

ORIGINAL
UNITED STATES
NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF:

DOCKET NO:

TEXAS UTILITIES GENERATING COMPANY,
et al.

50-445-OL2
50-446-OL2

(Comanche Peak Steam Electric
Station, Units 1 and 2)

DEPOSITION OF CECIL MANNING

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DEPOSITION OF CECIL MANNING

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P R O C E E D I N G S

1
2 JUDGE BLOCH: Good morning. It is the Court's
3 pleasure to be able at last to meet Mr. Cecil Manning on
4 the record after many trips on the site. I would like to
5 warn you about your obligations --

6 MR. WATKINS: Mr. Chairman, Mr. Manning has
7 testified in this proceeding and has been sworn.

8 JUDGE BLOCH: Would you remind me when?

9 MR. WATKINS: July 19, at Glenrose.

10 JUDGE BLOCH: You remain under oath as a result
11 of that.

12 Whereupon,

13 CECIL MANNING

14 resumed the stand, having been previously duly sworn, was
15 examined and testified further as follows:

16 EXAMINATION

17 BY MR. WATKINS:

18 Q Mr. Manning, you have before you six pages of
19 questions and answers titled "Prefiled Testimony of Cecil
20 Manning"?

21 A Yes, I do.

22 Q Did you prepare the question and answers --

23 JUDGE BLOCH: I take it you mean you prepared
24 the answers? You prepared the answers?

25 THE WITNESS: Yes, sir.

1 BY MR. WATKINS:

2 Q Do you have any changes or corrections owe to
3 make in your testimony?

4 A Yes, sir, on page 2, question and answer 10.
5 There is a sentence that says "I took him to Mr. Tolson's
6 office but he was out. I then took him to Mr. Brandt's
7 office but he was also out."

8 Q And that -- in that answer, who does "him" refer
9 to?

10 A Corry Allen.

11 Q What is your correction?

12 A I believe I had left Mr. Allen in my office when
13 I went to see if Mr. Brandt was in his office. After
14 thinking about it, I believe I left him at my office.

15 Q When did you realize that you wanted to make
16 this correction?

17 A It was just last week -- or week before last.

18 Q With that correction, is your testimony true and
19 complete to the best of your knowledge and belief?

20 A Yes, sir. Yes, sir, it is.

21 JUDGE BLOCH: Was there something special that
22 triggered that or just thinking about the testimony?

23 THE WITNESS: I was just thinking about it. I
24 couldn't remember why I would have taken him with me, just
25 to see if Brandt was in his office.

1 MR. WATKINS: Mr. Chairman, we move that
2 Mr. Manning's prefiled rebuttal testimony be admitted into
3 evidence and bound into the transcript.

4 JUDGE BLOCH: It is admitted and may be bound.

5 (The document follows:)

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:)	
)	
TEXAS UTILITIES ELECTRIC)	Dockets Nos. 50-445-2 and
COMPANY, <u>et al.</u>)	50-446-2
)	
(Comanche Peak Steam Electric)	(Application for
Station, Units 1 and 2))	Operating Licenses)

PREFILED REBUTTAL TESTIMONY
OF CECIL MANNING

- Q1. Please state your full name for the record.
- A1. Cecil Manning
- Q2. By whom and where are you employed?
- A2. Texas Utilities, Comanche Peak Steam Electric Station.
- Q3. Mr. Manning, have you testified before in this proceeding?
- A3. Yes.
- Q4. What is your position at Comanche Peak?
- A4. Training Quality Engineer and Procurement Quality Engineer.
- Q5. How long have you been employed in that capacity?
- A5. I have been Training Quality Engineer since October 1982,
and Procurement Quality Engineer since May 1982.
- Q6. In your capacity of Training Quality Engineer, did you
become acquainted with Cory Allen?
- A6. Yes.

Q7. Please describe the circumstances under which you met Mr. Allen.

A7. As Training Quality Engineer, I give the QA/QC orientation training to new hires in the QA/QC area. Mr. Allen attended one of these orientation sessions in early 1983. I met Mr. Allen at that time.

Q8. After the training session, did you have any further contact with Mr. Allen?

A8. Yes.

Q9. What led to your next contact with Mr. Allen?

A9. As part of the orientation, I instruct the trainees that they should feel free to come to me with any questions that they have about the QC program. Shortly after the session that Mr. Allen attended, he came to me with a question concerning the review process for Design Change Authorizations. He also asked me for a copy of Appendix B.

Q10. What did you say in response to Mr. Allen's inquiries?

