

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

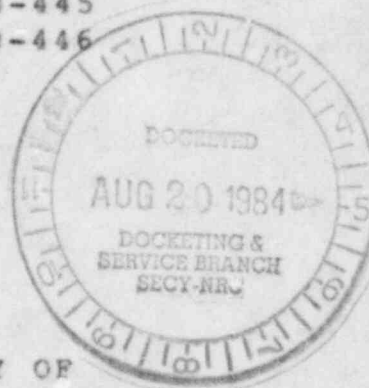
IN THE MATTER OF: )

TEXAS UTILITIES ELECTRIC )  
COMPANY, ET AL )

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

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PREFILED TESTIMONY OF  
KENNETH LIFORD  
JOHN R. JOHNSON  
JAMES W. CALICUTT  
AUGUST 19, 1984

PREFILED TESTIMONY OF KENNETH LIFORD, JOHN R.  
JOHNSON and JAMES W. CALICUTT, taken on the 19th 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 Janet E.  
Schaffer, a Certified Shorthand Reporter in and for  
the State of Texas.

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## 1 APPEARANCES:

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6 BY: Mark L. Davidson, Esq.

7 APPEARING FOR APPLICANTS  
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## P R O C E E D I N G S

1  
2 MR. DAVIDSON: My name is Mark L.  
3 Davidson. I am a member of the firm of Bishop,  
4 Liberman, Cook, Purcell & Reynolds, counsel for the  
5 Applicant in these proceedings. I am accompanied  
6 here today by Mr. Ken Liford, Mr. James Calicutt and  
7 Mr. John R. Johnson for the purpose of taking these  
8 gentlemen's direct testimony and preparing the same  
9 for prefiling pursuant to a procedure ordered by the  
10 Atomic Safety Licensing Board.

11 Ms. Reporter, would you please swear in  
12 these witnesses, who would appear here today as a  
13 panel, so we may begin their direct examination by  
14 way of this deposition.

15 KENNETH LIFORD,

16 JOHN R. JOHNSON and

17 JAMES W. CALICUTT,

18 the witnesses hereinbefore named, being first duly  
19 cautioned and sworn to testify the truth, the whole  
20 truth and nothing but the truth, testified on their  
21 oaths as follows:

22 MR. DAVIDSON: Mr. Liford, for the  
23 record, would you please state your full name,  
24 current employer and the capacity in which you are  
25 currently employed

1 MR. LIFORD: Kenneth Liford, Brown &  
2 Root, assistant general superintendent.

3 MR. DAVIDSON: And would you please  
4 describe or relate to us your work history at  
5 Comanche Peak and the date you were hired there  
6 until the present?

7 MR. LIFORD: I was hired January '78.  
8 I was hired in as a piping superintendent. I was  
9 the piping superintendent until a year and-a-half,  
10 plus or minus. Went to assistant general  
11 superintendent then, and am still in that capacity.

12 MR. DAVIDSON: As a piping  
13 superintendent, Mr. Liford, what were your  
14 responsibilities?

15 MR. LIFORD: Piping, welding, hangers  
16 and insulation.

17 MR. DAVIDSON: And as a piping  
18 superintendent during the period January '78 until  
19 approximately a year and-a-half ago, about how many  
20 individuals did you supervise?

21 MR. LIFORD: From 1100 to 1400.

22 MR. DAVIDSON: How many individuals  
23 directly reported to you, and what were their titles  
24 or capacities?

25 MR. LIFORD: At the peak when we had



1 the most people out there, I had approximately six  
2 superintendents reporting to me.

3 MR. DAVIDSON: And after you became  
4 assistant general superintendent, how many people  
5 reported directly to you?

6 MR. LIFORD: That was when I was  
7 referring to.

8 MR. DAVIDSON: I'm sorry. I believe  
9 my question was when you were piping superintendent,  
10 how many people did you have directly reporting to  
11 you and what were their capacities?

12 MR. LIFORD: I had about 1100 people  
13 working for me. Out of that, I had one  
14 superintendent and several general foremen and  
15 foremen reporting to me.

16 MR. DAVIDSON: I believe it's your  
17 testimony that subsequently you were promoted to  
18 assistant general superintendent and you had six  
19 superintendents reporting to you?

20 MR. LIFORD: Approximately, yes.

21 MR. DAVIDSON: And how many people  
22 were under your general supervision at that time?

23 MR. LIFORD: Ranged from 1100 to 1400.

24 MR. DAVIDSON: Mr. Calicutt, would you  
25 please tell us, for the record, your full name, your

1 current employer, current capacity in which you are  
2 so employed.

3 MR. CALICUTT: James Walter Calicutt.  
4 Work for Brown & Root as a general mechanical  
5 superintendent.

6 MR. DAVIDSON: Mr. Calicutt, would you  
7 please relate your work history at Comanche Peak  
8 from the date you were hired on to the present,  
9 detailing also for us your responsibilities during  
10 that period.

11 MR. CALICUTT: I have been over all  
12 mechanical activities since I've been there.

13 MR. DAVIDSON: Has your position  
14 changed since you were hired at Comanche Peak?

15 MR. CALICUTT: No.

16 MR. DAVIDSON: When was that, sir?

17 MR. CALICUTT: May of 1978.

18 MR. DAVIDSON: And in the capacity as  
19 general mechanical superintendent, how many people  
20 did you supervise?

21 MR. CALICUTT: I have two assistant --  
22 at one time I had two assistant superintendents and  
23 one superintendent reporting directly to me.

24 MR. DAVIDSON: And how many people  
25 overall were you responsible for?

1 MR. CALICUTT: At the peak, between 14  
2 and 15 men.

3 MR. DAVIDSON: Mr. Johnson, would you  
4 please state, for the record, your full name,  
5 current employer and the capacity in which you are  
6 employed currently.

7 MR. JOHNSON: John Ronald Johnson,  
8 Brown & Root, and superintendent.

9 MR. DAVIDSON: In what area, sir?

10 MR. JOHNSON: Superintendent of civil  
11 and mechanical in Reactor Number 2.

12 MR. DAVIDSON: Mr. Johnson, would you  
13 please tell us when you were first hired to work at  
14 Comanche Peak, and would you relate thereafter your  
15 subsequent work history, including any promotions or  
16 changes in responsibilities that you may have had?

17 MR. JOHNSON: June 1975 I hired in as  
18 a carpenter. Approximately two weeks later I was  
19 sent up to carpenter foreman. Six months later  
20 general foreman, Building Department. Approximately  
21 six months after that, assistant superintendent  
22 Civil Department. Probably six months after that,  
23 building superintendent, night shift. About a year  
24 and-a-half after that I was put on days as a hanger  
25 superintendent; about three years and nine months of

1 that. Then I went to Reactor Number 1 Task Force,  
2 craft superintendent, ten months. Now present.

3 MR. DAVIDSON: Mr. Liford, is there a  
4 policy in effect at Comanche Peak regarding the  
5 manner in which construction personnel are to relate  
6 to QC/QA personnel?

7 MR. LIFORD: Yes.

8 MR. DAVIDSON: What is your  
9 understanding of the policies, sir?

10 MR. LIFORD: The policy between  
11 construction and Quality Control on the project is  
12 simple working relationship to where each group does  
13 their specific job. There is no harassing,  
14 intimidating, threatening from one group to the  
15 other.

16 MR. DAVIDSON: When you say there is  
17 no harassing, intimidating and threatening between  
18 one group and another, do you mean that it is the  
19 policy that craft are not to engage in that kind of  
20 conduct with QC/QA personnel?

21 MR. LIFORD: Yes.

22 MR. DAVIDSON: Explain to me what you  
23 understood the policy in that regard to be.

24 MR. LIFORD: Construction personnel  
25 are not allowed to harass, intimidate or threaten



1 Quality Control personnel.

2 MR. DAVIDSON: What happens if they do,  
3 sir? What is the policy on that?

4 MR. LIFORD: They are terminated.

5 MR. DAVIDSON: Is there any policy of  
6 which you are aware that is in effect at Comanche  
7 Peak regarding the manner in which disagreements  
8 between craft personnel, QC/QA personnel should be  
9 handled?

10 MR. LIFORD: Yes. Any time a  
11 disagreement between construction and QC or QA  
12 personnel occurs, then it is taken to the next  
13 immediate supervisor until it is resolved.

14 MR. DAVIDSON: Now, when did you first  
15 become aware of these policies, Mr. Liford?

16 MR. LIFORD: Became aware of the  
17 policies prior to coming to Comanche Peak.

18 MR. DAVIDSON: How is that, sir?

19 MR. LIFORD: I worked on a nuclear  
20 power station in Wilmington, North Carolina. The  
21 policies are the same.

22 MR. DAVIDSON: How do you know the  
23 policies are the same?

24 MR. LIFORD: Both projects were Brown  
25 & Root construction, and Brown & Root's policies are

1 the same.

2 MR. DAVIDSON: When were you first  
3 made aware of these policies, sir?

4 MR. LIFORD: Upon indoctrination into  
5 Brunswick Steam Electric Station.

6 MR. DAVIDSON: About what date was  
7 that?

8 MR. LIFORD: Approximately '76

9 MR. DAVIDSON: When you were hired in  
10 January 1978 as pipe superintendent at Comanche Peak,  
11 did anyone reemphasize, remind you of the Brown &  
12 Root policies that you have just mentioned?

13 MR. LIFORD: U. D. Douglas, who is  
14 project manager, and Doug Frankum, who was assistant  
15 project manager, discussed the policies and the  
16 problems prior to me going to work.

17 MR. DAVIDSON: When you say they  
18 discussed the policies, do you mean the policies of  
19 Brown & Root with respect to the manner in which  
20 craft people should treat QC/QA personnel and how  
21 craft individuals should resolve differences of  
22 opinion with QC/QA personnel?

23 MR. LIFORD: Yes. And other policies,  
24 job policies.

25 MR. DAVIDSON: Were these discussions

1 that you had with Mr. Douglas and Mr. Frankum part  
2 of your indoctrination?

