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U.S. Department of Labor

1007 Main Street, Suite 200
Dallas, Texas 75201
(214) 767-0294

April 6, 1984

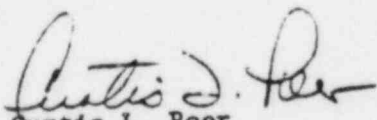
Mr. Thomas Westerman
Director of Enforcement
Nuclear Regulatory Commission
611 Ryan Place Drive
Arlington, Texas 76012

Re: ERA "Whistleblower" complaints of Dobie Hatley and Billie Orr.

Dear Mr. Westerman:

Enclosed please find copies of letters containing our determinations in these matters.

Sincerely,


Curtis L. Poer
Area Director

Enclosures

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A PDR

Dallas, Texas 75201

April 6, 1984

Stephen L. Hoech
Manager of Employee Relations/Compliance
Brown & Root, Inc.
P.O. Box 3
Houston, Texas 77001

Re: Dobie Hatley vs. Brown & Root Inc.

Dear Mr. Hoech:

This letter is to notify you of the results of our compliance actions in the above case. As you know Dobie Hatley filed a complaint with the Secretary of Labor under the Energy Reorganization Act on March 7, 1984. A copy of the complaint, a copy of Regulations, 29 CFR Part 24, and a copy of the pertinent section of the statute were furnished in a previous letter from this office.

Our initial efforts to conciliate the matter revealed that the parties would not at that time reach a mutually agreeable settlement. An investigation was then conducted. Based on our investigation, the weight of evidence to date indicates that Ms. Hatley was a protected employee engaging in a protected activity within the ambit of the Energy Reorganization Act, and that discrimination as defined and prohibited by the statute was a factor in the actions which comprise her complaint. The following disclosures were persuasive in this determination:

Pressure was brought to bear on Ms. Hatley by craft employees and by her supervisors to circumvent established document control procedures. The fact that she resisted this pressure and complained of document control deficiencies contributed to her termination.

This letter will notify you that the following actions are required to abate the violation and provide appropriate relief:

Reinstatement to her former position at the same salary and with the same benefits, and with seniority unbroken; back wages for the period from her termination through her reinstatement; and reimbursement of any and all legal fees and/or other expenses she incurred as a result of Brown & Root's action.


This letter will also notify you that if you wish to appeal the above findings and remedy, you have a right to a formal hearing on the record. To exercise this right you must, within five (5) calendar days of receipt of this letter, file your request for a hearing by telegram to:

The Chief Administrative Law Judge
U.S. Department of Labor
Suite 700, Vanguard Building
1111 - 20th Street, NW.
Washington, DC 20036

Unless a telegram request is received by the Chief Administrative Law Judge within the five-day period, this notice of determination and remedial action will become the final order of the Secretary of Labor. By copy of this letter I am advising Dobie Hatley of the determination and right to a hearing. A copy of this letter and the complaint have also been sent to the Chief Administrative Law Judge. If you decide to request a hearing it will be necessary to send copies of the telegram to Dobie Hatley and to me at Dept of Labor, 1607 Main Street, Suite 200, Dallas, Texas 75201; Telephone No. (214) 767-6294. After I receive the copy of your request, appropriate preparations for the hearing can be made. If you have any questions do not hesitate to call me.

It should be made clear to all parties that the role of the Department of Labor is not to represent the parties in any hearing. The Department would be neutral in such a hearing which is simply part of the fact-development process, and only allows the parties an opportunity to present evidence for the record. If there is a hearing, an Order of the Secretary shall be based upon the record made at said hearing, and shall either provide appropriate relief or deny the complaint.

Sincerely,


Curtis L. Poer
Area Director

cc: Dobie Hatley
NRC
ARA
Administrator
Tom Carpenter, Atty

Dallas, Texas 75201

Ms. Billie Orr
122 Buckboard
Granbury, Texas 76048

Re: Billie Orr vs. Brown & Root, Inc

Dear Ms. Orr:

This letter is to notify you of the results of our compliance actions in the above case. A previous letter from this office advised you that your complaint was received on March 7, 1984 and enclosed a copy of Regulations, 29 CFR Part 24 and a copy of the pertinent section of the Energy Reorganization Act.

Our initial efforts to conciliate the matter revealed that the parties would not at that time reach a mutually agreeable settlement. An investigation was then conducted. Our investigation did not verify that discrimination was a factor in the actions comprising your complaint. Conversely, it is our conclusion that your allegations are unprovable for the following reasons:

All available information indicates that, during the period preceding your termination, your actual job performance had deteriorated. Further, there was evidence of somewhat diminished capacity for performance.

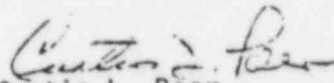
This letter will notify you that if you wish to appeal the above findings you have a right to a formal hearing on the record. To exercise this right you must, within five (5) calendar days of receipt of this letter, file your request for a hearing by telegram to:

The Chief Administrative Law Judge
U.S. Department of Labor
Suite 700, Vanguard Building
1111 - 20th Street, NW.
Washington, DC 20036

Unless a telegram request is received by the Chief Administrative Law Judge within the five-day period, this notice of determination will become the final order of the Secretary of Labor dismissing your complaint. By copy of this letter I am advising Brown & Root Inc. of the determination in this case and the right to a hearing. A copy of this letter has also been sent to the Chief Administrative Law Judge with your complaint. If you decide to request a hearing it will be necessary to send copies of the telegram to Brown & Root Inc. and to me at Dept of Labor, 1607 Main Street, Suite 200, Dallas, Texas 75201. Telephone No. (214) 767-6255. After I receive the copy of your request, appropriate preparations for the hearing can be made. If you have any questions, do not hesitate to call me.

It should be made clear to all parties that the role of the Department of Labor is not to represent the parties in a hearing. The Department is neutral in such a hearing which is simply part of the fact-development process, and only allows the parties an opportunity to present evidence for the record. If there is a hearing, an Order of the Secretary shall be based upon the record made at said hearing, and shall either provide appropriate relief or deny the complaint.

Sincerely,


Curtis L. Poer
Area Director

cc: Brown & Root Inc
NRC
ARA
Administrator
Tom Carpenter, Atty

TRANSCRIPTION OF TAPED INTERVIEW

WITH MRS. DOBIE HATLEY

ON FRIDAY, FEBRUARY 10, 1984

BY MESSRS. PAUL S. CHECK AND RICHARD P. DENISE

MR. DENISE This is Friday, February 10, 1984, at approximately 6:38 p.m. This is an interview with Mrs. Dobie Hatley by Mr. Paul S. Check and Mr. Richard P. Denise. Mrs. Hatley's daughter, Teree Hatley, is present. This interview will end up with a sworn statement, but is being recorded with the permission of Mrs. Hatley. Why don't you proceed?

MRS. HATLEY As I said before, I would like for everybody in the world to know that we, as a family, and individually, are pro-nuclear. I was on the committee who investigated the plant before the first spoon of dirt was turned out there, when Mr. Cubby Sewel came from Dallas and explained to us what was going to happen out in our backyard. I've always just

MR. CHECK So you're a long-time resident of this area?

MRS. HATLEY Yes, I've been here 30 years. I own this whole thing--that big house is mine also. I moved into this because it is just more economical to live than it is to support four bedrooms. And I think that the work at Comanche Peak has been good, and that there is just a few areas of concern, that I feel like should be addressed before any license is ever granted. I think there's like 15 percent of our power is being generated by nuclear. I have no fear of it, if it is done correctly. In fact, I am counting on it.

I love my air conditioner and I love my electric blanket and I want it to be there when I need it. I went to work at Comanche Peak, I do not have to work--I am independently (not wealthy) but I have enough money to survive. I went there because first of all I am an interested person, and I wanted to be there in the event that I saw anything going wrong. I never did ever tell my bosses otherwise. They all knew that I did not have to work.

MR. DENISE When you said you went to work there, were you an employee of Brown & Root or TUGCO?

MRS. HATLEY Yes, I am a Brown & Root employee. Initially, I went into the pipe hanger department, pipe support, and I worked the night shift and was the timekeeper as well as issuing documentation to the craft, assisting in that because the general foreman does that but somebody has to prepare it for the general foreman so that they could go and work. So I became familiar with pipe hangers first and then in August, that was 1979, in February. In August of that year they had a big layoff, and I took a layoff instead of going days because I didn't want to work in the pipe hanger department on days. I do not like the people who work there and the method they worked. I don't say they were unsafe; I just said I didn't want to work there. So I took a layoff and was out for approximately a month to 6 weeks and I was called back to document control. And I went back into document control nights, which I preferred, and worked there until November of '79 as a clerk. Then I was made night-shift supervisor and I stayed night-shift supervisor until May 16 of 1983. And at that time my boss asked me if I would come days and set up the satellite program. He said he could not

have anyone else who could do it. He had already given a young man the opportunity from February until May to do that, and they didn't even have the first one going so he asked me if I would do it. He told me it would be a dirty job. He told me I would be right out on the front line all the time, but that I had to stand my ground and not let anybody have anything they were not supposed to have outside of procedure. This is where we get into the nitty-gritty.

MR. CHECK Excuse me, could you describe your job?

MRS. HATLEY Now?

MR. CHECK To me--that job?

MRS. HATLEY When the satellite program came into being there was no buildings, there was no equipment, there was no furniture, there was no staff, there was nothing. There was me and one girl. Her name was Suzy Brown. We had to establish we had to get the buildings, get them put together, get them, we didn't do that personally here, we called the carpenters and had it done. But we planned them, we planned the layout of the building, we had the counters built to be able to serve the people and to put the security stuff in and then they had to be stocked with documentation, there had to be personnel hired and trained to run those satellites. I started with putting the first two buildings together.

MR. CHECK If I understand you, there is a central repository for documents, but now they were building satellites around it?

MRS. HATLEY Right. There was to be an engineering satellite, a start-up satellite, a civil satellite, electrical and mechanical. And that way craft or engineering would come directly to where they needed to be to get their documentation. It would be prepared at the satellite. The main DCC is more like supply for the satellite. They supply you with all the design changes as they come out and all this, but the satellite personnel they are the ones that have to process it and get it ready to go to the field in its correct form. In other words, pulling the packages of whatever has to be done. The procedure calls for all documentation at Comanche Peak to go out in package form. That means that the drawing that they are asking for has to have all supporting documentation that is currently against that to be with that drawing whenever it goes to the field. If it is not, it is out of procedure and it should not go. My concern was in the very beginning when we started to build these packages, it was the first time they had ever been built in all the year we had been out there was the enormity of them. You will see later.

