

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

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

DEPOSITION OF:
Billy Wayne Deaton
July 14, 1983

A28
8310240065 830810
PDR FOIA
AHLERS83-434 PDR

Evelyn Berger Associates
STENOTYPE REPORTING SERVICE
P. O. BOX 19444
CHARLOTTE, NORTH CAROLINA 28219



[illegible][illegible]

1 The deposition of Billy Wayne Deaton was taken on the
2 14th day of July 1983 at the legal offices of Duke Power
3 Company, 500 South Church Street in Charlotte, North Carolina.

4 APPEARANCES:

5 For Duke Power Company - Ronald L. Gibson, Esq.
6 951 South Independence Blvd.
Charlotte, North Carolina

7 For Palmetto Alliance - Robert Guild, Esq.
8 2135 1/2 Devine Street
Columbia, South Carolina 29205

9 (The deposition commenced at 2:08 p.m.)

10 BILLY WAYNE DEATON,

11 having been first duly sworn, was examined and deposed as
12 follows:

13 MR. GIBSON: Mr. Guild, this is Mr. Deaton, available
14 for his deposition. I presume we are proceeding under the
15 same stipulations. Present are Mr. Henry and Mr. Bell.

16 BY MR. GUILD:

17 Q Mr. Deaton, I am Bob Guild. I am counsel for Palmetto
18 Alliance. We are intervenors in the Catawba licensing
19 proceeding. We have raised questions about quality assurance
20 and construction at Catawba. Have you heard that? Are you
21 aware of that?

22 A Yes, sir.

23 Q Okay. With me is Mr. Philip Jos, of Palmetto Alliance,
24 and Ms. Besty Levitis with Carolina Environmental Study
25 Group in Charlotte. She is running a tape recorder and

1 maintains a record, which the court reporter is also
2 transcribing. If I ask any questions and I am not being clear
3 in my question, you don't understand a term I am using or I
4 am just not making myself understood, please stop me and ask me
5 to clarify and I will try. I want to understand that your
6 answers, when they are transcribed, are responsive to the
7 question as asked. I want to show you, first -- first let me
8 get you to state your full name.

9 A Billy Wayne Deaton.

10 Q How do you spell your first name?

11 A B-i-l-l-y, prefer to be called Bill though.

12 Q And, Mr. Deaton, what is your position with Duke Power
13 Company?

14 A I am a welding inspector supervisor.

15 Q Okay. Are you a supervising technician?

16 A Yes, sir.

17 Q That's your former title?

18 A Yes, sir.

19 Q Okay. And where are you employed, sir?

20 A At the Catawba project.

21 Q Okay. Let me ask you to take a moment and review the
22 text of our contention number 6, which is a legal contention
23 that has been raised in the case about quality assurance.
24 This is a December 31st, 1982, document. It is an answer by
25 Duke Power Company to some questions that we asked in discovery.

1 Mr. Deaton, would you look at the bottom of page 3 there,
2 this indented single-spaced quote, and it goes over to page 4,
3 and down to the bottom. Take a few moments and read that, sir,
4 to yourself.

5 (The witness read the document requested.)

6 Q Have you had a chance to review that, Mr. Deaton?

7 A Yes, sir, I looked over that.

8 Q Had you seen any of that before?

9 A I think this is the first time I have ever seen it.

10 Q All right, sir, thank you. Mr. Deaton, how long have
11 you held your present position at the Catawba station?

12 A I think since 1980, I believe May of '80.

13 Q Okay. Where were you prior to that?

14 A I was at the same job but at a different position.

15 Q What were you doing before that?

16 A I was an inspector before that.

17 Q Okay. And you got promoted to a supervisor in May of '80?

18 A Yes, sir.

19 Q Okay. And who did you work for when you were working as
20 a welding inspector?

21 A Beau Ross.

22 Q Okay. And what position did you hold before you were
23 welding inspector?

24 A A welder.

25 Q All right. When did you become welding inspector?

1 A I believe sometime in 1977. I don't know the exact date.

2 Q In 1977?

3 A '77, sometime in '77.

4 Q Okay. And had you been doing welding work at Catawba?

5 A Yes, sir, since '76.

6 Q All right, and what did you do before 1976?

7 A Construction work, outside construction work.

8 Q At Catawba?

9 A No, sir.

10 Q All right. Where had you been employed before '76?

11 A A company called Industrial Textile and Pipe.

12 Q All right. And can you recall when you joined Duke Power
13 Company?

14 A 1976.

15 Q In '76. Had you been doing welding work before you joined
16 Duke?

17 A Yes, sir.

18 Q Okay. How long had you worked as a welder before?

19 A That is a hard question for me to really answer because
20 I worked as a millwright, a welder and a rigger, a fitter,
21 all that work for the past several years prior to that. In
22 other words, my field has always been in the construction
23 field. A lot of companies you work for, they require you to
24 fit, they require you to rig, they require you to weld, and

25 I have always -- I have been associated with it since way back

1 in the early sixties.

2 Q Okay. You have done including welding work, but all
3 those other things as well, going back into the early sixties?

4 A Yes, sir.

5 Q When you were a welder at Catawba, is that the only
6 nuclear job you worked on as a welder, here at Catawba?

7 A Yes, sir.

8 Q And you are a certified welder?

9 A Yes, sir.

10 Q Okay. What kind of certification did you hold?

11 A Shielded metal arc and flux core.

12 Q Mr. Deaton, who is on your crew now? What welding inspectors
13 work for you, sir, at the present time?

14 A Are you asking for all of the names?

15 Q A list of names, yes. Maybe we could get Mr. Bell's list.
16 MR. GIBSON: Go ahead and start and we will give you that
17 list.

18 A Let's see, Joe Hinson, Charlie Farrell, Tom Barnes, Jr.,
19 Darrell Robertson, Johnny McCoy, Kenneth Carriker, C. D.
20 Cloninger.

21 Q How did you spell that man's name?

22 A C-l-o-n-i-n-g-e-r.

23 Q Okay.

24 A Alan Gault, Dennis Wright, William McNeil, David Zimmerman,
25 Jerry Stanridge.

1 Q Is Mickey Stanridge out there as well?

2 A That's his brother.

3 Q Okay. This is Jerry Stanridge, right?

4 A Yes, and Tim Musen.

5 Q How do you spell that man's name?

6 A M-u-s-e-n.

7 Q Now, Mr. Deaton, have you always had approximately 13
8 welding inspectors working for you?

9 A It fluctuates from 10, 12, 13, somewhere in this area.
10 It fluctuates.

11 Q Now, when you became first-level welding inspector supervisor,
12 how many other first-level supervisors were there at Catawba?