3 MR. LIFORD: Yes.

4 MR. DAVIDSON: How were they  
5 administered to you? In other words, under what  
6 circumstances did these discussions occur?

7 MR. LIFORD: When I came on site and  
8 was called to a meeting with Mr. Frankum and Mr.  
9 Douglas, we sat and discussed policies, procedures  
10 and problems in the area that I was to be over.

11 MR. DAVIDSON: When you say problems  
12 in the area that you were to supervise, what do you  
13 mean?

14 MR. LIFORD: Problems of -- in the  
15 manner like engineering problems, QA/QC problems,  
16 construction problems; just loose run of all types  
17 of problems that they were aware of in the  
18 department that I was taking over.

19 MR. DAVIDSON: What QC/QA problems did  
20 Mr. Douglas and Mr. Frankum discuss with you?

21 MR. LIFORD: Procedural problems.

22 MR. DAVIDSON: Could you amplify on  
23 that for me?

24 MR. LIFORD: There were, when I first  
25 came here, several procedural type problems



1 concerning QA/QC procedure and a construction  
2 procedure that did not say the same thing. Part of  
3 my task was to get a correlation between the  
4 construction procedures and the Quality Control  
5 procedures so everybody was operating with the same  
6 words in each specific procedure.

7 MR. DAVIDSON: Mr. Liford, after you  
8 received this indoctrination, did you make any  
9 effort to communicate the policies that you had been  
10 reminded of by Messrs. Frankum and Douglas to those  
11 individuals who were to be your subordinates in the  
12 department that you were going to supervise?

13 MR. LIFORD: Yes.

14 MR. DAVIDSON: Would you please  
15 describe those efforts.

16 MR. LIFORD: After approximately three  
17 weeks on the job site reviewing procedures,  
18 reviewing the craft production, number of NCR's that  
19 they were getting, the delivery of material,  
20 everything, I called a meeting with everyone that  
21 worked for me on a supervisory capacity and went  
22 over all the aspects of the job, including the  
23 policies for the site concerning Quality Control and --  
24 QA/QC, engineering and craft.

25 MR. DAVIDSON: And at that meeting you



1 emphasized that the harassment, intimidation or  
2 threatening of QA/QC personnel would not be  
3 tolerated and disagreements were to be handled in a  
4 professional manner, and where they could not be  
5 resolved in the field, they should be taken up to  
6 supervisors?

7 MR. LIFORD: Yes

8 MR. DAVIDSON: At any time subsequent  
9 to that meeting did you undertake to reinforce or  
10 reiterate the policies of which you were aware  
11 regarding relationship with QC/QA by craft personnel  
12 among your subordinates?

13 MR. LIFORD: The answer to your  
14 question is yes. I have always dealt with anybody  
15 working for me to the point that -- of conveying to  
16 them the way the job was to be run and how they were  
17 to conduct themselves when dealing with QA/QC.

18 MR. DAVIDSON: Now, when you say that  
19 you have always attempted to emphasize these  
20 policies and explain them to your subordinates, when  
21 you were pipe superintendent you were supervising  
22 general foremen and foremen; is that correct?

23 MR. LIFORD: Yes.

24 MR. DAVIDSON: Are you saying that you  
25 undertook, at meetings or in discussions, to

1 emphasize to these general foremen and foremen what  
2 the policies were for dealing with QA/QC personnel?

3 MR. LIFORD: Yes.

4 MR. DAVIDSON: Did you make any effort  
5 to communicate these policies to people below the  
6 level of general foreman and foreman?

7 MR. LIFORD: Yes.

8 MR. DAVIDSON: What efforts did you  
9 make?

10 MR. LIFORD: Any time that we have a  
11 meeting with supervisors, within approximately two  
12 days after the meeting I usually go out into the  
13 field and talk to the fitters, welders, helpers to  
14 find out has the word of the policy been transmitted  
15 down to that level.

16 MR. DAVIDSON: Mr. Calicutt, when were  
17 you first made aware of any policies regarding the  
18 way in which it was expected at Comanche Peak that  
19 craft and QC/QA personnel would relate to each other?

20 MR. CALICUTT: When I was hired on.

21 MR. DAVIDSON: And what policies were  
22 explained to you at that time?

23 MR. CALICUTT: All Brown & Root  
24 policies.

25 MR. DAVIDSON: Were any policies

1 specifically regarding the manner in which craft was  
2 to treat QC/QA personnel and deal with disagreements  
3 with them discussed with you?

4 MR. CALICUTT: Yes, they were.

5 MR. DAVIDSON: Could you tell us what  
6 those policies were?

7 MR. CALICUTT: I was told that dealing  
8 with QA/QC would be handled in a professional manner.  
9 If they had disagreements, it would be brought up to  
10 the letter until it was solved.

11 MR. DAVIDSON: Was any mention made as  
12 to whether or not it was appropriate to fight or  
13 argue with QC/QA, or otherwise harass, intimidate or  
14 threaten such individuals?

15 MR. CALICUTT: That was a no-no.  
16 There was to be none of that.

17 MR. DAVIDSON: When you say that was a  
18 no-no and there was to be none of that, what do you  
19 mean?

20 MR. CALICUTT: I mean that you would  
21 be terminated.

22 MR. DAVIDSON: And that was made clear  
23 to you, sir?

24 MR. CALICUTT: Yes, it was.

25 MR. DAVIDSON: And who made these

1 policies clear to you, and explained them to you,  
2 when you hired on at the Peak?

3 MR. CALICUTT: Mr. U. D. Douglas and  
4 Doug Frankum.

5 MR. DAVIDSON: In what cases or  
6 circumstances did they explain that?

7 MR. CALICUTT: As I was being informed  
8 of my duties when I got to Comanche Peak.

9 MR. DAVIDSON: At that time they took  
10 the occasion to explain these policies to you?

11 MR. CALICUTT: Yes, they did.

12 MR. DAVIDSON: Subsequent to your  
13 meeting with Messrs. Douglas and Frankum at which  
14 they explained the policies that were in force  
15 regarding the manner in which craft would deal with  
16 QC/QA personnel, did you personally make any effort  
17 to see to it that those policies, as you understood  
18 them, were communicated to your subordinates?

19 MR. CALICUTT: Yes, I did.

20 MR. DAVIDSON: What efforts did you  
21 make, sir, to communicate the policies on dealing  
22 with QA/QC personnel?

23 MR. CALICUTT: I had meetings with  
24 superintendents under me.

25 MR. DAVIDSON: Sir, when you say



1 "meetings," did you mean that you had more than one  
2 such meeting with the individuals who were  
3 subordinate to you?

4 MR. CALICUTT: Yes.

5 MR. DAVIDSON: How often or how  
6 frequently did you hold such meetings?

7 MR. CALICUTT: About once a month.

8 MR. DAVIDSON: Were these meetings  
9 solely to discuss the proper relationship between  
10 craft and QA/QC personnel, or were other subjects  
11 discussed?

12 MR. CALICUTT: Other subjects would be  
13 discussed.

14 MR. DAVIDSON: Did you also include in  
15 those discussions, however, mention of the policies  
16 regarding the relationship between craft personnel  
17 and QC/QA?

18 MR. CALICUTT: Quite frequently.

19 MR. DAVIDSON: Other than having  
20 meetings with the superintendants who reported to  
21 you at which you communicated the policies regarding  
22 the way in which craft would deal with QC/QA  
23 personnel, did you make any effort to see to it that  
24 those individuals communicated that policy down to  
25 the craft personnel they supervised?

1 MR. CALICUTT: Yes. When I was in the  
2 field, I would ask foremen, general foremen, crafts  
3 people if they had been made aware of that.

4 MR. DAVIDSON: You would specifically  
5 ask them that question?

6 MR. CALICUTT: Yes.

7 MR. DAVIDSON: And were you convinced,  
8 based on these discussion and question sessions that  
9 you had with various craft personnel, that the  
10 message was being communicated?

11 MR. CALICUTT: Yes.

12 MR. DAVIDSON: Do you know whether, as  
13 part of the indoctrination program at the Peak for  
14 all new employees, any discussions are had or  
15 mention made of policies that are in force regarding  
16 the proper relationship between craft personnel and  
17 QA/QC?

18 MR. CALICUTT: I believe it's in the  
19 indoctrination.

20 MR. DAVIDSON: So therefore, all  
21 employees receive this information when they're  
22 employed and then receive it again through  
23 communication by their superiors?

24 MR. CALICUTT: That's correct.

25 MR. DAVIDSON: Both at the time they

1 are hired and subsequently, just as you did with  
2 your subordinates?

3 MR. CALICUTT: Yes.

4 MR. DAVIDSON: Mr. Johnson, when you  
5 were hired on at the Peak, were you made aware of  
6 the existence of any policies with regard to the  
7 manner in which craft were to relate to QC/QA  
8 personnel?

9 MR. JOHNSON: No.

10 MR. DAVIDSON: Were you ever made  
11 aware of such policies?

12 MR. JOHNSON: Yes, sir.

13 MR. DAVIDSON: When were you first  
14 made aware of them?

15 MR. JOHNSON: It would be the latter  
16 part of 1979, around November.

17 MR. DAVIDSON: How is it that you were  
18 first made aware of these policies when you were  
19 first hired on, sir?

20 MR. JOHNSON: Concerning the QC  
21 programs and stuff, I was involved with non-Q  
22 buildings and temporary sites and things like that.  
23 And then whenever it came time for me to be moved  
24 down to hole, that's when I was indoctrinated on  
25 policies with QC.

1 MR. DAVIDSON: If I understand you  
2 correctly, Mr. Johnson, what you're saying is that  
3 your initial employment at the Peak did not involve  
4 what is known as Q-related equipment or jobs, and  
5 that the work you did was not subject to inspection  
6 by QC/QA personnel?

7 MR. JOHNSON: That's right.

8 MR. DAVIDSON: And therefore, you were  
9 not indoctrinated to craft QC personnel because it  
10 was not related to your job function?

11 MR. JOHNSON: That's correct.

12 MR. DAVIDSON: Now, subsequent to that  
13 time you were hired as a carpenter, you were  
14 transferred to areas that you would be employed in  
15 work on safety-related equipment, that was Q  
16 equipment, and that you would thereafter have to  
17 relate to QA/QC personnel?