A10. I couldn't fully answer his question about the review process. In an effort to get a complete answer to his question, I took him to Mr. Tolson's office, but he was out. I then took him to Mr. Brandt's office, but he was out also. I then told Mr. Allen that I would get someone who could answer his question and get back to him. I also made a copy of Appendix B and gave it to Mr. Allen.

Q11. Did you take any further action in response to Mr. Allen's inquiries?

A11. Yes.

Q12. What further action did you take?

A12. After lunch, I again went to Mr. Tolson's office. Mr. Tolson had returned and I explained Mr. Allen's question to him. Mr. Tolson told me to call Mr. Allen and ask him to come to the office to discuss the matter. I then went back to my office, called Mr. Allen and gave him the message. Mr. Allen then came to my office and I took him to Mr. Tolson's office, and introduced Mr. Allen to Mr. Tolson.

Q13. Did you remain in the office during the meeting?

A13. Yes.

Q14. What was the substance of the discussion after you introduced Mr. Allen to Mr. Tolson?

A14. Mr. Allen explained that he was concerned that site DCAs were not being reviewed properly. Mr. Tolson then explained the engineering review process for DCAs. As I recall, Mr. Tolson said that DCAs were initiated by the site engineering group for the discipline involved. Mr. Tolson said that, after DCAs are initiated, they were reviewed and approved by site engineering management, and, finally, that the DCAs were sent to Gibbs & Hill in New York for their review and approval. In short, Mr. Tolson tried to provide Mr. Allen with a full explanation of how DCAs were initiated and approved. Mr. Allen and Mr. Tolson then discussed the

review process by referring to a particular DCA, and the meeting ended. During the meeting, there was also some general discussion about the project, and that sort of thing.

Q15. In his testimony, Mr. Allen stated, "He [Tolson] essentially wanted to know why I was asking the Brown & Root quality instructor questions about DCAs." Did Mr. Tolson ask Mr. Allen this question?

A15. No.

Q16. In his testimony, Mr. Allen stated that, during the meeting we have been discussing, Mr. Tolson told him, "I [Allen] was expected to be out in my work area and to remain out there until the day was more or less finished, and that I wasn't expected to be asking questions or out of my work area, and that I was not to be involved in any engineering activities [such] as asking these questions." Did Mr. Tolson make this statement?

A16. No, he did not.

Q17. Did Mr. Tolson say anything about what he expected Mr. Allen to do?

A17. Yes. I believe there was a general discussion about the job site and I specifically remember Mr. Tolson saying that he wanted Mr. Allen to concentrate his efforts in the inspection area.

Q18. In his testimony, Mr. Allen stated that "he [Tolson] asked me [Allen] why I was trying to get a copy of Appendix B."

Did Mr. Tolson ask Mr. Allen this question?

A18. No, he did not. To the best of my knowledge, Mr. Tolson didn't even know that Mr. Allen had requested a copy of Appendix B.

Q19. Mr. Manning, what was the atmosphere of the meeting we have been discussing?

A19. It was friendly, but businesslike.

Q20. In his testimony, Mr. Allen stated that, during the meeting,

He [Tolson] seemed to be very defensive -- well, he seemed to be very irritated at the questions. He was very defensive about it.

My impression was that he [Tolson] was trying to explain or indicate to me that I was in an area that was none of my business or concern and I should stay out of it and I should only do the work, inspection work that deals directly with coatings inspection.

Did Mr. Tolson seem to you to be defensive during the meeting?

A20. No. To the contrary, he was relaxed and very open with Mr. Allen.

Q21. In your judgment, did Mr. Tolson intimate that the question Mr. Allen had raised was none of Mr. Allen's business?

A21. No, he did not.

A22. Mr. Manning, what reaction to the meeting did Mr. Allen have at the time?

A22. He seemed to be satisfied with the explanation Mr. Tolson provided him.

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Q23. Apart from the matters you have described, did Mr. Allen ever raise any other job-related questions with you while he was employed at Comanche Peak?

A23. No, sir, he did not.

1 MR. WATKINS: One question, question of counsel.
2 On page 5, line 19, there is a single quotation mark after
3 the question mark in that quotation, that should be
4 deleted.

5 JUDGE BLOCH: That clarifies that greatly.

6 MR. WATKINS: The witness is available for
7 cross-examination.

8 JUDGE BLOCH: Mr. Roisman?

9 EXAMINATION

10 BY MR. ROISMAN:

11 Q Mr. Manning, would you describe the process you
12 went through in preparing this testimony, please?

13 A In preparing this? Yes, sir.

14 In, I guess it was October I was with Mr. Bruce Downey
15 at Comanche Peak, and we went over it at that point. He
16 asked about the meeting. I told him about it to the best
17 of my knowledge and recollection. The meeting -- this
18 testimony was prepared at that time.

