into  
18 several different categories.

19 Q All right, sir; I am looking at some pieces of graph  
20 paper with handwritten notes on them.

21 A That's correct.

22 Q And those are your identification of non-technical  
23 concerns by individuals?

24 A Right.

25 Q Let's go back one step and let's identify Mr. Alexander's

1 notes, the four page document reflecting interviews as Exhibit  
2 Number One.

3 (Whereupon, the document referred to as four  
4 page handwritten notes of Mr. Alexander were  
5 marked and received by the Court Reporter as  
6 Alexander Exhibit One and entered into the Record.)  
7

8 BY MR. GUILD:

9 Q Now you are referring to your analysis of those non-  
10 technical concerns, and that is a two page document?

11 A Correct.

12 MR. GUILD: Let's identify that as Number Two, and  
13 is this the first page right in front of you (indica-  
14 ting)?

15 THE WITNESS: Yes.  
16

17 BY MR. GUILD:

18 Q I am going to paper clip those since it comes from a  
19 larger document, and we can copy those during the break. We ask  
20 that those be included as exhibits to Mr. Alexander's Deposition.

21 MR. GIBSON: I may have missed his identification  
22 of what those are. Could you repeat that?

23 THE WITNESS: Exhibit Two is where I went through  
24 each of the concerns and identified the non-technical  
25 concerns at each of the periods.

1 BY MR. GUILD:

2 Q Now on the bottom of the second page, Mr. Alexander,  
3 you have the heading, "General," and then some items that fall  
4 into that. What is the significance of that note?

5 A Those were some general topics that seemed to run  
6 through all of these, and some areas that we knew that would  
7 have to be identified or addressed.

8 It was a summary of the areas.

9 Q Are those areas in addition to the specific areas that  
10 are indicated by the named individuals?

11 A From reading the documents and identifying the individual  
12 concerns that we came up with here, communication was one that  
13 needed to be addressed.

14 It was just more or less a jumps out at you type thing.  
15 That one we felt like would have to be addressed.

16 Q So you don't have communications listed up top as one  
17 that would run through each of the individuals generally?

18 A Right.

19 Q Your note says, "Communication within QA and QC." The  
20 second item, "Advancement." Is that similarly run through all  
21 the concerns?

22 A Not necessarily, but Welding Inspectors had identified  
23 that as an area in which they were able to progress.

24 Q What do you mean by "Advancement"?

25 A Technical jobs, moving ahead, getting into better jobs.

1 Q What is the significance specifically with regard to  
2 Welding Inspector concerns?

3 A Well, I don't remember exactly, specifically; but what  
4 it meant was that we needed to address how people progressed  
5 within the department or within a classification like Welding  
6 Inspectors.

7 How do you get from learner to inspector and the time  
8 limits and those things. That was identified, but it was not  
9 communicated as well as it could have been how you transfer from  
10 one area to another area.

11 Q Did this relate generally to the reclassification of  
12 the Welding Inspector positions?

13 A Not necessarily.

14 Q And a third item, "Harassment."

15 A Yes, that one is a category we knew we would have to  
16 develop, a harassment procedure.

17 Q Would that run generally through the complaints that  
18 you got?

19 A No, sir; it only ran to the ones that I listed.

20 Q Why did you list it down under the heading of general?

21 A I knew we would have to develop a procedure for harass-  
22 ment in order to deal with harassment.

23 Q But not for the other specific ones that are listed up  
24 top?

25 A No.

1 Q And that is the distinction?

2 A Right.

3 Q "Wages."

4 A That was an issue from the beginning, and it was just  
5 listed as part of a general area.

6 Q Was it a general concern expressed by the Welding  
7 Inspectors?

8 A The answer to that is yes.

9 Q "Qualifications."

10 A Qualifications is a heading.

11 Q What does that mean; what does it mean first under the  
12 general category?

13 A Well, it was mentioned by several in qualifications as  
14 to what are the qualifications to be a Welding Inspector, what  
15 are the, you know, qualifications are changed, and there was a  
16 concern among the Welding Inspectors that these same qualifi-  
17 cations should be there that were initially there before they  
18 were changed.

19 Q That relates to reclassification?

20 A So to speak.

21 Q It relates to the concerns of a Welding Inspector?

22 A That's correct.

23 Q And it was the feeling that requirements ought to be  
24 maintained?

25 A Correct.

1 Q All right, sir; by some of the specific concerns you  
2 have little circled numbers. Help me understand what those  
3 numbers refer to.

4 Do you see that; look on Page One? Mr. Bentley, for  
5 example, his Column One, Line One has a one beside it. Column  
6 Two has a four beside it.

7 MR. GIBSON: Why don't you show him what you are  
8 talking about.

9 MR. GUILD: Maybe my copy has a different thing  
10 on there; it looks like it might.

11 THE WITNESS: It appears to have different--

12  
13 BY MR. GUILD:

14 Q Does your copy have these little circled numbers on it?  
15 I am showing you my copy provided me earlier. Are those your  
16 notes, Mr. Alexander, the little circled numbers (indicating)?

17 A Yes, I think they are. I need to try to determine what  
18 they are.

19 MR. GIBSON: Mr. Guild, Mr. Bell has shown me a  
20 copy that has the numbers on it. It is his explanation  
21 both sets were made available to you.

22 We don't know who placed the numbers on there, but  
23 both sets were made available.

24  
25 BY MR. GUILD:

1 Q Are those your numbers, Mr. Alexander, as best you can  
2 recall?

3 A I can't say they are or aren't, either way.

4 Q Take a minute and see if you can figure out if they  
5 mean something or if you can answer whether they are yours or  
6 not.

7 A It appears that these are just cross reference numbers  
8 against some other documents that have been numbered one through  
9 thirty and identified back to the chart.

10 Q All right; it is a cross reference to what document?

11 A To a four page document entitled, "General Concerns."

12 Q All right, is that your handwriting?

13 A The General Concerns document is what I'm referring to;  
14 yes.

15 Q When did you produce that list of General Concerns?

16 A These were produced from the inspector documents at the  
17 same time this was done. These go together (indicating).

18 Q I see, did you produce the list of General Concerns and  
19 then put them on the chart? Did it work that way?

20 A I don't remember how I got, you know, they both go  
21 together. Which came first, I don't remember exactly.

22 Q All right, hand me that list of General Concerns there  
23 (indicating). Were all those concerns transcribed verbatim onto  
24 the two page chart?

25 A Not necessarily verbatim from that, but the contents of

1 the concern, yes, to categorize them.

2 Q Let's do this, if we can; let's exchange Exhibit Two.  
3 Let's mark a copy with the cross reference on it so we can follow  
4 that, if we can, please, and then I would like to identify as  
5 the third document, Mr. Alexander's four pages entitled, "General  
6 Concerns" that he has just identified.

7 That would be Number Three.

8 MR. GIBSON: Okay, just hold on a second; I'm try-  
9 ing not to get this other set of documents mixed up.  
10 If you look over here, we have the same thing here, and  
11 we can mark that.

12 That does not have the numbers (indicating). Do  
13 you want these in separately or one exhibit right here?

14 MR. GUILD: Let's make them separately, how about  
15 that? As I understand it, Exhibit Two consists of the  
16 four page General Concerns document with a copy of the  
17 graphed version that has the numbers on it; is that  
18 correct?

19 MR. GIBSON: That isn't the way it started out,  
20 but let's do that. Let's make Number Two the graph  
21 with the cross reference numbers on what was previously  
22 identified as Number Two and add to that what I was  
23 starting to identify as Three, but that is the four page  
24 list of General Concerns, all as Number Two, and I will  
25 scratch through that.

1 Mr. Guild, Mr. Bell is going to make a copy, but I  
2 think we have the document in front of us.

3 (Whereupon, the documents referred to as four  
4 page handwritten document entitled, "General  
5 Concerns" with two page graph attached and two page  
6 typewritten document entitled, "General Concerns"  
7 were marked and received by the Court Reporter as  
8 Alexander Deposition Exhibits Two and Three,  
9 respectively, and entered into the Record.)  
10

11 BY MR. GUILD:

12 Q Let's look at your document that is entitled, "General  
13 Concerns," please. Let's look for example at Item 17, "Inspector  
14 states that he was told to 'slack up' on writing NCIs."

15 A Seventeen is Boyce Courthen, that is on the first page;  
16 correct?

17 Q Correct. How about 18, "Inspectors have been forced to  
18 accept conditions that do not meet Code Requirements."

19 A I don't see that one numbered, but I think what happened,  
20 they were trying to cross reference and decided that it was not  
21 necessary to cross reference those; but I'm sure that if you look  
22 through there you will be able to find those exact words.

23 Q Okay, help me find them; that is what I want to do.  
24 You say I will be able to find those words?

25 A Or an abbreviation of that. That was determined to be

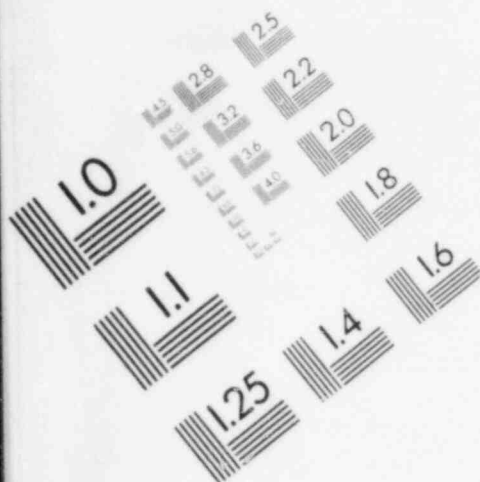
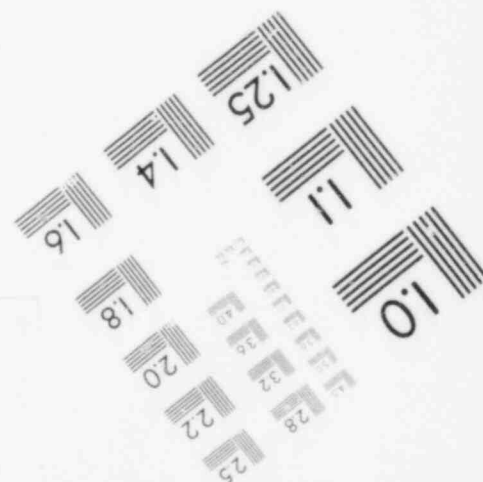
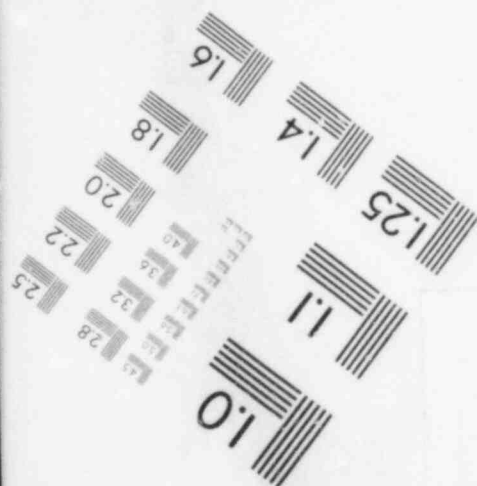
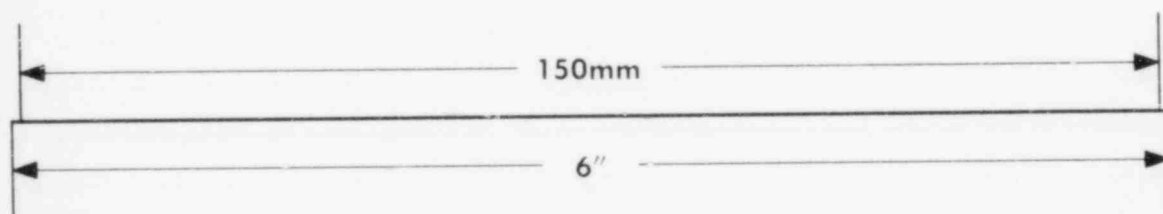
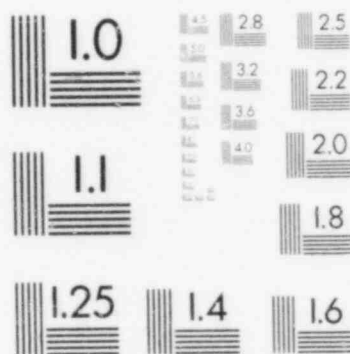
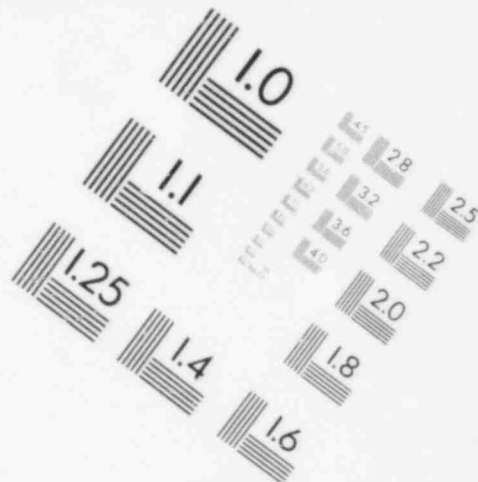