18 MR. JOHNSON: I think I understand  
19 your question. Yes, that's it.

20 MR. DAVIDSON: And at the time that  
21 you were assigned to the power block in a Q area,  
22 that is the time that you were given indoctrination  
23 into the policies of Brown & Root with respect to  
24 the manner in which craft personnel were to relate  
25 to QC/QA personnel?



1 MR. JOHNSON: That's right.

2 MR. DAVIDSON: What indoctrination  
3 were you given?

4 MR. JOHNSON: Mr. Raymond Hebert was  
5 my general foreman at the time. He had a meeting  
6 with me and told me how the QC program worked and  
7 how we were supposed to deal with those people.

8 MR. DAVIDSON: What did he tell you  
9 specifically about the way in which you were to deal  
10 with QC/QA people?

11 MR. JOHNSON: That if we had a problem  
12 arise that could not be handled between myself and  
13 the QC inspector, that I was then to inform him of  
14 the problem and to handle my part of it with  
15 professionalism, not to get boisterous or no cursing,  
16 so forth like that, and that he would take it up  
17 with the QC lead inspectors.

18 MR. DAVIDSON: Did he tell you whether  
19 there was any policy regarding the harassment,  
20 intimidation or threatening of QC/QA personnel by  
21 craft?

22 MR. JOHNSON: Yes, sir.

23 MR. DAVIDSON: What did he tell you,  
24 sir?

25 MR. JOHNSON: He told me at the time

1       there would be no harassment of QC, because if it  
2       was, it would be subject to termination.

3               MR. DAVIDSON: At any time subsequent  
4       to your conversation with Mr. Hebert regarding these  
5       policies, were you reminded or told once again about  
6       the existence of these policies at Comanche Peak?

7               MR. JOHNSON: Yes.

8               MR. DAVIDSON: Could you relate to us  
9       what those times or occasions were when that policy  
10      was reemphasized to you?

11              MR. JOHNSON: I cannot relate no  
12      special time as far as work with Raymond was  
13      concerned, except that during the time installing  
14      anchor bolts, hilti bolts, things like that, that  
15      the procedures, qualitywise and QC-wise, would be  
16      some differences of opinion. And we would discuss  
17      what went on in the field, and again he would tell  
18      me make sure that you don't mistreat or harass the  
19      QC people.

20              MR. DAVIDSON: When you say "he," do  
21      you mean Mr. Hebert?

22              MR. JOHNSON: Right.

23              MR. DAVIDSON: Did any of your other  
24      supervisors remind you or reemphasize this policy?

25              MR. JOHNSON: Yes, sir.

1 MR. DAVIDSON: Who were they, sir?

2 MR. JOHNSON: James Calicutt, Hal  
3 Goodson, Hal Lawford, Doug Frankum.

4 MR. DAVIDSON: Subsequent to the time  
5 you began working for Mr. Hebert, at one time or  
6 another did they remind you of the policies  
7 regarding QC personnel?

8 MR. JOHNSON: Prior to working with  
9 Hebert?

10 MR. DAVIDSON: Subsequent.

11 MR. JOHNSON: Yes.

12 MR. DAVIDSON: Do you remember on  
13 which occasions these individuals reminded you or  
14 reemphasized the policies in effect regarding the  
15 policies of QA/QC personnel?

16 MR. JOHNSON: The only special times I  
17 remember would be the time I was called in to Mr.  
18 Frankum's office about the intimidation charge  
19 against Eddie Niedecken and Charles Reeves and Mike  
20 Hundly.

21 MR. DAVIDSON: So these were incidents  
22 in which allegations were made that you might have  
23 violated the policies of which you were aware, and  
24 Mr. Frankum was discussing those incidents with you  
25 and reminded you of the policies and asked you for

1 your response with respect to the claims that were  
2 made against you?

3 MR. JOHNSON: That's right.

4 MR. DAVIDSON: Did Mr. Calicutt ever  
5 reemphasize or reiterate to you any of the policies  
6 on how to deal with QA/QC personnel and how to  
7 resolve differences with them?

8 MR. JOHNSON: Yes.

9 MR. DAVIDSON: On what occasion did  
10 Mr. Calicutt do that?

11 MR. JOHNSON: Whenever we had  
12 superintendents' meeting up there, he would call us  
13 together and talk to us about job problems and so  
14 forth, and during the course of the conversation,  
15 we'd be reminded of how we was supposed to carry on  
16 our business.

17 MR. DAVIDSON: Mr. Johnson, did you  
18 ever communicate or make any effort to communicate  
19 these policies regarding the treatment of QA/QC  
20 personnel, as you understood them, to your  
21 subordinates and the craft people you supervised?

22 MR. JOHNSON: Yes, sir.

23 MR. DAVIDSON: What efforts, sir, did  
24 you make?

25 MR. JOHNSON: We would have meetings



1 in my office with the general foreman; sometimes  
2 general foremen and foremen. And then after that  
3 was done, to make a followup, talk to the people in  
4 the fields and see if they had the word.

5 MR. DAVIDSON: Mr. Liford, did you  
6 have any occasion to implement the policies about  
7 which you've testified here today?

8 MR. LIFORD: Yes.

9 MR. DAVIDSON: Did you have any  
10 occasion to implement or give effect to the policy  
11 you have described in which it is a termination  
12 offense to harass, intimidate or threaten a QC/QA  
13 person?

14 MR. LIFORD: Yes.

15 MR. DAVIDSON: Would you please  
16 describe those incidents or those occasions on which  
17 you gave implementation to that policy?

18 MR. LIFORD: From the time I come on  
19 site until now, I have had to terminate three  
20 employees for threatening QC inspectors.

21 MR. DAVIDSON: When you say three  
22 employees, you mean three craft employees?

23 MR. LIFORD: Yes.

24 MR. DAVIDSON: Who were under your  
25 supervision?

1 MR. LIFORD: Yes.

2 MR. DAVIDSON: Could you tell us about  
3 each of those incidents where you were required to  
4 terminate craft personnel for harassing,  
5 intimidating or otherwise threatening a QC inspector?

6 MR. LIFORD: As far as giving specific  
7 background on each one, no. The last one --

8 MR. DAVIDSON: First, how many such  
9 occasions were there, sir?

10 MR. LIFORD: Three. The last occasion  
11 was strictly a threat by construction hand against  
12 bodily harm of a Quality Control inspector. The  
13 other two were similar, but I can't remember the  
14 details of them.

15 MR. DAVIDSON: When you say you can't  
16 remember the details, are you saying that you cannot  
17 remember the names of the craft individuals whom you  
18 terminated for violation of the policies?

19 MR. LIFORD: I don't. No, I can't.

20 MR. DAVIDSON: Do you remember the  
21 name of the QC inspector or QC representative who  
22 was involved?

23 MR. LIFORD: No.

24 MR. DAVIDSON: Can you remember who  
25 the superintendent of the craft employee that you

1 told me about, was?

2 MR. LIFORD: Vaguely, yes. Two of  
3 them worked for Gary Cox who was the superintendent  
4 for me at the time.

5 MR. DAVIDSON: In what discipline, sir?

6 MR. LIFORD: In piping. The last one  
7 I believe was Gene Everson.

8 MR. DAVIDSON: Was he a superintendent  
9 also, sir?

10 MR. LIFORD: He was also a piping  
11 superintendent.

12 MR. DAVIDSON: When, if you recollect,  
13 did Mr. Everson come to you regarding the problem  
14 that you ultimately resolved by terminating a craft  
15 person?

16 MR. LIFORD: Mr. Everson did not have  
17 the opportunity to come to me first.

18 MR. DAVIDSON: In other words, you  
19 became aware of the incident not through Mr. Everson  
20 who reported to you, but through some other means?

21 MR. LIFORD: The superintendent over  
22 the Quality Control inspector came to me.

23 MR. DAVIDSON: Do you remember who  
24 that was, sir?

25 MR. LIFORD: I'm guessing, but I think

1 it was Bob Siever.

2 MR. DAVIDSON: And what did Mr. Siever  
3 tell you?

4 MR. LIFORD: He explained what had  
5 happened per his inspector's view of the situation.

6 MR. DAVIDSON: When you say "what had  
7 happened," do you remember what it was he told you?

8 MR. LIFORD: Yes. There was a  
9 disagreement over over the interpretation of a  
10 procedure. Construction hand got irate and  
11 threatened to whoop the QC inspector's ass.

12 MR. DAVIDSON: So from what Mr. Siever  
13 told you, had there been a violation of two policies;  
14 first, the way in which to resolve an agreement with  
15 QC person, which was to take it to a supervisor  
16 rather than to dispute it with the QC inspector, and  
17 the second one was that he lost his temper and made  
18 a threat?

19 MR. LIFORD: Yes.

20 MR. DAVIDSON: What did you do after  
21 Mr. Siever told you that this individual, whose name  
22 at this time you can't remember, had apparently  
23 violated these two policies?

24 MR. LIFORD: As a normal run of events  
25 on any instance concerning any disagreements, both



1 parties were called in, in this particular case, to  
2 my office with both myself and the Quality Control  
3 superintendent and the two individuals involved. We  
4 interviewed both of them separately, both of them  
5 together, dismissed both of them back to the field,  
6 then made a determination as to what had to happen,  
7 who was wrong and who was right.

8 MR. DAVIDSON: Did you consult with or  
9 have Mr. Everson present, who was the immediate  
10 superior of the craft person involved, as you now  
11 remember?

12 MR. LIFORD: Yes. I did consult with  
13 Mr. Everson on the situation.

14 MR. DAVIDSON: Was he present at any  
15 of these interviews that you had with the craft  
16 person involved and with the QC inspector?

17 MR. LIFORD: No, he was not.

18 MR. DAVIDSON: After you concluded the  
19 interviews that you and Mr. Siever held jointly with  
20 these individuals, is that when you consulted Mr.  
21 Everson?

