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RELATED CORRESPONDENCE

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UNITED STATES OF AMERICA

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NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the Matter of

GEORGIA POWER COMPANY,
et al.

(Vogtle Electric Generating Plant,
Units 1 and 2)

) Docket Nos. 50-424-OLA-3
) 50-425-OLA-3
)

) Re: License Amendment
) (Transfer to Southern
) Nuclear)

) ASLBP No. 93-671-01-OLA-3

REBUTTAL TESTIMONY OF

W.F. KITCHENS

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1 REBUTTAL TESTIMONY OF W.F. KITCHENS

2 Q. PLEASE STATE YOUR NAME AND POSITION.

3 A. My name is W.F. Kitchens. I am Assistant General Manager,
4 Plant Support, Plant Vogtle, Georgia Power Company.

5 Q. WHAT POSITION DID YOU HOLD IN 1990?

6 A. In 1990, I was employed by Georgia Power Company as Assistant
7 General Manager, Operations at Plant Vogtle.

8 Q. WHAT ARE YOUR PROFESSIONAL QUALIFICATIONS IN THE NUCLEAR
9 FIELD?

10 A. My professional qualifications are attached hereto as Exhibit
11 A.

12 Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY NOW BEING
13 PROVIDED?

14 A. The purpose of this rebuttal testimony is to respond to three
15 issues raised in the Prefiled Testimony of Allen L. Mosbaugh:
16 (1) Mr. Mosbaugh's testimony concerning a January 1990
17 meeting with George Bockhold that I attended; (2) Mr.
18 Mosbaugh's testimony concerning alleged intimidation by Mr.
19 Bockhold of members of the Plant Review Board; and (3) issues
20 relating to dewpoint readings and air quality.

JANUARY 1990 TEAM BUILDING MEETING

Q. ON PAGES 8-9 OF MR. MOSBAUGH'S RETYPED PREFILED TESTIMONY, HE DESCRIBES A MEETING THAT HE ATTENDED WITH YOU AND MR. BOCKHOLD IN JANUARY 1990. COULD YOU EXPLAIN THE REASON THAT THE MEETING WAS CALLED AND WHAT HAPPENED AT THAT MEETING?

A. Yes. In January, 1990, Mr. Bockhold requested that we meet to have a "team building" meeting to improve communications between my organization (operations) and Mr. Mosbaugh's organization (plant support). This meeting was requested by Mr. Bockhold and scheduled in advance. While Mr. Mosbaugh says in his prefiled testimony that the meeting occurred on January 19, 1990, my daytimer indicates that this meeting was scheduled for January 12, 1990. My recollection is that the meeting took place on January 12.

Mr. Bockhold said that he had called the meeting because he had received outside feedback that the operations organization (which I headed) was not working well together with the plant support organization (which Mr. Mosbaugh headed). The meeting lasted 30 to 45 minutes. Mr. Bockhold asked both me and Mr. Mosbaugh to provide candid feedback about each other, both positive and negative. Mr. Mosbaugh and I also provided both positive and negative feedback to Mr. Bockhold.

1 Q. MR. MOSBAUGH SAYS, ON PAGE 8 OF HIS RETYPED PREFILED TESTIMONY
2 THAT DURING THAT MEETING, "BOCKHOLD PROCEEDED TO EXPLAIN TO ME
3 THAT THE ORGANIZATION WOULD NOT TOLERATE BACKSTABBING." DO
4 YOU HAVE ANY COMMENT ON THIS TESTIMONY?

5 A. I do not recall Mr. Bockhold's use of the word "backstabbing"
6 at that meeting, although I see that Mr. Mosbaugh's notes
7 apparently taken at that meeting do include that term.

8 Q. DO YOU AGREE WITH MR. MOSBAUGH'S PERCEPTION THAT COMMENTS MADE
9 AT THAT MEETING WERE IN REFERENCE TO MR. MOSBAUGH'S
10 "CONTACTING THE NRC AND ALLEGING THAT YOU HAD WILLFULLY
11 VIOLATED THE DILUTION VALVE TECH. SPEC," AS ALLEGED ON PAGE 8
12 OF MR. MOSBAUGH'S RETYPED PREFILED TESTIMONY?