13 A One.

14 Q And that was Mr. Ross?

15 A Right.

16 Q Mr. Ross was your supervisor at the time? Was he the only
17 supervisor of welding inspectors before you were promoted to
18 that position?

19 A He was the only one with a supervising technician title.

20 Q What else was there besides that?

21 A You had your -- what I call your nondestructive examination,
22 NDE supervisors.

23 Q And they did not supervise the visual inspectors?

24 A No, sir, they handled the NDE work and radiography.

25 Q Who was doing that, if you remember?

1 A Al Napier.

2 Q Someone else?

3 A I am trying to get on RT. I want to say Ray Petit, but
4 I may be wrong there.

5 Q Mr. Napier and one other person, in any event, were
6 supervising inspection of weld but not in the visual area.
7 They did NDE?

8 A NDE and RT.

9 Q And what were their titles, if you can remember them?
10 What did they call them?

11 A I really --

12 Q Would they be like level 3 inspectors as opposed to
13 supervising technicians?

14 A I would think they would be some type of supervising tech-
15 nicians.

16 Q Okay. Now, why did they, if you know -- how do you under-
17 stand or why do you understand they had only one supervisor
18 over the welding inspectors at the time when you worked as a
19 welding inspector? Mr. Ross supervised 20 or 30 welding
20 inspectors at the time?

21 A Somewhere in that neighborhood, yes.

22 Q Okay. And you now have 13 under you, and why do they have
23 all that many welding inspectors reporting to one supervisor,
24 if you know?

25 A I don't know. I don't think I can really answer that

1 because that's upper managements, you know.

2 Q You don't have any understanding as to why they had it set
3 up that way?

4 A Just one supervisor, no, I don't know.

5 Q When you became supervisor, how many of the welding
6 inspectors went under you, roughly?

7 A Let's just say approximately ten.

8 Q Okay. And so Mr. Ross kept more under him than went
9 under you when you got promoted, roughly?

10 A You know, I can't -- I really don't remember the answer
11 to that question as to he had more than what I did or I had more
12 than he did. The exact number, I just don't know right now.

13 Q All right. Would it be fair to say that they roughly
14 split them between the two of you when you got the supervisor
15 position?

16 A That would probably be a fair statement.

17 Q Okay. Now, would it be approximately true, there were
18 between 20 and 30 welding inspectors at the time when you became
19 a supervisor, visual inspectors?

20 A I would say it would be closer to 20 than 30.

21 Q Okay.

22 A That would be just more of a guess.

23 Q And how many welding inspectors are there now on the job,
24 if you know?

25 A That's a good question.

1 Q About 45? Does that sound about right?

2 A I would say somewhere in that general area, maybe less,
3 maybe more. I can't put an exact number on it.

4 Q Okay. Now, besides yourself and Mr. Ross, we just left
5 off with Mr. Sifford, he is a supervisor of welding inspectors
6 out at Catawba, and he just came from McGuire, who else
7 supervises welding inspectors now?

8 A Stanley Ledford and Bob Harris and Beau Ross.

9 Q Okay. Now, where did Mr. Ledford come from?

10 A He was transferred up from the Cherokee project.

11 Q Okay.

12 A It was Mr. Ledford, right.

13 Q Yes, Stan Ledford. Had he done that same job at Cherokee,
14 as far as you know?

15 A Yes, as far as I know.

16 Q And Mr. Harris, where did he come from?

17 A He come down from McGuire.

18 Q Okay. And approximately when did they come over?

19 A Bob Harris has not been down with us too long, around six
20 months.

21 Q Okay.

22 A Stanley has been down I would say approximately two years.
23 I can't put an exact date on it.

24 Q Okay. Now, how many of the inspectors under you, Mr.

25 Deaton, used to be NDE inspectors before they got trained and

1 certified as welding inspectors? Do you know?

2 A Right now some of the boys are from Cherokee, and they had
3 the certification from Cherokee. I think David Zimmerman and
4 William McNeil --

5 Q Okay.

6 A -- went through our extensive training program to be a
7 visual inspector. They were NDE inspectors, and they went
8 through our training program to become visual inspectors.

9 Q Okay. And the man that came over from Cherokee?

10 A They come up with the certification.

11 Q They had been welders before, welding inspectors but not
12 necessarily?

13 A I really don't know the answer to that. I don't know.

14 Q Who came over from Cherokee?

15 A Alan Gault and Dennis Wright.

16 Q Okay. And the rest of them had been welding inspectors
17 at -- the rest of the welding inspectors at Catawba came up
18 from being welders before they were welding inspectors?

19 A Okay. K. W. Carriker and C. D. Cloninger transferred
20 down from McGuire. I can't speak for the rest of the guys.

21 MR. GIBSON: Why don't you call out the names?

22 Q Mr. Carriker and Mr. Cloninger, had they worked as
23 welders before?

24 A They came down from McGuire. I just don't know.

25 Q I have Joe Hinson.

1 A Yes.

2 Q He had done welding?

3 A Yes, sir.

4 Q Charlie Farrell?

5 A Yes, sir.

6 Q All right. Tom Barnes, Jr.?

7 A Tom went through our training program just like David and

8 Mack.

9 Q Okay. He had been an NDE before?

10 A He was an RT and NDE.

11 Q And that was Tom Barnes, Jr.?

12 A Jr.

13 Q RT and NDE?

14 A No, just RT.

15 Q Just RT, okay. Now, Daniel Robertson?

16 A Yes, sir, he had welded before.

17 Q Johnny McCoy?

18 A Yes.

19 Q And Tim Musen?

20 A Tim Musen is in a training program right now.

21 Q Has he been a welder before?

22 A I can't answer that. I don't know.

23 Q Had he worked as an RT?

24 A He has worked as an RT.

25 Q Okay.

1 A He is from RT. That's his group.

2 Q Okay. Formerly been an RT inspector?

3 A Yes, sir.

4 Q Okay.

5 A Plus NDE too.

6 Q Okay. Mr. Deaton, along about late 1981 or late 1982
7 a number of welding inspectors expressed some concerns that
8 Duke has characterized as technical and nontechnical regarding
9 work at Catawba, and you are aware of those concerns, aren't
10 you?

11 A Yes, sir.

12 Q All right. And you and Mr. Ross, in addition to the welding
13 inspectors, expressed concerns yourself at the same time, didn't
14 you?