MR. CHECK The original drawing had so many--

MRS. HATLEY Design changes! But it was the craftsman when he came to get his papers to work with would be carrying three or four pounds of documentation to take to the field with him in order to have what he needed to work with. I started screaming then. I know that this has to be incorporated into the

design before we could get a license. When are we going to start doing this? This is going to bury me. I was concerned because of the paperwork. You know, I couldn't get this much paperwork to the field fast enough for them to do what they were doing. We did it, but it was hard to do and I said this is ridiculous. We need these incorporated into the design. Oh, they're going to do that, I was told. It will be done; it will be done. If they start right now and put everyone out there to incorporating those design changes into the original design they won't be through for 2 years from now.

MR. CHECK Once again, let me see if I understand. We have the design drawing and we have a number of changes or what not, modifications attached to it. If a craftsman takes that away, what is he to do as he is making the installation or fabricating the part, whatever. What do you understand him to be going?

MRS. HATLEY What you're supposed to be able to do is take his drawings and the supporting documentation and decide whether or not the work he is going to perform can be done in this manner, and be done according to procedure as the way the design is laid out.

MR. CHECK OK. You sense that there might not be on that one drawing all the modifications that he needs so he will have to work from many pieces of paper as he is doing his job.

MRS. HATLEY Possibly yes. Or he may not even have what he needs.

MR. DENISE Well, let me be sure I also understand what Paul was saying. I think I heard you say that when a craftsman came he got a complete package.

MRS. HATLEY That's right.

MR. DENISE Drawings, specifications, procedures--

MRS. HATLEY Not specs, just drawings and all supporting documentation to that drawing.

MR. DENISE Drawing and what he needed to do to execute that drawing. Was there a problem in that the drawings were not up-to-date or were multiple drawings, or

MRS. HATLEY The drawings were in the correct revision, and the design change that was issued against the drawings was in correct revision. If they were all there, and if the one that he particularly needed was there. Now this is the way this works, and it may be hard for you to understand without seeing a package.

MR. CHECK Well, take the time.

MRS. HATLEY OK. The craftsman is out in the field and he starts to do his work. His work has been given to him by his foreman, or whoever. He looks up and they say they are going to put this thing right here, and he looks up and there is something already there. So what's he to do? The design, the drawing says that he's to put this thing right here.

MR. CHECK So it was interference?

MRS. HATLEY And so there is something already there, so how in the world am I going to put it there. So what he does is get out his little notebook and he draws a little picture, and he says I've got this little thing coming down here and this little thing coming down here, therefore I can't do what I need to do in this area. Then he takes that up on the hill to the engineering department or calls the engineering department here, or most likely he's going up on the hill, and up there they decide what can be done to make this possible for him to work. OK. Then they draw this up on what is called a DCA or a CMC--Design Change Authorization or Component Modification Card. The CMC is the Component Modification Card, and the DCA is the Design Change Authorization. So this engineer then decides what can we do to make this happen. Nobody looked at the entire scope of anything. They looked at the little interference in the ceiling and they looked at the little piece of paper they had in their hand and they said well that won't work, will it? And so they go up and they change something. They say well if you bring it down this far and go over this way and then go back up it'll work. So they just redesigned it, put the calculations to it, supposedly, and send it through what's called design review where they look to see well can we someday ever put this into the drawing and somebody, somewhere, decides well maybe. Because a lot of what we have didn't ever make it--it's never going to be incorporated into the drawings, lots of it. Because I don't know why, they just didn't want it.

MR. CHECK This DCA or CMC would then become a package with the original design drawing and all the other things that were added to it.

MRS. HATLEY Right.

MR. CHECK Is that a complete package?

MRS. HATLEY Only if it has all of them in there. But see, this is the point, craft never had to work with prior to November of this year, of 1983, craft never had to work with the package, they only had to work with . . . , neither did engineering. Then the NRC came and they said this is unacceptable. You all have to come up with a way for you folks to be able to see the whole picture out here. That was my job. We got to figure out a way so we can make it feasible for these people to have the whole picture when they work. So that's what we did and that is why the satellites was set up. We put them in motion and decided OK, now we're going to have a drawing by S916. So you go and Now we have a computer. When we first started we only had log books, manual logs, but now it is in the computer. The computer, we are told, is always right but it's not. But, nevertheless, George is always right, that's his name, and my girls have been trained to know that George is always right. And so whatever that computer printout calls for, it doesn't make any difference to us what it is, those numbers have to correspond and they have to go attached to that drawing, the big drawing, like S916 is a drawing. OK. It has, I think, well when you get the package together it is about this thick, some of those are single pages and some are dual. So it probably has maybe 200 different design changes

against it. When we started building those packages and saw the enormity of the design change work that had been done against the original drawings, it was horrible to look at and I voiced my concern at that time. My boss also did--he kept saying we're in an inverse pyramid and we're going to bury under all this paper. Well, they could not proceduralize around that. NRC said no. This is what we're going to do. You all can't decide this fellow can have one DCA or CMC so he's going to take that package when he goes to the field. I think the original intent and this is just my opinion was that if they did that they would look at all of the design changes and see if that particular one had been done before. Because in some of the packages you will find that they will have a design change written in 1979 and it'll come on down and they'll be working in 1982 and nobody went to look back to see what was already against it and go back and drill right back in that same hole where they did in 1979 because nobody went to look at that first design change. They planned that a long time ago.

MR. DENISE OK, I just want to ask you for a point of clarification. You worked in the satellite program in a satellite building. Did you personally observe the craftsman going out and making drawings and taking them to engineering and so forth or was it something that you heard went on? You know, you were talking about the craftsman going out and making a sketch in his notebook and going up to engineering. Is this something that you saw him doing?

MRS. HATLEY Yes, they sketched them right at the counter where they check out the documentation. They sit down and they get their little notebook out and

know what they got to do. You know, sometimes they just call up the hill off of our telephone and say this is what I need you to get DCA so and so and so. Once they got these DCAs and CMCs, the strange part is that then they revise those. So they'll come down to like a So they will revise, not the drawing now, now we're revising the changes, and it'll have about 14 changes against the DCA. So that means they have gone up there and changed the DCA 14 times that affects that drawing that is already in Rev. 10, the drawing itself, and it'll have that much more supporting documentation to it. So if you pulled a package that had all of the old revisions in it, then the package that is about this big now would probably be about this big because all of the design changes in that package have a lot of revisions to them too.

MR. DENISE So that package may have gone, as you indicated, from about 3 inches to about 1 foot high.

MRS. HATLEY In some instances it does. My concern here was, first let me clarify this. When I was on nights, working in DCC, our main job was reproduction, and there wasn't a whole lot of reproduction so you had to have something to do. We had different people who came to the document control that were very knowledgeable people and they didn't mind teaching us, and they did. One was Bob Turnage and he taught me how to read drawings. He taught me how to read all the drawings, not just one or two, so I could pick up the drawing, go out in the field, find what I was looking for, and come back--you know, the whole bit. But that was just something to do and something to learn. We had the FTAR and the FSAR available to us to read,

and that was very interesting even though it is like 32 volumes, it was something that we could do rather than go to sleep at night when you didn't have nothing to do. So the girls that worked for me and myself when we did not have work to do that you know required us then we would dig out some of this stuff and start studying it, and the girls that worked for me nights were all trying to be able to do the same thing so that we know what we're talking about when a craftsman comes and he says I can't find a location on this drawing, and we can say well look, you go right here and you do this, or if it's not on there we know where to go to find the drawing to get the location with. So that was just like a little game we played because it was interesting for us to be able to do it and then sometimes if we were right, they'd come and tell us you know--hey, we found it. And they would come to us, this is how much documentation they get, they'll fix up a traveler and it'll have a valve on it that needs to be worked and as far as a location, they will have no location whatsoever. They will have a flow diagram, an M1408 for instance. If you could see an M1408, it's a 24 x 36 drawing and it's so covered up you can't see it because it has all this little stuff on it. And this craftsman now has to go and find a valve number, it might be like 8013. He has to look all over this thing until he finds 8013, and there is no other way to do it. There is no way that they've got it cross-referenced so we could go easily to the BRP and find that valve. Now that's the stupidest thing I've ever seen, but we figured out a way that if you went to the equipment list that came on site, then the equipment list would give you a line number and once you got a line number at least you had a bigger area on the drawing to look for. You know if you could find the line number rather than the little tiny valve number

and then you could follow that line until you found the valve. Now see that don't seem right. It seems like that if we are paying engineers to do that, that we shouldn't have helpers out there having to look that up so that they can find their way around.

MR. CHECK Let me ask, maybe it's not the concern, but from what I've understood, if I were a craftsman, from what you have told me it sounds like an extremely difficult job given this package, the original drawing and all of the attending documentation, to know what to do and to know that I have observed all the modifications. Is that a concern of yours? That a craftsman can't--

MRS. HATLEY He couldn't.

MR. CHECK From all this information discern what he really must know in order to do his job.

MRS. HATLEY That's exactly right. It would take him half of the day just to read the documentation before he went to see them.

MR. CHECK So, in your view, this package of information is not really helpful to the man who has the work to do? It does not do what it is supposed to do, which is to instruct him unambiguously in what his task is?

MRS. HATLEY It's all there, if he digs it out. It's not in that form.

MR. CHECK There are so many signals, discerning the one that he is supposed to receive however is very, very difficult.

MRS. HATLEY Oh, you will see when you see the packages.

MR. CHECK Is that the principal issue, or is this Aikens?

MRS. HATLEY That is a concern. That was the initial concern that I had. This is when I started telling my bosses and everybody else this is not working. Once they've looked at all this, I said why doesn't somebody call somebody to look at this. Somebody needs to see this besides me and you. This is not right. You cannot build a building with mountains of paper, you have to have a blueprint to build a building. They said they're smarter people than you that know that you don't have to do that.

MR. CHECK We'll leave that open for a moment.

MRS. HATLEY OK.

MR. CHECK Maybe somebody can figure it out, but from what you've told me, it does sound like a great deal of information that is not being packaged clearly for the . . .

MRS. HATLEY According to the NRC, it's supposed to be incorporated into the original drawing.