13 A. No. I recall no mention of the dilution valve technical
14 specification issue at that meeting; Mr. Mosbaugh's notes
15 confirm my recollection. In fact, as I recall it, Mr.
16 Bockhold's criticism was directed as much toward me as it was
17 toward Mr. Mosbaugh. I specifically recall that Mr. Bockhold
18 called me "pig-headed" at that meeting. Mr. Bockhold said
19 that I was stubborn and that I could improve by being more
20 willing to keep an open mind. I left that meeting with the
21 belief that Mr. Bockhold had raised a significant issue about
22 my performance and that it could affect my career if I failed
23 to address that issue. Mr. Mosbaugh's notes also indicate
24 that Mr. Mosbaugh and I expressed our own criticisms of Mr.

1 Bockhold at that meeting. This was a very candid exchange of
2 views.

3 In addition, at the time of this meeting, I did not know
4 that Mr. Mosbaugh had made allegations to the NRC. I recall
5 I became aware of the OI investigation into the dilution valve
6 issue on February 7, 1990, so there was no way I could have
7 known that Mr. Mosbaugh was the alleger in January. I did not
8 learn that Mr. Mosbaugh was the alleger on the dilution valve
9 issue until several months later.

10 Q. WAS THIS PERFORMANCE ISSUE DISCUSSED AT ANY OTHER TIME?

11 A. Yes. I pursued this performance issue further with Mr.
12 Mosbaugh after the meeting. We discussed how we could improve
13 the communications between our organizations. I suggested
14 that we attend each others' staff meetings. While I attended
15 several plant support staff meetings, Mr. Mosbaugh did not
16 attend any operations staff meetings. This effort was
17 recognized by Mr. Bockhold in my annual Performance Appraisal
18 later in 1990. He wrote that Mr. Mosbaugh and I had achieved
19 "peaceful coexistence" and that our organizations "worked
20 effectively together," but that more cooperation was required
21 in this regard. A copy of this Performance Appraisal is
22 attached hereto as Exhibit B.

23 Q. ON PAGES 8-9 OF MR. MOSBAUGH'S RETYPED PREFILED TESTIMONY, HE
24 SAYS THAT MR. BOCKHOLD "WAS TRYING TO INTIMIDATE" HIM FROM

1 PURSUING HIS CONCERN ABOUT DILUTION VALVES. DO YOU HAVE ANY
2 COMMENT ON THAT TESTIMONY?

3 A. I perceived no attempt by anyone at that meeting to intimidate
4 Mr. Mosbaugh. This was simply a frank and open discussion
5 with the intent of improving the communication, cooperation,
6 and performance of the nuclear organization.

7 ALLEGED INTIMIDATION OF MEMBERS OF THE
8 PLANT REVIEW BOARD BY MR. BOCKHOLD

9 Q. ON PAGE 9 OF MR. MOSBAUGH'S RETYPED PREFILED TESTIMONY, HE
10 SAYS THAT MR. BOCKHOLD INTIMIDATED AT LEAST ONE MEMBER OF THE
11 PLANT REVIEW BOARD. DO YOU HAVE ANY COMMENTS ON THIS
12 TESTIMONY?

13 A. Yes. Mr. Bockhold attended a PRB meeting on March 1, 1990 at
14 which time he briefed the board on what he perceived its
15 responsibilities to be. Mr. Bockhold told the PRB members
16 that his presence at PRB meetings should not intimidate them,
17 and that he wanted open and candid discussions by all meeting
18 attendees. He also said that PRB recommendations were very
19 valuable, and that they would lose their value if only "yes
20 men" sat on the board. He asked the PRB members to discuss
21 his briefing with their PRB alternate members, and to ensure
22 that these alternate members felt comfortable with speaking
23 their minds in Mr. Bockhold's presence.

1 Q. ON PAGE 10 OF MR. MOSBAUGH'S RETYPED PREFILED TESTIMONY, HE
2 ASSERTS THAT AT THAT TIME "PEOPLE WERE AFRAID TO RAISE
3 UNPOPULAR ISSUES." DO YOU HAVE ANY COMMENTS ON THIS
4 TESTIMONY?