15 A Yes, sir.

16 Q Now, I want to show you what I think is a copy of some
17 handwritten notes of yours. I am afraid my copy seems to spill
18 a little bit over the page here. Let me show you that. Do
19 you recognize that as your notes, reflecting your concern?

20 MR. GIBSON: I think this copy is a little better. I
21 think it does have the first sentence of each word in the margin.
22 You can see where lining up causes the problem. Why don't we
23 have him look at this one and see if that is better.

24 A What was the question?

25 Q First of all, can you identify that? Is that your

1 statement?

2 A Yes, sir.

3 Q Okay. Now, tell me the circumstances under which you made
4 the statement, this statement that you did, Mr. Deaton. How
5 did you come to do that?

6 A Okay. I see three statements here.

7 Q I want to get you to explain. Tell me the circumstances
8 about how you came to make the statement itself. Why did you
9 write it down?

10 A I think this is where we were asked to put our concerns
11 in writing.

12 Q Okay. And who asked you to do that?

13 A I can't put a name on it. I don't recall who asked.

14 Q You recall a meeting where Mr. Davison talked to a bunch
15 of folks in welding inspection and asked if people would put
16 their specific concerns in writing?

17 A I am sorry, but -- there may have been. I just don't
18 recall.

19 Q Okay. Do you remember a meeting that would have been
20 probably the 11th or 12th of January 1982, sometime in January
21 1982, meeting with welding inspectors with management?

22 A I am sorry, again I don't recall either.

23 Q Okay. In one way or another it came to you that someone
24 requested that you put your concerns in writing, and you
25 and others did, correct?

1 A Yes.

2 Q Okay. Did you discuss with Mr. Ross and welding
3 inspectors the nature of your concern? Have you talked about
4 it among yourselves?

5 A My concerns are my concerns.

6 Q Okay. Let's look at them then. You started to tell me,
7 and I am afraid mine doesn't --

8 MR. GIBSON: Why don't we pause for about 30 seconds and
9 we will get copies of this one.

10 MR. GUILD: I am going to mark that.

11 (Thereupon, a short break was taken between 2:35 p.m.
12 and 2:36 p.m.)

13 Q Mr. Deaton, do you have a better copy there in front of
14 you?

15 A Yes, sir.

16 Q Now, I would like, if you would, to explain -- I see it
17 labeled 3, A, B, and C.

18 A Would you like for me to summarize what I have here?

19 Q Let me just ask you. The first one I see, "I feel there is
20 a lack of interest or support from the QA technical group on
21 NCI's," and then you go on and elaborate about that. First
22 of all, who was the QA technical group that you had reference
23 to there at the time?

24 A That's basically, what I said, our QA technical group.
25 We do have a group, a QA technical group, and our NCI's and

1 stuff gone through this technical group.

2 Q Who was in that group at the time in early 1982?

3 A I want to say Joe Shropshire. I might be wrong, but I
4 want to say Joe Shropshire.

5 Q Joe Shropshire, okay. And anyone else that you can recall.

6 A Mr. Bob Morgan was there but I can't remember in what
7 capacity.

8 Q All right, Mr. Morgan.

9 A I might be totally off base there.

10 Q All right. Anyone else come to mind that was in the QA
11 technical group that you had reference to there?

12 A There were a lot of people working in this technical
13 group. You want me to try to name the people that were working
14 in this technical group?

15 Q I want to understand it in this context. I want to show
16 you an NCI. Let's take this -- let's see, we had one here.
17 Here is an NCI that we talked with Mr. Shropshire about earlier,
18 and this is from about 1981. This is from about that time period.
19 Now, when you are talking about the support of QA technical
20 group on NCI's, you are talking about the QA review that
21 got performed, that is reflected on that document, aren't you?

22 A Yes, sir, the QA group.

23 Q The QA approval?

24 A The form, yes, sir.

25 Q This is exhibit 1 from Mr. Shropshire's deposition. On

1 that NCI form, the Q-1A, there is a place where Mr. Shropshire
2 at the top, it's originated by Mr. Bryant in this case,
3 correct?

4 A Correct.

5 Q Mr. Bryant was a welding inspector and was then?

6 A Right.

7 Q It has technical review, and that is the review performed
8 in this case by Mr. Baldwin, correct?

9 A Right.

10 Q Okay. And Mr. Baldwin was -- he was your supervisor at
11 the time, correct? He was over you?

12 A Yes, sir.

13 Q Okay. And then from Mr. Baldwin it went to Mr. Shropshire,
14 and he did the QA review?

15 A Yes, sir.

16 Q Now, that's the review of the origination, and you are
17 also talking about the QA review of the resolution of the NCI,
18 correct?

19 A Right.

20 Q Okay. And that's what is shown down the bottom of the
21 form under the heading "Correction Action," and it has got a
22 QA approval down there too, right?

23 A It has another QA approval here.

24 Q I am sorry, I missed that one. Okay. There is a QA
25 review of the origination, QA review of the evaluation, correct,

1 also signed in this case by Mr. Shropshire?

2 A Yes.

3 Q And then a QA review of the correction action, also Mr.
4 Shropshire?

5 A Yes.

6 Q Now, in your statement, Mr. Deaton, you say that the
7 evaluation justification action and inspection requirements
8 do not answer the problem as stated on some NCI's, but that
9 NCI's get QA approval. Tell me what you meant by that please.

10 A We have to go on to where what my concern is there.

11 Q All right.

12 A And my statement is my concern is that my responsibility
13 to question these resolutions or to accept them without regard
14 to the answer. As to the support from the supervisor, it is
15 their job to make decisions on problems. I may not fully
16 understand but accept it as a person whose experience is much
17 greater than mine. And I do have the chance to express myself
18 if I disagree. In other words, what I am trying to say is,
19 is his expertise to be questioned or not.

20 Q Okay. And that was with respect to the QA technical
21 group's review and approval of the NCI, is that what you are
22 talking about?

23 A Yes, I feel sure this went to that group.

24 Q That's what I mean, when you are talking about whether
25 ~~it was your responsibility to question these resolutions, and~~

1 you were talking about the resolution by the QA technical
2 review?

3 A What I am trying to say is, my expertise is at a level.
4 Their expertise is at a higher level. Should I question the
5 answer when I do not have the expertise what the higher level
6 has?

7 Q Okay. All right. And how was that concern of yours
8 resolved, Mr. Deaton?

9 A I think it has given us the opportunity to take NCI's
10 back, whereas the statement, the deposition of the value
11 justification may or not truly have answered the question and
12 get them rewritten, the deposition and the justification.