MR. CHECK That's all of--

MRS. HATLEY All of that stuff. They can't leave it hanging.

MR. CHECK They should work only off a drawing--is that what you're saying?

MRS. HATLEY Yes, I do believe that. Because how can he see? How could you possibly know what you're doing if you could not see the drawing and see your part in it when you are looking up at whatever or down at whatever you are doing and you see this is part of the plan. OK. And you don't even . . . the drawing is there but the part you're working off of is not the drawing. The part you're working off of is one of those design changes that has already been revised several times so therefore you don't even know even what the original document looks like. And before the satellites came into being and we set up that system, the craft people never saw the drawings. All they saw was the DCAs and CMCs and that's why that the NRC said that was not acceptable and they had to look at the whole picture. Well, I don't think that the NRC or anyone else knew what the whole picture was when they put that rule down for them to have to look at, because those packages had never been built. Nobody had ever pulled all the supporting documentation against the drawing and looked at it. So here we are in there pulling all this stuff and looking at it and the amount of paperwork is unreal. OK.

MR. CHECK OK. Well, let's call this point No. 1 then.

MRS. HATLEY OK.

MR. DENISE Will someone phrase it so I can . . . I just want to say point #1 is that the craftsman received so much documentation--

MRS. HATLEY They may or may not be right, that may or may not be all inclusive. I feel that it is impossible for them to make a judgement of whether or not what they're doing is all there.

MR. CHECK I understand the question of too many signals coming to him off this big package, do you have some and that is reasonably understandable, do you have some basis for your conclusion that it may not be a complete package?

MRS. HATLEY Yes sir, I do. In fact, I had an NCR written against me in my satellite 306, and that's why I called it against me by a young lady named Janice Whett who was studying drawing and we, like I said, George is correct, whatever George says that's what goes into the package. George is programmed by the design change review group, and they're supposed to tell us everything that goes in that package. We don't know what all's supposed to go there except what they tell us. When they tell us what goes in go in that package, then we go to our individual books and pull that and make that package up. And the NCR was written against Satellite 306 because a design change that was supposed to be in the package was not in the package. The reason it was not in the package is because the computer printout did not include it. It had been missed. So the NCR was improperly addressed because, but of course the girl didn't know that when

she wrote it, because we were only doing what we were told in Satellite 306 by supplying that to her. We did not know that there was any missing documentation, but she, being the QC inspector, that was looking for that particular item knew that it wasn't there and that it should be.

MR. CHECK So you don't think there is an adequate basis for a confidence that this is a complete and correct package--

MRS. HATLEY That's exactly right--

MR. CHECK Even if it is enormous.

MRS. HATLEY Even if it is enormous, yes--because that happened daily. That was just And what you have to do in the event that that occurs is that you have to call up to the design change review group and tell them that CMC number so and so is supposed to be in such and such a package, would they please put it on the computer so we could run that package and sent it to Lucille. So there you are putting the responsibility into the hands of people that are not trained to make those decisions so we will never know whether or not those packages were complete and have to leave that up to those people up there and often they were not complete. And, as a result of that, the NCRs were written. Those NCRs are on file out at the plant. So, inadequate documentation is why I say that part of that problem exists. The other part is because I don't . . . the, uh . . . they just wouldn't put everything in there that was supposed to be and they put 90 percent of what shouldn't be in there in there. A lot of the times the numbers were

wrong, and still are as you'll see in the packages. If it should be 96199, for instance, the person programming that may have put in 96119. As a result of that we pull 96119 because that is what it tells us.

MR. CHECK OK, one of the purposes for our going there is to corroborate this allegation that there are errors in the packages.

MRS. HATLEY What we don't know is when that error was made that put, for instance, a pipe hanger into an electrical package, a pipe hanger CMC into an electrical package. Was something omitted? You know, was the one that was supposed to be there not there as a result of that because of the fact that the person doing the input failed to hit the right number, and we had what we didn't need but we didn't have what we did need, or was it just added to it? That's the part I don't know. That's why I kept screaming all the time for somebody to look at these.

MR. CHECK Questionably complete and accurate information---

MRS. HATLEY In the packages--

MR. CHECK Not especially usefully conveyed to the--

MRS. HATLEY Right--

MR. CHECK Right--

MRS. HATLEY Therefore, crafts didn't like that had to use all of this stuff. They had never had anything before in all of the construction of Comanche Peak except the design changes. They had never had to look at the drawing and all the stuff that goes with it, they just looked at parts. Never had they seen the whole package--nobody had. So they were all . . . craft was not happy about it. Incidentally, I want to add to this right here, I think that at Comanche Peak craft personnel is as good as there is anywhere. I think our QC is fine.

MR. CHECK Brown builders, right?

MRS. HATLEY No, they're not Brown builders. Nope, they're not.

MR. CHECK What are they?

MRS. HATLEY They're construction craftsman.

MR. CHECK I see.

MRS. HATLEY They've come from lots of different areas, and they are trained, and they know what they are doing.

MR. CHECK What's the distinction? I don't know--

MRS. HATLEY Between being a Brown builder--I don't think anybody out there is very proud of being a Brown builder. Brown & Root pays our salary, but I

MR. CHECK I thought that might be a long-term employee, as opposed to one that has just come for the job, or what.

MRS. HATLEY I never called myself a Brown builder and I was there for 5 years, so I don't think that craft is proud in working for Brown & Root. In fact I know that most of them are not. However, they love to work. I feel like they are very satisfied when they've got --- I'm dealing directly with craft all day, and when they have been given a piece of work that they can go out and do and they come back in and it's finished and QC has come and they bought it and everything --- you can tell they are really excited at having done a good day's work. I will say that 75 percent of the time right now, this is not the case because there is no work. Everything that we have out there is rework. Why is it rework? Because all these design changes were not where they belonged whenever it started. But primarily, the people that are working out there, I think, are fine craftsmen and they resent very much that they have to do the things that they have to do, such as pretend to be busy when they are not. This is kind of comical. We have one young man that -- all the time he keeps a piece of conduit pipe and a file in his back pocket so that anytime he stops walking, he takes out his file and conduit as though he is filing to get ready to make a fit, so that if anybody sees him, he's getting ready to do his work. Now that's indicative of what everybody has to do. You have to be -- they have work

samples out there, and you either have to be carrying something, you can't just be going somewhere, not even to the bathroom, you are supposed to be carrying something or holding something, or you either have to have a piece of paper or a board -- a lot of the guys carry a board around with them, or whatever -- but most of them look like their going, and you will see this one particular fellow, man, and every so often he had to get another piece of conduit because he has got that one all filed away. Now that young man is as good an employee as I could tell you about that we have out there. Obviously he is because he done thought of the cute way of covering himself. But, it bothers me that he has to do that. I think there ought to be work for him to do so that he could go out there and do it and not have to pretend that he's working. That is because we are so far overstaffed, you know, my opinion, of course, that everybody is so skilled at covering themselves that it's really funny. Cause if somebody with old grungy cloths and a pink hat walks through the building, and there's not anybody watching you are going to see this one sitting over here and that one standing over there and all this kind of stuff, but if you see anybody with that gold hat or white hat or perhaps dressed as you are, come through -- everybody, if they are swinging through the pipes, they are moving. So when I walk through there they all know me, of course, and when I walk through there they don't bother to get up because they know it's just me. If I had with me, you two people, they would just -- you would just see all of this activity, but if you walked up and asked that individual, 'what is it that you are doing?' He would be hard pressed to tell you what activity he was performing at that time. In other words, I'm fitting this pipe up, and you said 'where is your drawing?,' and, you know, this sort of thing,

he would be hard pressed to explain what he was doing. So that's just . . . , that's a moral issue.

MR. CHECK Yes, it's something that we could talk about for a long time because it's fascinating, especially because this is not a union project and those kinds of things are not supposed to happen -- but you can tell you make this first point very well, and I'm confident that I understand it. Is there another you want to make, or do we want to get on to the --

MRS. HATLEY I'm sorry, because I know one of the things that you are primarily interested in is the CYGNA.

MR. CHECK The CYGNA, yes.

MRS. HATLEY As I said, I started from scratch with the satellite. CYGNA came in and -- I believe it was in August the first time to look, to see if the concept was good and if it was a workable concept. At that time they came, and I feel like they looked pretty thoroughly at the whole picture of what the satellites were doing, and how -- and they made different recommendations and so forth, and we were grateful that they had come and looked. They came back in November.

MR. DENISE Of '83.

MRS. HATLEY Yes.

MR. CHECK Do you think that this was the same task, or another task. The CYGNA employee in the first case -- to do the job that you just mentioned, to look at your satellite operation and make some comments to Brown & Root or to TUGCO?

MRS. HATLEY Yes. That -- whether or not this would be a workable thing. You know, like I said, this satellite concept -- my immediate supervisor and myself have the plan, the overall plan, and we presented that back in February the first time and it was accepted as opposed to, or as my boss told me -- I don't know whether this is true or not -- as opposed to being shut down, we came up with a way of supplying documentation to craft that would be acceptable. When the NRC was out there and did the audit prior to that, they had found so much documentation in the field that was out of revision, and all this kind of stuff, and so much just garbage documentation, they said all of that had to be cleaned up out of the field. We had to devise a method to get them current documentation, and accurate documentation in order to work, and get the rest of that garbage out of there. Our method of doing that was to change the control numbers, so that everything going out of the satellites was carrying a 300 series number. Anything else found out in the field was no longer a valid document.

MR. CHECK CYGNA looked at this in August and they said 'that looks pretty good.'

MRS. HATLEY Yes. This concept is good, but now remember, we just started in May really, so I'm not completely set up. At that time I think I had only three satellites up and they were not fully staffed or stocked because we

were moving as fast as we could, but not complete. So they said they would be back in November, and at that time we should be fully operative and -- or they said that said they would be back and we should be fully operative at that time. And we were. My staff is, if you want to check, worked anywhere from nothing less than 60, many times as much as 80 hours a week preparing the satellite so that we would be ready when the next time came. And at the same time we were serving craft and trying to stock our satellite, so they came back. I was told that they were coming and I was called into Frank Strand's office and Hayward Hutchinson, who is Frank Strand's boss, was sitting in Frank's office. He had in his hand a handwritten -- it was a piece of paper that was handwritten -- and on it it had drawing numbers -- pipe support numbers, mechanical, electrical, structural, and so forth, at the top of the page -- I shall always remember, it had a girl's name, I don't remember the name, and it had a room number at Grandbury Motor Inn. That's all it said. But I remember, it was there and I thought, what the hell is that doing there? Excuse me, Teree. Any --

MR. CHECK I don't know what to make of that.