IMAGE EVALUATION  
TEST TARGET (MT-3)



1 technical.

2 Q How can you tell that?

3 A Because I have another list over here that is typed that  
4 has the ones that were turned over to the Technical Task Force.

5 Q Okay, how about showing me that list? Let's see what  
6 you are looking at.

7 A It is a two page typed list that has "General Concerns"  
8 typed out. You also have a set. I will give you that back.

9 Q Let me see what you have there, Mr. Alexander, please.  
10 You have identified another document, Mr. Alexander. This is a  
11 typewritten list of the General Concerns with the same code  
12 numbers by them?

13 A Right.

14 Q Let's identify this as Number Three; now, sir, I see  
15 identified here a number of numbered concerns that have the  
16 notation, "Technical" by them and have circles by them.

17 What is the significance of the notation that says,  
18 "Technical"?

19 A Those were turned back over to the Technical Task Force.

20 Q All right; would you read, sir, the numbered items that  
21 were turned back over to the Technical Task Force?

22 A Four, Five, Ten, Seventeen, Eighteen, Twenty, Twenty-one.

23 Q How did you turn them back over to the Technical Task  
24 Force?

25 A They were communicated back or determined they could be

1 addressed by the Technical Task Force and were told they would  
2 have to address those items.

3 Q How did you communicate it back to them?

4 A I don't recall.

5 Q How are you sure that they addressed those items, Mr.  
6 Alexander?

7 A Well, a lot of them referred to NCIs; for example, Number  
8 Four, "Construction Welding Technical Support is not qualified to  
9 resolve nonconforming items."

10 That is an NCI.

11 Q Yes?

12 A They were reviewing NCIs, and they would have in their  
13 review, whether or not the resolutions that they had were not good  
14 ones.

15 Therefore, they would be able to determine whether or  
16 not they were qualified to resolve the issues.

17 Q So you know what the subject of the Technical Task Force's  
18 study would be? You knew what concerns they had listed as  
19 technical concerns, and you knew that was already being addressed  
20 by the Technical Task Force?

21 A Or would be; I didn't know whether they had gotten into  
22 the NCIs at that point or they would be at a later point.

23 Q How do you know they would at a later point?

24 A A lot of concerns that the Welding Inspectors had  
25 referenced in the NCIs.

1 Q So you assumed they would get into the NCIs as a tech-  
2 nical concern?

3 A I knew they would because of the concerns that the  
4 Welding Inspectors had.

5 Q You knew you weren't going to pursue them because you  
6 viewed them as technical?

7 A That's correct.

8 Q So you presumed the other Task Force would handle them  
9 because they were responsible for the technical concerns; and you  
10 knew that the matters had been raised?

11 A I knew that the NCI process, as a whole, was being  
12 addressed as a result of the Welding Inspector Task Force.

13 Q Let me ask you this: Did you ever make a cross reference  
14 of the numbered concerns that you have identified as technical  
15 with the technical concerns identified by the other Task Force  
16 to determine whether or not they had addressed and resolved those  
17 technical concerns?

18 A I don't recall doing that, but in the case of this, the  
19 ones that are identified here relate directly to NCIs, and the  
20 NCI process was being reviewed as a whole by the Technical Task  
21 Force.

22 Q And that is true of all the ones you have listed?

23 A As technical, they all fall under that general  
24 description; that's correct.

25 Q Is it fair to say, Mr. Alexander, that you looked at

1 those, and you knew what the Technical Task Force was going to  
2 be covering, and you felt confident they were going to address  
3 those areas?

4 A I'm sure there was some conversation, at least, about  
5 items that were identified here as being technical, and they  
6 would identify those as being technical whether there was a  
7 memo written, or not; but there was some communication about  
8 them.

9 Looking at the NCI process, I would not have known they  
10 were going to look at the NCI process.

11 Q Was there a memo?

12 A I don't recall a memo.

13 Q You don't have one with you today?

14 A Not without going through everything I have here.

15 Q I hate to force you to do it, but if there is something  
16 that reflects those specific concerns were transmitted--

17 A I have a note here 4/10.

18 Q Is that the communication you are talking about?

19 A It is a note where I referred it to them; whether I  
20 referred it to them verbally, which I probably did, there is also  
21 another document here that is non-technical Welding Inspector  
22 concerns.

23 That talks about the NCIs' resolutions that lists each  
24 of the areas that we just talked about with a summary there that  
25 reads, "A review of the NCI resolution process conducted were in

1 general correct."

2 "A few should have better explanations or been more  
3 explicit in the resolution. There was no process other than a  
4 consulting role as to the process that may or may not work in  
5 carrying out the NCI resolutions."

6 So in fact they were identified, they were reviewed by  
7 the Technical Task Force, and this is a summary of that; so they  
8 were in effect reviewed by the Technical Task Force.

9 Q You prepared that notation when?

10 A It does not have a date on it; but it would have been  
11 during the course of the investigation.

12 Q It would have been after the Technical Task Force pre-  
13 pared its report?

14 A Or during that same period of time they were writing  
15 their summaries I was writing my summaries.

16 Q What I'm trying to understand, earlier you said you  
17 did not know what they were doing because they had not done it  
18 yet.

19 A Now I have refreshed my memory as to the documents; and  
20 yes, it was done.

21 Q At that time you prepared that writing, you did have  
22 available to you some work that the other Task Force had done to  
23 assure yourself they addressed the NCI issue.

24 A I felt comfortable in what I wrote here, either by  
25 meeting and discussing the NCI I proposed or some type of

1 discussion with them to make myself feel comfortable, saying that  
2 these issues had been addressed by the Technical Task Force.

3 Q All right, sir; is there any other cross reference that  
4 you are aware of that takes the specific identified concerns as  
5 you have numbered them and listed them on Exhibit Two, and cross  
6 references them to the Technical Task Force's recommendations?

7 A Not that I am aware of.

8 Q All right, sir; how did you imply the term "harassment"  
9 as used there?

10 A The term harassment, as written on Exhibit Two, refers  
11 to picking the word out of the Welding Inspectors' concerns. It  
12 was taken at face value.

13 Q You attached no meaning to it other than the meaning  
14 used by the inspectors in expressing their concerns?

15 A That's correct.

16 Q All right, sir; now I am looking at a document that is  
17 entitled, "Non-technical Welding Inspector Concerns," and this  
18 is the document you just had reference to a moment ago.

19 It is your findings, is it not?

20 A Okay, I have that one here, let me get a perspective.

21 Q Sure.

22 A I would agree with that.

23 Q That is the conclusion, and when was that document pre-  
24 pared?

25 A It would have been prepared sometime around the first of

1 March, 1982. For some reason it does not have a date on the last  
2 sheet.

3 Q I have two cover letters, one to Mr. Owen and one to  
4 Mr. Grier?

5 A That's correct.

6 Q Did one of those cover letters transmit that document?  
7 If so, tell me which one.

8 A The March 24th letter would have transmitted that docu-  
9 ment through Warren Owen; and the one on March 15 to George  
10 Grier would not have, even though he got a copy of the 24th letter.

11 Q Yes, I understand; all right, sir, and this represents  
12 the results of your findings regarding the non-technical concerns?

13 A Yes.

14 Q Now identified is a category of concerns by Welding  
15 Inspectors that you categorized in Exhibit Two as harassment,  
16 you say that term is a term that they, the inspectors, used;  
17 right?

18 A That's correct.

19 Q Now where in your final report did you reflect your  
20 findings on the subject of harassment?

21 A Let me get some of this together so I can get organized  
22 enough to talk about the situation.

23 MR. GUILD: Let's mark this as the next exhibit  
24 while you are getting ready to go through that. This  
25 would be Number Four.

1                   (Whereupon, the document referred to as non-  
2                   technical Welding Inspector concerns, seven pages,  
3                   was marked and received by the Court Reporter as  
4                   Alexander Exhibit Four and entered into the  
5                   Record.)

6

7 BY MR. GUILD:

8       Q     On the fifth page, Item C, now that falls under recourse?

9       A     The major heading, Four, recourse; that's correct.

10      Q     Item C, and read Item C if you would.

11      A     "QA employees feel that they are harassed by Construction  
12 employees."

13      Q     What is your finding?

14      A     It is understood because of their responsibility of  
15 inspecting work and finding defects, that inspectors are in some-  
16 what of an unusual situation.

17            This should not lead inspectors to be harassed by  
18 management or others whose work they are inspecting. The con-  
19 clusion was to adopt and implement a harassment procedure to  
20 give employees an avenue for airing harassments; and this was  
21 done.

22      Q     And I think that procedure has been previously identified;  
23 and is this document reflective of the department harassment  
24 procedure that you have reference to (indicating)?

25      A     It is.

1 MR. GUILD: Let's mark that as Exhibit Five.  
2 Exhibit Four is the final report that is entitled,  
3 "Non-technical Welding Inspector Concerns," and Five is  
4 entitled, "Harassment of Employees."