13 Q What's changed to allow you to do that that you couldn't
14 do that before?

15 A Better communication

16 Q Did you have any procedure changes that allow you to do that
17 that didn't exist before?

18 A I don't think so.

19 Q Okay. Well, how do you answer the question that you had
20 then? You had a question then, as I read you, Mr. Deaton,
21 which said, you know, am I supposed to question these resolutions,
22 or am I supposed to just defer to the man with more experience
23 who is my boss, and how did you answer that question? Were
24 you supposed to accept it or were you supposed to question it?

25 A Again it comes down to what I call communication, not knowing

1 how to communicate. I think communication, part of it has
2 greatly been improved. Have I answered your question now?

3 Q Well, I guess I am still left trying to understand what
4 the answer to your original question was, and that, is it
5 my responsibility to question these resolutions or to accept
6 them without regard to the answer. That's your question. I
7 want to know how you answer that if you have got an answer.

8 A I am going to answer that by saying that if I feel like
9 the evaluation justification is erroneous to a statement,
10 I will question the NCI at any time.

11 Q Okay. Now, what I want to understand now is, if you have
12 such a question, how is that question resolved?

13 A I pass it back up through my supervision.

14 Q Okay. Is it their job to resolve it?

15 A They will get together and come back and either show me
16 justification or the NCI would get reevaluated.

17 Q Well, they would either show you justification, and what
18 happens if they don't show you justification?

19 A I keep on protesting.

20 Q Okay.. Let me ask you one question. Did you get inter-
21 viewed, Mr. Deaton, by Mr. Zwissler, the consultant to the task
22 force that was looking into these concerns? Do you remember?

23 A The name just don't ring a bell.

24 Q Okay. You don't recall speaking with a consultant task
25 force?

1 A I talked with some members of the task force but names
2 I do not remember.

3 Q Okay.

4 MR. GUILD: Do you have notes --

5 MR. GIBSON: The Zwissler document indicates the persons
6 he interviewed. We can pull that document and see. His
7 report indicates who he interviewed. Mr. Deaton does not appear
8 on the list of quality assurance personnel interviewed. He
9 doesn't appear in construction personnel interview nor the task
10 force personnel interview.

11 MR. GUILD: Okay.

12 Q Under the procedure as it existed at about the time that
13 you wrote these concerns, Mr. Deaton, if a welding inspector
14 under your supervision identified a deficiency that he believed
15 should be treated as an NCI, should be nonconformed, what was
16 your involvement in that? How did you deal with that issue?

17 A I would think the inspector would write the description
18 of the item and a statement of the problem on the Q-1A form,
19 and I would review this statement on the form to see that it
20 was procedural violation.

21 Q Okay.

22 A And then I would co-initial it with the inspector to show
23 that I had reviewed it, to see that it did make a clear statement
24 of the problem.

25 Q Okay. And where would you initial it, Mr. Deaton?

1 A In with the inspector.

2 Q In the origination block there?

3 A Yes, sir.

4 Q Okay. And what initials did you use?

5 A I just used BD.

6 Q All right. That was your practice generally, was to put
7 the initials on them?

8 A Right, that's when I reviewed it for clarity, to see if
9 it needed any wording or what have you.

10 Q Okay. And you reviewed it to see if in your opinion it
11 was a valid nonconforming item?

12 A Yes, they were valid, you know, and I just reviewed it
13 to see mainly that it did state the problem.

14 Q Okay. Did you understand that the procedures in effect
15 at the time required you to initial the document?

16 A No.

17 Q That was just your practice?

18 A Okay, that was a deal to where it got originated back to,
19 it could, through our office mail, could get back to me.

20 Q Uh-huh.

21 A In other words, with the number of inspectors and supervisors,
22 the initial there, it would come in, you know, a stack available
23 would come in, and you could say this one belonged to Beau or
24 this one belonged to Bill or this one belonged to Stanley or
25 what have you.

1 Q Then you would initial it showing you had seen it?

2 A Right.

3 Q Then what? Give it back to the inspector?

4 A Yes, the inspector then would take it for a technical
5 review.

6 Q Okay. Now, at that time who did the technical review?

7 A Well, what time are you speaking of?

8 Q By the time of these concerns.

9 A It would be Mr. Baldwin.

10 Q Charles Baldwin?

11 A Right.

12 Q Mr. Baldwin, he was your supervisor at the time?

13 A Yes, sir.

14 Q He would take a look at it, and what would Mr. Baldwin
15 do?

16 A He would sign it and then pass it on to our technical,
17 QA technical.

18 Q If Mr. Baldwin reviewed and his technical review concluded
19 that it was not a valid nonconforming item, how would you hear
20 about it, and what would you do?

21 A He would usually call me back or get with me on it, me
22 and the generator or the originator.

23 Q The inspector. He would call you both in?

24 A Right.

25 Q And you would talk about it some?

1 A Yes.

2 Q What happens if Mr. Baldwin continued to hold the opinion
3 that it was not a valid NCI?

4 A Well, rephrase that for me or restate it.

5 Q You and inspector go in and see Mr. Baldwin, and you talk
6 about it, and the inspector says yes, this is an NCI, and it
7 should be written up as NCI, and you agree with your inspector.
8 Mr. Baldwin disagrees and says no, it's not a valid NCI. You
9 have to get the guy to rework the item, or don't write it up.
10 What happens then?

11 A I am thinking.

12 MR. GIBSON: Do you need to confer with me?

13 THE WITNESS: Yes.

14 (Mr. Gibson conferred with the witness.)

15 A I reckon the only time that I recall of a situation like
16 this happening to me was when the craftsman was there, and the
17 craftsman says, "Hey, look, I will get rid of the problem."
18 I will say, "The material did not have no identification. Which
19 one of our procedure requirements to check for is material?"
20 The craftsman says, "Hey, I will cut it out."

21 Then, you know, he is going to cut it out, we have solved
22 the problem. The problem was that the material was unidentifiable,
23 and he is going to get it out and get an identifiable material,
24 so really the problem is solved.

25 A Okay.

1 A That's one of the only cases that comes to my mind as
2 the answer to your question there.

3 Q Okay.

4 A The craft was there, and the craft was willing to remove,
5 and again I am using material I had as an example, and they
6 were willing to cut it out and discard it, throw it in the trash
7 can, what have you.

8 Q Okay. Now, in that situation, that actually happened,
9 correct?

10 A Yes, I am pretty sure we had one case where that happened.

11 Q Okay. In that case, had a Q-1A been written up?

12 A Yes, sir.

13 Q Okay. How did this happen? Tell me what happened. What
14 point did you get with the craft and the craft say, "I will take
15 care of the problem"? At the point when you got to Mr. Baldwin?