MRS. HATLEY I don't either. I don't either, I'm only telling you what was on it, I wished I had one, but I don't, to show you. But it was handwritten. It was no formal thing at all, it was just --

MR. CHECK Now Hutchinson had that?

MRS. HATLEY Hayward Hutchinson had it in his hand. He handed it to me and he said 'get some copies of this. CYGNA will be here tomorrow, and this is what they are going to look at.' So I went in to the -- I'll show when we get there -- I went into the DCC area, made some copies of it because I was making one for each satellite, each satellite has to have -- you have to have some of this documentation in it. So I made one for each satellite, took the original back to him and took mine. He said when you get through with those, destroy them. I said, OK. So, I then leave that office, go out to each of my satellite supervisors and give them a copy of the list. Tell them, 'make sure that every -- all of this documentation, if you are suppose to have it here, it should be here and it should be correct -- that CYGNA is coming tomorrow, and that's what they want to look at.

MR. DENISE Now let me interrupt you. Did you receive that instruction from Mr. Hutchinson to have to drawings available, and be sure they were available, and was there any concern on his part that they simply might not be there at all?

MRS. HATLEY I don't know about his concern. All I know is that's what he told me.

MR. DENISE He told you to have the copies of the drawing available to give to CYGNA?

MRS. HATLEY Well, no. If each of these areas was supposed to have those -- any of those drawings in them -- and we have that through a computer system, like naturally the electrical satellite doesn't have mechanical drawings in it, so they would only be concerned with that part of the list that referred to

electrical. The mechanical satellite would not have the electrical, so they would only be concerned with that part that was mechanical. But the list was -- its entire list -- the entire list of what they were going to look at. Do you follow what I'm saying?

MR. DENISE Yes.

MRS. HATLEY Have you seen the list?

MR. DENISE No.

MRS. HATLEY Well I've read the CYGNA report. It's the exact same list that tells them that's what they looked at in the satellite. So --

MR. CHECK _____ develop this further. I don't want to miss the sinister point if -- because --

MRS. HATLEY OK. At the time --

MR. CHECK CYGNA was -- At first I thought, when you were talking back in August that CYGNA was consulting with either Brown & Root or TUGCO about a document control system, but I'm not that familiar with the CYNGA report, but I thought that was a design review.

MRS. HATLEY No.

MR. CHECK No.

MR. DENISE So you are speaking about the job they did to be sure that the documentation was OK, or to assess that documentation.

MRS. HATLEY That's part of it, and all the parts of the CYGNA report that have DC on them refer to the satellites or document control. So they -- when I was given this I thought it was kind of strange, I

MR. CHECK OK. So it looked like CYGNA, let me say it and then if I've got it wrong you can straighten me out.

MRS. HATLEY OK.

MR. CHECK CYGNA was coming back now to check further to confirm that the new document control system was working.

MRS. HATLEY Exactly.

MR. CHECK And, I summarised from what you are telling me, that you feel that one of the ways they were going to test it was to look for certain documents.

MRS. HATLEY Audit -- with the computer.

MR. CHECK They were going to take a sample.

MRS. HATLEY Right.

MR. CHECK They were going to take a sample of all of the documents that you had and if those were there, they would be allowed to infer something about all that they didn't ask for.

MRS. HATLEY That's true. And the way that they would know which satellite was to have which part of the documentation was through the trace that we have that tells, from document control, what each satellite has. You know, so --

MR. CHECK If it's electrical, you've got to go there; if it's mechanical, you have to go there.

MRS. HATLEY OK. So I gave each satellite supervisor their respective list and asked them to check and be sure that each of those things was there, and if it's an apperature card -- we have reproductive capability -- and if it was an apperature card, then it needed to be sure that it was the right revision. If it's just a hard copy, then it needed to be sure that the whole package was there and not just one or two pages of what they might be asked for. When they did that, I was not concerned about the fact that they were only asking for certain documentation because I knew that my documentation was good so it didn't bother me. It really didn't bother me.

MR. DENISE Let me pick up on that point. When you did this, did you find that the documentation that was supposed to be there, was there?

MRS. HATLEY Oh yes, yes. We didn't have anything to do literally, other than to check and see that it was there.

MR. DENISE So you didn't have to scramble around and get things that were supposed to have, and didn't have. You found that you passed the test.

MR. CHECK You would have passed it even with this --

MRS. HATLEY Yes, I feel real secure that we would because I asked my supervisors . . . cause I personally went back to check and I asked them, was everything the way that -- you know -- what did you have, and was it like it like it was supposed to be. They all assured me it was, and I assured them that it had better be, and then we went on our merry way.

MR. CHECK You then went on home that night, expecting that tomorrow when CYGNA came they were going to find everything.

MRS. HATLEY That's exactly right.

MR. CHECK It was nice to have this warning, but you didn't need it.

MRS. HATLEY I didn't think so. That's why I wasn't too concerned about the warning, at the time. I wasn't ever concerned about the warning until I read this in the paper on February the 7th. And you want to enter that as whatever.

MR. DENISE Now why don't we say what this is referring to. Can you first tell me, let's look at what newspaper this is.

MRS. HATLEY Alright. This is an article written by Bruce Milar, it's published on --

MR. CHECK Fort Worth Star Telegram.

MRS. HATLEY Tuesday morning, February 7, 1984.

MR. DENISE Fort Worth Star Telegram.

MRS. HATLEY And it reads as follows, "A group opposing the licensing of Comanche Peak nuclear power plant, Monday, criticized a proposal by plant owners to hire three outside consultants for an evaluation of pipe supports at the plant. Juanita Ellis, president of the Dallas based Citizens Association for Sound Energy, said she opposed selection of engineering consultant, Ebasco Services, Inc., of New York, and CYGNA Energy Services Company of San Francisco. She said both have a stake in the licensing of Comanche Peak. Ebasco is under contract to review quality control at the plant. Last fall utility officials hired CYGNA for a \$500,000 technical evaluation of plant design standards. CASE witnesses, Jack Doyle and Mark Walsh, say that the CYGNA report is not an independent assessment and lacks sufficient engineering data. Walsh and Doyle are former engineers at Comanche Peak." Well I don't know anything about Walsh and Doyle, and I don't know anything about anything else, but I do know a little something about pipe support. And it bothered me, then I got to thinking, well what if they do them the

same way that they did me. What if they come and give them a list and say 'here is what we are going to look at tomorrow when we come,' ahead of time and they would go and get things ready and then they would come and get them and they would say, 'all the pipe supports are good' just like that. If you will read the report they say, 'all my documentation was good.' That bothered me, and I expressed my concern.

MR. CHECK I think I understand your point. Do you think that it is certain that CYGNA was involved in the disclosure of that list of specific documents.

MRS. HATLEY I will not even make a judgement.

MR. CHECK It could be that someone else -- you talked to Brown & Root people I guess.

MRS. HATLEY I was told CYNGA --

MR. CHECK -- gave it to them?

MRS. HATLEY Yes, got this list from CYGNA--

MR. CHECK Somebody just picked it up and was taking advantage of perhaps someones lack of care. You think CYGNA actually -- or somebody told you that? This man Hutchinson or --

MRS. HATLEY Yes.

MRS. CHECK He led you to --

MRS. HATLEY -- to believe that CYGNA provided

MR. CHECK That CYGNA actually gave the answer so that when they were tested tomorrow you would do well.

MRS. HATLEY Yes. That's my opinion. I cannot -- I wouldn't swear to anything. I'm only saying that's how it came to me. Now how it came to Brown & Root, I don't know. Whether the whole CYGNA bunch was included, or just maybe one person in CYGNA that for whatever reason wanted to disclose because if I understand it all of them had that list. All of the CYGNA people had that list, not just one or two. So it's entirely possible that there is only one CYGNA employee that does one thing to somebody else.

MR. CHECK Is this like the beginning of your involvement -- you read this in the paper and that turned the light on in your head.

MRS. HATLEY It scared the -- it scared me. Now, I know my involvement begins back when we build packages.

MR. CHECK No, what I mean is with Juanita Ellis.

MRS. HATLEY Oh, I never -- no -- in fact, my friend over there -- when we got home -- when I got home that night, and I said that I'm going to call that lady and so we hunted for an hour trying to find her phone number, because she's not

listed in the book and CASE is not -- we don't have a book so we had to try to get Information. Information couldn't give it to me. And in fact I couldn't get her number until I called somebody else to get it, and then somebody else gave me her number and that was on the night that this thing was published and that was the first time I had ever talked with her.

MR. CHECK So her basis for opposing the selection of the consultants was not your information.

MRS. HATLEY No.

MR. CHECK She had another basis.

MRS. HATLEY Oh, this was in the -- that was like Tuesday morning, and of course, that was a long -- I'm sure I don't even know when she expressed her concern about CYGNA.

MR. CHECK It was just -- her concern at that time --

MRS. HATLEY You know, her name had not even been in there, and I had seen that -- I would have been concerned.

MR. CHECK No, I understand that, I'm just trying to understand the sequence of things.

MRS. HATLEY OK.

MR. CHECK Of course a newspaper article is a very small piece of all that it represents, but it suggests that it was simply on the basis of the fact that CYGNA had been involved with the plant before and had a stake in the licensing that she didn't think it would be intelligent for TUGCO to now employ them as an independent . . . to do this new, independent review of pipe supports and perhaps other things.

MRS. HATLEY That part of it was not even part of my concern. My concern was that if they provided me with the information in order to pass the test, were they going to do the same thing with the pipe support people in order that they could pass the test.

MR. CHECK You made your point clearly, I understand it.

MRS. HATLEY And that bothers me. Cause, I know pipe support has been in trouble out there since the beginning of the plant. I don't know if they are right or wrong, I only know that they have had to work and rework and rework, and all that but that's not my fear.

MR. CHECK We can leave all of that aside, you have some evidence that suggests that CYGNA doesn't behave in a thoroughly responsible fashion.

MRS. HATLEY I don't know if they stold it out of their rooms, or how they got it. I know a Brown & Root person had it in their hand and handed it to me. That's how I got it.