22 MR. LIFORD: That is right.

23 MR. DAVIDSON: And what did you say to  
24 Mr. Everson?

25 MR. LIFORD: We went over the

1 interview with both parties with Mr. Everson and  
2 told him what my decision was as to the outcome.

3 MR. DAVIDSON: And what was your  
4 decision, Mr. Liford?

5 MR. LIFORD: To terminate my employee.

6 MR. DAVIDSON: The craft person?

7 MR. LIFORD: The craft person.

8 MR. DAVIDSON: Because he had violated  
9 the established policies?

10 MR. LIFORD: Yes.

11 MR. DAVIDSON: Did you communicate  
12 this to the craft person?

13 MR. LIFORD: Yes.

14 MR. DAVIDSON: How did you do that,  
15 sir?

16 MR. LIFORD: When the decision was  
17 made, I called the superintendent and the craft  
18 person into my office, told the craft individual  
19 what was going to happen and why it was going to  
20 happen.

21 MR. DAVIDSON: When you say why it was  
22 going to happen, what did you tell him?

23 MR. LIFORD: He was wrong. That was  
24 the main thing I wanted to convey to him, was the  
25 fact that he was wrong. I wanted him to understand

1       that he was wrong and why he was wrong.

2               MR. DAVIDSON: Well, why was he wrong,  
3       Mr. Liford, in your view?

4               MR. LIFORD: He violated the  
5       procedures, the policies, and he let his temper rule  
6       when he should not have.

7               MR. DAVIDSON: How long after the  
8       incident with the QC inspector occurred -- that is,  
9       after this craft person apparently made a threat to  
10      the QC inspector -- how long after that did the  
11      interviews that you had with him occur?

12              MR. LIFORD: That day.

13              MR. DAVIDSON: And how long after the  
14      interviews that you and Mr. Siever conducted with  
15      the craft and QC inspector involved did you make  
16      your determination to terminate that employee?

17              MR. LIFORD: Same day.

18              MR. DAVIDSON: And how long after you  
19      made that decision was that employee terminated?

20              MR. LIFORD: The same day.

21              MR. DAVIDSON: Now, Mr. Liford, going  
22      back to the other incident or incidents that you  
23      recall, that is the two employees that you recollect  
24      worked for Mr. Gary Cox, can you give us similar  
25      background information, as you have now, with

1       respect to how those matters were handled?

2               MR. LIFORD: I cannot give you any  
3 details because of the time span from when it  
4 happened to now.

5               MR. DAVIDSON: How long ago did the  
6 incidents with Cox's employees occur?

7               MR. LIFORD: Somewhere between three  
8 and five years.

9               MR. DAVIDSON: Somewhere between three  
10 and five years ago?

11              MR. LIFORD: Yes.

12              MR. DAVIDSON: What about the  
13 incidents involving Mr. Everson's employee; how long  
14 ago did that happen?

15              MR. LIFORD: Approximately two years.

16              MR. DAVIDSON: About two years ago.  
17 Other than these three incidents in which you gave  
18 implementation to the policy for dealing with QC/QA  
19 personnel, were you involved or aware of any other  
20 incidents where that policy was given implementation?  
21 And I mean specifically the policy against harassing,  
22 intimidating and threatening QA/QC personnel.

23              MR. LIFORD: Yes. The policy -- well,  
24 let me back up a step. During the course of events  
25 since I have been on site, we have had an ongoing



1 training program training craft personnel into their  
2 procedures and any revisions thereto. During almost  
3 all training sessions, this subject is brought up  
4 when it comes to the section in the procedure that  
5 is appropriate for this.

6 MR. DAVIDSON: When you you say "this  
7 subject," do you mean the policy that disagreements  
8 with QC/QA personnel are to be dealt with in a  
9 professional manner, and if they cannot be dealt  
10 with in the field, they should go up in the chain of  
11 command and the fact that there will be no  
12 toleration of harassment, intimidation and  
13 threatening of QA/QC personnel?

14 MR. LIFORD: Yes.

15 MR. DAVIDSON: I think, however, my  
16 question was directed at something else. What I was  
17 asking about, Mr. Liford, was, were you involved in  
18 or aware of any other incidents where the policy  
19 against harassing, intimidating and threatening  
20 QA/QC personnel was implemented by termination of  
21 the craft person accused of doing that or otherwise?

22 MR. LIFORD: The only other instance  
23 that I can think of right now is the one concerning  
24 Mr. Johnson and the allegation against him of  
25 harassing or trying to intimidate QC.

1 MR. DAVIDSON: All right. You were  
2 not involved in the resolution of that issue, were  
3 you?

4 MR. LIFORD: Yes.

5 MR. DAVIDSON: Yes, you were or you  
6 were not?

7 MR. LIFORD: Yes, I was.

8 MR. DAVIDSON: Well, after Mr. Johnson  
9 has had an opportunity to tell us about it, perhaps  
10 we can have you supply some additional detail.

11 With respect to the policy for the  
12 resolution of disagreements between craft and QA/QC  
13 personnel, were you involved in the implementation  
14 of that policy? In other words, did anyone at any  
15 time, any subordinate of yours, bring to your  
16 attention a disagreement between craft and QA/QC  
17 personnel that had proceeded up the chain of command  
18 and brought to you for resolution in accordance with  
19 that policy?

20 MR. LIFORD: Talking in terms of other  
21 than the three that I have discussed? Reask the  
22 question shorter.

23 MR. DAVIDSON: Well, Mr. Liford, what  
24 I'm getting at is, you told us how you gave  
25 implementation to the policy that prohibits the

1 harassment, intimidation and threatening of QC/QA  
2 personnel. When it was brought to your attention  
3 that some three individuals had engaged in that  
4 prohibited conduct, you made inquiry, you dealt with  
5 the matter and you terminated them.

6 MR. LIFORD: Yes.

7 MR. DAVIDSON: So therefore, you  
8 understood the policy; they understood the policy.  
9 You gave effect to the policy; you implemented the  
10 policy.

11 Now, you also told us in your testimony  
12 here today that in addition to the policy that  
13 prohibits harassment, intimidation and threatening  
14 of QA/QC personnel, there is also a policy or  
15 procedure for dealing with disagreements between  
16 craft and QA/QC personnel. You've told us that  
17 where craft cannot resolve a difference of opinion  
18 with QC or QA personnel in the field, that instead  
19 of arguing with QC/QA personnel, they are to take  
20 the matter up with their superior, their supervisor,  
21 who would attempt to resolve it, and this matter  
22 proceeds up the chain of command until resolved.

23 My question to you, sir, was, were you ever  
24 involved in any situation where such a problem was  
25 brought up the chain of command to you and you were

1 required to resolve the dispute and, therefore, you  
2 were giving implementation, you were giving effect,  
3 to the policy you spoke of?

4 MR. LIFORD: Yes.

5 MR. DAVIDSON: Would you please  
6 describe those incidents, as best you recollect them,  
7 in which you gave effect to the policy we've just  
8 discussed.

9 MR. LIFORD: On almost any major  
10 revision of a procedure, and effectively on minor  
11 revisions to procedures, there is an agreement on  
12 the interpretation of that procedure. When these  
13 disagreements on the interpretation of a procedure --  
14 or when my people run into those disagreements, they  
15 bring them to me.

16 MR. DAVIDSON: They always bring them  
17 to you? They don't resolve those differences  
18 themselves?

19 MR. LIFORD: In most cases where there  
20 is a disagreement over an interpretation and it cannot  
21 be solved or agreed upon by QC or the craft  
22 personnel, the combination of the two, it has to be  
23 brought up to the quality engineers, the Quality  
24 Control supervisors and the craft supervisors to sit  
25 down and discuss the words written into the



1 procedures so everybody can interpret the procedure  
2 the same way.

3 MR. DAVIDSON: And is it your  
4 experience, based on what you've just related, that  
5 most craft personnel understand the manner in which  
6 they are to deal with QC/QA and how they are to  
7 resolve differences or report differences to their  
8 superiors?

9 MR. LIFORD: Yes.

10 MR. DAVIDSON: Do your subordinates  
11 also give implementation to this policy?

12 MR. LIFORD: Yes, they do.

13 MR. DAVIDSON: Mr. Calicutt, you have  
14 testified here to the existence of two policies with  
15 regard to the relationship between craft and QC/QA  
16 personnel, the first being that harassment,  
17 intimidation or threatening of QC/QA personnel by  
18 craft will not be tolerated, that it is a  
19 termination offense; the second policy being that  
20 craft personnel are to behave professionally in  
21 dealing with QC/QA, and should they have a  
22 disagreement with QC/QA personnel, they are not to  
23 fight with personnel about it, but to take it up to  
24 their supervisors and it rises up the chain of  
25 command until it is properly resolved; is that

1 correct?

2 MR. CALICUTT: Yes.

3 MR. DAVIDSON: With regard to that  
4 first policy, the one involving the problem of  
5 harassment, intimidation and threatening, have you  
6 ever been involved in the implementation of that  
7 policy; that is, carrying it out and giving it  
8 effect?

9 MR. CALICUTT: That directly involved,  
10 no. But I knew of the three cases that it happened.

11 MR. DAVIDSON: When you say the three  
12 cases that had happened, to what do you refer, Mr.  
13 Calicutt?

14 MR. CALICUTT: The three cases Mr.  
15 Liford talked about.

16 MR. DAVIDSON: Did Mr. Liford report  
17 his action, with respect to the three individuals  
18 reported here, to you as a responsibility of your  
19 subordinate?

20 MR. CALICUTT: Yes, he did.

21 MR. DAVIDSON: Was he required to do  
22 so, or secure your approval for his action?

23 MR. CALICUTT: Not for approval.

24 MR. DAVIDSON: But he was  
25 appropriately required to inform you?

1 MR. CALICUTT: Correct.

2 MR. DAVIDSON: But he did not require  
3 your approval in order to terminate them?

4 MR. CALICUTT: No, he didn't.

5 MR. DAVIDSON: Did you express to him  
6 any opinion as to his action?

7 MR. CALICUTT: We talked about it, yes.

8 MR. DAVIDSON: Did you agree with Mr.  
9 Liford's action?

10 MR. CALICUTT: Yes, I did.

11 MR. DAVIDSON: Did you think he  
12 handled the matter properly?

13 MR. CALICUTT: Yes, I did.

14 MR. DAVIDSON: And in accordance with  
15 the procedures and policies at Comanche Peak?

16 MR. CALICUTT: That's correct.

17 MR. DAVIDSON: Other than these three  
18 incidents of which Mr. Liford made you aware, were  
19 you personally involved in the implementation of  
20 that policy?