16 A Yes, sir, when we got to Mr. Baldwin's office for review,
17 craft come in and asked if they could cut out the material and
18 destroy it rather than carrying the NCI through because
19 chances are that would have been the -- the evaluation was to
20 remove said material.

21 Q Okay. What would Mr. Baldwin have said about that?

22 A Mr. Baldwin says, "Hey, if you get rid of the problem,
23 then we really don't have an NCI."

24 Q His conclusion was to fix the work and we will fix the
25 problem?

1 A Right.

2 Q And do you agree with that?

3 A Yes, sir.

4 Q And so the work got fixed?

5 A Yes, sir.

6 Q What happened to the Q-1A?

7 A It was never -- it just never was in existence really.

8 Q Okay. Well, it got to the point where the originator had

9 written it up, right?

10 A Right.

11 Q And you had initialed it?

12 A Right.

13 Q And you got to the point where it was going to have a

14 technical review?

15 A Right.

16 Q And I assume Mr. Baldwin didn't sign it at this point

17 because he had figured how to deal with it, right?

18 A Craft come in. It don't become an NCI until it gets a

19 serial number on it.

20 Q Okay. This one hadn't a number put on it?

21 A Hadn't been serialized.

22 Q Or logged?

23 A Right.

24 Q And so what happened to Q-1A?

25 A It would just become invalid. In other words, it just

1 didn't go because the craft took it upon themselves to solve the
2 problem of the justification of the NCI theirself, remove
3 the article.

4 Q Okay. But what happened to the piece of paper, the form,
5 the Q-1A form?

6 A It was probably discarded.

7 Q Okay. Do you know if any record was kept of that Q-1A
8 or its resolution?

9 A It never did get a resolution.

10 Q It did get a resolution, it just didn't get written up,
11 right?

12 A I think you are not following me or I am not following
13 you, one.

14 Q Okay.

15 A The nonconforming item has to go through steps. At one
16 point craft and the inspector, myself, and Mr. Baldwin got
17 together, and craft says, "Hey, look, I want to cut it out."
18 Chances are that the evaluation -- that craft felt like the
19 evaluation was going to be cut out, so they wanted to cut it
20 out. Okay. They felt that there was no need for the NCI,
21 because, like I said, they wanted to cut it out -- they felt
22 like that's what the justification would be, so really it would
23 boil down to you had a problem, you had a potential problem,
24 but it got resolved before it ever really got reported.

25 Q Okay. As far as you know, it never did get reported?

1 A Right. In other words, it got cut out, which really didn't
2 require reporting.

3 Q All right. That was consistent with the procedure as you
4 understood it at the time?

5 A I would think it was in accordance with the procedure,
6 yes.

7 Q Is that in accordance with the procedure as it exists
8 today?

9 A Well, today we are operating under somewhat different
10 guidelines.

11 Q Okay. How were they different in this situation? How
12 would it be handled differently in this situation? I know Mr.
13 Baldwin is not there.

14 A Okay. First of all, the inspector in the field would have
15 hold points or process control, which requires signature for
16 him to sign.

17 Q So it would be fixed earlier to save you a little bit
18 of trouble?

19 A The inspector would say, "Hey, I am not in accordance with
20 the program, I can't sign your process control."

21 Q It would be fixed then, and he would sign process control,
22 after it had been reworked?

23 A After it had been reworked and taken out.

24 Q How would that be documented that it had been taken out,
25 now, today?

1 A If the form had a rejection block on it. The rejection
2 block would be marked as to why it was rejected.

3 Q Would it have a rejection block in all cases?

4 A In some cases there is not rejection blocks. In some
5 cases there is rejection blocks.

6 Q If there was a rejection block, how would you document that
7 you were required to rework, had been cut out?

8 A We use a sign-up sheet. I don't know whether you have
9 heard of sign-up sheets or not.

10 Q No, sir, huh-uh. What's that?

11 A Craft comes and asks for an inspection.

12 Q Okay.

13 A And we put it down on this piece of paper, and if we turn
14 that inspection down, we put a reason on that piece of paper,
15 and that passes it on to the other inspectors because everybody
16 is reading it, and plus they pass it on verbally.

17 Q How long would you use this sign-up sheet?

18 A We have had them in existence for quite a while.

19 Q Since before these concerns are written up?

20 A The sheet that we have went through several revisions. I
21 can't say that the sheet had all of the information on it that
22 we gather now when the concerns were written up. I can't say
23 that.

24 Q What happens to those sign-up sheets? Are they used for
25 anything other than just signing inspectors, making sure you

1 have an inspector around to see a piece of work?

2 A We review them to see what the workload is in what areas,
3 whether we need to up our inspectors or what have you. We see the
4 number inspections that the inspectors are making. We see problems
5 with potential or problems with fitters or welders or what have
6 you due to the rejections that is on the sheet.

7 Q What's the name of this form, or has it got a name?

8 A We just call it a sign-up sheet.

9 Q Did it specify any of the QA department procedures, that
10 you know about?

11 A No. In other words, an inspector, he is out inspecting.
12 A craftsman may come, and if I may use an example --

13 Q Sure.

14 A He will come, and he will put his name down as him being
15 the craftsman. He will put the type of inspection he wants,
16 clean up, fit up, final, et cetera, and he will put the crew
17 that he works for, and he will put the time, and he will
18 even go and put a column location to where he is working at,
19 and then he will go on back to his work area, and the inspector
20 will come in, and he will check his list, and he will see where
21 he has got to go to next. Okay, if he sees he has got three
22 finals, for example, he will go out there and he will check
23 the finals. If all three of the finals is good, he has a
24 little block here where it says, "Accept," and he will put
25 three.

1 Q On the sign-up sheet?

2 A Right. If he has got two that is bad, he puts two. If
3 it is reject, and one is accept, and then he will put out
4 here the reason.

5 Q Uh-huh. And if it is reject, does he do the reinspection?

6 A We try to.

7 Q Try to have the same inspector do that?

8 A Yes.

9 Q What happens if it is the next shift?

10 A He would --

11 Q Hold it over until he comes back?

12 A No, the next shiftman would look at it.

13 Q The inspector on the next shift would look at it?

14 A Right, or another inspector would do it. We don't try
15 to hold it to the same individual because all of our standards
16 are the same. We like for the person that turned it down to
17 look at it.