MR. CHECK There's reason to wonder when someone says that they are going an objective, fair independent study.

MR. DENISE Is it clear to say the name of the group you are in was DCC?

MRS. HATLEY The DCC satellite system. We were not integrally involved with DCC, in fact I had a separate payroll.

MR. DENISE OK. I just wanted to identify it. The DCC satellite system.

MRS. HATLEY Right.

MR. CHECK So that's point No. 2.

MRS. HATLEY And that's me and CYGNA.

MR. DENISE Is CYGNA, C-Y-G-N-A?

MRS. HATLEY Yes. The first time when they came out there, and everything, I didn't have any idea who they were, and what they were. There's another point of concern that I had never even discussed, if your interested in hearing it and that is that TUGCO QA that's out there at the plant and does the same method as this whenever they are auditing anything, they usually give them what they are going to be audited on before they get there. I'm not -- that may be procedurally correct. I don't know.

MR. DENISE Have you personally observed it?

MRS. HATLEY You mean that they are going to tell us what they are going to look at when they come the next day?

MR. DENISE Yes.

MRS. HATLEY Yes.

MR. DENISE Is this the QA audits of the DCC satellite system, or are you talking about the QA audits of piping support, or electrical transfer?

MRS. HATLEY No. It wouldn't be the system in its entirety. It would be certain packages relating to the satellite. No, you know if they are going to do an audit, TUGCO QA comes in to do an audit.

MR. CHECK You mean something like CYGNA did? Do they do these periodically and in the same way that CYGNA did, they give you the answers the day before, is that it?

MRS. HATLEY I'm going to go out real far on a limb and tell you this -- TUGCO QA, out there is called in to go and identify problems when they want to identify a problem. Do you hear what I'm saying?

MR. CHECK Yes, I would like you to talk some more about this so it sinks in.

MRS. HATLEY OK. My boss told me -- we are going to have to first tell you this -- there's task forces then. My satellites were going fine, everything was good but -- it was working, it was starting to work, except that the construction supervisors were still screaming their heads off cause craft could not work with individual paper. They went every way possible to try to get paper without getting it procedurally. I had to fire some of my employees because the supervision would coerce them into going and getting them illegal documentation so that they could go to the field and work without it. Now why would supervisors not want -- why wouldn't they want to stay within procedure? I don't know. I just don't know, but they never did and they fought me continuously on it. My boss told me over and over again, 'stay in there, it's OK, just don't let them have it. Don't let your girls let them have it. They will have to come over me to get to you,' and all this good stuff. I told him that -- the day I resigned -- I said, 'You are firing me, or asking me to quit, and you are still sitting there. What happened?' He said 'Oh they will get me next.' But anyway, the Task Forces then were set up and this -- what we had to do -- is literally, violate procedure, but that didn't matter. They just rewrote that procedure. That put documentation out into the field overnight. The procedure says that it can't stay out there overnight. The procedure says it has to go out with the craft, be checked as it goes out, has to come back in at the end of the day, be checked as it comes back in to see that it's all there and during the nighttime hours, it is updated with the new computer printout so that we know that it is completely accurate, everytime it goes across that counter to be worked. So they decided that was not what they wanted to do and they said we were going to have Task Forces, and

we are going to put paperflow groups in these Task Forces. So each paperflow group then decides that they have to have a full set of drawing out in the field, drawings and design changes. Oh, they didn't want the changes, they just want the drawings, but of course they had to take the whole package. So here we have another set of what we had before, but the NRC said was unacceptable -- unacceptable. Before we had little groups, you know, all out there that had sets of drawings. Now we have Task Forces. So those Task Forces didn't know any more about keeping up with paper. They were outside of procedure. They did not have file custodians handling the paper. The stuff stayed out of the satellite overnight, and I'm talking hundreds of packages, so therefore, it was not possible to keep an accurate update going all the time without great effort on our part, which we did. However, I had runners that would go out of the satellite with each design change as it changed revision, or was issued against a new drawing, take it out, run the copies, run it out to the Task Forces so that they could immediately get it incorporated into what they were working. And as a result --

MR. CHECK In effect, satellites had satellites, is that what these Task Forces . . .

MRS. HATLEY Well, that's what they -- No, they wouldn't let them be our satellites, but that would have been OK. I wanted that, subsatellites. So that our people would always be in control of the documents and not somebody that doesn't know how to control them.

MR. CHECK But in effect, that's what they were. They were satellites, although not --

MRS. HATLEY They called them Paperflow Groups. OK, when they got to the Paperflow Group, they would take the package and take what they wanted out of it. Well, they couldn't do that out of the satellite, so they had to devise --

MR. CHECK It wasn't good discipline out there.

MRS. HATLEY They didn't want no discipline. This is the superintendents that are doing it. So, you know, they are the ones that are supposed to be doing the discipline, and they are the ones that wanted that stuff out there so they could pull just what they wanted out of the package again, and go back to working off that individual piece of paper. So, needless to say, that didn't work. So my girls would be running out to the field to update the design changes and they'd get out there and the packages wouldn't even be there. They'd be out somewhere. Well, whoever was supposed to provide them with that package for update would sign a three-part memo saying that package number so-and-so was unavailable for update for DCA such and-such so that my girl is cleared. We've done our job. We have gone to the area, tried to secure the document so we could attach the new paper to it, and it's not there for us to do, so somebody is going to take the responsibility for it, not us. So that's what we did. So, the little runner girl has a stack of them about this tall, saying that they were not available for update.

MR. DENISE That's about a foot high.

MRS. HATLEY Yes. Maybe more than that. So, then what they do is, she goes back each time she goes, she takes this same DCA or CMC with her until that package is made available for update. Each time that she takes it, and each time it's not, they have to sign it again saying it's not there. But, you know, it's the only way that I could clear my personnel as having done the jobs they were supposed to do. So, we had -- but the people in charge of the paper in the field just really were flippant about it. They made little rhymes on their three-parts, you know, "On this day, second of May, Buck . . . ' you know, this kind of stuff, and nobody cared, except me. And they'd loose them. They'd just flat loose them. They would say 'Joanna had brought' -- you know, they brought a three-part to me and they would say 'Joanna has brought this stuff out here six times, and we obviously don't have it, if we did we would have give it to her in the first place, so count us lost on that one and give us another one,' sign it off and that's what we'd have to do. OK, here I've got a lost package out there, in care of my control staff out in the field doing the work. Nobody cares. Then, I get a three-part from the chairman of the Paperflow Group for the reactor building, telling me that he does not have an SS09, nor has he ever had, and he wants that removed from his lists of documents, and I went up to where he was and I said, 'Jack, you just don't realize what this is. This is the spec. This is not' -- 'OK,' he said, 'I don't have a place in my file for it.' And he doesn't. 'It's a spec, we keep them in books. Because of your specs are with your procedures, here under this counter, so if you make that available to my runners, she will update your stuff.' And

so it gets kind of scarey. I went and told my boss. I said, 'The chairman of the Paperflow Group -- I have a three-part saying he never had that spec in the field, doesn't know what it is, or nothing else' and I said 'that scares me.' Again, I am told don't worry about it, people smarter than you are going to take care of this problem. But when you start to voice your concern about anything out there, you're marked. You will be gone, for whatever the reason, soon.

MR. DENISE I want to see if I can capture this last concern in a few words, but before I do that I want to go ahead and turn over the tape because we are reaching the end of this.

MRS. HATLEY OK, I'll go and get a cigarette.

TAPE SIDE A

MRS. HATLEY Let's see, I don't know what day that it was, but I can get the calendar and show you. OK, it would have been Friday, the 27th.

MR. DENISE Of January?

MRS. HATLEY Yes, And I was told -- now I've explained this Task Force business to you -- I was told that when the heat is too hot out there for you, they are taking shots at you every day, it's just too rough on you and I'm going to take you out of your satellite and I'm going to put you on nights for a month, 3 weeks to a month. And I didn't like that because I've done

put sweat and blood into the satellite, and I said that's not fair, and I'll just quit. He said, 'no you can't quit. I need you.' And he banged his fist on the desk and he said, 'You will come in here and you will work 40 hours a week instead of 80,' like I've been working before. And he said, 'I don't care whether you do a damn thing or not, just come in here and be here 40 hours a week until the heat is off, until all this is over and then Phoenix will rise from the ashes,' meaning me, 'and go back into the satellite.' he said. 'I'm sending the TUGCO QA in to the Task Force to see to it that they are all shut down.'

MR. DENISE Now, who is your supervisor that was telling you this?

MRS. HATLEY Frank Strand.

MR. CHECK From what you say, do you think he was trying to protect you?

MRS. HATLEY Yes, at that time I do. So, I said well, OK, because one thing I have always done is follow instructions. I said, 'Alright, if you feel like that is what I need to do, then that is what I will do.' As a result of that, I went to Austin, I was upset, obviously over what had happened, and I went to Austin to where my sister, then we came back to my mother's, my dad just died the 14th of December, and so we are still trying to get his estate taken care of and everything, and I was in Fort Worth with my mother, and I called my boss and I said there is absolutely no reason in the world why I need to be there, to come in at 4:30 this afternoon, I called him on this Monday, and work. I have 4 weeks vacation accrued, they

had delayed all my vacations every time -- there just wasn't time, we had to go on with this thing, I said I have 4 weeks vacation, I am going to take one now. My toe was hurting. I had an ingrown toenail, and had to get my toe taken care of and everything, and I will be in a week from tonight, and go to work. And he said OK. So I came in at 4:30 then, I guess it would be February 6, to go to work. When I got there, he called me into his office. The first thing that he said to me was, 'Do you have a daughter?' And I said, yes. I had also told him -- no, the kids at work had told him -- in the meantime then, my daughter-in-law had to go to the hospital, she's expecting but she didn't lose the baby, and I had to babysit my grandbaby. So, he knew that, and he asked me did I have a daughter. And I said yes. He said, 'Have I met her?' I said, 'Yes, I believe you did a couple of years ago.' He said, 'Does she work here?' I said, 'She doesn't work here anymore.' And he said, 'But she's in the hospital.' I said, 'No, that's my daughter-in-law.' He said, 'I told them that was your daughter.' I said, 'You told who-' And -- the ironic thing was that my daughter had had her hearing that day on the TEC suit that, where Brown & Root from Houston had to be in on the call, and the arbitrator in Austin, and her ex-boss at Brown & Root had been in a conference call with her that very morning. That was very ironic to me.