5 A. Yes. There was no fear on the PRB or, to the best of my
6 knowledge, elsewhere at Plant Vogtle. As chairman of the PRB
7 during the time at issue, I am not aware of any occasion where
8 any individual failed to make a comment or vote as he wished
9 because of any pressure or intimidation. Personnel who worked
10 for me frequently brought issues and concerns to my attention,
11 and I felt no hesitancy about taking such concerns to Mr.
12 Bockhold. During PRB meetings, it was not uncommon that
13 there would be differing points of view. Mr. Mosbaugh's
14 assertion that people were afraid to speak up makes no sense
15 given the fact that there were many varying opinions expressed
16 at PRB meetings. In fact, sometimes when there were
17 dissenting opinions recorded at PRB meetings, I would ask Mr.
18 Bockhold to attend PRB meetings so that he could hear the
19 members' differing views first hand.

1 PROVIDING DEWPOINT DATA TO THE NRC

2 Q. MR. MOSBAUGH ASSERTS ON PAGES 90-92 OF HIS RETYPED PREFILED
3 TESTIMONY THAT GEORGIA POWER PROVIDED INCOMPLETE AND
4 INACCURATE INFORMATION TO THE NRC IN RESPONSE TO THE NRC'S
5 REQUEST FOR A TABLE OF DEWPOINT RESULTS. SPECIFICALLY, HE
6 CONTENDS THAT INTERVENORS' EXHIBIT II-82 (GPC EXHIBIT II-57)
7 IS NOT ACCURATE AND COMPLETE. WHAT WAS YOUR ROLE IN
8 RESPONDING TO THE NRC'S QUESTIONS ON AIR QUALITY FOLLOWING THE
9 MARCH 20, 1990 SITE AREA EMERGENCY?

10 A. As the Assistant General Manager - Operations, I assisted in
11 addressing questions raised by the NRC's IIT concerning air
12 quality. With regard to Intervenor's Exhibit II-82, I was
13 involved in a conference call with members of the NRC's IIT on
14 April 9, 1990 (IIT Document 206). A copy of the relevant
15 portions of the transcript of that conference call has been
16 admitted as GPC Exhibit II-61 (Ward Ex. C).

17 Q. WHAT TRANSPIRED DURING THE APRIL 9, 1990 CONFERENCE CALL?

18 A. During that call I advised the IIT of the latest dewpoint
19 measurements. I told the IIT that all of the air receivers
20 were in specification except for one, for which the
21 measurement was 60.9° F. I told the IIT that I believed that
22 a possible reason why the dewpoint was high on that one air
23 receiver was because the air dryer had been inadvertently

1 turned off. As a follow-up, Mr. Chaffee asked about the
2 "history of these air dryers," and then asked to be provided
3 "information that addresses the air-dryer performance on" the
4 Unit 1 air dryers. Mr. Chaffee explained that he needed "the
5 information that shows us to what extent air poor quality
6 [sic] might have had an impact on the operation of the Unit 1-
7 A diesel." He suggested that maybe we could just give him a
8 "table of these surveillance results over the past couple of
9 years." I suggested that I could have somebody look up the
10 dewpoint readings over the last year of preventive maintenance
11 ("PM") work orders. I left the conversation with the
12 understanding that this was acceptable -- that I was to
13 provide to the IIT with monthly PM dewpoint measurement
14 information the year prior to the March 1990 Site Area
15 Emergency.

16 Q. MR. MOSBAUGH HAS STATED THAT "APPARENTLY" YOU HAD COMPLETED A
17 COMPILATION OF DEWPOINT MEASUREMENTS AT THE TIME OF YOUR
18 DISCUSSIONS WITH THE IIT. (Tr. 10518) IS HE CORRECT?

19 A. No, I do not believe so. The discussions with the IIT were in
20 the morning of (9:02 a.m.) Monday, April 9. I expressly told
21 Mr. Chaffee that I didn't have the data, but only a list of PM
22 work orders (IIT 206, page 8, lines 6-9). The monthly PM dew-
23 point measurements were obtained after these discussions.