5 It is the Quality Assurance Department procedure.

6 MR. GIBSON: Four again is the final report,  
7 roughly five, six, seven pages? Put a clip on that so  
8 we can make another copy.

9 (Whereupon, the document referred to as  
10 Management Procedure, Harassment of Employees, was  
11 marked and received by the Court Reporter as  
12 Alexander Exhibit Five and entered into the Record.)

13

14 BY MR. GUILD:

15 Q Is there any other corrective action that you are aware  
16 of that addresses that concern, the concern of harassment?

17 A Not that I'm aware of.

18 Q All right, sir; let's go back to our list of General  
19 Concerns, Mr. Alexander. Do you have the list?

20 A It is entitled, "General Concerns." It is Exhibit Two,  
21 part of Exhibit Two.

22 Q Looking at the third page, Item Number 22, "Craft super-  
23 vision does not know procedures; therefore, inspectors have to  
24 direct the work and Craft asks for direction."

25 Help me understand where first, Item Number 22, related

1 to the list of non-technical concerns on the chart.

2 A On the chart?

3 Q Yes, let's go to the chart, please.

4 A It comes under the column, "Direct Craft," on Page One.  
5 Also it comes under Page One--

6 Q "Direct Craft," will you, sir, do you have Item 22  
7 listed there?

8 A Well, it says, "Craft supervision does not know pro-  
9 cedures; therefore, inspectors have to direct the work and Craft  
10 asks for direction."

11 It says, "Has to direct Craft, they don't know pro-  
12 cedures. Craft still asks for direction."

13 Q That is Item 22?

14 A Yes.

15 Q How come it is not numbered? Is there any reason for  
16 that?

17 A Earlier we started numbering them and then later felt  
18 like it really wasn't necessary to number them.

19 Q Twenty-four, "QC Inspectors are concerned about per-  
20 forming work that is not their responsibility." Help me find that  
21 on the chart.

22 A Number 24?

23 Q Yes, sir.

24 A Okay, that comes under "Work Direction," or "Directing  
25 Craft." If you will look at the other typed sheet, this may

1 have come out of the same thing. It was just abbreviated there  
2 under "Directing Craft."

3 Q But on the page under "Work Direction," on Page 4C at  
4 the top of the page there, "QA Inspectors are concerned about  
5 performing work that is not their responsibility."

6 And it says, "There is no clear indication that  
7 inspectors are performing work outside their responsibility. It  
8 should not matter what they do to aid productivity as long as it  
9 does not violate the procedures."

10 "We all work for Duke Power, and we should work to-  
11 gether in a team effort to complete the job." Conclusion,  
12 "Communicate to inspectors that in performing their work there  
13 is a potential for conflict with the Craft.

14 "Provide appropriate training to inspectors that will  
15 allow them to deal with these situations. Develop a 'team work'  
16 program for QA--Construction--Design that brings the departments  
17 together with an attitude of cooperation for the common goal of  
18 productivity and quality in building nuclear plants."

19 You are saying that it falls where on the handwritten  
20 chart of the concerns?

21 A It is probably under the "Directing Craft," or it is  
22 possibly the second one there that relates to John Bryant,  
23 "Craft still asks for directions."

24 Q It is not anywhere else?

25 A No.

1 Q Okay, Number 25 on that handwritten list?

2 A "QC Inspectors feel that too much control is exercised  
3 over what they are doing--procedure should be the control."  
4 That would be under Procedures under Jackson.

5 Q "Told to interpret, strictly told to be liberal on  
6 problems."

7 A Right, just a minute and I will find that on here.

8 Q I am talking about 25 now.

9 A Well, that is what I'm looking for. On Page Two under  
10 Procedures, A3, it is Number 25, and it was addressed in summary  
11 form at the top of Page 3, "In all procedures there are gray  
12 areas that call for judgment decisions on the part of an  
13 inspector. The intent and purpose of the procedure must be  
14 understood before dealing with gray areas."

15 "These gray areas are sometimes addressed through  
16 memos or word of mouth instructions as to exactly what is meant  
17 by a particular procedure."

18 "These memos and instructions are then incorporated into  
19 the next revision. There is no evidence that too much control  
20 has been exercised over inspectors rather than procedures being  
21 the controlling factor."

22 Q Okay; it is clear that Number 24 is not on the hand-  
23 written chart, is it?

24 A No, it would be.

25 Q I mean Number 25, 25 is what I'm talking about. The

1 number is not there?

2 A The number is not there.

3 Q And you are saying it falls under 25, 25 is under  
4 Jackson's Procedures?

5 A Correct.

6 Q How about Standridge responsibilities?

7 A "M. Standridge." It says, "too much control." Now what  
8 is your question in reference to that?

9 Q Which one is it; is it "too much control," or is too  
10 much control "told to interpret, strictly told to be liberal when  
11 problems--

12 A Okay, that could be either one of those.

13 Q How about 26, could 26 be either one of those?

14 Twenty-six on the handwritten list, "QC Inspectors feel they  
15 receive inconsistent direction from supervision--one time tighten  
16 up and the next time lighten up."

17 A That could be Jackson.

18 MR. GIBSON: Mr. Guild, it is almost 20 after.  
19 Would continuing for about ten minutes allow you to  
20 finish up Mr. Alexander?

21 MR. GUILD: We will finish this list, anyway.

22

23 BY MR. GUILD:

24 Q Number 26 does not appear on this handwritten chart;  
25 does it, the number?

1 A Yes, it does.

2 Q Okay, it appears by the blank?

3 A Right, which would be "Manager Support Division is  
4 inconsistent."

5 Q Oh, it goes along under Management Support?

6 A That's correct.

7 Q "Directions inconsistent; inspector not trusted,  
8 respected."

9 A Yes, which would be 16.

10 Q Twenty-six and Sixteen are the same?

11 A "Inspector not trusted," is 16.

12 Q All right, sir; I see. How about 27? Is that an NCI  
13 matter?

14 A It could have been.

15 Q "QC Inspectors feel that QA Management overrides their  
16 decisions on NCIs."

17 A "Overrides their decision on NCIs," 27 is under Manage-  
18 ment Support.

19 Q All right, and where does 27 appear in the final report?

20 A On the bottom of Page One, Number 1C2, "QC Inspectors  
21 feel that QA Management overrides their decisions on NCIs."

22 Q Number 28, "QC Inspectors feel that Larry Davison is  
23 trying to cover up his mistakes while he was at Catawba."

24 A How about under Career, under Management Support?  
25 That is probably it.

1 Q Number 28 does not appear on the chart?

2 A No, 28 does not appear on the chart that I saw. It may  
3 be like 26 was a moment ago.

4 Q Take a moment and see if we can find it here.

5 A I can speak to that under Recourse on Page 5E2, E1.

6 Q Okay, yes.

7 A There it is.

8 Q Yes, what did you find?

9 A That there was no specific instance given in "A" above;  
10 two concerns, summary, "There are no specific incidents given in  
11 the above two concerns and no summary or conclusion can be  
12 reached."

13 The recommendation was to "talk to each of the inspectors  
14 that had the concern of cover up or scapegoating for additional  
15 specifics before addressing these concerns."

16 I did talk with them, and there was no specific infor-  
17 mation that I could give. It was more or less a feeling that  
18 they had from Larry Davison.

19 Q What else did you do about it?

20 A Nothing.

21 Q Nothing, no further action?

22 A (The Witness shook his head negatively.)

23 Q When there were no specifics to investigate or to look  
24 into, who did you talk to?

25 A I talked to the two inspectors about that.

1 Q Who?

2 A MR. GIBSON: He is getting Exhibit One.

3 THE WITNESS: Karriker was one of those, I believe  
4 we are talking about--which item now, so I don't get  
5 confused here?  
6

7 BY MR. GUILD:

8 Q Well, I asked you first about Item Number 29, and you  
9 referred me to findings E1, it is under what, Recourse?

10 A Right.

11 Q Okay, E1 and E2, both relate to Larry Davison?

12 A Yes.

13 Q Okay, sir; tell me what you find.

14 A Just looking back at the chart and trying to identify,  
15 since Items One and Two you are referring to both of those, one  
16 of those would probably have come from John Bryant and the other  
17 from Karriker; and both of those individuals were interviewed,  
18 Karriker on 3/31, and Bryant on April 2nd.

19 Q Before you go any further now, we will get down to the  
20 last one, Number 30 on your handwritten list. Are you saying  
21 30 cross references with Mr. Bryant's under the Management  
22 Support chart?

23 A "Larry Davison suggested that an inspector resign and  
24 used inspectors as scapegoats when NRC found work that didn't  
25 conform to standards."

1 Well, I am saying that 28 is probably Karriker, Cover  
2 Up; and 30 is Bryant.

3 Q Under Management Support?

4 A Right.

5 Q Go ahead, I'm sorry; and you know who Mr. Bryant meant?

6 A No, on 4/2.

7 Q And Karriker on 3/31?

8 A Right.

9 Q Continue.

10 A On Page Three you can see where I had written down just  
11 some notes of intimidated threats and lack of trust, and Larry  
12 Davison's scapegoats, your fault in not giving directions to them;  
13 he could not give me any other information other than it was his  
14 feeling of that.

15 On Karriker I did not make a note, but it was discussed.  
16 He did not give me any specifics about his situation either.  
17 It was more or less a feeling that he had, but no specifics.

18 Q Did they tell you that they no longer had those concerns?

19 A The inspectors at the time of the discussion that I had  
20 with them were open to allowing us to implement the things that  
21 we had completed, and if they were not satisfied, they would come  
22 back later and they have not come back.

23 Q Put it this way; what choice did they have?

24 A They could have filed another recourse.

25 Q All right, sir; on this specific matter, did either Mr.

1 Bryant or Mr. Karriker tell you how they were no longer concern-  
2 ed as they described relating to Mr. Davison covering up his  
3 mistakes or using, Davison using inspectors as scapegoats when  
4 the NRC found work that did not conform?

5 A They did not tell me that they were.

6 Q They felt good about the Task Force and the explanation  
7 of it and were willing, with the changes that were being made  
8 and implemented as a result of the Task Force, to allow this to  
9 be implemented.

10 In your notes of your meeting with Mr. Bryant, you  
11 said, "Larry Davison--scapegoats--your fault--give direction."  
12 Did Mr. Davison, did Mr. Bryant review his concern?

13 A He was relating in discussions that he had had with  
14 Larry, that something that Larry had said was his fault, and he  
15 felt that he was being the scapegoat for it.

16 Q So Mr. Bryant renewed his concern?

17 A He was relating his feeling, I don't know that he was  
18 renewing his concern.

19 Q Okay, and then the General Concerns, I am back to the  
20 handwritten list of concerns down at the bottom, the handwritten  
21 list of concerns, another heading, General, one, two, three, four,  
22 five items; and where are those five items addressed, Mr. Alexander?

23 A They are addressed in the Welding Inspector Summary  
24 Report.

25 Q What do you mean by the "Summary Report"? That is

1 Exhibit Four here?

2 A Yes.

3 Q The non-technical Welding Inspector concerns?

4 A Communications is identified as Item Six. "While there  
5 is no specific concern in the area of communication, it is clear  
6 that this is an area that needs much attention."