MR. CHECK TEC is Texas Employment Commission?

MRS. HATLEY Yes. You know, just where you go to sign up for your unemployment, if you don't get it, you file a claim -- you appear, and it goes to the Appeal Board. She appealed her claim -- but I said it's funny that you should

ask, she just had her appeal hearing today, and you've never asked me about my daughter before. And then he said -- he just turned ashen-white, and he said what I have to do now is the hardest thing that I've ever had to do in my life. Tolson wants you off-site. I want you to resign. I said a week ago you wouldn't let me resign. And now, here I am back and you're wanting me to quit. Now what's the deal? What grounds are you going to use.

He . . . 'Failure to follow instructions.' And I looked at him and I just said, 'I have never failed to follow an instruction that you gave me. Now you tell me why I'm being fired.' He said, 'Dobie, you know that there is just too much heat out there. You've made too many people upset at you for not letting them have what they want, and so forth, so you know that now you are going to have to pay the price.' I said, 'That's when -- But you told me that -- you told me this in front of all of my girls and in front of everybody, that they would have to come through him to get to me.' And I said, 'But you're still here and I'm gone. What happened?' He said, 'Well, they will get me next.' He said, 'I'm going back to GD and go to work, or something like that.' So, I said -- we talked about it briefly, I did not make any claims or any other thing, I just told him that I felt betrayed by him, that he would do this to me. Because I said obviously here I am to do what you told me to do, come nights until the heat's off. He said, 'Well the heat got too hot while you was gone.' He said, 'you've got to go.' And he said that I would go peacefully, that I should resign, to work elsewhere. And I said that I will not resign. He said, 'Then I will be forced to terminate you.' I said, 'Well then that's what you'll have to do.' And then I said, 'Frank, what is the possibility of an ROF?' That's a reduction-of-force. And that way I felt that it would not be on

his -- their record -- or my record or anything, it would just be a reduction-of-force type thing and it would not be -- if somebody picks up an application -- or a termination slip somewhere it says that I failed to follow instruction, I don't want that to happen. He said, 'That probably can be arranged. So, you come back in the morning at 8:00 and I will have Tabor --,' first I had asked for a hearing, you know, I want my accusers -- he told me it was not him, that it was upper management; Hayward Hutchinson, Doug Frankham, and Tolson.

MR. CHECK Are there formal procedures for hearings?

MRS. HATLEY No. He granted me one, so I went in -- he called me the next morning at 6:00 o'clock though and told me that it would be 12:30 before they could get to the time to hear what I had to say about the situation. So I waited until 12:30 and I went out there, and when I got to the time office, then Mr. -- the time office man told me that I would have to call Mr. Hayward Hutchinson. In other words I couldn't just race through like I always did. So I called him and Hayward came over to the time office and got me and walked me over to -- so I knew from that point on that I was under escort. Not allowed to speak to any of my personnel or any other thing, I was under escort. So he took me over to the office, and Ray Yackie the EEOC officer was there; and Doug Frankham, the project manager; and Hayward Hutchinson, and I'm still not -- what his title was, he's over my boss, that's all I know. And I said that I would like for somebody to tell me wherein did I fail to follow instructions. He said, 'The computer does not match what's in the field.' I said, 'No, it certainly does not, and it never will.

There is no way that that stuff can be tracked out there in its present state, into the Task Forces.' I said that I don't think that that is failure to follow instruction. If there was nothing in the computer, then I would have failed to have my staff put it in there, but if it didn't match, then that would seem that that would be incompetency rather than failure to follow instructions, so wouldn't it be best for you to terminate me on the grounds of incompetency. They said no, we are not going to do that. I said OK, then what other instruction did I fail to follow. And they said that there was a procedure that they found at the fab shop that was out of revision. Now keep in mind, I have 23 persons working for me, and we control all of the documents on site, and I have been gone for a week and they found one procedure out of rev and that the computer don't match. The computer will never match. They they said to me, we can discuss this all day and it wouldn't get you anywhere. You're gone. And I had written my resignation the night before, and I said in that case I will resign. And I gave them my resignation. Well, Hayward read it and he looked at -- he flipped it over to Ray Yackie, and he said is this going to have anything to do with what we are going to do? Ray Yackie said, absolutely not. He picked it up and put it in his folder without reading -- in my personnel folder -- without reading it, got up, left the room. Doug Frankham went behind him. At the same time, then Hayward proceeded to fill out the termination papers. Which happened first, did I resign or did they fire me? I resigned first, because the termination papers were not filled out. So he filled out the termination papers and asked me to sign them, and I refused to sign the termination papers. I said I do not believe that I am guilty of not having followed instructions, therefore, I will not sign

them. Besides that, I have resigned and you cannot fire me, I quit. I didn't say that. So he said, whatever. He took me over to the time office. I told him that I had vacation time coming. I wanted my checks for my vacation -- and normally you cannot accumulate more than 2 weeks and then you lose it but they had deferred my vacation time for me. So I asked for all my vacation checks, plus the hour and a half for the night before when I was there, even though I didn't work. They made me come in -- or asked me -- come in and I did, and I stayed there an hour and a half, so I felt they ought to pay me for it. So, they were cutting those checks when the telephone rang and it was Mr. Frankham, and he wanted me to come back over there. And I said, do you want me to walk over there by myself, or do you want to send somebody over to get me? So he said, you can walk over there. So I got to walk over there by myself, and he -- when I got there he said, there's a man down the hall who wants to talk you you. And I said, OK. He took me to a man named Bruce Cryer (?), whom I had not met before, and I could not tell you today what his title is. And he said . . . have you read my resignation?

MR. CHECK Have I, oh no, we are brand new as of about three o'clock this afternoon.

MRS. HATLEY In my resignation I state that I cannot in all good conscience work here anymore because I feel like construction supervision is intimidating the craft and that I just don't think that there . . . -- I feel like that there is erroneous documentation and errors in construction that need to be addressed, and I just didn't feel like that I can in all good conscience continue to work here. And I had on the bottom, it was handwritten, I had

said that I will -- I had sent copies to Brown & Root, Houston; Texas Utilities; the Fort Worth Star Telegram; and the Dallas Morning News. So, they took -- Bruce Cryer by then has a copy of my resignation and he said let's go into this point-by-point what is it so that we can get it fixed. And I said, no sir, I don't think that this is the time or the place. We will go into it when the time is right, but if you would like to know why I'm here right now in your office, then I will tell you of the events that led up to this point. But I said I don't feel that it would be in my best interest to tell you about the documentation and stuff at this point in time. I think that someone other than your site personnel needs to be aware of this. If I tell you what I know, then within 24 hours it will either be doctored or fixed, one or the other. Then it won't be there anymore. So, anyway, he talked to be for 2 hours, or I talked to him for 2 hours, and then I left. When I got home, I was still concerned about all the stuff that had happened that day, and so this same friend that is here now, came over and I just said I think I'm going to call this lady, Juanita Ellis from CASE, and see what to do next. What should I do? I really didn't have to do that, because as a result of my resignation, obviously, then I got a subpoena from Texas Utilities to come and testify before the Nuclear Regulatory Commission. And I will say that I'm glad that I did because you don't approach the NRC on-site. If you have any concerns, you best not go down there to their office, because if you do, you are going to go out the gate. And that's the way it is at Comanche Peak. I'd love to tell you it's differently, but it's not.

MR. CHECK I was under the impression that certain new procedures had been put in place within the past couple of months, posters and . . .

MRS. HATLEY The quality hotline?

MR. CHECK Yes.

MRS. HATLEY The only time they ever got any calls was then the plumbing froze up and we didn't have no indoor bathroom. Nobody's going to call the quality hotline. People at Comanche Peak are intimidated beyond belief. If you say one word, you're gone. They may not get you then, but they will get you. But lots of times they just get you right then and you're gone. Now that I can tell you for sure. You could have this house full of people that would tell you, that would substantiate my story over and over again, if they thought they could do it and not be fired. But anybody who has ever said anything out at Brown & Root, that we are aware of -- now they may have come to you all that I don't know about and still be out there, but any other person that I am involved with that have ever even just said, I don't think that this is right, I think that somebody ought to know about this, they don't last at Brown & Root. So, the NRC and Brown & Root on site -- I don't feel like has done its job. It has not been there as a protector of us -- that should we have some concerns, we could go and say to them, we have concerns and let's get it worked out, because if you got concerns, you don't have a job. And that's just the way it is at Comanche Peak.

FRIEND And I'll verify that.

MRS. HATLEY And she will verify that, but she still has a job, so I'm making her keep her mouth shut.

MR. DENISE Mrs. Hatley, let me just be sure we understand one point, because we've now gone off into the NRC protection system. I understood that what you were saying is that while the NRC office is there, and while you can go into it and talk to people, that if you do that then the company is likely to fire you. Now, I understand that statement, but I don't understand what you mean by the idea that the NRC site office won't protect you. Do you mean that they won't protect you from being fired, or do you mean that they won't set it up so you can go see them more in secret, or

MRS. HATLEY That's true.

MR. DENISE -- or is that, I mean the fact that you have to walk in there and everybody is going to see you if you go there?

MRS. HATLEY You have to walk by the project manager to get to him. And then he has a glass in his door. And while you are in there, whoever is in there, within 5 minutes after anybody walks into the NRC office, everybody on-site knows who's in there because somebody is telling it like it is and everybody and everybody out there knows it.

MR. DENISE So you are saying that if the NRC and you or other employees are relying on our site office to be available to you to receive complaints, that it isn't practical because your job is threatened as soon as you show up at the door. Is that correct?

MRS. HATLEY You are exactly correct, yes sir.

MR. DENISE OK, well I don't think that we look at the situation as one where that's the main area to receive concerns about construction or quality or safety, but I -- and we do have a number to call so that you can do this from your home anonymously, and so forth. Do the people on the site know that they can call the NRC on the telephone, and do it anonymously?

MRS. HATLEY Yes. Have you ever tried it?

MR. DENISE No. But you say that they do know that.

MRS. HATLEY Yes.

MR. DENISE Are there difficulties in trying to hear it?

MRS. HATLEY If you call them and say that you would like to talk to them anonymously they act -- well, first of all they really don't care to talk to you and make it quite obvious, that if you are not willing to tell them who you are

--

MR. DENISE Now, I'm talking about NRC, not Brown & Root.