21 MR. CALICUTT: Not to termination  
22 offense, no.

23 MR. DAVIDSON: Were you involved in  
24 any matters in which the allegation at hand was  
25 craft harassment or intimidation or threatening of

1 QA/QC personnel?

2 MR. CALICUTT: In Mr. Johnson's case.

3 MR. DAVIDSON: You mean in resolving  
4 certain allegations made against Mr. Johnson?

5 MR. CALICUTT: Yes.

6 MR. DAVIDSON: Other than that matter  
7 on which we may have received some of your testimony  
8 after Mr. Johnson has spoken, were you involved in  
9 any other such incidents?

10 MR. CALICUTT: There were two  
11 incidents that I can recall was brought to my  
12 attention. Me, George Tanley and Mr. Bob Siever --

13 MR. DAVIDSON: I'm sorry, sir. I  
14 don't think I heard you?

15 MR. CALICUTT: There were two  
16 incidents that I can recall was brought to my  
17 attention. Me, George Tanley and Bob Siever --

18 MR. DAVIDSON: Were involved in what,  
19 sir?

20 MR. CALICUTT: Where it was brought to  
21 my level.

22 MR. DAVIDSON: An incident involving  
23 alleged harassment, intimidation, or threatening by  
24 craft to QA/QC personnel?

25 MR. CALICUTT: Yes.



1 MR. DAVIDSON: Was this merely a  
2 disagreement between a craft person --

3 MR. CALICUTT: This was merely a  
4 disagreement.

5 MR. DAVIDSON: Let me then ask you  
6 questions about that. With respect to the second  
7 policy about which you've testified here today,  
8 namely the policy that governed the manner in which  
9 craft were to deal with disagreements with QA/QC  
10 personnel, namely not to attempt to resolve them  
11 themselves but to take them forward up the chain of  
12 commands, were you ever involved in the resolution  
13 of such a disagreement?

14 MR. CALICUTT: Yes.

15 MR. DAVIDSON: Would you please state  
16 the circumstances.

17 MR. CALICUTT: Mr. George Tanley came  
18 to me when we started installing snubbers and told  
19 me he was having problems with QC. I approached Mr.  
20 Bob Siever. We met in my office and got the problem  
21 resolved.

22 MR. DAVIDSON: Now, who was Mr. George  
23 Tanley at the time?

24 MR. CALICUTT: Boilermaker, millwright  
25 superintendent.

1 MR. DAVIDSON: And Bob Siever?

2 MR. CALICUTT: QC superintendent.

3 MR. DAVIDSON: And it's your testimony  
4 that there was a disagreement between the craft and  
5 QC personnel regarding the installation of certain  
6 snubbers?

7 MR. CALICUTT: Yes.

8 MR. DAVIDSON: And that craft had  
9 reported this to their foreman or superintendent,  
10 George Tanley?

11 MR. CALICUTT: Yes.

12 MR. DAVIDSON: And the matter was  
13 ultimately brought up to you for resolution?

14 MR. CALICUTT: Yes.

15 MR. DAVIDSON: And how did you go  
16 about resolving it?

17 MR. CALICUTT: Had Mr. Siever and  
18 Tanley in my office.

19 MR. DAVIDSON: Do you recall what  
20 exactly the disagreement was?

21 MR. CALICUTT: Torque and safety bar.

22 MR. DAVIDSON: Can you think of any  
23 other occasions in which the matter was brought to  
24 your attention which required resolution of the  
25 disagreement between craft and QC/QA personnel?

1 MR. CALICUTT: Yes. On a stainless  
2 suhp. Mr. Tanley brought me a welding problem. Mr.  
3 Lawrence, Mr. Tanley and me got that straightened  
4 out.

5 MR. DAVIDSON: Let me just backtrack a  
6 bit. When did the snubbers incident occur, if you  
7 recollect?

8 MR. CALICUTT: Approximately two years  
9 ago.

10 MR. DAVIDSON: What about the one  
11 involving stainless steel suhps?

12 MR. CALICUTT: Between two, two  
13 and-a-half years ago.

14 MR. DAVIDSON: All right. Now, Mr.  
15 Tanley again brought to your attention a problem  
16 where his craft employees were having a difference  
17 of opinion or disagreement with QC/QA regarding  
18 inspections of welds; is that your testimony?

19 MR. CALICUTT: Yes.

20 MR. DAVIDSON: Do you recollect what  
21 the problem was, or disagreement?

22 MR. CALICUTT: Visual inspection of  
23 the welds. He thought the QC person was being too  
24 tight.

25 MR. DAVIDSON: Now, there was no claim

1 of any harassment, intimidation or threatening by  
2 craft of QC personnel, was there?

3 MR. CALICUTT: No, there wasn't.

4 MR. DAVIDSON: And none vice-versa?

5 MR. CALICUTT: No.

6 MR. DAVIDSON: Just a matter of  
7 disagreement that the craft had brought up with  
8 their supervisor?

9 MR. CALICUTT: That's correct.

10 MR. DAVIDSON: And do you know whether  
11 Mr. Tanley took any action to resolve the matter  
12 himself?

13 MR. CALICUTT: Yes, I do.

14 MR. DAVIDSON: Do you know what he did?

15 MR. CALICUTT: He had met with some of  
16 the QC lead, probably Cappy himself, but they didn't  
17 reach an agreement.

18 MR. DAVIDSON: When you say "Cappy  
19 himself," do you refer to Cappy Lawrence?

20 MR. CALICUTT: Yes.

21 MR. DAVIDSON: Do you remember what  
22 his position was at the time of the occurrence?

23 MR. CALICUTT: No, not specifically I  
24 don't.

25 MR. DAVIDSON: What is your best



1 recollection of what position he held at the time in  
2 the QC organization?

3 MR. CALICUTT: He was a QC lead  
4 inspector, non-ASME inspector.

5 MR. DAVIDSON: That's non-ASME?

6 MR. CALICUTT: Yes.

7 MR. DAVIDSON: Subsequent to Mr.  
8 Tanley's effort to resolve the issue, he brought it  
9 to you; what did you do?

10 MR. CALICUTT: He sat down, went over  
11 the procedures, talked among ourselves.

12 MR. DAVIDSON: When you say you talked  
13 among yourselves, you mean you, George Tanley and  
14 Mr. Lawrence?

15 MR. CALICUTT: Right.

16 MR. DAVIDSON: Was anyone else  
17 involved?

18 MR. CALICUTT: Not right at the  
19 present, no.

20 MR. DAVIDSON: You mean not at that  
21 time?

22 MR. CALICUTT: No.

23 MR. DAVIDSON: After you had this  
24 discussion, did you reach a resolution?

25 MR. CALICUTT: Yes, we did.

1 MR. DAVIDSON: Was anyone else  
2 involved?

3 MR. CALICUTT: Mr. Tanley got back  
4 with the craft people and Mr. Lawrence got back with  
5 the QC personnel, and everything was solved.

6 MR. DAVIDSON: Thank you. Other than  
7 the incidents of the snubbers and the stainless  
8 steel suhps, were you involved in the implementation  
9 of the policy for the resolution of disagreements  
10 between craft and QA/QC personnel?

11 MR. CALICUTT: I'm sorry. I didn't  
12 understand you.

13 MR. DAVIDSON: I may not have phrased  
14 that correctly. Other than these two incidents that  
15 you just mentioned, were there any other occasions  
16 on which you were required to resolve the  
17 disagreement between craft personnel and QC/QA, thus  
18 giving implementation to the policy that we have  
19 been discussing here?

20 MR. CALICUTT: I'm sure there probably  
21 were, but I can't remember a specific instance.

22 MR. DAVIDSON: Mr. Johnson, were you  
23 ever involved in an incident concerning the policy  
24 that QC/QA personnel not be harassed, intimidated or  
25 threatened by craft?

1 MR. JOHNSON: Yes, sir.

2 MR. DAVIDSON: Could you describe that  
3 incident or incidents in which you were involved in  
4 the implementation or application of that policy?

5 MR. JOHNSON: The first one was with  
6 Charles Reeves and Mike Kennedy. They were Class 5  
7 non-ASME inspectors. It happened one time we was on  
8 night shift with a Task Force group to set up -- to  
9 finish the hangers in the Auxiliary Buildings  
10 Safeguards, whatever.

11 MR. DAVIDSON: About when was that,  
12 sir?

13 MR. JOHNSON: About two years ago,  
14 something like that.

15 MR. DAVIDSON: About July or August of  
16 1982?

17 MR. JOHNSON: Something like that.  
18 About two years ago.

19 And we were having problems selling hangers  
20 off on the night shift. I had talked with George  
21 Bunt who was over the day shift people and also  
22 trying to take care of the hanger people on days.  
23 Whenever I come in on night shift in afternoons,  
24 George would get with me and tell me what he needed  
25 done that afternoon and tell me what kind of

1 problems they had during the daytime, what was sold,  
2 what wasn't, so on and so forth.

3 When George would give me his turnover, he  
4 would tell me what we had to do on nights. We would  
5 go in the field, get lined up and we'd start to work.

6 MR. DAVIDSON: You were, at this time,  
7 a hanger superintendent?

8 MR. JOHNSON: Night shift hanger  
9 superintendent.

10 MR. DAVIDSON: And you would consult  
11 with Mr. Bunt, the Task Force leader, in the  
12 Auxiliary Safeguards Building regarding hangers and  
13 find out what work would be assigned to you and that  
14 would be necessary to be completed during the  
15 evening shift?

