

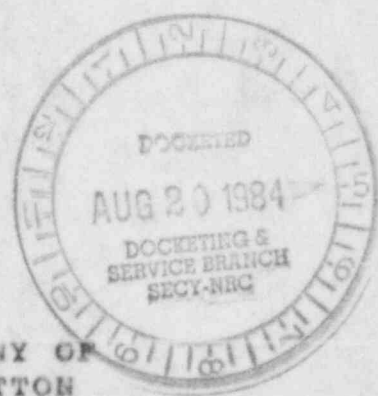
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY & LICENSING BOARD

IN THE MATTER OF:

TEXAS UTILITIES ELECTRIC
COMPANY, ET AL

(COMANCHE PEAK STEAM
ELECTRIC STATION, UNITS
1 AND 2)

) DOCKET NUMBER 50-445- 60-2
) PROB. & UTIL. REG. 50-446 00-2
) DOCKET NOS.
) 50-445
) 50-446



PREFILED TESTIMONY OF
NEILL AUSTIN BRITTON
AUGUST 18, 1984

PREFILED TESTIMONY OF NEILL AUSTIN BRITTON,
taken on the 18th day of August, 1984, in the
above-styled and numbered cause, at Glen Rose Motor
Inn located at Highway 67 & FM Road 201, in the City
of Glen Rose, County of Somervell and State of
Texas, before David B. Jackson, a Certified
Shorthand Reporter in and for the State of Texas.

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PDR ADOCK 05000445
T PDR

1 APPEARANCES:

2 BISHOP, LIBERMAN, COOK, PURCELL & REYNOLDS
3 Attorneys at Law
4 1200 Seventeenth Street, N.W.
5 Washington, D.C. 20036

6 BY: Bruce L. Downey, Esq.

7 APPEARING FOR APPLICANTS
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I N D E X

WITNESS: NEILL AUSTIN BRITTON
Examination by Mr. Downey

Page 4

DEPOSITION (N. BRITTON) EXHIBITS

Exhibit Number 1

Page 22

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NEILL AUSTIN BRITTON,

the witness hereinbefore named, having been first
duly cautioned and sworn to tell the truth, the
whole truth and nothing but the truth, testified on
his oath as follows:

MR. DOWNEY: This deposition is being
taken as part of the licensing proceeding for the
Comanche Peak Steam Electric Station, which
proceeding is now pending before the ASLB. Pursuant
to the order of the ASLB, this deposition is being
taken upon direct examination. Cross-examination of
the witness has been deferred until the hearing
before the Board, which is now scheduled for
September 10, 1984.

EXAMINATION

BY MR. DOWNEY:

Q. Mr. Britton, will you please state your
full name for the record.

A. Neill Austin Britton.

Q. And by whom are you employed?

A. Brown & Root.

Q. And in what capacity are you employed by
Brown & Root?

A. At the present I am a Level III quality
engineer in the Protective Coatings Department.

1 Q. Is your employment at the Comanche Peak
2 Steam Electric Station?

3 A. Yes.

4 Q. Mr. Britton, did you first -- when did you
5 first begin work at Comanche Peak?

6 A. March 1976.

7 Q. In what capacity were you employed at that
8 time?

9 A. I came in as an inspector, and later on I
10 was promoted to lead inspector.

11 Q. In what discipline did you initially work?

12 A. Civil.

13 Q. In what position was your principal job
14 function, to inspect concrete?

15 A. Yes.

16 Q. How long did you stay in the civil area?

17 A. Until approximately June 1978.

18 Q. At that time were you transferred to a new
19 discipline?

20 A. Yes, sir.

21 Q. To which discipline were you transferred?

22 A. Protective coatings.

23 Q. And in what capacity did you begin working
24 in the protective coatings area?

25 A. As an inspector Level II.

1 Q. How long did you remain as a coatings
2 inspector at Comanche Peak?

3 A. Until March 1979.

4 Q. At that time were you transferred?

5 A. Yes. I was transferred to the south Texas
6 project in Bay City, Texas.

7 Q. To what position were you assigned at the
8 south Texas project?

9 A. Quality engineer for civil and protective
10 coatings.

11 Q. How long did you remain in that position?

12 A. For approximately nine months.

13 Q. So you worked as a QE at south Texas until
14 September or October 1979; is that correct?

15 A. Correct.

16 Q. At that time what position did you assume?

17 A. QC superintendent at the south Texas
18 project.

19 Q. How long did you remain in that position?

20 A. Until November 1981.

21 Q. As the QC coatings superintendent at south
22 Texas, approximately how many people did you
23 supervise?

24 A. Approximately ten.

25 Q. What were your responsibilities in that

1 position?

2 A. I supervised the day-to-day activities of
3 the protective coatings inspectors on the site. I
4 also had administrative responsibility for all of
5 the employees in the department.

6 Q. You testified that you remained in that
7 position until November of 1981; is that right?

8 A. Yes.

9 Q. And at that time what position did you
10 assume?

11 A. I returned to Comanche Peak to work on the
12 backfit program in the coatings area.

13 Q. And what was the status of the backfit
14 program at the time you returned to Comanche Peak?

15 A. The backfit program had just begun a few
16 weeks earlier.

17 Q. What responsibilities did you assume for
18 that program?

19 A. I assumed responsibility for implementing
20 the backfit procedures, performing backfit tests,
21 preparing and reviewing backfit inspection
22 documentation and interfacing with an engineer for
23 resolution of unsatisfactory items.

24 Q. Approximately how many persons did you
25 supervise in that position?

1 A. Approximately six.

2 Q. Who was your supervisor when you first took
3 responsibility for the backfit program?

4 A. Ron Michaels.

5 Q. Was Mr. Michaels associated with ongoing
6 coatings inspection efforts?

7 A. No. Just the backfit program.

8 Q. What is the difference between the backfit
9 inspection program and the ongoing inspection
10 program?

11 A. Backfit inspectors conduct special
12 destructive tests on coatings that had been applied
13 several months or even years before. The ongoing
14 inspectors conduct inspections of painting
15 activities that are being performed at the time.

16 Q. Did there come a time when the backfit
17 coatings inspection program was consolidated with
18 the ongoing coatings inspection program?

19 A. Yes.

20 Q. When did that occur?

21 A. March 8th, 1982.

22 Q. What position did you assume as of that
23 date?

24 A. QC supervisor for ongoing protective
25 coatings inspection work and the backfit program.

1 Q. So at that time you assumed responsibility
2 for the entire inspection effort in the coatings
3 area; is that right?

4 A. Yes.

5 Q. Approximately how many employees were under
6 your supervision at that time?

7 A. 12.

8 Q. How many of those were assigned to the
9 backfit area?

10 A. Six.

11 Q. Were the rest assigned to ongoing
12 inspection activities?

13 A. Yes.

14 Q. Who were the ongoing inspectors?

15 A. Joe Krolak, Sherman Sheldon, Bob Hamilton,
16 Houston Gunn and a clerk, Cordella Birdwell.

17 Q. Were all of these people assigned to the
18 day shift?

19 A. Yes.

20 Q. Did you have any responsibilities for any
21 night shift inspectors?

22 A. Yes, I did.

23 Q. Who worked on the night shift?

24 A. Bill Dunham and Joe Fazi.

25 Q. Did they do ongoing inspections or backfit

1 inspections?

2 A. They did ongoing inspections.

3 Q. So you had six ongoing inspectors; is that
4 right?

5 A. Correct.

6 Q. You testified earlier you had supervisory
7 responsibilities for approximately six backfit
8 inspectors; is that correct?