18 Q Okay.

19 A But we don't hold it to that.

20 Q Okay.

21 Q And who keeps these sign-up sheets, Mr. Deaton?

22 A For my crew, I have mine in my office.

23 Q You kept them ever since you started using these things?

24 A No, I don't have that much of a backlog. I usually keep
25 them six months or what have you, you know, and review them

1 and then I will throw them away. I probably have six months
2 back, maybe a little longer.

3 Q Okay. How many things did you generate? One a day, two
4 a day?

5 A We use these sign-up sheets per elevation in my particular
6 area of interest. Sometimes we go through three or four sheets,
7 all in elevation.

8 Q Per shift?

9 A Yes.

10 Q Okay. Do you compile any of the information that is
11 on these sign-up sheets, any other kind of report or document?

12 A Yes, sir, our clerks, when they do a final visual, our
13 clerks take off the final visual, the inspector puts
14 down the weld number, and our clerk uses that with the weld
15 packages that come up, and we have a running log of what weld
16 packages come through our office and go to the QA department
17 for QA review.

18 Q Okay. How about any of the information you used in
19 talking about any of the monitor or workload, number of
20 inspections and rejections of work, take any of that information
21 off of the worksheets, off of the sign-up sheets? What I
22 am interested in is this -- when you got the worksheet, your
23 clerks or anybody else take off any of the information about
24 how many inspections a particular inspector has been performing,
25 keep that any place other than on a worksheet?

1 A The clerk gives me periodicals. She will give me the
2 number of inspections that each inspector makes per week.

3 Q She would do that on a report?

4 A Just a little piece of paper, she will have the names
5 and the inspections they do. That is just for my information,
6 to see if I need to reinforce here or move inspectors there.

7 Q Okay.

8 A To be sure that the craft is being adequately covered.

9 Q Okay. Do you keep those forms?

10 A Yes, sir.

11 Q For how long?

12 A I don't know how many back I have got. I have got some
13 there in my desk. I don't know how many. Some weeks the clerk
14 don't even get it to me.

15 Q Okay.

16 A That's strictly for me scheduling my people.

17 Q You use it to evaluate their work?

18 A Just mainly for scheduling purposes.

19 Q How about the other piece of information, the rejections
20 for individual welders? You take that information off of a
21 sign-up sheet?

22 A Okay. If we get one particular person showing a lot of
23 rejections, we will go to his foreman, and we will discuss it
24 with him.

25 Q How do you document the number of rejections for a particular

1 welder?

2 A Again I go back to the sign-up sheets. If we do have a welder
3 that we are having problems with or a fitter that we are
4 having problems with, the inspectors will come to me, and he will
5 say, "See here, Bill, we turned down two fits here and two fits
6 here and two fits here," and then we will proceed to go on to
7 the craftsman.

8 Q The inspector brings that information to you and maybe uses
9 the sign-up sheet as a source of information to support his
10 position?

11 A Right.

12 Q Do you or anyone else use those sign-up sheets other than
13 the inspector for that purpose?

14 A I think craft even comes by and looks at them to see what
15 kind of work they are having done. I don't know for sure. I
16 wouldn't want to say for sure on that.

17 Q Maybe craft supervision would come in there?

18 A Right. I look at them and my inspectors look at them and
19 when they see they have a potential problem, we deal with the
20 potential problem.

21 Q Does that information get carried over onto any other kind
22 of document or report, information about rejections for
23 particular welders or fitters?

24 A The information itself may be also recorded on a process
25 control form too.

1 Q I understand that it would be, if it gets noted that there
2 was a rejection, if there is a box for a rejection, then that
3 weld or fitter's name is on there, right?

4 A Right.

5 Q What I want to know is, if it ever gets off the process
6 control form or your sign-up sheet, is there any kind of report
7 that lists John Doe welder had five, you know, rejectable welds
8 this week, or anything like that?

9 A No.

10 Q Not that you know of?

11 A (The witness moved his head from side to side.)

12 Q It's just a matter of welder noting it or the welding
13 inspector noting it and bringing it to your attention, or if
14 in fact the welder supervision looks at it?

15 A Well, the inspectors themselves will deal with the welding
16 foreman and show him he has a potential problem right there.

17 Q Are they supposed to come to you too when they do that?

18 A Yes, sir.

19 Q Okay. We were going through an example about a Q-1A before
20 the procedures changed, and we had gotten to the point of
21 talking about the technical review, and that was Mr. Baldwin's
22 review at the time and you told me an example of the situation
23 where a piece of work was reworked. Now, I was asking you at
24 that point what happens if you carry the NCI, which you've
25 initialed, that's been originated by your welding inspector,

1 and you carry it to Mr. Baldwin, and Mr. Baldwin decides it's
2 not a valid NCI. I am not talking about the rework situation.
3 I am saying that is not a valid NCI. What happens then?
4 What happened then?

5 A I myself, I don't recall a case in which what you are
6 stating, I don't recall of a case of that now.

7 Q Okay.

8 A What you are saying is different from what we talked about
9 a while ago.

10 Q Uh-huh. I am not talking about the rework situation,
11 the instance you remember. I am talking about a situation, if
12 it ever happened, and if it didn't, tell me, where Mr. Baldwin
13 said that is not an NCI.

14 A I don't think I ever had that situation arise.

15 Q Okay.

16 A Other than the one, like I say, where we talked about where
17 it was a mutual agreement.

18 Q Okay.

19 A That would maybe cut it out.

20 Q So for you then for the most part except for that one
21 instance, Mr. Baldwin would look at it, and he would sign off
22 giving you the technical approval, and that was your experience,
23 he would approve it?

24 A Right.

25 Q Then it would get a number issued?

1 A Sometimes we would get the number prior to and lay them on
2 his desk, and sometimes we would get technical review.

3 Q First?

4 A Right, in other words, if he would be out of the office or
5 what have you, you know, we would get a number first.

6 Q If he was available and chances are you would get a
7 technical review before the number was issued?

8 A Right.

9 Q The number gets issued and then it gets logged, and then
10 it goes to the QA people for QA review, right?

11 A Yes, and the technical, yes.

12 Q You have the technical review already, it goes over to Mr.
13 Shropshire for QA review?

14 A Right.

15 Q What happens if Mr. Shropshire's evaluation or the technical
16 and the QA technical evaluation is something that you don't agree
17 with? I am remembering what you said in your concern here, Mr.
18 Deaton.

19 A Okay.

20 Q We were talking about lack of interest or support from
21 QA technical group on NCI's, the evaluation, justification, action
22 and inspection requirements do not answer the problem as stated.
23 Now, I am talking about the evaluation first. Here is Mr.
24 Shropshire, QA technical people evaluating your NCI, and what
25 happens if you don't agree with their evaluation, it doesn't

1 describe what you found or what your inspector found or doesn't
2 state it clearly or correctly or what have you?