16 MR. JOHNSON: Right.

17 MR. DAVIDSON: Would you please  
18 continue.

19 MR. JOHNSON: Most of the time, two  
20 hours or so after we got to work and trying to sell  
21 off hangers, we would have the same problems come up  
22 with the two inspectors I just mentioned. They  
23 would not buy off what the day shift people bought  
24 off because of their interpretation of the  
25 procedures.



1           And whenever we would talk to them, there  
2           would be no resolving. We would go with Mr. C.C.  
3           Randall, which was their boss, when it first started  
4           happening, and he would resolve the problems most of  
5           the time. Then as the work continued, time went on,  
6           these problems continued to happen.

7           Mr. C.C. Randall was not on the job on this  
8           particular night, and I went to see if I could find  
9           him and ran up with his two inspectors, Kennedy and  
10          Reeves. And we talked a few minutes, and there was  
11          nothing that could be done, so I told them I had  
12          been asked to make a recommendation on paper that  
13          would possibly speed up production on night shift.  
14          So I told them what I was going to do, have to  
15          recommend that the QC personnel be moved days and  
16          that we would do the work on nights. And the day  
17          shift people would have -- excuse me -- the day  
18          shift Quality Control people would have ample  
19          supervision and engineering support to give them the  
20          answers that they needed to be able to buy or unsat  
21          the item.

22                 MR. DAVIDSON: When you say "buy or  
23                 unsat," you mean that your view was that the day  
24                 shift QC inspectors would be able to either accept  
25                 or reject the hangers with the support, advice and

1 help of their supervisors who were more readily  
2 available during the day, and also because they  
3 would have access to engineering, so that any NCR's  
4 or unsatisfactory IR's could be evaluated properly?

5 MR. JOHNSON: That's true.

6 MR. DAVIDSON: And who asked you to  
7 make the recommendation on how to improve the  
8 situation?

9 MR. JOHNSON: Ken Liford.

10 MR. DAVIDSON: Mr. Liford asked you to  
11 look into the matter as to why so few hangers were  
12 being bought off, and to make a recommendation to  
13 whom?

14 MR. JOHNSON: To make a recommendation  
15 to him.

16 MR. DAVIDSON: Was that recommendation  
17 designed to explain to Mr. Liford what the problem  
18 was?

19 MR. JOHNSON: We were always -- as  
20 supervisors and managers in this position, we were  
21 always looking for more efficient ways to do our job.  
22 And that being Mr. Liford's job, he was looking for  
23 answers to solve our problems on night shift.

24 MR. DAVIDSON: And did you prepare  
25 this recommendation?

1 MR. JOHNSON: No, sir. I never got to  
2 the point of doing that.

3 MR. DAVIDSON: Why did you not get to  
4 the point of making the recommendation?

5 MR. JOHNSON: Yes, I did make it  
6 verbally.

7 MR. DAVIDSON: You never wrote it up?

8 MR. JOHNSON: No.

9 MR. DAVIDSON: I think I interrupted  
10 you when you were saying you had a conversation with  
11 Mr. Mike Kennedy and Charles Reeves, the two QC's  
12 who worked with Mike Randall on the night shift in  
13 the Auxiliary Building. And what is it you were  
14 discussing with them?

15 MR. JOHNSON: I discussed what I had  
16 been asked to do as far as the recommendation was  
17 concerned, and I did not want to hit them on the  
18 blind side. I was going to make a recommendation  
19 that they be sent days.

20 MR. DAVIDSON: You were going to make  
21 a recommendation that Mr. Kennedy and Mr. Reeves be  
22 transferred from the night staff to the day staff?

23 MR. JOHNSON: Not by name. The QC  
24 personnel on nights, non-ASME side, because I think  
25 there was three at the time.



1 MR. DAVIDSON: So this wasn't directed  
2 to those individuals but, rather, you thought that  
3 the QC inspection should be done in the daytime?

4 MR. JOHNSON: That's true.

5 MR. DAVIDSON: But you had no  
6 intention of changing the personnel?

7 MR. JOHNSON: No.

8 MR. DAVIDSON: You just wanted them to  
9 do it during the daytime when they would have access  
10 to engineering and supervision so that there would  
11 be some consistency in their evaluation?

12 MR. JOHNSON: That's true. So then I  
13 left. The next afternoon I came in to work --

14 MR. DAVIDSON: I'm not through with  
15 this incident.

16 You told them about the recommendation; is  
17 that correct?

18 MR. JOHNSON: That's true.

19 MR. DAVIDSON: Did they say anything  
20 to you when you told them that?

21 MR. JOHNSON: To my recollection, no.

22 MR. DAVIDSON: They said nothing?

23 MR. JOHNSON: Not to my knowledge.

24 MR. DAVIDSON: You walked in the room,  
25 they said nothing. You discussed this with them and



1 they said nothing. Did they speak to you at all?

2 MR. JOHNSON: Yes, sir.

3 MR. DAVIDSON: What did they say?

4 MR. JOHNSON: As we first stated, that  
5 was two years ago. What I'm fixing to say here  
6 would not be per se exactly what they said.

7 MR. DAVIDSON: The best you remember.

8 MR. JOHNSON: The best I remember is  
9 we talked a bit, we discussed the fact of what I was  
10 saying. They wanted to know my reasoning for it. I  
11 told them at the time because we were spending too  
12 much time on hangers in the evening on night shift.  
13 I have people not doing anything two or three hours,  
14 half a day gone, and that I needed to be able to  
15 sell the hangers if they were correct. If they  
16 weren't, I needed them unsatted.

17 MR. DAVIDSON: Why was there so much  
18 dead time for your employees by virtue of the night  
19 inspections?

20 MR. JOHNSON: Because they would take  
21 time to go to the field to do the inspections.

22 MR. DAVIDSON: When you say "they," QC  
23 inspectors?

24 MR. JOHNSON: They would inspect the  
25 hangers. QC would unsat the hangers. Then I would

1 let my people come to me and show me the procedures  
2 that we had to work with in the construction  
3 procedures.

4 Then I would have to go get with them and  
5 talk with them about it and see what they had to say  
6 and try to figure out what was right and what was  
7 wrong. And by the time all this got done, you  
8 probably lost anywhere from two hours to half a day.  
9 And the time I'm doing this with them I got more  
10 inspections ready. So actually, usually lost five  
11 or six hangers.

12 MR. DAVIDSON: So it was your idea  
13 then to have Mr. Bunt, or whoever was the  
14 superintendent in the daytime, spend all this time  
15 resolving these problems so that you could just  
16 spend your time supervising your employees in  
17 producing hangers for inspection?

18 MR. JOHNSON: No, sir, that's not  
19 quite right.

20 MR. DAVIDSON: Why did you think that  
21 having the inspections then during the daytime would  
22 save you time in the evening?

23 MR. JOHNSON: Because the day shift  
24 people was buying off items that the night shift  
25 personnel would not buy.

1 MR. DAVIDSON: So you thought there  
2 was inconsistency in the way in which the procedures  
3 were being implemented?

4 MR. JOHNSON: That's true.

5 MR. DAVIDSON: And that you thought if  
6 the night inspectors were transferred to the day  
7 shift, that they would then become aware of what the  
8 proper standards were and, more likely than not,  
9 would start buying off more hangers?

10 MR. JOHNSON: That's true.

11 MR. DAVIDSON: Did you tell that to  
12 Mr. Kennedy and Mr. Reeves?

13 MR. JOHNSON: That's true.

14 MR. DAVIDSON: What did they say when  
15 you said that?

16 MR. JOHNSON: They didn't say anything.

17 MR. DAVIDSON: Did you get angry with  
18 them?

19 MR. JOHNSON: No, sir.

20 MR. DAVIDSON: Did they get angry with  
21 you?

22 MR. JOHNSON: Evidently, they did.

23 MR. DAVIDSON: I'm not asking for you  
24 to speculate. Did they raise their voices?

25 MR. JOHNSON: They did not raise their

1 voices.

2 MR. DAVIDSON: Was there any harsh  
3 words exchanged between you and them?

4 MR. JOHNSON: No, sir.

5 MR. DAVIDSON: After you had that  
6 conversation, you left?

7 MR. JOHNSON: That's true.

8 MR. DAVIDSON: What happened then?

9 MR. JOHNSON: We continued to finish  
10 off that night, come in the next afternoon. I went  
11 to see C.C. Randall in the early afternoon, and he  
12 was a little bit irritable or that way towards me in  
13 the afternoon, and we talked just a few minutes.  
14 And he asked me about why I was cussing him and why  
15 I had made the position against him I had made. I  
16 asked him what he was talking about.

17 MR. DAVIDSON: He said you had been  
18 cussing him?

19 MR. JOHNSON: From his QC people.

20 MR. DAVIDSON: Someone had told him  
21 you had cursed him out?

22 MR. JOHNSON: Yeah.

23 MR. DAVIDSON: What did you say when  
24 he accused you of making these statements?

25 MR. JOHNSON: I asked him how long I



1 had been working with him on nights. I said, "How  
2 many times have you heard me curse since I've been  
3 on nights?" He said, "Not any." I said, "That  
4 should tell you something about the story you're  
5 getting."

6 MR. DAVIDSON: What else had he been  
7 told, other than that you were supposed to have  
8 cursed?

9 MR. JOHNSON: That I had run down his  
10 credibility and his knowledge of his job.

11 MR. DAVIDSON: Was this true?

12 MR. JOHNSON: No, sir.

13 MR. DAVIDSON: Who had told Mr.  
14 Randall this, so far as you know?

15 MR. JOHNSON: So as far as I know, it  
16 would be the two QC personnel we talked about.

17 MR. DAVIDSON: But you don't know that  
18 for a fact?

19 MR. JOHNSON: I don't know.

20 MR. DAVIDSON: After you said to Mr.  
21 Randall, "Have you ever known me to use profanity?"  
22 and he said, "No, never," what then did you discuss?

23 MR. JOHNSON: He told me of the  
24 accusations made against me, not prior to this day  
25 by Mr. Charles Reeves and Mike Tanley.