24 Q. WHAT INFORMATION DID YOU PROVIDE TO THE IIT?

1 A. I provided the IIT with a table of dewpoint measurements for
2 the 1A diesel generator going back to March 1989 this table
3 has been admitted as GPC Exhibit II-57 (Bockhold K).

4 Q. WHY DID THE LIST OF DATA INCLUDE DATA FROM APRIL 8, AND WHY
5 DID IT NOT INCLUDE DATA FROM APRIL 5-7?

6 A. We omitted the April 5-7 data for two reasons. We did not
7 believe the dewpoint readings taken on April 5-7 because the
8 readings for all eight air receivers were outside the
9 acceptable range at the same time. We did not believe these
10 readings were accurate. There was some concern whether the
11 instruments were giving accurate readings, and whether we were
12 using the measurement instrumentation correctly. There was no
13 point to giving the NRC dewpoint information that we did not
14 believe to be correct.

15 Moreover, I believed at the time that the NRC was fully
16 aware of the out-of-specification readings for the air
17 receivers, and also that NRC knew that we questioned our
18 measurement equipment. This is confirmed by the transcript of
19 the April 9, 1990 conference call with the IIT. (GPC Exhibit
20 II-61) During that call, Mr. Chaffee of NRC, apparently
21 referring to a phone call he received on Saturday, April 7,
22 said that what he "heard later that day [Saturday] was that
23 you had gotten a new instrument, but when you did testing with
24 it, you got negative numbers, which didn't make any sense.
25 So, you were going to go get another instrument for measuring

1 the air quality from Hatch, and I don't know -- have you
2 gotten that instrument and used it, or are you still waiting
3 for it?" Tr. 3-4. To me, this shows that Mr. Chaffee knew of
4 the high readings obtained prior to the first new instrument.
5 Mr. Ward replied that we had received another instrument from
6 the V.C. Summer plant that was "identical or similar to the
7 [instrument] we originally had and all of the numbers that
8 were reported Sunday were in the range of 36 to 45 degrees."
9 Id. at 4. This exchange illustrates that Mr. Chaffee had been
10 informed about the out-of-specification numbers and knew about
11 our concern with the instrumentation.

12 Q. MR. MOSBAUGH IMPLIES THAT THERE WAS SOME IMPROPER "PICKING
13 AND CHOOSING" OF DATA TO BE INCLUDED IN DEWPOINT MEASUREMENTS
14 PROVIDED TO THE NRC, RESULTING IN A LESS THAN COMPLETE AND
15 ACCURATE SET OF DATA. (TR. 10520) DO YOU HAVE ANY COMMENTS
16 ON HIS VIEW?

17 A. Mr. Mosbaugh is incorrect. I explained to Mr. Chaffee that I
18 would endeavor to provide the NRC with the monthly PM results
19 that show dewpoints (IIT 206, Tr. 7-9) for the last year. To
20 me, the results showed the dewpoints over the requested period
21 of time and was responsive.

William P. Kitchens
Professional Qualifications

EDUCATION

Bachelor of Engineering Science, Georgia Tech, 1974

Master of Engineering (Nuclear), University of Virginia,
1976

CERTIFICATIONS

Senior Operator's License from USNRC, Plant Vogtle Unit 1,
1986

Senior Operator Instructor Certification from USNRC, Plant
Vogtle, 1983

Registered Professional Engineer, State of Georgia, 1979

EXPERIENCE

20 Years Nuclear Power Plant Experience:

Assistant Engineer, Virginia Electric & Power Company,
Richmond, VA., 1974-75

Plant Engineer, Florida Power & Light Co., St. Lucie Plant,
1976-79

Plant Engineer, Georgia Power Co., Plant Hatch, 1979

Sr. Plant Engineer/Plant Engineering Supervisor, Georgia
Power Co., Plant Vogtle, 1979-83

Operations Superintendent/Operations Manager, Georgia Power
Co., Plant Vogtle, 1983-89

Assistant General Manager - Operations, Georgia Power Co.,
Plant Vogtle, 1989-91

Assistant General Manager - Support, Georgia Power Co.,
Plant Vogtle, 1991-Present

Performance Appraisal

Page 1 of 3

Georgia Power

Employee Name (Last, First, Middle) Kitchens, William F.	Employee No. 51752	Current Job No./Title Ass't. General Manager - Operations
Division/Department Operations	Annual Review Date 01/90	Location Nuclear Plant Vogtle

Organizational Plan - 90% of each Goal Weight

Goal

When possible, four acceptable levels of performance should be described for each goal.