19 Q Were the words that appear here as the answers
20 to those questions, were they originally written down by
21 you or by somebody else?

22 A The questions were asked by Mr. Downey, I
23 believe.

24 Q The answers, I'm talking about?

25 A The answers were my own answers.

1 Q And --

2 A As written by Mr. Downey.

3 Q I see. Did you -- were you at the testimony
4 that Mr. Allen gave? Were you present in the hearing room?

5 A No, sir, I was not.

6 Q Did you ever read the testimony that Mr. Allen
7 gave?

8 A Not until about two weeks ago, had I ever seen
9 it.

10 Q Did Mr. Downey describe it to you, when you were
11 asked by him to give this testimony?

12 A No, sir, he did not.

13 Q Other than the portions that are identified in
14 the questions, I assume?

15 A That's it. Just that.

16 Q Did you have any conversations about Mr. Allen's
17 testimony with Mr. Tolson?

18 A After this meeting? No, sir. I never talked to
19 Mr. Tolson about it again after that.

20 Q Was he present at the meeting when you had the
21 discussion about the meeting with Mr. Downey?

22 A No, sir, he was not.

23 Q Did you discuss it with him before you had the
24 meeting with Mr. Downey?

25 A No, sir.

1 Q So, other than the time that you were actually
2 at the meeting, you never discussed it with Mr. Tolson?

3 A No, sir.

4 Q I would like you to look at page 2 of your
5 testimony, please; in the answer 10.

6 You indicate that in an effort to get a complete answer
7 to his question you had taken him to Mr. Tolson's office
8 and now, according to your corrected testimony, you then
9 went to check to see if Mr. Brandt was in his office?

10 A Yes, sir.

11 Q Was that a normal procedure that you would
12 follow, when a person raised a question in a training
13 session with you?

14 A It's not -- it wouldn't have been normal because
15 at this point this was the first time a question of this
16 nature had ever been -- had ever been raised.

17 Q Was there any person who was at a lower level
18 than Mr. Brandt or Mr. Tolson, who might reasonably have
19 been able to answer Mr. Allen's question?

20 A His supervisor. But I assume that he had
21 already checked with his supervisor.

22 Q You didn't ask him that?

23 A I'll be honest with you, Mr. Roisman, I don't
24 remember if I did or not.

25 Q It didn't seem to you at all unusual to go to,

1 essentially the boss and the assistant boss to get an
2 answer to a modestly routine question?

3 A No, sir, not to me it didn't.

4 Q Had you ever done that before?

5 A I had gone to Mr. Tolson and Mr. Brandt many
6 times with questions. Never -- never from, you know -- in
7 a situation like this. Because, as I stated, this was the
8 first time a situation like this had ever arisen.

9 Q Have you, since that time, ever had occasion to
10 take anyone to their offices in order to have a question
11 answered by Mr. Tolson or Mr. Brandt?

12 A No, sir.

13 Q You said you had gone to their offices before to
14 get an answer to a question. Were those questions that
15 you yourself had?

16 A Yes, sir.

17 EXAMINATION

18 BY JUDGE BLOCH:

19 Q Mr. Manning, why did you go to Mr. Tolson first?

20 A The only reason was his office was right
21 directly across the hall from mine and I just wanted to
22 clear up Corry's question for him right away.

23 Q There was no particular encouragement to start
24 with a lower-down supervisor, rather than right at the top?

25 A No, sir. Like I said, I don't remember if I

1 asked Corry had he checked with his supervisor already or
2 not. It would have been natural for him to do that first.

3 By him coming to me, I assumed that he had already
4 checked with his supervisor in the field and couldn't get
5 an answer there.

6 Q Now, where is Brandt's office with respect to
7 Tolson's?

8 A Mr. Tolson's office is in the main admin
9 building, Mr. Brandt's office was in a trailer right
10 directly out the back down from the main admin building.

11 Q So it was much closer for you to go to
12 Mr. Tolson?

13 A Yes, sir.

14 EXAMINATION (Continued)

15 BY MR. ROISMAN:

16 Q Where exactly were you at the time when
17 Mr. Allen raised the question about the DCA?

18 A I was in my office.

19 Q Is that where the training program was taking
20 place?

21 A No, sir, the training program happens in a small --
22 at that point in time it was in a small trailer at the
23 east end of the admin building, outside of the main admin
24 building.

25 Q So that Mr. Allen did not ask you the question

1 while you were still in the meeting room?