9 A. That's correct.

10 Q. On what date was this consolidation
11 effective?

12 A. March 8th, 1982.

13 Q. What activity was Mr. Gunn assigned to
14 perform at this time?

15 A. He was assigned to perform inspections of
16 ongoing work in the paint shop.

17 Q. What activity is conducted at the paint
18 shop?

19 A. Coating of structural steel, hangers and
20 components for installation in the reactor area.

21 Q. Do you know why Mr. Gunn was assigned to
22 the paint shop?

23 A. Yes. He was acrophobic.

24 Q. Why did that require his assignment to the
25 paint shop?

1 A. All other inspection activities in the
2 coatings area required inspectors to work in high
3 places on a regular basis.

4 Q. Was he required to do any climbing in the
5 paint shop?

6 A. No, sir, he wasn't.

7 Q. How long had Mr. Gunn been assigned to the
8 paint shop?

9 A. For several years.

10 Q. Was he assigned there when you first became
11 a coatings inspector in July 1978?

12 A. Yes, sir.

13 Q. To your knowledge, did Mr. Gunn perform any
14 field inspections?

15 A. Not to my knowledge.

16 Q. Was working in the paint shop a full-time
17 activity?

18 A. Yes, it was.

19 Q. Mr. Britton, do you recall the events that
20 led to the termination of the employment of Bob
21 Hamilton, Joe Krolak and Sherman Shelton?

22 A. Yes, sir.

23 Q. On what date were they terminated?

24 A. March 9, 1982.

25 Q. What's your first recollection of the

1 events that led to their termination?

2 A. The first recollection I have is a phone
3 call I received that morning from a supervisor in
4 the paint department.

5 Q. Do you recall who made that call?

6 A. I believe it was either Charles Oxley or
7 Jim Brackin.

8 Q. What did the paint supervisor tell you?

9 A. He said construction had an inspection
10 ready on the CARP.

11 Q. What is the CARP?

12 A. The Containment Access Rotating Platform.
13 He said they had an inspection on the liner plate.

14 Q. Did the paint supervisor indicate there was
15 any problem?

16 A. Yes, he did. He said the inspectors would
17 not come up to perform the inspection because they
18 thought it was unsafe.

19 Q. When you say they thought it was unsafe, do
20 you mean the inspectors?

21 A. Yes. I mean Mr. Hamilton, Mr. Krolak and
22 Mr. Shelton.

23 Q. What did you say to the paint supervisor to
24 whom you spoke?

25 A. I told him I would look into it and get

1 back with him.

2 Q. Mr. Britton, do you know where this
3 particular inspection was to be performed?

4 A. Yes, sir, I do.

5 Q. Where was the inspection to be performed?

6 A. On the liner plate at approximately a
7 thousand feet elevation. I do not recollect the
8 azimuth, but it was around azimuth 20.

9 Q. 20 percent, around?

10 A. Roughly 20 percent.

11 Q. How does one get to this particular
12 location to make an inspection?

13 A. At that time you would take the elevator
14 from elevation 808 to elevation 905. At that point
15 you would send a scaffold in a series of ladders
16 to the CARP rail, which is located at elevation 1006.
17 At the top of the last ladder there was a rest
18 platform. When you got off the rest platform, there
19 was a safety cable mounted approximately four feet
20 above the rail. The cable and the rail run 360
21 degrees around the entire Containment Building.

22 From the rest platform, the inspector would
23 hook his lanyard to the cable and step onto the rail.

24 Q. How far from the liner plate is the CARP
25 rail?

1 A. The liner plate is approximately six feet
2 from the center of the rail.

3 Q. And how wide is the CARP rail?

4 A. Approximately two feet.

5 Q. I want to understand this correctly. On
6 the CARP rail was a track that is two feet wide that
7 you can use to walk around the entire Containment
8 Building?

9 A. Correct.

10 Q. What safety apparatus is used when you walk
11 on this track?

12 A. Safety -- the safety apparatus on this
13 track is a life line which is composed of
14 three-eighths inch cable attached permanently to the
15 liner plate. You attach one end of your lanyard to
16 your safety belt and one into the cable. You then
17 walk around to the area of your inspection work
18 activity.

19 Q. Now, you said this particular inspection
20 activity was approximately 60 degrees?

21 A. Right.

22 Q. When you arrived at the work area, from
23 what base do you work?

24 A. You work from a swing stage, which is a
25 platform with rails that is hung between the CARP

1 rail supports.