1 MR. DAVIDSON: What accusations had  
2 been made against you?

3 MR. JOHNSON: That I had run down his  
4 knowledgeability of his job, his credibility, and  
5 that I wanted to try and get his people moved from  
6 nights to days. And he said he had a letter there,  
7 and I asked him could I see it. He gave it to me.  
8 I read the letter and discussed it with him.

9 MR. DAVIDSON: Who was the letter by?

10 MR. JOHNSON: The letter was by Mike  
11 Kennedy and Charles Reeves.

12 MR. DAVIDSON: So in other words,  
13 these two individuals with whom you had had the  
14 discussion the prior evening and prepared a letter  
15 or memorandum to Mr. Randall in which they accused  
16 you of having said some unkind things about Mr.  
17 Randall and also engaging in some kind of conduct  
18 that they thought was improper?

19 MR. JOHNSON: That's right.

20 MR. DAVIDSON: Is that correct?

21 MR. JOHNSON: That's correct.

22 MR. DAVIDSON: Did you read the letter?

23 MR. JOHNSON: I read the letter.

24 MR. DAVIDSON: And what, to your  
25 recollection, did it say?

1 MR. JOHNSON: The letter said that I  
2 had ran down his credibility and knowledge of his  
3 job, and that I had got upset with QC inspectors.

4 MR. DAVIDSON: So they accused you of  
5 losing your temper?

6 MR. JOHNSON: Yeah, they did.

7 MR. DAVIDSON: Were the fact in that  
8 letter or memorandum true?

9 MR. JOHNSON: No, sir.

10 MR. DAVIDSON: Did you tell Mr.  
11 Randall whether they were true or not?

12 MR. JOHNSON: I discussed each item  
13 that was discussed in the letter with Mr. Randall,  
14 the ones that was true and the ones that was not  
15 true.

16 MR. DAVIDSON: And was he satisfied  
17 with your explanation?

18 MR. JOHNSON: Whenever I left there,  
19 he and I was under the general understanding that it  
20 was basically blown out of proportion.

21 MR. DAVIDSON: And you had not  
22 intended to or in fact harassed, intimidated or  
23 threatened either of these two individuals, Mr.  
24 Kennedy or Mr. Reeves?

25 MR. JOHNSON: That was my

1 understanding.

2 MR. DAVIDSON: And was that Mr.  
3 Randall's understanding, as far as you knew?

4 MR. JOHNSON: As far as I knew.

5 MR. DAVIDSON: Is that the end of the  
6 incident?

7 MR. JOHNSON: No, sir.

8 MR. DAVIDSON: What happened after  
9 that?

10 MR. JOHNSON: I took a copy of the  
11 letter that Mr. Randall let me have, went into my  
12 office and wrote a reply or a statement concerning  
13 that letter and turned it in to my superiors.

14 MR. DAVIDSON: And to whom did you  
15 turn it in?

16 MR. JOHNSON: I gave the copy to Mr.  
17 Liford.

18 MR. DAVIDSON: Mr. Ken Liford? Did  
19 you give it to anyone else?

20 MR. JOHNSON: Mr. Frankum got a copy  
21 of the thing.

22 MR. DAVIDSON: So the only copy that  
23 you gave out or distributed was to Mr. Liford?

24 MR. JOHNSON: Yes, sir.

25 MR. DAVIDSON: And did you discuss



1 this letter or memorandum with Mr. Liford, and your  
2 response?

3 MR. JOHNSON: He had the opportunity  
4 to read it before I ever got back to the job. And  
5 then when I got back the next afternoon is when Mr.  
6 Frankum wanted to talk with me. And after the fact --  
7 after I talked with Frankum, I talked to Mr. Liford  
8 again, and he told me that's what I should have done.

9 MR. DAVIDSON: You were asked by Mr.  
10 Frankum to meet with him regarding this incident?

11 MR. JOHNSON: Yes.

12 MR. DAVIDSON: Was anyone else present  
13 at the meeting that you had with Mr. Frankum?

14 MR. JOHNSON: Mr. James Calicutt.

15 MR. DAVIDSON: Mr. Calicutt was  
16 present. And what did Mr. Frankum tell you?

17 MR. JOHNSON: Every word he said I do  
18 not remember. But we talked about job policies and  
19 how our work relationships with QC would be handled.

20 MR. DAVIDSON: Did you understand him  
21 to be reprimanding you?

22 MR. JOHNSON: I understood him, in  
23 areas that I may have been vague in, to have been  
24 reprimanding. The other areas that I had done like  
25 I was supposed to have done.

1 MR. DAVIDSON: When you say, "In the  
2 areas I was vague in, I was reprimanded and the  
3 other areas I was not," what do you mean? What did  
4 you mean?

5 MR. JOHNSON: That maybe I should not  
6 have went as far as I did, discussing with two QC  
7 persons what my recommendation was going to be until  
8 I first talked to their leaders.

9 MR. DAVIDSON: Their supervisors?

10 MR. JOHNSON: Yes.

11 MR. DAVIDSON: Was that the end of the  
12 incident, sir?

13 MR. JOHNSON: That was it.

14 MR. DAVIDSON: Were there any other  
15 incidents in which you were involved concerning the  
16 policy against harassing, intimidating or  
17 threatening QA/QC personnel?

18 MR. JOHNSON: Ed Niedecken.

19 MR. DAVIDSON: Could you tell us the  
20 circumstances and facts regarding that incident?

21 MR. JOHNSON: The circumstances. I  
22 was over the Paint Department in Reactor Number 1,  
23 trying to get it painted out. We had a foreman  
24 named Danny Ackery in one area in putting in  
25 applications with the inspector by the name of Ed

1     Niedecken working with him. Next to Danny Ackery  
2     was a foreman named Benny -- that was wrong. Name  
3     of Henry, and I don't know what his last name was.  
4     And he had approximately 20 hangers that were ready  
5     for prime coat application to be put on.

6             And we did not have a QC inspector to  
7     inspect the hangers to say if we could or couldn't  
8     put it on them. I spoke with Ed Niedecken about it.  
9     He said he was busy putting a finished coat  
10    application on those. So I went up to the QC to see  
11    if I could find QC lead. They were not in the  
12    trailer office. Coming out of the office, Ed  
13    Niedecken was up there, and I asked him at the time  
14    what was he doing, and he told me nothing.

15            And I asked him again about being able to  
16    do the inspections for the primeable coat  
17    application inspection. He said he was not going to  
18    do the primeable coat application inspection. I  
19    left him and went to try to find a QC lead. I come  
20    back around to where Danny was at, and Eddie was  
21    back down there again.

22            So I discussed with Danny Ackery how many  
23    people he had busy and he told me he had them all  
24    busy painting except for one, maybe two finish coat  
25    painters. So then I asked Eddie again was there any

1 way he could possibly inspect those hangers over  
2 there, because I could put those painters doing  
3 something else and I needed those other things  
4 painted.

5 And about that time Jim Ewely, which was  
6 his supervisor, came up, heard the conversation and  
7 Jimmy told him that's what we would do. And Eddie  
8 got hot, shrunk off, used a few cuss words, said  
9 he would not do today what he had been doing. And  
10 Bob Morey saw all this going on and he asked Eddie  
11 Niedecken could we have a word with him, and they  
12 had a word or two on whatever.

13 And the next morning is when I found out  
14 that I had been written up, along with Bob Morey,  
15 for intimidation of QC personnel.

16 MR. DAVIDSON: Did you know why Mr.  
17 Niedecken had written you up?

18 MR. JOHNSON: I did not know why at  
19 the time, and I still do not know the real reason,  
20 other than they were trying to say that I was trying  
21 to tell QC where to go.

22 MR. DAVIDSON: And what work to do?

23 MR. JOHNSON: Yes, sir.

24 MR. DAVIDSON: Well, how did you find  
25 out that you had been written up by Mr. Niedecken?



1 MR. JOHNSON: Bob Morey told me about  
2 it the next morning.

3 MR. DAVIDSON: And did anything occur  
4 after that, after you were written up or told that?

5 MR. JOHNSON: Yes, sir.

6 MR. DAVIDSON: What happened?

7 MR. JOHNSON: Mr. Boyce Grier called  
8 me to his office and he wanted to know what had  
9 happened.

10 MR. DAVIDSON: Who is Mr. Boyce Grier?

11 MR. JOHNSON: I don't know who he is  
12 or what his title is. All I know is that I was told  
13 he investigates all allegations to which craft and  
14 QC have problems.

15 MR. DAVIDSON: And did you speak with  
16 Mr. Grier?

17 MR. JOHNSON: Yes.

18 MR. DAVIDSON: And did he tell you  
19 anything about the incident?

20 MR. JOHNSON: He asked me about the  
21 incident.

22 MR. DAVIDSON: And you've told him as  
23 much as you've told us here about what had occurred?

24 MR. JOHNSON: Yes.

25 MR. DAVIDSON: Did he say anything

1 after that?

2 MR. JOHNSON: No, sir.

3 MR. DAVIDSON: Did anything happen  
4 after your interview with Mr. Boyce Grier?

5 MR. JOHNSON: Mr. Doug Frankum called  
6 me.

7 MR. DAVIDSON: Mr. Frankum?

8 MR. JOHNSON: Yes.

9 MR. DAVIDSON: And what did Mr.  
10 Frankum want from you?

11 MR. JOHNSON: Mr. Frankum wanted to go  
12 over it one more time on our policies as far as QC  
13 is concerned, that we do not tell QC where to go,  
14 what to inspect, and that we must or should get  
15 ahold of the QC lead to tell him what we needed done.  
16 And by that time I told him my side of the story,  
17 that the only reason I didn't go to QC lead is  
18 because we were all out in other schools that were  
19 being trained.

20 We only had one QC lead that day for that  
21 period of time, and he was doing something else in  
22 the building; I couldn't find him. And I told him  
23 from then on, I would be sure to get ahold of the QC  
24 leads.

25 MR. DAVIDSON: Anything else happen

1 after that?