7 And we list conclusion items here.

8 Q All right, sir; you identified that as a primary area  
9 for corrective action?

10 A Yes.

11 Q But the inspectors did not identify it as a specific  
12 concern at all?

13 A That's correct.

14 Q Okay, how about advancements?

15 A That would come under "General," under Item Five under  
16 "Qualifications." And there are about three items that are  
17 addressed there that talk about employees being unqualified;  
18 employees were over qualified; and then education and prior  
19 experience were not taken into consideration like other organi-  
20 zations, which is a general thing which talks about advancement  
21 and that type of thing.

22 It is a general thing like the "communications."

23 Q Okay, and harassment.

24 A We have identified harassment.

25 Q Okay, help me identify that again.

1 A It is the top of Page 5C1, under Item 4, "Recourse."

2 Q Okay, wages?

3 A That would be under A1 under the conclusions there where  
4 it talks about the position analysis for Welding Inspector.

5 Q This is under "Qualifications"?

6 A Yes, sir.

7 Q All right, and Qualifications?

8 A It is Item Five.

9 Q By the same name, "Qualifications"?

10 A Correct.

11 Q Okay, let's break for lunch.

12 MR. GIBSON: Proceeding for another few minutes  
13 would not allow you to finish him?

14 MR. GUILD: No, I have 12:35.

15 (Whereupon, the Deposition adjourned for a  
16 luncheon recess at 12:35 p.m., and reconvened at  
17 2:02 p.m., and the following proceedings were had:)

18

19

20

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22

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25

1 BY MR. GUILD:

2 Q Mr. Alexander, when did you complete the work of the  
3 non-technical concerns review?

4 A The review of the concerns?

5 Q Yes.

6 A It would have been sometime probably in early March of  
7 '82.

8 Q Okay; reflected in the cover correspondence that you  
9 earlier identified to Mr. Owen and Mr. Grier?

10 A Right, it is in that stack.

11 Q That is all right; we need it in a moment. I am trying  
12 to get an idea of the time and about the work of the Task Force  
13 in recommended corrective action of these concerns.

14 A The recommended corrective action?

15 Q Yes, as far as what was going on when.

16 A I wrote a letter on July 15 on the status of the Welding  
17 Inspector non-technical concerns which outlined the status of the  
18 recommendations.

19 Q All right, and is there a more recent status report on  
20 the implementation of recommendations from the non-technical  
21 concerns review?

22 A Well, if you want to take them item by item, the first  
23 work is work direction to train inspectors in their role and  
24 responsibility.

25 Q Let me ask you this: Is there a document that reflects

1 a more recent status other than July 15, 1982?

2 A No, not that I'm aware of.

3 Q Can you give me updates from this document of current  
4 status?

5 A That's correct; that is what I can do.

6 Q Let's go through the specific points on your July 15,  
7 1982, memo.

8 A Item One was complete during August of '82, the  
9 presentation of The Inspector, implementation of the Team Work  
10 Program -- while we haven't implemented a full Team Work Program,  
11 certain things have been done; and this is using the department  
12 logo, the department newsletter, the uniform department color;  
13 and there was a laundry room list included as part of the  
14 things that could be done as far as team work things.

15 I don't have a copy of that before me, uniform hard  
16 hat color.

17 Q What are you referring to?

18 A A laundry list of things to be done as far as team work.

19 Q It is a single sheet, it says, "Team Work Program,"  
20 at the top?

21 A The purpose of this was basically just to outline  
22 some things, welders, identification of the inspectors, and to the  
23 QA organization and to improve the unit of the department.

24 Q Standard hard hat, department logo, department news-  
25 letter, use of bulletins, meetings with employees to explain

1 management procedures and employee forum procedure, Quality  
2 Circles Program, increased training in safety and first aid  
3 development, train employees in communication skills and bulletin  
4 boards--

5 And those are in process?

6 A Yes, the hard hat has been completed, the department  
7 logo, the department newsletter, we've identified a bulletin  
8 board to use for departmental communications; we have new manage-  
9 ment procedures.

10 We are meeting with employees to explain those.

11 Q What are those?

12 A Management procedures?

13 Q Yes.

14 A That would be procedures like the harassment procedures,  
15 those administrative type procedures.

16 Q Are there others?

17 A It would be regular work procedures which would be just  
18 handled on a required training list.

19 Q Are there any management procedures that represent  
20 corrective actions recommended by the Non-technical Task Force?

21 A Are there management procedures?

22 Q Are there any new or changed management procedures that  
23 represent corrective actions recommended by your Task Force?

24 A Yes, Employee Recourse, Quality Recourse and Harassment,  
25 as well as Employee Forum.

1 Q And they are referred to further on?

2 A On the July 15 memo.

3 Q Okay, will you get to those?

4 A Yes. The Employee Forum is a management procedure,  
5 Quality Circle Program, training in safety, first aid--all  
6 supervisors at Catawba have been trained in communication skills,  
7 and we have bulletin boards in place at Catawba.

8 Q Tell me what the Employee Forum is, please.

9 A The Employee Forum is a procedure that allows employees  
10 to meet with a Second Level Manager, not their first line, but  
11 Second Level Management Supervisor and discuss questions, con-  
12 cerns that they may have, just an informal type setting.

13 Q Group setting?

14 A Yes.

15 Q So it is more or less a two way type communication  
16 program where employees can ask questions and the supervisor will  
17 answer the question.

18 How frequently are those conducted?

19 A There will be two of those per year. That is the way it  
20 is scheduled now.

21 Q That vehicle has not been available before?

22 A Not in that form; there was some of that being done, but  
23 it was not in that form.

24 Q And in the instance of Welding Inspectors, that would be  
25 Mr. Davison?

1 A No, not necessarily; it would be the Second Level  
2 Supervisor.

3 Q Who would that be?

4 A Art Allum or Fred Bulgin, now, would be who the super-  
5 visors report to. You have first line, second level. Do you  
6 want me to go through this list?

7 Q Yes, please.

8 A Recourse, Employee Recourse Procedure was implemented  
9 July 1, '82. Quality Recourse was implemented July 1, '82; and  
10 Harassment Procedure was implemented July 1, '82.

11 Q How many times have employees used the departmental  
12 Harassment Procedure?

13 A Let's see, I believe it has been used only one time that  
14 I can think of right now.

15 Q When was that?

16 A In the last few months.

17 Q Is that the Max Reep?

18 A Right.

19 Q Is that consistent with your expectations?

20 A Of the use of the procedure?

21 Q Yes.

22 A I guess the inspectors were saying if they were being  
23 harassed as much as they said they were, I would expect the pro-  
24 cedure to have been used more.

25 Q How about the Employee Recourse Procedure?

1 A The Employee Recourse Procedure has been used quite often.

2 Q By inspectors?

3 A Yes.

4 Q Give me an idea of how often is "quite often."

5 A At Catawba I think we may have had, I can only think of  
6 one instance there. We have had several at some of the other  
7 locations.

8 Q What was the one instance at Catawba?

9 A It was on--let me think a minute--I don't know what the  
10 guy's name was; but I need to put it in perspective in my mind.  
11 It was on a promotion.

12 Q Was it for an inspector?

13 A Yes.

14 Q Who was that?

15 A It was not a Welding Inspector, a Radiographer.

16 MR. GIBSON: Mr. Guild, I am not sure we will release  
17 that information unless it is clearly involving Welding  
18 Inspection at Catawba.

19 I think I need to confer with Mr. Alexander unless  
20 you do not plan to ask him anything further.

21 MR. GUILD: Yes, I would like to know who the  
22 inspector was.

23 (Whereupon, the Witness and his Counsel con-  
24 ferred off the Record.)  
25

1 MR. GIBSON: He will answer your questions, Mr.  
2 Guild. I believe this involves Mike Bring, whose  
3 documents have already been made available concerning  
4 his recourse.

5

6 BY MR. GUILD:

7 Q Mr. Bring is a Radiographer?

8 A Right.

9 Q And how about the departmental Quality Recourse  
10 Procedure?

11 A It has not been used to my knowledge.

12 Q And is that in essence a technical recourse procedure  
13 in the QA Department?

14 A That's correct.

15 Q Would you know if it had been used?

16 A Definitely.

17 Q All right, sir; you've gone through "Recourse" then.

18 A Qualifications, this relates back to Item 1A, which was  
19 done in August of 1982.

20 Q It is the training?

21 A Right. Communications was to train the supervisors in  
22 inspection and communication skills, both oral and written. The  
23 supervisors have had the training at Catawba.

24 The inspectors will get it in a training plan that we  
25 have devised beginning in late '83, and going into '84. Written

1 communications will also be a part of this; but it will also be  
2 a later date.

3 Employee Forum, we talked about. I can't remember  
4 when that was implemented. It seems like it was February of '83.  
5 Effective Management Program, we have had 14 supervisors to  
6 attend this program.

7 Q What is that?

8 A A comprehensive program dealing with management, planning,  
9 organizing, developing program skills.

10 Q What level supervision has been trained?

11 A Those that have been trained and probably will, this is  
12 all that will be trained were the managers and Third Level  
13 Supervisors.

14 Q Third Level and above?

15 A Yes, there may be some Second Level that were trained;  
16 I don't remember right off.

17 Q In Catawba in Inspection who would that be?

18 A That would be people like Third Level would be people  
19 like Bob Morgan or Joe Willis.

20 Q And above?

21 A And above, and we may have gotten some Second Level  
22 people; I don't remember right off.

23 Q And what recommendation does that relate to?

24 A It is to a general recommendation on communication and  
25 training.

1 Q You don't have a specific recommendation about manage-  
2 ment effectiveness that that relates to?

3 A No, I don't believe so.

4 Q Now, Mr. Alexander, what, if any changes in those areas,  
5 work direction, recourse, qualifications or communications, have  
6 been recommended or effected for Craft employees or supervision?

7 A I can't answer that question.

8 Q Do you know of any?

9 A You have to talk to somebody from the Construction  
10 Department. I don't know what they have done or haven't done.

11 Q They haven't informed you of any; have they?

12 A We have a catalog of their training, but I don't know if  
13 any of that training was implemented as a result of this or not.  
14 I can't answer that question.

15 Q You have not been informed of any?

16 A I know they haven't said we are doing this training  
17 because of this particular item here.

18 Q And you haven't recommended any corrective action in any  
19 of the areas here or any other areas with regard to Craft  
20 personnel; have you?

21 A Construction Department is aware of the things that we  
22 are doing or have done. If you remember back to one of the things  
23 was to bring some unity between Design Engineering, Construction  
24 and QA, and the personnel people have a monthly meeting in which  
25 we talk about things we are doing and things we are planning on

1 doing which would cover some of these items; so they are aware  
2 of what we are doing and we are aware of what they are doing.

3 But to say specifically they relate to this, I can't  
4 say that.

5 Q You are not aware of anyone who was charged with  
6 specifically taking corrective action outside of the QA Depart-  
7 ment with Craft or Construction?