2 Q. So there is a scaffolding that is placed
3 between --

4 A. Between the two supports.

5 Q. -- between the two supports.

6 So you get off of the rail at this point
7 and into the scaffolding?

8 A. Yes.

9 Q. When working in this area, painters and
10 paint inspectors worked off of scaffolding that's
11 between the rail and the liner plate; is that right?

12 A. That's correct.

13 Q. What safety apparatus is attached to the
14 scaffold from which you work?

15 A. There is a rope binder. You unhook your
16 lanyard and rehook it in the rope binder before
17 entering the basket.

18 Q. So that's the process an inspector would
19 have to do --

20 A. Yes.

21 Q. -- to get to his assigned work, this
22 particular work that was being requested?

23 A. Yes, sir.

24 Q. So at any time does the inspector work off
25 the rail?

1 A. No.

2 Q. The rail is simply used to get to the place
3 of work; is that right?

4 A. That's correct.

5 Q. In the backfit program that you had been
6 supervising, had you worked off the CARP rail?

7 A. Yes, I had.

8 Q. And have your inspectors worked off the
9 CARP rail?

10 A. Yes.

11 Q. I say "worked off." They used it to get to
12 the work area; is that right?

13 A. Yes.

14 Q. So you were familiar with this area?

15 A. Yes, I was.

16 Q. And you were at the time?

17 A. Yes.

18 Q. You testified that you received this call
19 from Mr. Brackin or Mr. Oxley reporting to you
20 exactly where the inspection was. What did you say
21 to Mr. Brackin or Mr. Oxley in response to their
22 report to you?

23 A. That I would check into the situation and
24 get back to them.

25 Q. Following this phone call, what did you do

1 about this situation?

2 A. I called the Safety Department.

3 Q. Do you recall who you spoke with in the
4 Safety Department?

5 A. Sam Hoggard. I asked Mr. Hoggard whether
6 the CARP rail was safe to walk.

7 Q. What did Mr. Hoggard say to you?

8 A. His response was yes, it was safe.

9 Q. What did you do after your conversation
10 with Mr. Hoggard?

11 A. I got up with Mr. Williams.

12 Q. Who is Mr. Williams?

13 A. He was my supervisor.

14 Q. What did you say to him?

15 A. I told him of the phone call I had just
16 received from the Paint Department, and of my
17 conversation with Mr. Hoggard.

18 Q. Did you report to him what the Safety
19 Department had told you?

20 A. Yes, I did.

21 Q. What did Mr. Williams say to you?

22 A. He said to get up with Mr. Hamilton and see
23 what the problem was.

24 Q. Had you known Mr. Hamilton before this time?

25 A. Yes. I worked with him back in '78 and '79.

1 Q. After your conversation with Mr. Williams --
2 was this still the morning of the 9th?

3 A. Yes.

4 Q. Did you go see Mr. Hamilton?

5 A. Yes, I did.

6 Q. Where was Mr. Hamilton physically located
7 at this time?

8 A. In the QC coatings shack on the south
9 island.

10 Q. Did you go down there to see him?

11 A. Yes, I did.

12 Q. What was the substance of your conversation
13 with him?

14 A. I told him that we needed to perform the
15 inspection, that I had talked to the Safety
16 Department and they had assured me that there were
17 no safety violations or unsafe working conditions at
18 the site of the inspection.

19 Q. Did you ask him to make the inspection?

20 A. Yes, I did.

21 Q. What did he say to you?

22 A. He refused.

23 Q. Did you have any further conversation with
24 him at this time?

25 A. Yes. I told him refusing to perform the

1 inspection was a serious matter. And his response
2 was, quote, they're bluffing, close quote.