See attached.

4.6

Skip's hard work, ability, expertise, attitude and perspective directly enabled us to achieve impressive performance. See attached for specific ratings.

- ☒ Goals Clearly Exceeded by a Wide Margin
 ☐ Goals More Than Fully Achieved
 ☐ Goals Fully Achieved
 ☐ Goals Met Minimally
 ☐ Goals Achievement Clearly Below Expected Level

Accountability

10% - Provide management leadership as Ass't. General Manager - Operations

When possible, four acceptable levels of performance should be described for each goal.

This accountability will be rated by the General Manager based on communication, leadership and teamwork skills displayed. Special attention will be paid to inter-departmental and site/corporate areas to observe these skills.

Performance Evaluation

Skip and Allen achieved peaceful coexistence and their organizations worked effectively together. To achieve complete synergy, more effort will be required.

- ☐ Goals Clearly Exceeded by a Wide Margin
 ☐ Goals More Than Fully Achieved
 ☒ Goals Fully Achieved
 ☐ Goals Met Minimally
 ☐ Goals Achievement Clearly Below Expected Level

Appraisal

Page 2 of 3

Georgia Power

Name (Last, First, Middle)

Kitchens, William F.

Employee No.

51752

Annual Review Date

01/90

Overall Performance Rating

4.9

- ☒ Goals Clearly Exceeded by a Wide Margin
 ☐ Goals More Than Fully Achieved
 ☐ Goals Fully Achieved
 ☐ Goals Met Minimally
 ☐ Goals Achievement Clearly Below Expected Level

Strengths

We achieved impressive performance and record-setting startup. Skip is the key manager who's mindset kept our attention on all the details enabling us to manage our complex tasks. Skip is a very effective manager because of hard work, ability, expertise, attitude and perspective. Of my manager direct reports, Skip deserved and received my highest overall performance rating.

Developmental Needs

Skip can improve his management style by occasionally applying broad management principles to better achieve organizational synergy. Effective corrective action and holding subordinates fully accountable can improve our performance.

Future Recommendations

Excellent candidate for future promotion.

Developmental Goals

Developmental Goals	Action Steps	Target Completion Date	Person Responsible
1. Continued experience in his current position will improve his General Manager Skills.			
2. Complete the INPO Senior Manager course in 1990.			

Goals for the Review Period

(This section to be completed at the beginning of the Review Period.)

The employee has been presented goals for the review period and these goals have been discussed in relation to department and/or organizational goals.

Employee Signature <i>W F Kitchens</i>	Date 2/20/90	Reviewer (Immediate Supervisor)	Date
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(This section to be completed at time of review)

Employee Signature <i>W F Kitchens</i>	Date 2/20/90		
Reviewer (Immediate Supervisor) <i>A. Sockhold</i>	Date 2/26/90		
Endorser (Second Level Supervisor) <i>C. X. Hill</i>	Date 3/6/90		

The Performance Appraisal has been reviewed with the employee and approved by the endorser (second level supervisor).

Employee Name (Please type or print)	Emp. No.	Date
Reviewer (Immediate Supervisor)	Emp. No.	Date

1989 YEAR END PERFORMANCE

GOAL NO.	INDICATOR	VALUE	LEVEL	
NG-1	INPO RATING	2	4	26
NG-2	NUCLEAR SAFETY SALP RATING	1.66	4	12
NG-3	PLANT RELIABILITY EQUIVALENT AVAILABILITY	91.966	5	26
NG-4	UNPLANNED AUTOMATIC REACTOR TRIPS	2	5	6
NG-5	INDUSTRIAL SAFETY LOST TIME ACCIDENTS	0	5	6
NG-6	RADIATION EXPOSURE COLLECTIVE MANREMS	30.52	5	6
NG-7	O & M BUDGET	-19.66	5	16
NG-8	CAPITAL BUDGET	-12.38	5	2