8 A Jim Grogan would be the person who would be charged with  
9 that. He is the Manager of Construction Resources.

10 Q Mr. Grogan would have known that?

11 A Right.

12 Q Let's mark the July 15, 1982, memo as the next Exhibit,  
13 please.

14 (Whereupon, the document referred to as memo  
15 dated July 15, 1982, was marked and received by the  
16 Court Reporter as Alexander Exhibit Six and entered  
17 into the Record.)

18

19 BY MR. GUILD:

20 Q Mr. Alexander, beyond the completion of the recommenda-  
21 tions reflected in your July 15 memo to Mr. Grier and the updates  
22 that you have given us, do you have that continual responsibility  
23 with respect to implementation of corrective actions from the  
24 non-technical concerns?

25 A Yes.

1 Q What other responsibilities did you have in that regard?

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

3 Q Was there anything else that is included in your  
4 responsibilities with respect to implementing those recommenda-  
5 tions beyond the items that you have mentioned?

6 A We developed additional training plans and things of  
7 that nature.

8 Q Did they relate to the recommendations of the Welding  
9 Inspection?

10 A I don't know that they relate specifically to this;  
11 but they could have been the result of this or the indication  
12 for additional training, and the others have training that were  
13 identified; yes.

14 Q What I want to understand is any and all corrective  
15 action that you are aware of and in this instance, ones that  
16 you are aware of regarding their implementation of matters  
17 identified in response to the Welding Inspector concerns.

18 A Well, the training plan, 8/3 through 8/5 or 8/7, I  
19 don't remember exactly what the date on that is; I believe it is  
20 8/7.

21 Q Yes, okay.

22 A A lot of other things that we have as far as communi-  
23 cations, Employee Forums, all those things were ongoing programs.  
24 A lot of those are ongoing, and they will continue to be ongoing.

25 We will continue to do other things not necessarily as

1 a result of this, but because it is good management and good  
2 communication skills and will make us more productive in the  
3 things we are doing.

4 Q We could take a long time about all those things, but  
5 what I'm interested in is things that relate to the Welding  
6 Inspection.

7 A I can't think of anything specifically other than the  
8 things we have talked about. There is no list of things we are  
9 doing as a result of that.

10 Q All right, sir; thank you. Now what is your responsi-  
11 bility with regard to responding to recourses that have been  
12 filed under, let's take first the Harassment Recourse Procedure?

13 A Where harassment has been reported or suspected, it is  
14 reported to the supervisor and to Employee Relations, which is  
15 one of my organizational groups.

16 Employee Relations personnel will determine whether or  
17 not an investigation or further information is needed to make a  
18 decision.

19 If so, they will take care of this. I would be apprised  
20 of harassment situations in much the same way that other managers  
21 would be, except it would come through Employee Relations instead  
22 of through the line organization.

23 It would be involved in the discussion of recommendations  
24 to the manager as to what should or should not be done to deal  
25 with the situation at hand; basically an advisory function.

1 Q And you have had only one of those?

2 A Yes.

3 Q And that was Mr. Reep?

4 A Correct.

5 Q Will you tell me about Mr. Reep's harassment charge?

6 A If I remember correctly, he had gone down to do an  
7 inspection and found a welder asleep and not in control or  
8 possession of his welding rods.

9 He went back and got a Senior person or lead person in  
10 his crew, in the inspector's crew; and they came back down and  
11 took control of the welding rods.

12 About this time the welder woke up and an exchange of  
13 words resulted from that; and Reep filed an harassment charge  
14 as a result of that.

15 We investigated from the QA side. Construction investi-  
16 gated from the construction side, and it was determined that was  
17 not really harassment, but more or less an exchange of words during  
18 a heated argument.

19 Both were counseled. The welder did receive a disci-  
20 plinary action because he was not in control of his welding rods.

21 Q And what did you do to investigate or review the  
22 harassment charge?

23 A Debbie Ensley, who was Employee Relations Assistant at  
24 Catawba, did the investigation on that from the QA side. Faye  
25 Fowler, Employee Relations from Construction, did the investigation

1 was the Supervisor of Employee Relations, and her people did  
2 an investigation I believe from the Construction side.

3 Q Yes; and what was the result and what did you do?

4 A I think there may be one or two or a memo that I wrote  
5 to the Personnel Manager at Catawba. I would have to look at  
6 that information to be able to refresh my memory as to exactly  
7 what I did and did not do.

8 Q Sure.

9 MR. GUILD: Counsel, will you make a copy of that  
10 available?

11 MR. GIBSON: We do not have an extra set of the  
12 Reep documents at hand. If you want us to go a few  
13 offices away and get one, we will.

14 MR. GUILD: I would appreciate that, I only have  
15 this one set.

16 MR. GIBSON: Why don't we break while we get that.

17 (Whereupon, the Deposition recessed at 2:35  
18 p.m., and resumed at 2:41 p.m.)

19  
20 THE WITNESS: What is your question?

21

22 BY MR. GUILD:

23 Q I want to understand what the conclusion of the harass-  
24 ment charge was and what your involvement in it was, Mr.  
25 Alexander?

1       A     March 29, Steve Alexander, who was Personnel Manager at  
2 Catawba, wrote a letter and stated, "Enclosed is a copy of the  
3 recent investigation of the Welding Inspector complaints against  
4 Construction Welder J. R. Jones."

5               "The investigation did not reveal evidence to support  
6 Reep's complaint of harassment." I wrote him back a letter on  
7 April 6 and stated, "While the investigation revealed that a  
8 confrontation did take place, both the welder and inspector are  
9 responsible for their actions in this incident; recommended that  
10 Reep be counseled on carrying out their jobs in a calm, collected  
11 and rational manner."

12               So that was, so to speak, the analysis of all the  
13 investigative material that was provided by QA and Construction.

14       Q     Did you find for or against Mr. Reep in his complaint  
15 of harassment, Mr. Alexander?

16       A     There was a confrontation, but I did not see it as being  
17 harassment.

18       Q     So you rejected Mr. Reep's claim of harassment?

19               Now the department Craftsmen procedure commits the  
20 investigation to the Employee Relations?

21       A     Personnel, correct.

22       Q     Debbie Ensley?

23       A     Yes.

24       Q     Didn't Ms. Ensley conclude that Mr. Reep's harassment  
25 charge should be sustained, that there was evidence supporting

1 his harassment charge?

2 A She had written a letter on March 30 to J. C. Rogers  
3 which was never sent stating that the harassment charge should  
4 be upheld.

5 Q She is saying that he felt threatened and intimidated,  
6 verbally abused by Jones' statement that Reep would not leave  
7 the in-core pit with the welding rods in his hand.

8 It goes on to say that one of the Witnesses that was  
9 deposed said he heard Jones make this statement and the fact that  
10 Jones denied making the statement shows that he realizes the  
11 serious implications.

12 "An employee should not have to wait for a physical  
13 action to take place before he can claim to have felt threatened  
14 (verbally abused)."

15 "Clearly there is no need for statements such as the one  
16 Reep and Barkley say that Jones made. It is recommended that  
17 Jones be counseled about not making such statements again and about  
18 the consequences of making such statements again."

19 A While she said that the statement of harassment be upheld,  
20 her conclusion was the same conclusion that I came to; that Jones  
21 should be counseled about making such statements and the conse-  
22 quences of doing this.

23 She does that in the last paragraph of her letter.

24 Q You recommended that the complainant be counseled?

25 A Both be counseled, the Welding Inspector and the welder.

1 Q And you rejected the claim of harassment?

2 A I rejected it on the fact that I did not see it as  
3 harassment; I did see it as a confrontation, but not as harass-  
4 ment.

5 Q Who wrote "no," on the face of Ms. Ensley's March 30  
6 memo?

7 A I don't know.

8 Q Did you?

9 A Not that I know of; I could have. I don't think so,  
10 though.

11 Q You got a copy?

12 A Do I have a copy?

13 Q You've got a copy; you received a copy?

14 A Yes. I don't know if this is my copy.

15 Q Your name appears at the bottom; right, along with Steve  
16 Alexander and Larry Davison. Is that Mr. Davison's handwriting?

17 A I don't know.

18 Q Is that your handwriting?

19 A I don't know.

20 Q You don't know whether it is the other Mr. Alexander,  
21 Steve Alexander's?

22 A No, I don't know where this document came from.

23 Q You got one from Mrs. Ensley; didn't you?

24 A I don't know if--I don't recall the circumstances  
25 surrounding the letter. I said that we did not want to send this

1 letter to John Rogers.

2 Q You told her that?

3 A Yes, or Larry Davison, one; I don't remember which one.

4 Q One of you, you or Mr. Davison, told her not to send  
5 it?

6 A I told her one of them, either Debbie Ensley or Larry  
7 Davison, that we did not want to send this letter to John Rogers.

8 Q It was your decision not to send the letter?

9 A Yes.

10 Q You just don't know who wrote "no" on the face of it?

11 A That's correct.

12 Q Did you reject Mrs. Ensley's factual conclusion that  
13 this reflected in this letter concerning the actual events that  
14 occurred?

15 A What part are you referring to?

16 Q Anything, I want to understand whether you rejected her  
17 factual conclusion.

18 A I rejected the fact that it was harassment.

19 Q That is what I understand; you did not agree it was  
20 harassment, but did you reject the facts that she concluded  
21 occurred?

22 A No, because there are statements to substantiate what  
23 occurred.

24 Q You don't reject her factual conclusions; you just reject  
25 her conclusion that it was harassment?

1 A Right.

2 Q We come back to a question that was asked earlier: How  
3 do you define harassment? I think you said with respect to the  
4 welding concerns you took it at face value; correct?

5 A Right.

6 Q How do you understand the term harassment?

7 A We have harassment defined in the Harassment Procedure  
8 as any action that singles out employees to the employee's  
9 objection or detriment because of but not limited to race, sex,  
10 religion, national origin, age, handicap or innate personal  
11 characteristics.

12 It involves two or more employees and may or may not  
13 involve supervisors.

14 Q Okay.

15 A Most of the times, especially in a verbal abuse type  
16 thing, it is a repeated thing.

17 Q Calling someone short, shorty, when they object to that  
18 and they have said, "Don't call me short or shorty, I don't like  
19 that."

20 A That would be an example of it.

21 Q Okay, why isn't this harassment, the Reep facts as found  
22 by Mrs. Ensley?

23 A Well, it was a confrontation between a Welding Inspector  
24 and a welder. I don't think there was any intent of harassment;  
25 it was more or less a disagreement.

1 I don't think the intent was harassment. It was a mis-  
2 understanding of a situation, and it got heated, and it got out  
3 of hand.

4 Both the welder and the Welding Inspector did not act  
5 in an adult manner. And that to me, is not necessarily harass-  
6 ment.

7 It is just like you and one of your people agreeing  
8 on a particular item and getting loud about the item, and  
9 exactly what happened in this situation here.