3 Q. What did you -- was that the end of your
4 conversation with Mr. Hamilton?

5 A. That was the end of the conversation.

6 Q. Did you discuss this matter with Mr. Krolak
7 or Mr. Shelton at this time?

8 A. They were present but they didn't say
9 anything. They just agreed with Mr. Hamilton.

10 Q. What did you do next?

11 A. I went back to Mr. Williams and told him
12 what had just taken place. He said he would talk to
13 Mr. Brandt and get back to me.

14 Q. Who was Mr. Brandt?

15 A. Mr. Brandt was Mr. Williams' supervisor.

16 Q. Did you accompany Mr. Williams when he
17 spoke with Mr. Brandt?

18 A. No, I did not.

19 Q. Did Mr. Williams subsequently report to you
20 the substance of his conversation with Mr. Brandt?

21 A. Yes, he did. He said that Mr. Brandt had
22 asked Mike Foote and him to inspect the rail.

23 Q. Did Mr. Williams and Mr. Foote go up to the
24 rail?

25 A. Yes, they did.

1 Q. Did you accompany them?

2 A. Yes.

3 Q. When did you go to the rail?

4 A. Right after Mr. Williams returned from Mr.
5 Brandt's office.

6 Q. What did you find when you arrived there?

7 A. The life lines were up. There was no
8 debris or oil or grease on the rail. The rail
9 provided adequate footing, and that the inspection
10 was accessible.

11 Q. Mr. Britton, did you walk around the rail
12 to the point of the inspection?

13 A. Yes, I did.

14 Q. Did you hook your lanyard to the safety
15 line?

16 A. Yes, I did.

17 Q. Was the safety line taut?

18 A. Yes, it was.

19 Q. How high about the rail was the safety line?

20 A. Approximately four feet.

21 Q. How long is the safety line?

22 A. Six feet.

23 Q. If one were to fall while walking along the
24 rail, how far could you fall below the rail itself?

25 A. From the point of the safety line to the

1 bottom of your fall would be six feet, approximately
2 at your waist.

3 Q. And how far above the rail is the safety
4 line?

5 A. Four feet.

6 Q. So you would have fallen no more than two
7 feet below the rail itself?

8 A. That's correct.

9 Q. To what part of your body is the lanyard
10 attached?

11 A. To your mid section.

12 Q. So how far could you physically fall from
13 the rail?

14 A. Physically fall from the rail?
15 Approximately two feet.

16 Q. Mr. Britton, did you see any safety
17 problems with the CARP rail when you were up there
18 that day?

19 A. No, I did not.

20 Q. Did you see any oil or grease on the rail?

21 A. No, sir, I did not.

22 Q. How long were you up there?

23 A. Approximately five to ten minutes.

24 Q. Did you or Mr. Williams or Mr. Foote report
25 back to Mr. Brandt about what you had learned on

1 your trip up to the rail?

2 A. Mr. Williams did.

3 Q. Did you go with him?

4 A. No, I don't believe I did.

5 Q. Mr. Britton, did you prepare a memorandum
6 summarizing your observations on the CARP rail that
7 day?

8 A. Yes.

9 Q. Mr. Britton, I'd like you to review a
10 document that's been marked for identification as N.
11 Britton Exhibit 1 and ask you, after having reviewed
12 that document, whether you can identify it.

13 A. Yes.

14 Q. What is the document?

15 A. It is a copy of the memorandum that I
16 prepared about my observations on March 9, 1982.

17 Q. Does Britton Exhibit 1 correctly reflect
18 your observations on that day?

19 A. Yes, it does.

20 MR. DOWNEY: Applicant moves that
21 Britton Exhibit 1 be received in evidence in this
22 proceeding.

23 Q. What was the next thing you heard about
24 this matter after Mr. Williams went to Mr. Brandt's
25 office to report on his trip to the rail?

1 A. Sometime after lunch I was instructed to
2 bring Mr. Hamilton, Mr. Krolak and Mr. Shelton to
3 Mr. Brandt's office.

4 Q. And did you do that?

5 A. Yes, I did.

6 Q. Did you have a conversation with them at
7 that -- with Mr. Hamilton, Mr. Krolak, Mr. Shelton --
8 at that time?

9 A. Yes, I did. I told them again that the
10 failure to perform the inspection was a serious
11 problem, and asked them to reconsider their decision.