3 A You have about three questions.

4 Q Okay. Take them any order you would like.

5 A You have got me confused. Okay. What I am trying to
6 say here is that this justification evaluation, is it my
7 responsibility to accept what's there?

8 Q Right.

9 A Being that people with more expertise than what I have
10 write this.

11 Q Right, okay. That's what I am interested in. I am sure that
12 I -- I suspect there is no question at all, if he writes some-
13 thing down, you agree with it, right?

14 A Right.

15 Q Fine, but let's say Mr. Shropshire writes something down
16 under the evaluation part and you don't agree with it or you
17 don't understand.

18 A I don't know that Mr. Shropshire would be writing this.

19 Q Who would write this down?

20 A I believe in this particular case Mr. Sams out of
21 technical support done that one.

22 Q Mr. Shropshire, he is the one that approved it, right,
23 at this point?

24 A Here.

25 Q Whoever, either Mr. Shropshire writing it up or the person

1 working for him writing it up, you don't understand or you don't
2 agree with their evaluation, justification, all right, dis-
3 position, what would happen before?

4 A I would question it.

5 Q Okay. And then what would happen?

6 A I would get it sent back through and then I have had
7 them sent back through and have seen the justification on them
8 changed.

9 Q Okay. Changed so that you understood it or agreed with
10 it, one or the other, right?

11 A Changed to a point where it answered the problem.

12 Q That you identified in the NCI?

13 A Right.

14 Q Okay. What happens if that didn't happen, if they didn't
15 change it?

16 A Then I would question it until I got shown satisfaction.

17 Q Okay.

18 A To codes. In other words, you see, I work by QA procedures.

19 A lot of these evaluations are made from code.

20 Q So they get the code out and show you the code that
21 justified their position?

22 A Right.

23 Q How would you document your question or the question of your
24 welding inspector, if you questioned his justification?

25 A We wouldn't act on our step.

1 Q Which would be?

2 A The SVTW, it says remove the Q-1B tag, and we just wouldn't
3 act on that step.

4 Q What do those initials stand for, SVTW?

5 A Supervising technician welder.

6 Q That's your signature, that's you?

7 A Right.

8 Q You wouldn't remove the tag, that's basically the point?

9 A Just wouldn't proceed on.

10 Q Okay. And would it appear -- that's like a hold point
11 on that NCI, kind of?

12 A That NCI, until all of the appropriate action is signed,
13 can't be QA'd.

14 Q Okay. Would there be any other -- that is simply --
15 that's like getting the rework done. You just don't accept it
16 until it's done right but is there any other way that your
17 question would be documented?

18 A No more than just bringing the question up and holding onto
19 the NCI.

20 Q Okay. What happens if all is said and done and you don't
21 get it resolved to your satisfaction?

22 A I don't know of a case that I have ever had that hadn't
23 been satisfied.

24 Q Okay, good. Now then, let's get to the next step, the
25 final step, I guess. What happens if the corrective action that

1 is called for by -- first of all, tell me who writes the correc-
2 tive action part of the NCI. Who writes that part up at that
3 time?

4 A I would think it would be by this originator here, by here.

5 Q By the QA technical person there, is that right?

6 A I believe that is put in by the technical group.

7 Q Is that construction?

8 A Yes.

9 Q Okay. The construction people specify the corrective
10 action?

11 A I think different NCI's are handled different, depending
12 on the type and who generates.

13 Q Okay. This particular one called for construction for
14 purposes of evaluation, disposition responsibility, right?
15 That's that box checked there, the example we are looking at
16 right now, correct?

17 A Come by me again.

18 Q It has construction as the box checked by evaluation
19 disposition responsibility, right?

20 A Yes.

21 Q Okay. That means that it's construction's responsibility
22 to take the corrective action, is that right?

23 A That's saying that -- no, that is saying that they are
24 going to -- construction is going to do the evaluation and
25 justification.

1 Q And they did?

2 A Evidently.

3 Q Evidently that's why this technical, what do they call it?

4 A That would be what craft terms as their technical support
5 group.

6 Q That's the construction technical support?

7 A Right.

8 Q Okay, all right. And the same people respond then for
9 corrective action for specifying the corrective action, in
10 this case remove the Q-1B tag and attach copy of this NCI to
11 the M-19A in question, correct?

12 A Yes.

13 Q Okay.

14 A Here is your corrective action, by same individual.

15 Q Who is in construction technical support?

16 A Right.

17 Q Now, okay, and then it says management has already
18 instructed the welder per resolution. Just say, for example,
19 hypothetically you disagree with that corrective action,
20 you or your inspector disagree with that corrective action or
21 you question it, what happens?

22 A You are not giving me a good -- well, like this one, it
23 says management has already instructed the welder per resolution.
24 Okay, I have to take that at face value. They are saying
25 that they have already instructed. You are going to have to

1 give me a better example of something here.

2 Q Okay. Well, let's make that one the example, if we can.
3 You tell me if we can't do it, it just doesn't make sense,
4 you say you don't think that is appropriate corrective action.
5 You say that welder needs more than just being instructed per
6 resolution. He needs to be sent back to welding school or
7 recertified or something like that. I am just saying as a
8 hypothetical, Mr. Deaton, what happens if you disagree, you
9 don't think that is an effective corrective action, what do you
10 do?

11 A I would pass it back up the line.

12 Q And what does that mean? Who do you pass it up to?

13 A I would pass it up to Charles.

14 Q Mr. Baldwin?

15 A Yes, sir. When I say I would pass it back to him, I would
16 go discuss it with him.

17 Q Right, okay. And what happens --

18 A And then he would probably take it over to Mr. Shropshire
19 and discuss it.

20 Q Okay.

21 A And then he may get with Mr. Sams and discuss it.

22 Q Who is the technical support man?

23 A Right.

24 Q What happens, after all that is said and done, you, as
25 you stated in your concerns here, it doesn't answer the problem

1 as you understand it, do you still have the problem?

2 A Okay, after it goes through these steps, they would either
3 redo this or prove to my originator that that is the proper
4 way to handle it.

5 Q Okay. And what if they didn't?

6 A I don't know of a case where we hadn't done that.

7 Q Okay. As far as you are concerned, that either changed it
8 or you were satisfied by their explanation?

9 A Right.

10 Q Okay. How would your question be documented? How did
11 the fact that you questioned the corrective action be documented,
12 if you would?