10 Q May I see that copy of the procedure for a second, Mr.  
11 Alexander?

12 MR. GIBSON: Similar to our discussions about  
13 objections, Mr. Guild.

14 MR. GUILD: Right.

15  
16 BY MR. GUILD:

17 Q You would agree, would you not, Mr. Alexander, verbal  
18 abuse can represent harassment?

19 A Yes, if it is a continuous or repeated action and the  
20 other person has been notified or said that I consider this as  
21 harassment or verbal action.

22 Q Did you understand harassment to require that the  
23 individual who is the victim of harassment is singled out because  
24 of a characteristic such as race, sex, religion, national origin,  
25 age, handicap, or innate personal characteristic, as you stated

1 in the policy?

2 A Repeat that again.

3 Q Is your understanding of the term harassment such that  
4 the victim has to be singled out because of one of those  
5 characteristics that is mentioned?

6 A Not necessarily.

7 Q Then what other kind of personal characteristics would  
8 be required in order to constitute harassment?

9 A Well, we state in the procedure where there is harass-  
10 ment or knowledge of something that is not correct, whether  
11 harassment or not, we are going to investigate the situation and  
12 take whatever corrective action needs to be taken.

13 More than likely had this situation come up and the  
14 employee had not come in and said I want to file a harassment  
15 charge, and we knew there had been a confrontation between a  
16 welder and Welding Inspector, we would have taken action at that  
17 time regardless of whether or not the employee had filed a  
18 harassment charge.

19 Here is what I'm saying: If we know something out there  
20 is not right as far as an employee relationship, then we are  
21 going to look into those situations when we have knowledge of  
22 them and get to the bottom of them and try to take some corrective  
23 action or make the working relationship such that they can get  
24 their jobs done.

25 We don't just sit back and not do anything until somebody

1 supposed--when I came up against a situation like that, instead  
2 of egging it on and continuing the thing, walking away and dealing  
3 with it like that, no; I wouldn't feel threatened and intimidated  
4 by it.

5 But where you stay there, I'm not so sure he was  
6 threatened or intimidated by the initial part, but the confron-  
7 tation got worse on both sides.

8 To me, there is no way you can get harassment out of that.  
9 It is more or less a verbal confrontation, not verbal abuse.

10 Q Did you conclude that Mr. Reep acted improperly?

11 A Yes.

12 Q On what basis?

13 A That he did not walk away from the situation once he  
14 saw it was getting into a confrontation, as he had been instructed  
15 to do.

16 Q By whom?

17 A In The Inspector tape.

18 Q The film?

19 A (The Witness nodded his head affirmatively.)

20 Q Now, Mr. Davison, Mr. Larry Davison, received a copy  
21 of the resolution of this harassment complaint.

22 A My resolution, yes.

23 Q Did Mr. Davison agree with your resolution?

24 A Not entirely.

25 Q What did Mr. Davison do, say? I am looking at an

1 April 6, 1983, memo, a note on your memo.

2 A He says he talked with me by phone on April 13 and I  
3 indicated, "He will discuss with Steve Alexander and make the  
4 point we think their report should be amended to clearly counsel  
5 Jones that action like he took in this case is not type expected  
6 and will not be tolerated."

7 This was communicated to Steve Alexander, and they have  
8 done this. We haven't received the documentation where they have  
9 done it, but it has been done.

10 Q Why did Mr. Davison disagree with your resolution?

11 A I think in the end he agreed with my resolution. Again,  
12 he had a concern about how I was looking at it as being a  
13 confrontation rather than harassment.

14 Once we went through his concerns, then he was in agree-  
15 ment with my resolution or my recommendation, or we would have  
16 stated so on this April 6 memo.

17 Q Well, is it his March 26 memo to you that reflects his  
18 position?

19 A Yes, right.

20 Q Saying that he disagreed with my recommendation is not  
21 necessarily truly accurate?

22 A This was his observation from it, and after we discussed  
23 it, he and I concurred to the best of my memory.

24 Q Mr. Davison states in that memo, the March 26 memo,  
25 second page, "Therefore, I recommend the basis of charge of

1 harassment be upheld and Jones be warned not to make such state-  
2 ments again, and the consequence of making such statements again."

3 He disagreed with you on the harassment conclusion.

4 A Yes, but not on the action to be taken.

5 Q Did Mr. Davison change his mind on his conclusion about  
6 the charge of harassment?

7 A Well, my recommendation states the counseling part, and  
8 that is what he had recommended. It is more or less his inter-  
9 pretation of harassment as he saw it versus my interpretation of  
10 harassment as I saw it.

11 I saw it as a confrontation.

12 Q Right, but even Larry Davison saw it as harassment.

13 A I don't know if he would call it harassment; he would  
14 call it a confrontation. I can't disagree with what is there  
15 because that is what he says.

16 Q It is on a piece of paper in front of you?

17 A Right, I can't say that if it is on the piece of paper.

18 Q And beyond you recommending that both of them be  
19 counseled, in effect, finding that both of them did wrong and  
20 rejecting the harassment claim, Mr. Davison notes on the face of  
21 your April 6th memo, his conversation with you where he urges you  
22 to amend the report to reflect counseling Jones, that such behavior  
23 would not be tolerated; namely, the harassment?

24 A The behavior will not be tolerated, whether harassment  
25 or confrontation; the behavior will not be tolerated, but that

1 was already in my April 6 letter.

2 He is saying in his note, "I will follow up with Steve  
3 Alexander and make sure it is part of the record," and that I  
4 have done, although we have not yet received the documentation.

5 Q All right, and this is the only instance where your  
6 harassment procedure has been employed, Mr. Alexander?

7 A To the best of my knowledge, it is.

8 Q Do you have any expectation, given your reviews on what  
9 constitutes harassment, that you will ever see another charge of  
10 harassment?

11 A Yes, sir; I think we will.

12 Q And this harassment procedure is your response to Welding  
13 Inspector concerns regarding harassment?

14 A (The Witness nodded his head affirmatively.)

15 Q You expect that you will follow the procedure in the  
16 future in the manner you followed it in the Reep case?

17 A As far as investigating, taking statements from employees  
18 and recommendations being made to managers and decisions being  
19 made; yes.

20 Q How about the standard that you apply? Are you confident  
21 in the standard that you employed in the Reep case, your defi-  
22 nition of the term harassment?

23 A Yes.

24 Q And you will apply those in the future?

25 A I think it has to be on a case by case basis. If there

1 were some things, if Reep had walked away and the Welding Inspector  
2 was persistent, then yes; I think it would have been harassment.

3 But where it was both parties, the Welding Inspector  
4 became a part of what was going on and then he was equally as  
5 guilty as the welder; and that was a confrontation and not  
6 harassment.

7 Harassment, as I view it, is you doing something to me,  
8 but I don't do anything to you and you continue to do it back to  
9 me.

10 Q All right, what I want to understand is are you com-  
11 fortable with the Reep case being a precedent? By that, I mean  
12 others on the job in the Quality Assurance Department who have  
13 looked at the one instance where the department harassment pro-  
14 cedure has been employed, the corrective action for the Welding  
15 Inspectors, non-technical concern about harassment, should I  
16 understand they should look at this as representative and prece-  
17 dent of how your department will apply the standard of harassment  
18 in the future?

19 A No.

20 Q Why not?

21 A Because each case is done on a case by case basis. All  
22 the circumstances have to be investigated. We have concerns that  
23 come to us that are not harassment that we look into, and we  
24 follow up on, and we take action on, whether it is an employee  
25 and their supervisor or two employees that don't get along within

1 a crew and that takes place.

2 There it is handled through counseling sessions.

3 Q What I want to understand is this: Are you going to  
4 do anything different than you did in the Reep case?

5 A What I'm saying is we will look at each case on a case  
6 by case basis.

7 Q Do you know of any policy you will make on a basis of  
8 the Reep case?

9 A No, it states what we will do right there in the pro-  
10 cedure. I am comfortable with the Reep case.

11 Q And the standard employed?

12 A And the standard in that does not mean we will use the  
13 same standard in another case. Each will be handled on a case by  
14 case basis.

15 Very few Employee Relation matters are handled identically  
16 the same way.

17 Q Judges say that kind of thing all the time, Mr. Alexander;  
18 and every case has to be on a case by case basis, but I want to  
19 understand you, sir, if there is a procedure, a written standard  
20 of conduct, wouldn't you agree it is important that a standard be  
21 applied on a consistent basis?

22 Don't you want it to say I can trust that standard will  
23 be applied to Joe Doe and Sammy Smith in a consistent fashion?

24 A If I felt like I was being harassed I would not hesitate  
25 to talk to my supervisor and go to Employee Relations, and that a

1 fair and equitable decision would be made after investigation.

2 Q That sounds fine, but is the standard that you applied  
3 in this case consistent with the departmental policy, first?

4 A It is consistent with the procedure.

5 Q And that procedure is not going to be changed on the  
6 basis of this case?

7 A That's correct.

8 MR. GUILD: That is all I have; thank you.

9  
10 CROSS EXAMINATION

11 BY MR. GIBSON:

12 Q Mr. Alexander, are you aware of anything that would  
13 cause you to question whether or not the Catawba Nuclear Station  
14 is safely built?

15 A No, nothing at all.

16 MR. GIBSON: No further questions.

17 FURTHER THE DEPONENT SAITH NOT.

18  
19 I, C. Neal Alexander, hereby certify that I  
20 have read and understand the foregoing transcript and believe it  
21 to be a true, accurate and complete testimony of my testimony.

22

23

24

25

C. Neal Alexander

1                   This Deposition was signed in my presence by C.  
2 Neal Alexander on the \_\_\_\_\_ day of July, 1933.

3  
4  
5  
6 \_\_\_\_\_  
7 Notary Public  
8  
9  
10

11                   C E R T I F I C A T E

12 STATE OF NORTH CAROLINA  
13 COUNTY OF MECKLENBURG

14                   I, Lynn B. Gilliam, do hereby certify that the  
15 proceedings were by me reduced to machine shorthand in the  
16 presence of the Witness, afterwards transcribed upon a typewriter  
17 under my direction; and that the foregoing is a true and correct  
18 transcript of the proceedings.

19                   I further certify that these proceedings were  
20 taken at the time and place in the foregoing caption specified.

21                   I further certify that I am not a relative,  
22 Counsel or Attorney for either Party or otherwise interested  
23 in the outcome of this action.  
24  
25

1                   IN WITNESS WHEREOF, I have hereunto set my hand  
2 at Charlotte, North Carolina, on this the \_\_\_\_\_ day of July,  
3 1983.