12 Q. What did they say to you?

13 A. They said it was all a bluff.

14 Q. Did you then go with them to Mr. Brandt's
15 office?

16 A. Yes, I did.

17 Q. Who was present in his office?

18 A. Mr. Brandt, Mr. Purdy, Mr. Williams and
19 myself.

20 Q. And the three inspectors; is that right?

21 A. Yes, and the three inspectors.

22 Q. Was there a discussion at this time?

23 A. Yes. It was basically the same discussion
24 that I had with them before. Mr. Brandt said that
25 we had checked with Safety and there was no safety

1 violation or unsafe working conditions, and that Mr.
2 Williams and I had inspected the area and we thought
3 it was safe.

4 Q. Did Mr. Brandt again ask them to perform
5 the inspection?

6 A. Yes, he did.

7 Q. Did Mr. Purdy join in that request?

8 A. Yes.

9 Q. What was the response to this request?

10 A. They said they wouldn't do it because it
11 was unsafe.

12 Q. And what happened at this point?

13 A. At this point there was no alternative.
14 Mr. Purdy and Mr. Brandt terminated the individuals.

15 Q. Do you know the basis for the termination?

16 A. Yes. For failure to perform assigned
17 duties and failure to follow instructions.

18 Q. Following the termination of Mr. Hamilton
19 and Mr. Krolak and Mr. Shelton, did you continue to
20 be supervisor of the coatings group?

21 A. Yes, I did.

22 Q. Based on your observations, did the
23 termination of those three gentlemen in any way
24 deter the remaining inspectors from writing up
25 non-conforming conditions?

1 A. No.

2 Q. Do you have any reason to believe that
3 non-conforming conditions were not reported as a
4 consequence of their termination?

5 A. No.

6 Q. Did anyone other than these three
7 inspectors refuse to make this inspection?

8 A. No.

9 Q. When was the inspection actually performed?

10 A. I believe it was March 9, and I believe it
11 was performed on the night shift.

12 Q. Who was working the night shift at that
13 time?

14 A. Joe Fazi and Bill Dunham.

15 Q. Did either of those gentlemen refuse to
16 make this inspection?

17 A. No. The inspection was performed that
18 night.

19 Q. Was Mr. Gunn at any time asked to perform
20 this inspection?

21 A. No, he was not.

22 Q. Do you know why?

23 A. Yes.

24 Q. Why did you not ask him to do it?

25 A. His work area was in the paint shop and he

1 had been assigned to the paint shop because he was
2 acrophobic.

3 Q. Did you ask any of the backfit inspectors
4 to make this inspection?

5 A. No, I did not.

6 Q. Why not?

7 A. Because those individuals were assigned to
8 backfit ducies.

9 Q. Were all of these backfit inspectors
10 qualified to do ongoing inspections?

11 A. Some were; some weren't.

12 Q. Do you recall whether the ones working at
13 the time were qualified to perform ongoing
14 inspections?

15 A. I don't recall.

16 Q. After these three inspectors were
17 terminated, were there any ongoing inspectors left
18 on your staff?

19 A. Only Houston Gunn in the paint shop and the
20 two inspectors on night shift.

21 Q. Later were you forced to reassign some of
22 your backfit inspectors to ongoing activities?

23 A. Yes. I believe I assigned the ones who
24 were certified to perform ongoing inspections to
25 that activity.

1 Q. Do you know when you made that reassignment?

2 A. Late on the afternoon of the 9th or in the
3 morning of the 10th.

4 Q. To your knowledge, did any inspectors
5 refuse to perform this inspection other than Mr.
6 Hamilton, Mr. Krolak and Mr. Shelton?

7 A. No.

8 Q. Had any of the other inspectors refused to
9 perform the inspection, would you have learned of
10 their refusal to do so?

