

1 that my testimony will be on a crankshaft, bearing, a skirt,
2 fabrication, testing analysis. I haven't been given any
3 details that I can tell you at this time.

4 Q So today you don't know what you are going to do?

5 A Other than provide testimony on the area of the
6 diesel engine. I'm gathering data by reading Failure Analysis
7 reports, gathering data by examination of the fabrication
8 procedures. I presume I will testify in those areas.

9 Q What do you propose to do, just keep doing this for-
10 ever?

11 A No, I don't believe the attorneys involved will allow
12 me to do that. They will ask me to write something at some
13 point.

14 Q But they haven't done that?

15 A I have no request at this time to document.

16 Q And so you have no schedule --

17 A At the present time, it was asked and answered, I am
18 not under a schedule or request.

19 Q Do you know anything about the difference between
20 the stress levels in the old and new crankshafts?

21 A No.

22 Q Do you know the range of that stress, maximum range?

23 A No.

24 Q Between the old and the new?

25 A No.

26 Q Do you know whether or not the fatigue life of the
27 new crankshafts is better or worse than the old?

28 A Indirectly, if it has been surface treated as we

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in the matter of K-1600
NUCLEAR REGULATORY COMMISSION
Official Exp. No. # 42

Applicant ☒ *AMS*
Intervenor ☒
Staff ☒
Director ☒
Chair ☒
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☒ REJECTED

1 have talked about and was recommended by Failure Analysis,
2 then that should certainly improve fatigue resistance.

3 However, I said indirectly because I don't know
4 what the process is. I can't evaluate how it was done and
5 how it was characterized and how it was controlled. So I
6 can't tell you if it is going to do the job it is supposed
7 to do or not do the job.

8 Q Do you know whether or not Failure Analysis followed
9 the same procedures in forming the opinion that the old
10 crankshafts were of inadequate design in determining that
11 the new crankshafts were of adequate design?

12 A My belief is they did.

13 Q That is your belief?

14 A I would review the material but my belief at this
15 point is that they did.

16 Q The only thing you can review is the reports that
17 have been furnished to you by Failure Analysis. Is that
18 right?

19 A That is right. And in order to confirm my belief,
20 I would want to read those reports again. But I believe
21 that they were the same methodology.

22 Q Do you know whether or not the new crankshafts have
23 larger crank pins than the old ones?

24 A I also believe that is affirmative, that they do have.

25 Q Have you asked anybody to go to Shoreham and see these
26 new crankshafts?

27 A Yes, I asked that we go to Shoreham and see.

28 Q You asked Mr. Dynner to make those arrangements?