4  
5  
6  
7                   \_\_\_\_\_  
8                   LYNN B. GILLIAM  
9                   Court Reporter  
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20  
21  
22

23 My Commission expires May 12, 1988.  
24  
25

3/31/82 Dear Bently -

- Qualification - 3 week training program - Wells -  
~~do~~ what do we do to get qualified inspectors when they are needed?
- Men in his position Making a Statement like that -
- Technical Support - Considerations -
- ~~Opportunities to Advance~~ - looked at -
- ← Costs tech support.
- 1 Individual - looked his work in field - Walker - John Peace -
- Couldn't Accept Work - paper - Mechanical also -

NCI's

Mirale - Biggest Problem in QA - as incl. most good for  
inspect - Come in & Do the job

- M Standage - OK - Technical

- Larry Jackson - Support

~

# Changes in Procedures Training

2

3/24/82

KW Kaub -  
Transfer Policy -

Lee's letter - Could transfer - SMS  
appears -

Clarify Transfer Policy  
Look at Approach

→ Deaton - Need for more inspectors

— Ronald Kirkland - Concerns & Resource - OK  
NCI - Number -

I. McCoy -  
Concerns & Resource - OK

f. Standridge -

Laid off Chubb - Stayed top money -  
Stayed in WI - AWSS Certification

Rat Children -

(X) → No time given for sewer  
(X) → AWSS - time for Ed -  
Duke - time for Ed - (No)

G. 50 when left +  
B. 9.5 Now - Wild B

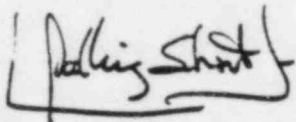
→ Can you get time toward Mos for Ed?  
Proj 4A Eng at time of fire -

72/82

John Bryant -

~~- Intimidate - Threat - Trust -~~

Larry Davidson - Scape goats - your fault - give direction then



Bay or Cantharus -

RA Jones -

4/19/82

→ Lindsey Harris -

is violation - done by mistake - could have been easily <sup>avoided</sup> by lining out & then signing off then -

→ IE Hanson

→ VC Godfrey - Tin Walls & Gail Addis - told him overqualified -

Transfer Request -

→ Technical Cases - Res. explained -

→ John Rockholt -

LRD - threaten - do way I lay them down - not Cox  
→ do it or gone -

Promotion - slighted - because of offending people -  
in - LRD.

John Peeler - Cindy Cummings - job -

Not afforded opportunities to progress -

32

General Concern

1. New employees may be unqualified with new requirements.
2. Employees were told that they were overqualified for their jobs.
3. Education and prior inspection experience not taken into consideration like other organizations.
4. Construction Welding Technical Support is not qualified to resolve non conforming items.
5. Quality Assurance, Technical Support accepts Construction Technical Support resolutions and they are sometimes wrong.
6. Craft has too much input into resolutions of NCI's. Inspectors have little or none.
7. Inspectors were told that resolutions of NCI's were not their concern.
8. Resolutions to NCI's lean toward Construction and make the inspector appear to be wrong.
9. Management wants a liberal interpretation of procedures but, <sup>then</sup> we are told that procedures are to be followed precisely.

10. Q.A. tech support accepts resolutions from craft tech support that are wrong.
11. An inspector was told that Larry Davison was as far as he could carry his concerns.
12. An inspector was told to forget the past and let "by gones" be "by gones". He feels that violations of procedures should be resolved.
13. Mistakes made by inspectors are emphasised. Mistakes made by craft are covered up.
14. One inspector feels that the 2nd shift should have ~~someone~~ to assign NCI numbers, sign off QI-A form and handle problems.
15. One inspector feels that QA tech support personnel should be available to 2nd shift tech support.
16. Inspectors feel that their management does not respect or trust them.
17. Inspector states that he was told to "slack up" on writing NCIs.
18. Inspectors have been forced to accept conditions that do not meet code requirements.

- QC Inspectors feel that QA Mgt overrides their decisions on NCI's.
- QC Inspectors feel that Larry Davidson is trying to cover up his mistakes while he was at Catawba.
- Supervision is concerned that resolutions are not explained after they are arrived at.
- Larry Davidson suggested that <sup>an</sup> inspector resign & used inspectors' scapegoats when NRC found about that didn't conform to standards.

## General

Communication within QA/QC  
 Advancement  
 Harassment  
 Wages  
 Qualifications

## General Concerns

- DA Employees feel that they are Harassed/Intimidated by Const Employees
- The decision for Assigning NCI's Numbers rests with their Supervision, if they don't feel it (NCI) is justified it is destroyed.
- Concern about having to Work from Memo's & Word of Mouth instructions vs Procedures
- Craft Supervision does Not Know Procedures, therefore Inspectors have to direct the Work & Craft Ask for direction.
- Does QC Supervision Have the Responsibility to Question a Recommendation.
- QC Inspectors are Concerned about performing Work that is not their Responsibility
- QC Inspectors feel that too Much Control is placed over what they are doing - Procedure should be the Control.
- QC Inspectors feel they receive inconsistent Direction from Supervision - one time tighten up the next time lighten up

Name	Qualifications	Tech Support	Production	Wright Support	Proposition	Directed Craft	Procedure	Remarks
(A) D. Beatty ✓	considered the most people unqualified	Believes Court Tech Support is qualified	Believes that the draft has the draft	Believes that Wright oversees inspection of former for the rule in court (Bryant)	Talked about Xmas responsibility (Crisp, one to go)	Wrote to direct craft they don't know procedure	New turn out to respond not procedure	
(B) J. Bryant ✓	Wrote to direct Believes that the draft is qualified for the draft		Wrote to direct Believes that the draft is qualified for the draft	L. Davis is in charge of the draft (Bryant) to make sure: escape from the NRC		Craft allocated for direction	N.C.S.'s meeting with other staff	
E. Boyce-Curtis ✓				Wrote to direct Believes that the draft is qualified for the draft				
F. C.D. Crisp				Believes that the draft is qualified for the draft				
G. B. Deane ✓				Believes that the draft is qualified for the draft				
J. V.C. Godfrey	Talked to the most qualified (Crisp) to (Crisp)	Question QAP Believes that the draft is qualified for the draft	Question QAP Believes that the draft is qualified for the draft	Believes that the draft is qualified for the draft	Should a DC group question: (Crisp)		S.N.'s not going to N.I.B. directly	
L. L.D. Jackson ✓				Believes that the draft is qualified for the draft				
M. R.A. Jones ✓				Believes that the draft is qualified for the draft				
N. K.W. Karciver ✓				Believes that the draft is qualified for the draft				

Eds	Name	Qualification	Tech Support	Resolution	Agent Support	Representation	Dist. Craft	Procedure	Remarks
D	R. Kinkaid	✓			2nd shift sup.				
P	J.R. McCoy	✓		Cons Learning (6)	QC. Monitoring For Cons Learning				
R	B. Ross	✓	Review QA- Are they correct (5)	Cons Learning 11/20/85 Review QA Assistance				Assign SW	Managem To Think of Engage
T	J. Standridge	✓ (3) Prior EXP 15 PRY							
V	M. Standridge	✓	Review QA (5)	Cons Learning (6)	Intermittent Direction	TOS over control		Assign SW	
V	L. Harris	✓		Cons Learning (6)					Managem
	Medical								
	Communication with QA								
	Advance ment								
	HABASSMENT								
	Wages								
	Qualifications								

## General Concerns

1. ✓ New employees may be unqualified with new requirements. —
2. ✓ Employees were told that they were overqualified for their jobs.
3. ✓ Education and prior inspection experience not taken into consideration like other organizations.
4. ✓ Construction Welding Technical Support is not qualified to resolve non conforming items.  
Technl.
5. ✓ Quality Assurance Technical Support accepts Construction Technical Support resolutions and they are sometimes wrong.  
Technl.
6. ✓ Craft has too much input into resolutions of NCI's. Inspectors have little or none.
7. ✓ Inspectors were told that resolutions of NCI's were not their concern.
8. ✓ Resolutions to NCI's lean toward Construction and make the inspector appear to be wrong.
9. ✓ Management wants a liberal intepretation of procedures but then we are told that ~~procedures are to be followed~~ ~~precisely~~ are to be followed precisely. This is an inconsistent practice.
10. ✓ Q.A. Tech Support accepts resolutions from Craft Tech Support that are wrong.  
Technl.
11. ✓ An Inspector was told that Larry Davison was as far as he could carry his concern. *Boofey*
12. ✓ An inspector was told to forget the past and let "by gones" be "by gones". He feels that violations of ~~procedures~~ should be resolved.
13. ✓ Mistakes made by inspectors are emphasised. Mistakes made by craft are covered up.
14. ✓ One Inspector feels that the 2nd shift should have someone to assign NCI numbers, sign off QI-A forms and handle problems.
15. ✓ One inspector feels that QA tech support personnel should be available to 2nd shift Tech Support.
16. ✓ Inspectors feel that their management does not respect or trust them.
17. ✓ Inspector states that he was told to "slack up" on writing NCI's.  
Technl.
18. ✓ Inspectors have been forced to accept conditions that do not meet code  
Technl.

19. ✓ QA employees feel that they are Harassed  
by Construction Employees.

*Technical* 20. ✓ The decision for assigning NCI's numbers rests with their  
Supervision, If they don't feel it (NCI) is justified, it is destroyed.

*Technical* 21. ✓ Concern about having to work from memo's and word of mouth instructions  
vs. procedures.

22. ✓ Craft Supervision does not know procedures, therefore, inspectors have  
to direct the work and craft asks for direction.

23. ✓ Does QC Supervision have the responsibility to question a resolution?

24. ✓ QC Inspectors are concerned about performing work that is not their respon-  
sibility. *It's on change holds - sketches*

25. ✓ QC Inspectors feel that too much control is exercised over what they  
are doing - Procedure should be the control.

26. ✓ QC Inspectors feel they receive inconsistent direction from supervision -  
one time tighten up and the next time lighten up.

27. ✓ QC Inspectors feel that QA management overrides their decisions on NCI's.

*Follow up*  
28. ✓ QC Inspectors feel that Larry Davidson is trying to cover up his mistakes  
while he was at Catawba.

29. ✓ Supervision is concerned that resolutions are not explained after they  
are arrived at.

30. ✓ Larry Davidson suggested that an inspector resign and used inspectors as  
scapgoats when NRC found work that didn't conform to standards.

#### General

Communication with QA & QC  
Advancement  
Harrassment  
Wages  
Qualifications

*Alexander 4*

NON-TECHNICAL  
WELDING INSPECTOR CONCERNS

I. NCI'S/RESOLUTIONS

- A. 1. Construction Welding Technical Support is not qualified to resolve non-conforming items.
2. Quality Assurance Technical Support accepts Construction Technical Support resolutions and they are sometimes wrong.
3. Craft has too much input into resolutions of NCI's. Inspectors have little or none.
4. Resolutions to NCI's lean toward Construction and make the inspector appear to be wrong.
5. QA Tech Support accepts resolutions from Craft Tech Support that are wrong.

SUMMARY

A review of the NCI/Resolution process conducted by the Technical Task Force indicates that resolutions to NCI's were in general correct, a few should have had better explanations or been more explicit in the resolution. There was no evidence that the Crafts had too much input into the resolution process other than a consulting role as to a process that may or may not work in carrying out the NCI resolutions.

- B. 1. Inspectors were told that resolutions of NCI's were not their concern.
2. Supervision is concerned that resolutions are not explained after they are arrived at.