MRS. HATLEY NRC, the Nuclear Regulatory Commission office, Region IV in Dallas, or Arlington, wherever it's at. You call that number and tell them you want to anonymously tell them something about construction at Comanche Peak, no they do not respond. I have done that. I can vouch for the fact that I have done it myself, but I would not tell my name at the time and I was given absolutely no support.

MR. DENISE Does that mean that we didn't receive your telephone call?

MRS. HATLEY Oh, you listened.

MRS. DENISE Did we ask for a way that we might contact you back?

MRS. HATLEY Yes.

MR. DENISE Was that done in such a way that you could no longer remain anonymous?

MRS. HATLEY Yes.

MR. CHECK We do have provisions for confidentiality, would that be not sufficient?

MRS. HATLEY Nobody made me aware of it. When I talked to them nobody made me aware of it. They only said that if I was not willing to give them someplace to contact me, that I would not be hearing from them. In other words, there

was no way that we could together get to a mutual place that I could give them

MR. CHECK I think that we could all The problem does not get more difficult. But we do have certain safeguards to protect the identity of people who will come forward and talk to us.

MR. DENISE Because if you want it to be confidential, but still known so that we could communicate back and forth, we have -- we'll protect that confidentiality.

MRS. HATLEY In what manner?

MR. DENISE Simply not disclosing your name to anybody.

MRS. HATLEY I see. That's debatable.

MR. DENISE I'll just accept that as --

MR. CHECK If it isn't working, we'd like to know about it.

MRS. HATLEY I don't think it's working gentlemen.

MR. DENISE If it isn't working, Mr. Check and I want it fixed because we're committed to see that, and if you have anything that would help us fix it, then to get through to the problem then we definitely want to do that because its a corner stone of the quality assurance program that there not be any form of

intimidation to prevent disclosure of information. And if you are threatened loss of your job if you disclose it, and if the NRC can't even protect you when you communicate with them, then we need to fix that system. And I'm not aware of any difficulties in it and I don't think Mr. Check is aware that it's not working, but if you folks are aware that it's not working, you're in a better position to tell us.

MRS. HATLEY OK, the complaints that I am making to you right now, the ones that writing down and going on tape with were made to your office exactly, sometime in December and nothing was done.

MR. DENISE Were those complaints made anonymously by you.

MRS. HATLEY Yes sir, they were.

MR. DENISE And you are saying that the complaints made in December -- you are saying that nothing was done because you didn't see anything done.

MRS. HATLEY That's right. No changes were visible to me.

MR. DENISE Alright.

MR. CHECK Well, there are certain things that we can do. I can't guarantee that our check is going to be perfect, but I do know that we have a system by which we record all allegations and track them to help in the disposition. So, it would be an interesting test for us to go back and look and see if

something like what we have been talking about tonight have been entered into the system.

MRS. HATLEY OK. What my request was at that time was that somebody come and look. That's all, just come and look at the packages. Maybe I'm wrong. You know. Maybe it's OK. But somebody needs to come and look at this thing because it's getting out of control. Nobody did.

MR. DENISE As far as you know, nobody looked at it.

MRS. HATLEY That's true, as far as I know nobody came and looked. OK. But the part about if you go and complain to anybody, whether it be your supervisor, the NRC, quality control, or whoever, at Comanche Peak, if you voice concern about anything, you will not be working at Comanche Peak. And that's the way it is. And I think I'm pretty good evidence of that, after giving 5 years and having all the faith in the world, all the trust and everything put into my ability and then -- just like that, when I say I don't think it's working. And that bothers me that that can happen out there.

MR. CHECK It bothers us too.

FRIEND Would I be able to say something?

MR. CHECK Sure.

MR. DENISE Do you want me to just simply turn this off so that you can, so that you don't get involved?

FRIEND Yes.

MRS. HATLEY Yes.

FRIEND Somebody's got to get involved.

MRS. HATLEY No.

(At this point, recorder turned off briefly, then continued)

MR. CHECK I tell you what, my experience with the Government or any big complex operation is that if you want to do some good, take a bite that you can digest and then you swallow it, --

MRS. HATLEY I understand.

MR. CHECK -- and then they move on and take another bite chew it up and digest it. And I think you have given us a very good -- I like all the other stuff, but I don't want to lose --

MRS. HATLEY -- what we are here for.

MR. CHECK -- the initiative on this -- on what I think is a very good and well-controlled and identified point, and I also don't want to keep you up all night.

MRS. HATLEY Oh well, we are used to that.

MR. CHECK We would like, if we could, to get a fairly brief but complete statement of the issue -- the principle issue that we are pursuing, get you to read it and agree that is what you are saying, and then we will go out and take a look at the stuff and lock it up.

MR. DENISE I'm not sure that I have the third concern captured. So I might recycle what we covered.

MRS. HATLEY All right.

MR. DENISE Let me just read briefly, and then you can just kind of read it yourself.

MRS. HATLEY Allright.

MR. DENISE This starts out saying that this was at -- this statement was made at Mrs. Hatley's home in Glen Rose, Texas, on the 10th of February 1984. I Mrs. Dobie Hatley hereby make the following voluntary statement to Mr. Paul Check who has identified himself as a representative of the U.S. Nuclear Regulatory Commission. I make this statement freely with no threats or promises or reward having been made to me. Then it goes on to

say that I reside at Glen Rose, Texas. I was employed by the Brown & Root Company on the Comanche Peak project beginning in February 1979 until February 1984. My positions included document control night supervisor from August 1979 until May 1983; and satellite supervisor from May 1983 until February 1984, when I was terminated. My concerns about Comanche Peak project are as follows: Craftsmen receive so much documentation that may or may not be correct or all inclusive that he cannot be sure what he is doing is right and correct. (2) The CYGNA evaluation of the drawing control system lacked independence because what was to be checked by CYGNA was given to me and others before CYGNA came to check, and I was told to be sure that the information that CYGNA was going to check was available in the satellite. If they did this, to be sure that the DCC satellite system passed the test, they may to the same thing on pipe supports to be sure that they passed the test.

Now those are the two things that I have captured, and we talked about task forces and paperflow groups, but I wasn't able to capture in a few words what your concern was. So if we need, we have another concern that needs to be set down, we need to put it in words, a few sentences, that I can capture.

MRS. HATLEY I think what I was trying to tell you is that the -- I don't think this thing is on either -- the TUGCO QA that they have out there, which is site QA besides the Brown & Root QA, is also called in whenever they want to destroy the credibility of whatever group that they are going in to.

MR. CHECK Let me see if I can help in a sense that we wanted to include this point but perhaps we don't want to beat it to death. We will take it up at another time.

MRS. HATLEY Right.

MR. CHECK You are also lacking confidence in TUGO quality assurance program to the extent that it is suppose to provide similar checks of the document control system to those that the CYGNA audit was given, and we can pursue that at greater length at another time.

MRS. HATLEY Yes.

MR. DENISE Can you give me a few words here?

MRS. HATLEY Give him ten.

MR. CHECK Do you have similar reservations about the quality assurance efforts of TUGCO, along the same line; that is, verifying that the document control system at Comanche Peak is acceptable. I'm prepared to discuss this matter more fully if time permits.

MRS. HATLEY That's good.

MR. DENISE OK.

MRS. HATLEY There's another -- I don't know whether you realize this, but in my resignation it also addresses the problems of construction. Now we are talking documentation and what has to do with that that I am thoroughly knowledgeable of. In dealing with the craft person, I became aware that we had to work these long hours and do all this kind of stuff because of the need of the craft and it surfaces that there are problems existing in the cable tray hanger area that the cable tray hanger clamps are installed and have never been inspected, either on-site or off, to know whether or not that they are expendable. The reason that I became aware and involved is because we had to run a full set of documentation for those to be backfitted. We call it backfitted. That means go back, check it all out, and see what is right. I said that it was my opinion that they had to check -- the quality control people have to check by what was built right. You got to have the original document to build it, then you got to have the original document to buy it, and I said why don't they get those out of the vault. Why are we having to run a full new set of documentation for them out in the field. And they told me that they couldn't get them out of the vault. They had already been signed by somebody and gone to the vault, and they are not supposed to go to the vault until it's complete. Now how do I

get -- how did that all happen if all of the checks and balances are working? So I became concerned about that, and I expressed my concern. Any so they are currently doing an entire backfit of all the plants in the system. In this regard I had to deal with the QC, Brown & Root QC, because they wanted to take just a little section of design changes and go out and do this inspection instead of ordering the documentation necessary to do it. And that suited me just fine, except it was procedurally incorrect and, therefore, I would not let it go across the counter. And if I did, it was in violation. Nobody was willing to rewrite the procedure concerning that, so it had to go that way -- or it had to go that way in my opinion, which constitutes a package that is about 9, 10 inches high, that contains 4 documents and all support material for those documents, and we had to make up about 20 of those packages so that they could go out and do this backfit. And when we went to the field to check on these packages and update them as they changed, we found that they had gone in and reviewed just that same little package that they wanted to do with initially, and just take it out of what we sent them and was still out there and doing it with just a little pieces that they were supposed to go with. So therefore the QC was procedurally incorrect because they were out there backfitting without taking the documentation like you are supposed to. And of course, I raised all kinds of Cain about that, but it didn't do any good. They were still permitted to do whatever they wanted to do, as far as documentation was concerned. The thing that bothered me about that was in this little package that they had, they had a CMC, a Component Modification Card, and I became aware of it because one of the persons -- the field hands -- brought it to the office and he said I understand there

is a Rev. 1 out on this, and I only have the original. And I said OK, I'll check it. So I plugged into the computer to see if Rev. 1 had come out yet. And what I found out was that that one had never come out. That was a nonexistent CMC. So I called Design Change Review to ask them if they had, in fact, and just not for some reason or another, had not made it to the computer. And they said, no, it's not. So they are out there doing a backfit on the cable tray clamps with documentation that has never even existed in our system at Brown & Root. Now how can they do that? And I questioned it, and you best not. I took them into my boss's office and I showed him, and I showed Hayward Hutchinson, and I showed Cathy Lawrence the QC head, they were all in there and I said, how can you do this? This is not in our system. How can you fit to it? And they said, that's not your problem.

MR. CHECK Now let's see if I'm going to lose my job. OK, I'd like to use your phone for a moment to alert our resident. I've got some people standing by just so they don't close it.