13 A By not signing the NCI.

14 Q Again, it's like a hold point?

15 A Yes.

16 Q Beyond that, would it be documented in any other way?

17 Is there a requirement?

18 A Here is your documentation right here, you sign off.

19 Q That's the sign off, that you took the tag off?

20 A Right.

21 Q Beyond that, is there any other documentation of your
22 question?

23 A No.

24 Q Okay. Now, we have gone through that illustration, and
25 what about the handling of NCI's before? I am trying to

1 understand. My concern, is it my responsibility to question
2 these resolutions or to accept them without regard to the
3 answer, and do I understand your concern as being should I
4 keep pressing those questions that I have, or should I just
5 take it at face value that my supervision is more supervision,
6 and being my supervision is going to make the decision? I am
7 trying to understand your concern in the context of the
8 illustration we have using through, Mr. Deaton.

9 A Again, I can summarize it, my concern was, is do I take it
10 at face value.

11 Q Right.

12 A Or do I have the right to question it?

13 Q Okay.

14 A And I feel like I have the right to question it.

15 Q Okay. You weren't clear on that at the point when you
16 wrote this concern?

17 A Right. I definitely feel that I have a right to question
18 it.

19 Q Okay. Now then, we have gone through that one, and that
20 was with regard to the Q-1 procedure and the Q-1A form that was
21 used in 1981. I am going to show you, this is a revision,
22 18 procedure Q-1, is that the current revision, as far as you
23 know? I understand it is.

24 A I would probably say it is, yes.

25 Q Flip on through there, the QA-1 form.

1 MR. GIBSON: I need to check on the documents.

2 Q You have quote the Q-1A form there?

3 A Uh-huh.

4 Q Is there anything about the way the Q-1 procedure is
5 handled now or the way that Q-1A form is handled now that
6 addresses your concern, Mr. Deaton, about your responsibility
7 to question resolutions or the manner in which you question
8 those resolutions?

9 A I think now we are getting into criteria 16, which gives us
10 a whole lot more insight into the -- they are calling it here
11 the deposition of the nonconformist.

12 Q Talking about the R-6 procedure now?

13 A Criteria 16 evaluation.

14 Q And the use of the R-6A?

15 A I look at it as criteria 16 evaluation, where they come
16 in and make an evaluation.

17 Q They make an evaluation of the significance of the
18 corrective action?

19 A Right.

20 Q Have you ever done an NCI where it was part of your
21 responsibility indicated that it should be handled pursuant
22 to procedure R-6?

23 A I don't think so.

24 Q Okay. How long has that procedure been in place? Is that
25 pretty new?

1 A Yes, it's relatively new.

2 Q Last month maybe?

3 A No, I would say it's older than that. I can't put an
4 exact date on it.

5 Q Six months?

6 A You have so many that change so much. I would say that
7 we could go here, 3-11-83 is when this was approved, so I
8 would say -- I don't know. I would have to get into the
9 procedure. I do know that's when the revision was.

10 Q Okay. What about the use of that criterion 16 evaluation?
11 What is significant about that in addressing your concern?

12 A It breaks down to show whether it is generic, nongeneric,
13 requires training, et cetera, and sign off on it.

14 Q But you are not aware of your ever having to use one of
15 those?

16 A Oh, yes, in other words, sometimes we will have training
17 on it.

18 Q But what I mean is, you are not aware of your ever having
19 initiated --

20 A To have to initiate one, no.

21 Q Okay. Would you be responsible for initiating it if it
22 was done by a welding inspector under your supervision,
23 correct?

24 A No, somebody else would be initiating that.

25 Q Who would be doing that?

1 A That would be in the technical group.

2 Q Mr. Shropshire?

3 A No, technical support welding or technical support QA.

4 Q Mr. Shropshire or his people, people under him?

5 A It could come from his people. It could come from
6 technical support welding people.

7 Q Okay. And if it were on an NCI that your people had
8 initiated, you would know about it?

9 A Oh, yes.

10 Q And you are not aware of any that came from your people?

11 A I am not following you.

12 Q What I don't understand is, are you aware of any NCI's
13 that came from welding inspectors that you supervised that
14 required the use of the R-6 procedure?

15 A There probably has been but right now I just can't put
16 my finger on it.

17 Q Okay. Let me show you this. This is the procedure R-6,
18 isn't it?

19 A Yes.

20 Q Okay. Look through there, and you have got -- there is
21 a form that is attached to that?

22 A Yes.

23 Q And that form -- what's it now called, an R-6A, correct?

24 A Right.

25 Q That form would have to be filled out if that box were

1 checked on the NCI, right?

2 A. Right.

3 Q. And you would be involved in that --

4 A. Depending on the corrective action required.

5 Q. If it was QA -- if it requires reinspection, you would be
6 involved in it, wouldn't you?

7 A. Right.

8 Q. Are you aware of ever having completed one of those?

9 A. I don't recall it.

10 Q. Okay. What unit are your people working on, Mr. Deaton?
11 Are you one unit or the other?

12 A. I primarily cover the auxiliary building.

13 MR. GUILD: Okay, Mr. Deaton, thank you very much.
14 That's all I have.

15 BY MR. GIBSON:

16 Q. Mr. Deaton, are you aware of anything that would cause
17 you to question whether the Catawba Nuclear Station is safely
18 built?

19 A. The Catawba Nuclear Station is safely built.

20 MR. GIBSON: All right, thank you.

21 (The deposition was concluded at 3:43 p.m.)

22 * * *

23

24

25

1 I, Billy Wayne Deaton, hereby certify that I have read
2 and understand the foregoing transcript and believe it to be
3 a true, accurate and complete transcript of my testimony.

4 _____
5 Billy Wayne Deaton

6 This deposition was signed in my presence by Billy Wayne
7 Deaton on the _____ day of _____ 1983.

8 _____
9 Notary Public

10 CERTIFICATE

11 I, Ann P. Harris, court reporter and notary public, do
12 hereby certify that the foregoing 48 pages are a true,
13 accurate and complete transcript of the proceedings during the
14 deposition of Billy Wayne Deaton; that Mr. Deaton was duly
15 sworn prior to the taking of his deposition, and that the parties
16 were present as stated.

17 I also certify that I am not of counsel for nor in the
18 employment of any of the parties, and that I am not interested,
19 either directly or indirectly, in the outcome of the lawsuit.

20 This 22nd day of July 1983.

21 Ann P. Harris
22 ANN P. HARRIS - NOTARY PUBLIC
23 State of North Carolina
24 County of Mecklenburg

25 My commission expires:
June 30, 1986