11 A. Yes. As a QC supervisor, I would have
12 known if any other inspectors had refused to perform
13 the inspection.

14 Q. In your judgment, did Mr. Purdy and Mr.
15 Brandt follow the proper course of action in this
16 matter?

17 A. If I would have been in Mr. Purdy's
18 position, I would have made the same assessment of
19 the situation.

20 Q. Why do you concur with Mr. Purdy's judgment
21 in this matter?

22 A. Because these employees were given several
23 opportunities to reconsider. The Safety Department
24 was called and confirmed that the area was safe.
25 Mr. Williams, Mr. Foote and myself inspected the

1 area and it was safe. Dozens of craftsmen and other
2 inspectors repeatedly walked the rail to their work
3 area without incident. On the basis of these facts,
4 I believe Mr. Purdy and Mr. Brandt made the right
5 decision on the basis of these facts.

6 MR. DOWNEY: No more questions.
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CORRECTIONS AND SIGNATURE

PAGE/LINE CORRECTION REASON FOR CHANGE

I, NEILL AUSTIN BRITTON, have read the foregoing deposition, and hereby affix my signature that same is true and correct, except as noted herein.

NEILL AUSTIN BRITTON

SUBSCRIBED and sworn to before me this the _____ day of _____, 1984.

NOTARY PUBLIC for the
State of Texas

My Commission Expires: _____

1 STATE OF TEXAS)

2
3 I, David B. Jackson, RPR, Certified Shorthand
4 Reporter in and for the State of Texas, do hereby
5 certify that there came before me on the 18th day of
6 August, A. D., 1984, at the Glen Rose Motor Inn,
7 Glen Rose, Texas, the following named person, to-wit:
8 Neill Austin Britton, who was by me duly sworn to
9 testify the truth and nothing but the truth of his
10 knowledge touching and concerning the matters in
11 controversy in this cause; and that he was thereupon
12 examined upon his oath and his examination reduced
13 to writing; same to be sworn and subscribed to by
14 said witness before any notary public.

15
16 I further certify that I am neither attorney or
17 counsel for, nor related to or employed by, any of
18 the parties to the action in which this deposition
19 is taken, and further that I am not a relative or
20 employee of any attorney or counsel employed by the
21 parties hereto, or financially interested in the
22 action.

23
24 In witness whereof, I have hereunto set my hand
25 and affixed my seal this _____ day of August , A.D.,

1 1984.

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3
4 DAVID B. JACKSON, 672, RPR, CSR
5 IN AND FOR THE STATE OF TEXAS
6 1226 Commerce, Suite 411
7 Dallas, Texas 75202
8 (214) 742-3035

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My commission expires December 31, 1985

SUBJECT: Rotating Platform & Rail Assembly @ El. 1002'± Safety Aspects

FROM: Neill Britton, C954

DATE: March 17, 1982

This is a statement discussing conditions for inspection activities on the rotating platform beam and rail assembly. An inspection was made of the above items by Harry Williams, Mike Foote and myself. I observed the following:

At El. 905' a scaffold leads to the top of the elevator shaft with a sign posted requiring notification of the rigger before ascending the scaffold with stairs and handrails at the top of the elevator shaft which is enclosed with handrails. A ladder leads to the polar crane rail at which there is an open ladder with a vertical safety line with a rope binder which is used to ascend this ladder up to a rest platform. From this point, the ladder is roped to the next rest platform. At this point, the rest platform is even with the rotating platform rail and beam assembly, a person must be hooked by safety belt lanyard before stepping on to the rail and beam assembly which is 2' wide. The safety line is 3/8" cable running horizontal around the reactor containment No. 2 @ approximately 5' above elevation of beam and rail assembly. When I was observing all items above, also, I found the rail and beam assembly to be free of debris, furthermore, I scuffed my feet to check if beam was dry and clean, this producing favorable results. At this point, I walked approximately 60 ft. on the rail to the point the inspection would take place. At this point, a hanging scaffold had been placed with handrails, kickrails, etc. I saw no unsafe conditions. The above items are correct to the best of my knowledge, also, these conditions observed on 3/9/82.

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