SUMMARY

While the inspector has the responsibility to inspect work to ensure compliance with procedures it is felt that resolutions should be explained, even through the inspector and in some cases the supervisor may not be satisfied with the explanations. Supervision does have a responsibility to question resolutions when a situation arises that needs to be addressed to assure that the requirements for completing the inspection are met.

- C. 1. Inspector states that he was told to "slack up" on writing NCI's.
2. QC Inspectors feel that QA management overrides their decisions on NCI's.

## SUMMARY

From conversations with the Technical Task Force there were a number of NCI's written that could have been corrected without an NCI through other corrective means. It is understood that an NCI be written when specifications have been violated and the work needs to be done over. There are other corrective actions for problems found during the inspection process. QA management can and should override an inspectors decision on NCI's when there is good reason or the situation could be handled through an easier corrective measure.

- D. 1. The decision for assigning NCI's numbers rest with their Supervision. If they don't feel it (NCI) is justified, it is destroyed.

## SUMMARY

There seems to be some confusion on the assignment of numbers to NCI's. Generally no number is given to NCI's until after technical review of an NCI. If the person at the technical review does not agree with the NCI then no number is assigned. This doesn't mean that there is no a problem but that it may be easier handled in another manner.

## CONCLUSION

The information gathered by the Technical Task Force, the recommendations, and the Management Implementation Plan address each of the above concerns and identify a means for taking corrective action.

## II. PROCEDURES

- A. 1. Management wants a liberal interpretation of procedures but then we are told that procedures are to be followed precisely. This is an inconsistent practice.
2. Concern about having to work from memo's and word of mouth instructions vs. procedures.
3. QC inspectors feel that too much control is exercised over what they are doing - Procedure should be the control.
4. QC inspectors feel they receive inconsistent direction from supervision - one time tighten up and the next time lighten up.

### SUMMARY

In all procedures there are gray areas that call for judgement decisions on the part of an inspector. The intent and purpose of the procedure must be understood before dealing with gray areas. These gray areas are sometimes addressed through memos or word of mouth instructions as to exactly what is meant by a particular part of a procedure. These memos and instructions are then incorporated into the next revision. There is no evidence that too much control has been exercised over inspectors rather than procedures being the controlling factor.

- B. 1. Craft supervision does not know procedures, therefore, inspectors have to direct the work and crafts asks for direction.

### SUMMARY

This is basically true. Inspectors do know the procedure because of the extensive training and use of the procedures. A lot of time the craft will do only what is good enough for the inspector after a "courtesy inspection" and the possibility that the crafts may not be provided enough direction to perform the job.

### CONCLUSION

The recommendations of the Technical Task Force and the Management Implementation Plan address each of the above concerns and identify a course for taking corrective action.

## III. WORK DIRECTION

- A. 1. Mistakes made by inspectors are emphasized. Mistakes made by craft are covered up.
2. Inspectors feel that their Management does not respect or trust them.

### SUMMARY

There has been no indication that inspectors mistakes are emphasized while those of the craft are covered up. Inspectors are in the limelight and their work is seen by all in the QC line organization as well as the craft organization. Their job will always be questioned especially when they make controversial decisions in the course of performing their job which may give some the opinion that they are not trusted or respected.

- B. 1. One inspector feels that the 2nd shift should have someone to assign NCI numbers, sign off Q-1A forms and handle problems.
2. One inspector feels that QA tech support personnel should be available to 2nd shift Tech Support.

## CONCLUSION

The second shift question does not need to be answered since the second shift at Catawba is being reduced to only a skeleton workforce.

- C. 1. QA Inspectors are concerned about performing work that is not their responsibility.

## SUMMARY

There is no clear indication that inspectors are performing work outside their responsibility. It should not matter what they do to aid productivity as long as it does not violate the procedures. We all work for Duke Power and we should work together in a team effort to complete the job.

## CONCLUSION

Communicate to inspectors that in performing their work there is a potential for conflict with the craft. Provide appropriate training to inspectors that will allow them to deal with these situations.

Develop a "team work" program for QA-Construction-Design that brings the departments together with an attitude of cooperation for the common goal of productivity and quality in building Nuclear Plants.

## IV. RECOURSE

- A. 1. An inspector was told that Larry Davison was as far as he could carry his concern.

## SUMMARY

Through out the review of the non technical items it is apparent that employees have no in-house recourse other than the Corporate Procedure on employee recourse which brings their concern in the first step to the Corporate QA Manager.

## CONCLUSION

Implement an Departmental Employee Recourse procedure for addressing and answering employees concerns at the lowest possible level.

- B. 1. An inspector was told to forget the past and let "by gones" be "by gones". He feels that violations of procedures should be resolved.

## SUMMARY

Answered through the Technical and Non-Technical Task Force to review concerns of Welding Inspectors.

C. 1. QA employees feel that they are harassed by Construction Employees.

#### SUMMARY

It is understood that because of their responsibility of inspecting work and finding defects that inspectors are in some what of an unusual situation but this should not lend to inspectors being harassed by Management or others whose work they are inspecting.

#### CONCLUSION

Implement a Department Harassment Procedure to give employees an avenue for airing harassment of them.

D. 1. Inspectors have been forced to accept conditions that do not meet code requirements.

#### SUMMARY

From discussion with the Technical Task Force there is some indication that welding inspectors have been required to sign off welds that were inspected by someone else for various reasons.

#### CONCLUSION

Develop and implement a procedure for addressing inspectors technical concerns. This would enable these technical concerns to be addressed as they occur rather than being held back and brought up at a latter time.

(Specific Concern)

E. 1. QC inspectors feel that Larry Davison is trying to cover up his mistakes while he was at Catawba.

(Specific Concern)

2. Larry Davison used inspectors as scapgoats when NRC found work that didn't conform to standards.

#### SUMMARY

There are no specific incidents given in the above two concerns and no summary or conclusion can be reached.

#### RECOMMENDATION

Talk to each of the inspectors that had the concern of cover up or scapgoating for additional specifics before addressing these concerns.

V. QUALIFICATIONS

- A. 1. New employees may be unqualified with new requirements.

SUMMARY

There is concern among welding inspectors that the Company is relaxing its experience requirements by not requiring previous welding experience in a growing and complex program of Welding Inspection.

CONCLUSION

Review the Position Analysis for welding inspector to ensure that it is complete and accurate and ensure the qualifications meet the QA program requirements. (This has already been done when the Wage Program was implemented.)

- B. 1. Employees were told that they were overqualified for their jobs.

SUMMARY

This comes from a statement made by Jim Welis when an employee commented that Welding inspectors possess skills to direct the Craft and are more knowledgeable than some Craft supervision.

CONCLUSION

Communicate to inspectors that work direction is not their job. They should answer Craft questions on how a particular weld will be inspected and could be used for the Welding Inspectors convenience.

(Specific Concern)

- C. 1. Education and prior inspection experience not taken into consideration like other organizations.

SUMMARY

This is a specific concern of an employee who worked at Cherokee from May of 79 to March of 81 as a Welding Inspector and was laid off, then recalled to Catawba in October of 81.

RECOMMENDATION

Review this specific concerns and explain the process to the inspector for employing inspectors.

## VI. COMMUNICATIONS

While there is no specific concern in the area of communication it is clear that this is an area that needs much attention.

### CONCLUSION

Implement training in Communication skills both oral and written for Supervisors and Inspectors.

Develop an Employee Forum program for all levels of QA Personnel to encourage two way communications.

Implement the Effective Management Program for QA Management.



MANAGEMENT PROCEDURE NUMBER 8901-0019-OA-001

SUBJECT: HARASSMENT OF EMPLOYEES

PAGE 1 of 3      DATE REVISED      New      DATE EFFECTIVE      7/1/82

STATEMENT:

The Quality Assurance Department promotes the equal treatment of all employees. The harassment of any employee is contrary to this policy and will be considered justification for disciplinary action.

Harassment is any action that singles out an employee, to the employee's objection or detriment, because of, but not limited to race, sex, religion, national origin, age, handicap, or innate personal characteristics. Harassment involves two or more employees, who may or may not include supervisors.

IMPLEMENTATION:

I. DEFINITIONS OF VIOLATIONS

A. Class A violations include any of the following:

1. Verbal abuse or ridicule.
2. Unnecessarily rough or repeated physical contact.
3. Interference with an employee's work.

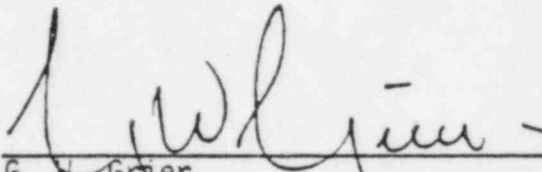
B. Class B violations include any of the following:

1. Displaying or distributing pornographic or racist materials.
2. Discriminating against any employee in work assignments or job-related training.
3. Intimate physical contact.
4. Demanding favors under threat of punitive action or promise of special consideration. (The threat or promise may be expressed or implied.)

C. Class C violations include any of the following:

1. Demanding sexual favors, explicitly or implicitly as a condition of employment, promotion, transfer, or any other term or condition of employment.

- F. The Quality Assurance Department will not tolerate harassment or any form of retaliation against an employee who has either instigated or cooperated in an investigation of alleged harassment.
- G. Each complaint shall be fully investigated and a determination of the facts will be made on a case by case basis.

  
\_\_\_\_\_  
G. W. Greer  
Corporate Quality Assurance Manager

Alexander G  
Document Room

July 15, 1982

G. W. Grier

Re: Status of Welding Inspector  
Non-Technical Concerns

All specific action recommendations have been completed on April 19, 1982.

General recommendation status is as follows:

1 - Work Direction

- A - Train inspectors in their role and responsibility as it relates to the craft.

Status

This program, "The Inspector", is in the final stages and should be ready for presentation by August 1, 1982.

- B - Implementation of a 'team work' program.

Status

While a formal 'team work' program has not been implemented, certain things have been or will be done to create a more team effort in QA. These include Department Newsletter, Department logo, and uniform hard hat color.

2 - Recourse

- A - Departmental employee recourse procedure implemented July 1, 1982.
- B - Departmental Quality recourse procedure implemented July 1, 1982.
- C - Departmental harassment procedure implemented July 1, 1982.

3 - Qualification

- A - Communicate to inspectors the kind of instruction that can be given to craft personnel by inspectors.

Status

This is part of the program on the Role and Responsibility of the Inspector which is referred to in 1.A.

4 - Communication

- A - Train supervisors and inspectors in communication skills, both oral and written.

Status

Supervisors at Catawba have had training in "Effective Communication Skills". This program will be presented to all supervisors

July 15, 1982

G. W. Grier

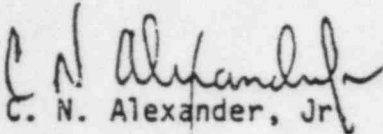
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in the Department. An overview of communication skills that inspectors should use are in the program on Role and Responsibility of Inspectors. Other communication programs for communication and writing will be used at a later date.

B - Employee Forum program in the Department has been delayed to fully review how such a program could be fully beneficial to the Department.

B - We have had fourteen (14) supervisors to attend the Effective Management Program.

  
C. N. Alexander, Jr.

:SW