2 MR. JOHNSON: No, sir.

3 MR. DAVIDSON: Do you recollect when  
4 you had that conversation with Mr. Frankum?

5 MR. JOHNSON: Approximately four or  
6 five months ago.

7 MR. DAVIDSON: So in March or April of  
8 1984?

9 MR. JOHNSON: Yes.

10 MR. DAVIDSON: Other than these two  
11 incidents that you've just mentioned in which you  
12 were involved as the subject of an accusation of  
13 harassment, intimidation or threatening, were you  
14 involved as a supervisor in dealing with any  
15 incident involving the craft personnel that you  
16 supervised?

17 MR. JOHNSON: No, sir.

18 MR. DAVIDSON: Turning to the other  
19 policy that has been discussed here today, namely  
20 the policy on how to handle disagreements between  
21 craft and QA/QC personnel, were you ever involved in  
22 resolving a disagreement or dispute between craft  
23 and QC personnel with respect to procedures?

24 MR. JOHNSON: Yes, sir.

25 MR. DAVIDSON: The matter had been

1 brought up to your attention by a subordinate?

2 MR. JOHNSON: Yes, sir.

3 MR. DAVIDSON: Could you describe that  
4 incident?

5 MR. JOHNSON: One of them card keys  
6 was brought to my attention, I think, by Cleef Buck,  
7 which was hanger general foreman. And what the  
8 problem was, QC had made accusation that we were  
9 using smaller card keys in the pins than we should  
10 be using. And we tried to tell them the only ones  
11 we was using was the keys that come with the pins.  
12 So they were still insisting that those keys were  
13 too small.

14 So at that time I discussed the matter with  
15 the QC lead and also went to Pat Clark, and the  
16 procedures was to change to allow any key to be used  
17 as long as the heads would not go through the hole,  
18 as long as it was satisfactory.

19 MR. DAVIDSON: Do you know or  
20 recollect what Pat Clark's position was at the time  
21 of this incident?

22 MR. JOHNSON: My understanding is  
23 project engineer.

24 MR. DAVIDSON: Can you think of any  
25 other occasion when you were involved in the



1 resolution of a disagreement between QA/QC personnel  
2 and craft?

3 MR. JOHNSON: One was with pipe  
4 clearances in the R-tunnel on which side they would  
5 be on. They had to have a clearance of a sixteenth  
6 of an inch, and the drawing would call for just  
7 exactly one side and the pipe would be moved from  
8 one side to the other, and you could never get it  
9 exactly like it was supposed to be there. So we  
10 went to QC leads and back through Pat Clark and  
11 engineers and resolved that problem.

12 MR. DAVIDSON: Are there any other  
13 incidents or occasions that you can recollect now  
14 regarding you being involved in the implementation  
15 of the policy for resolving disagreements between  
16 QC/QA personnel and craft?

17 MR. JOHNSON: Not specific stuff, no,  
18 sir.

19 MR. DAVIDSON: Nothing right now?

20 MR. JOHNSON: No, sir.

21 MR. DAVIDSON: Mr. Liford, earlier in  
22 the testimony here today, it was mentioned that you  
23 had some involvement in one of the incidents in  
24 which Mr. Johnson was accused of harassment,  
25 intimidation or threatening of QC personnel; is that

1 correct?

2 MR. LIFORD: That's right.

3 MR. DAVIDSON: I believe, in fact, you  
4 mentioned that you had some involvement in one of  
5 those incidents.

6 Could you tell us what incident it was that  
7 you were referring to and what involvement you had?

8 MR. LIFORD: On the night shift  
9 turnover sheet that I got from Mr. Johnson, part of  
10 that night shift turnover to me on day shift was a  
11 copy of the allegations by QC and a copy of the  
12 letter that Mr. Johnson sent me explaining the  
13 allegations.

14 Early the next morning I picked this up,  
15 read it, went to Doug Frankum's office to make sure  
16 he was aware that we had an allegation coming down.  
17 When I got to Mr. Frankum's office, Ron Tolson was  
18 already in his office with a copy of the letter from  
19 the Quality Control inspector. We sat, went over  
20 both the QC's allegation letter and Mr. Johnson's  
21 answer to those allegations. And when I left the  
22 office, Ron Tolson, who was QA manager, and Doug  
23 Frankum, project manager, were pretty well in  
24 agreement.

25 What they had was a misunderstanding more

1       than a harassment and intimidation threatening type  
2       situation.

3                   MR. DAVIDSON:   Mr. Liford, other than  
4       Mr. Tolson and Mr. Frankum, was anyone else at that  
5       meeting in which this incident was discussed with  
6       you?

7                   MR. LIFORD:   No.

8                   MR. DAVIDSON:   After that meeting had  
9       concluded, at which the three of you had agreed that  
10      what was at issue was a misunderstanding rather than  
11      an incident in which there had been harassment,  
12      intimidation and threatening of a QA/QC person, what  
13      happened?

14                  MR. LIFORD:   When I left, it was  
15      agreed that Mr. Tolson was going to call in the QC  
16      lead and the two QC inspectors that were involved  
17      with the letter, and he was going to talk to them.  
18      Mr. Frankum was going to call in Mr. Johnson and  
19      discuss the matter with him, and both parties would  
20      get together the following day. And if they had  
21      anything come out of the meetings other than what we  
22      had already discussed, then they would proceed  
23      further. Otherwise, end of subject.

24                  MR. DAVIDSON:   Were you involved or  
25      did you participate in any further meetings or

1 discussions of this subject?

2 MR. LIFORD: Only to the point of Mr.  
3 Frankum discussing with me later his discussion with  
4 Johnson and primarily what come out of his  
5 discussion.

6 MR. DAVIDSON: Could you relate to us  
7 that conversation that you had with Mr. Frankum?

8 MR. LIFORD: The end result was that,  
9 due to the earlier discussions between Johnson and  
10 the two QC inspectors concerning problems of getting  
11 inspections and the results of inspections, when Mr.  
12 Johnson went into the next subject, which was the  
13 request for an evaluation and recommendation of the  
14 problems on night shift and what to do about them,  
15 they interpreted the switch from one subject to  
16 another as a threat against them personally more so  
17 than a solution to a problem. That's what the  
18 misunderstanding was.

19 MR. DAVIDSON: And Mr. Frankum  
20 explained this to you?

21 MR. LIFORD: That was in the  
22 conversation, yes.

23 MR. DAVIDSON: After you had the  
24 conversation, was anything further done or said  
25 about the incident?



1 MR. LIFORD: Not to my knowledge.

2 MR. DAVIDSON: Mr. Liford, were you  
3 involved in the second incident that Mr. Johnson  
4 made mention of here today?

5 MR. LIFORD: Very slightly. I was  
6 aware of the incident. I was aware of some  
7 conversations on the subject. Mr. Johnson did not  
8 work for me directly at the time, and I chose to  
9 stand back and let people that were involved with it  
10 take care of that problem, and stay out of it.

11 MR. DAVIDSON: Mr. Calicutt, you heard  
12 Mr. Johnson testify about an incident involving an  
13 allegation of harassment, intimidation and  
14 threatening lodged by two Quality Control persons.  
15 Were you involved or in any way made aware of that  
16 incident?

17 MR. CALICUTT: I was made aware of it  
18 by Mr. Liford, and I was present when Mr. Frankum  
19 talked to Mr. Johnson.

20 MR. DAVIDSON: Do you recollect what  
21 Mr. Frankum said to Mr. Johnson?

22 MR. CALICUTT: Basically the same  
23 thing Mr. Liford just testified to.

24 MR. DAVIDSON: What is your  
25 recollection of what Mr. Frankum said, since you

1 were present at the meeting and Mr. Liford has  
2 testified he was not?

3 MR. CALICUTT: I don't think I could  
4 add anything to that.

5 MR. DAVIDSON: Do you have any  
6 recollection of what took place at the meeting?

7 MR. CALICUTT: Just said that we would  
8 do our business with the QC leads.

9 MR. DAVIDSON: Did you have any  
10 involvement or were you aware of the second incident  
11 that Mr. Johnson mentioned, the one involving Mr.  
12 Eddie Niedecken?

13 MR. CALICUTT: I was aware that it  
14 happened. I didn't have any involvement in it.

15 MR. DAVIDSON: That concludes my  
16 direct examination of this panel.

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## CORRECTIONS AND SIGNATURE

PAGE/LINE	CORRECTION	REASON FOR CHANGE
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I, KENNETH LIFORD, have read the foregoing deposition, and hereby affix my signature that same is true and correct, except as noted herein.

KENNETH LIFORD

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

NOTARY PUBLIC for the  
State of Texas

My Commission Expires: \_\_\_\_\_

## CORRECTIONS AND SIGNATURE

PAGE/LINE      CORRECTION      REASON FOR CHANGE

I, JOHN R. JOHNSON, have read the foregoing deposition, and hereby affix my signature that same is true and correct, except as noted herein.

\_\_\_\_\_  
JOHN R. JOHNSON

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

\_\_\_\_\_  
NOTARY PUBLIC for the  
State of Texas

My Commission Expires: \_\_\_\_\_



## CORRECTIONS AND SIGNATURE

PAGE/LINE	CORRECTION	REASON FOR CHANGE
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I, JAMES W. CALICUTT, have read the foregoing deposition, and hereby affix my signature that same is true and correct, except as noted herein.

JAMES W. CALICUTT

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       )

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3           I, Janet E. Schaffer, RPR, Certified Shorthand  
4       Reporter in and for the State of Texas, do hereby  
5       certify that there came before me on the 19th day of  
6       August, A. D., 1984, at the Glen Rose Motor Inn,  
7       Glen Rose, Texas, the following named persons, to-wit:  
8       Kenneth Liford, John R. Johnson and James W.  
9       Calicutt, who were by me duly sworn to testify the  
10      truth and nothing but the truth of their knowledge  
11      touching and concerning the matters in controversy  
12      in this cause; and that they were thereupon examined  
13      upon their oaths and their examination reduced to  
14      writing; same to be sworn and subscribed to by said  
15      witnesses before any notary public.

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

24  
25           In witness whereof, I have hereunto set my hand

1 and affixed my seal this \_\_\_\_\_ day of August , A.D.,  
2 1984.

3  
4 JANET E. SCHAPFER, 1543, 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