MR. DENISE Why don't you just --

MRS. HATLEY That part is a long story too.

MRS. HATLEY OK. It was color-coded wrong and they -- the craftsmen installed it according to design and according to color-coding. But it turns out that the color-coding did not match the design. In other words, somebody had

goofed and saw that the gray pipe was supposed to be the yellow one, and the yellow one was supposed to be the green one, and so forth.

MR. DENISE So what did they do, go back and rip it all out?

MRS. HATLEY Nothing. When I left they were just contemplating what was going to happen next. So I don't know what they are going to do. They probably will as-built it. You know everything is as-built. They go in and look at it and say, that's OK - we'll do it as-built, write it off.

MR. DENISE Alright, what was the other one besides the color-coding?

MRS. HATLEY The steel pillars that are in the spread room.

MR. DENISE Cable spread room?

MRS. HATLEY Yes. There's 1,050 feet of it that appears to be like laminated, instead of extruding. And there was no documentation that that had ever been Q-reviewed whenever this was discovered by a paint inspector, because he was looking at a new paint job that was on it, and saw what appeared to be a pencil mark, investigated further and found that the steel was flaking. And that's how they got into that problem.

MR. DENISE How did you personally get involved in that one?

MRS. HATLEY The paint inspector told me, and then I checked it. You know, I told my boss about it and he said, yes - there was 1,050 feet of it and they found all but 10.

MR. DENISE Did they take it all out?

MRS. HATLEY I don't know. That's what scaring me. If it's laminated steel and is supposed to be extruded steel, what are they going to do about it. And if they do it, this is in the spread room, it's under the control room. It would seem to be like if you are going in my wall and you start cutting out the two-by-fours and putting them back in, and cutting them out and putting them back in you are going to weaken the structure in the wall. I don't know, engineering may say that you can do that and it won't hurt anything but I'm not so sure. But you best not say anything about that either.

MR. DENISE Why not?

MRS. HATLEY You'd be fired.

MR. DENISE Oh, they won't fire me.

MR. CHECK Our plan, or hope was that we could go in two cars, and that way we wouldn't have to come back. Is that OK?

MRS. HATLEY That's fine with me.

MR. CHECK You would be the only one that would come in because I don't want to put anybody else in jeopardy though.

MRS. HATLEY No --

MR. CHECK Can you wait out at the gate or something.

FRIEND I'll go with her.

MRS. HATLEY Well, I'll just go ahead and take my car out.

(Recorder turned off for trip to plant site)

MR. DENISE This is Denise. Following the interview at Mrs. Hatley's home in Glen Rose, Texas, we drove out to the plant site at Comanche Peak to the NRC resident inspector's office. At approximately 10:15 p.m., Mr. Check, Mr. Kelley, Mrs. Hatley, and Mr. Denise accompanied Mr. Frank Strand, Brown & Root, to satellites, beginning with Satellite 306, and then 307. At building 306 we looked at a package for safeguard building cable tray support plan, elevation 790-6, Drawing 2323EH060101-5.

MRS. HATLEY S

MR. DENISE S, S instead of 5. This drawing was accompanied by approximately an inch and one-half of single sheets, plus a log on the front of CMC, current design change log, with this package. The point made by Mrs. Hatley is that when this package is handed to the craftsmen he'll be unable to proceed with the installation adequately with this much information. The drawing just referred, we looked at Revision 4, dated April 1, 1983. We also looked at a package of information that includes component modification card, Serial Number 00154, dated September 9, 1978.

MR. CHECK . . . we can have other people look at this further, to examine this practice. Mrs. Hatley, we thought also that there were places you could show no where there were errors. Do you think we understand this problem?

MRS. HATLEY You understand the concept of the document package.

(unintelligible)

In order for them to inspect or to do anything to a . . . type plant, they have to take this . . .

(unintelligible)

MRS. HATLEY . . this is FSA159, they call that one drawing, and its all these books, they just recently ran all this to go out to the field . . . here we go . . .

(unintelligible)

MR. DENISE . . . but nobody is going to work on it without the drawing . . .

MRS. HATLEY Without more being in there?

MR. DENISE Yes. They are not going to be given a package to go . . .

MRS. HATLEY Not an incomplete package, no.

MR. DENISE OK. So this is basically a hold that says, hold it till we get these other things to stick in here.

MRS. HATLEY Yes. Before that he goes to the field.

MR. DENISE So this isn't complete yet.

MRS. HATLEY No.

MR. DENISE But this is just another example of another cumbersome set.

MRS. HATLEY Oh, a lot of these are. Do you see? Here's this one. This would be 712025.

MR. DENISE Wait a minute, what's this one here. How would I identify this?

MR. STRAND E117-01S.

MR. DENISE Wait, this is a drawing. No, this is a sheet number. Now if I wanted to identify this package, is this it right here.

We also looked at package E1-710-01S, it's approximately an inch and one-half thick, it's got notes on it saying it is not complete yet, hold it for various CMC's. We also looked at a package of drawings E1-712-02S, approximately 3 inches thick, containing numbers of drawings, as well as change log, etc. We looked at a Drawing 2323-E1-0712-02S, a Gibbs & Hill original drawing on the cable room, auxiliary building, cable tray support plan elevation 870-0. This particular drawing has been modified on-site for mechanical installation reasons. We looked at Revision No. 8, . . . were back to that Revision 10, dated April 28, 1982. The drawing has a clear, big, red stamp, approximately an inch and one-half high and 3 inches long, saying that this document affected by design changes." Apparently has been through design control and engineering analysis and is ready for use when used in conjunction with the rest of the package, which I said is approximately 3 inches high. Mrs. Hatley points out that the drawing is covered with many notations already is complex, and then coupled with the big stack of papers that go with it, represents a very, very complex system. We are looking at a mechanical drawing M1605. The complete package is about an inch and one-half thick, numerous design changes against the drawing. Drawing is well marked up. That is, very much marked up by a variety of design changes. That is clearly stamped, 'This document is affected by design changes.' M1605 is in Revision 14. We also viewed a number of books regarding instrumentation and control drawings which were incorporated in large loose-leaf books, and used to go check the installation. Mrs. Hatley said this is a very complicated and cumbersome system. One of these books, or a missing CMC in one of these books, was the subject of an NCR written against the document control

MR. CHECK We gotta be darn sure she's qualified.

MRS. HATLEY Well, you are going to have to look long and hard to find out she's only
here 3 days a week.

(End of recording)

We also looked at package E1-710-01S, it's approximately an inch and one-half thick, it's got notes on it saying it is not complete yet, hold it for various CMC's. We also looked at a package of drawings E1-712-02S, approximately 3 inches thick, containing numbers of drawings, as well as change log, etc. We looked at a Drawing 2323-E1-0712-02S, a Gibbs & Hill original drawing on the cable room, auxiliary building, cable tray support plan elevation 870-0. This particular drawing has been modified on-site for mechanical installation reasons. We looked at Revision No. 8, . . . were back to that Revision 10, dated April 28, 1982. The drawing has a clear, big, red stemp, approximately an inch and one-half high and 3 inches long, saying that this document affected by design changes." Apparently has been through design control and engineering analysis and is ready for use when used in conjunction with the rest of the package, which I said is approximately 3 inches high. Mrs. Hatley points out that the drawing is covered with many notations already is complex, and then coupled with the big stack of papers that go with it, represents a very, very complex system. We are looking at a mechanical drawing M1605. The complete package is about an inch and one-half thick, numerous design changes against the drawing. Drawing is well marked up. That is, very much marked up by a variety of design changes. That is clearly stamped, 'This document is affected by design changes.' M1605 is in Revision 14. We also viewed a number of books regarding instrumentation and control drawings which were incorporated in large loose-leaf books, and used to go check the installation. Mrs. Hatley said this is a very complicated and cumbersome system. One of these books, or a missing CMC in one of these books, was the subject of an NCR written against the document control

(6) There are steel pillars in the cable control room, about 1050 feet, which appears to be laminated instead of extended, with no documentation of quality. This was revealed to me by a paint inspector.

page 3 of 3

I have read the foregoing statement consisting of 3 handwritten/
~~typed~~ pages. I have made and initialed any necessary corrections and
have signed my name in ink in the margin of each page. I swear that the
foregoing statement is true and correct. Signed on 2-10-84 at 8:40 PM
(date) (time)

Delia Hickey
(SIGNATURE: TYPED OR PRINTED)

Subscribed and sworn to before me this 10 day of FEB, 1984,
at ALON ROSE TX

INVESTIGATOR: Paul S. Cliche
(NAME: TYPED OR PRINTED)

WITNESS: Robert J. Jones
(NAME & TITLE: TYPED OR PRINTED)
Robert J. Jones

PLACE: MRS HATLEY'S HOME
GLEN ROSE, TEXAS

DATE: 10 FEBRUARY 1984

I, Mrs DOBIE HATLEY, hereby make the following voluntary statement to MR. PAUL S. CHECK, who has identified himself to me as a representative of the U. S. Nuclear Regulatory Commission. I make this statement freely with no threats or promises of reward having been made to me.

I reside at Glen Rose, Texas. I was ~~have~~ employed by the Brown and Root Company on the Comanche Peak project beginning in February 1979 until February 1984. My positions included Document Control Night Shift Supervisor (from August 1979 until May 1983) and Satellite Supervisor from May 1983 until February 1984, when I was terminated.

My concerns about the Comanche Peak project are as follows:

- (1) "Craftsmen receive so much documentation, that many or may not be correct or all inclusive, that he can not be sure that what he is doing is right and correct,
 - (2) The CYGSA evaluation of the drawing control system lacked independence because what was to be checked by CYGSA was given to me and others
- mull 1.1.3

before CYGNA came to check, and I was told to be sure that the information that CYGNA was going to check was available in the Satellite. If they did this to be sure that the DCC Satellite System passed the test, did they do the same thing on pipe supports to be sure that they passed the test.

(3) The TUGCO QA group is not doing what needs to be done to assure that the Document Control System at Comanche Peak is correct. I am prepared to discuss this more fully at a later time.

(4) There are problems in the cable tray hanger area. Clamps were never inspected on site or off site to see that they were acceptable. I was made aware of this when we got involved in a backfit effort on cable tray supports. There was not correct documentation available.

(5) There were errors in color coding of instrumentation piping which need to be corrected.