2 A No, sir, he did not.

3 Q Was it immediately after the orientation session?

4 A I believe it was the next morning.

5 Q Next morning?

6 A Yes, sir.

7 Q And he came to your office --

8 A Yes, sir.

9 Q In the main admin building?

10 A Yes, sir.

11 Q Was that the time that he asked you for the copy
12 of appendix B?

13 A Yes, sir.

14 Q Now, on page 3 of your testimony in answer 12,
15 you indicate that "after lunch I again went to Mr. Tolson."
16 Are we still talking about the same day?

17 A Yes, sir.

18 Q Would you please tell me exactly what transpired,
19 as best as you can remember it, between you and Mr. Tolson
20 at that time?

21 A I walked to Mr. Tolson's office. I thought I
22 heard his voice and I walked over to his office. He was
23 in there on the phone and I waited until he got off the
24 phone. I tapped on his window. He motioned me in.

25 I walked in, I said: Mr. Tolson, there's an inspector

1 by the name of Corry Allen who has a question about an
2 ALARA review of DCAs. I said I cannot answer his question.

3 So he told me to get Mr. Allen, call Mr. Allen, asked
4 him to come back up and to bring him to his office, which
5 I did.

6 I called Mr. Allen's office --

7 Q Wait. I'm going to get you let to that but I
8 want to just finish -- the conversation between you and
9 Mr. Tolson?

10 A Yes, sir.

11 Q You posed the one question to Mr. Tolson. He
12 said: "Bring him up" and that was the end of the
13 conversation between you and Mr. Tolson?

14 A Yes, sir.

15 Q Now, when he told you "bring him up," do you
16 remember, how did he say that? Did he just say: Well,
17 gets him up here? Or did he say gee, I'd love to see him?
18 Or how did you communicate his idea to you that he wanted
19 him?

20 A He just told me to call Mr. Allen and ask him to
21 come back to the office, or to come to the office.

22 Q Did you have any sense when he did that as to
23 whether he was glad, sad, angry, happy -- about this
24 prospect of having Mr. Allen come to his office?

25 A I can't speculate on his attitude about the

1 question. At the time, to me, he was not -- it was just a
2 question, you know? He wasn't angry. He wasn't happy.
3 It was just a normal tone of voice for Mr. Tolson.

4 Q So it wasn't any different than if he had said
5 to you well, ask Mr. Brandt to come in my office? Or any
6 other person to come in the office?

7 A Yes, sir.

8 Q All right. Did you, at that time, indicate to
9 him all of the concerns that Mr. Allen had raised with you,
10 that you weren't able to answer?

11 A The only concern that he had raised to me that I
12 could not answer, I felt that was not my position to
13 answer, was the ALARA review on the DCAs. And that's the
14 only thing I conveyed to Mr. Tolson.

15 Q Did you explain it to him, to the extent that
16 Corry Allen had explained it to you? Or did you just say
17 he's concerned about the ALARA review on the DCA, and not
18 go into any detail?

19 A I really don't remember at this point. I
20 believe I just told him that Mr. Allen had a question
21 concerning the review, the ALARA reviews on DCAs.

22 Q Was it unusual for Mr. Tolson to have Mr. Allen
23 come there for him to get that answer rather than just to
24 tell you the answer to the question?

25 A I don't know how to answer that, really. He --

1 like I say, I had never been in a situation where I had,
2 you know, had an inspector come to me and ask a question
3 like that, that I went to Mr. Tolson with. I don't know
4 that Mr. Tolson wanted to give me the answer and convey it
5 to Mr. Allen.

6 Q Well, you had indicated before that there had
7 been occasions when you had gone to Mr. Tolson --

8 A Sure.

9 Q -- to get an answer to questions that you had?

10 A Yes, sir.

11 Q And I take it that when we think of the origin
12 of the question as being Mr. Allen or you, this could have
13 been a situation in which you were just putting a question
14 to Mr. Tolson, getting an answer, which you could have
15 transmitted back.

16 I'm trying to figure out --

17 A It could have, however, I guess the way I posed
18 it to him I said -- there is an inspector, a Mr. Corry
19 Allen, or Corry Allen, who has a question. I assume he
20 could have given me the answer. Why he didn't, I don't
21 know.

22 Q Did you think it was at all troublesome that
23 Mr. Allen had this question?

24 A No, sir.

25 Q Were you concerned about the answer to the

1 question? When you heard it, did it prick your curiosity
2 at all?

3 A Quite honestly, no, sir.

4 Q Did you have any reason to think that the answer
5 to the question would be anything other than "everything
6 was okay"?

7 A No, sir.

8 Q I take it that you did realize that the question
9 did appear to raise some question about the propriety of
10 procedures on DCAs; correct?

11 A To me it did not, for the plain and simple
12 reason that it was not in my scope of work. It's not
13 something I dealt with daily.

14 I just honestly wasn't worried about it.

15 Q No, what I meant was just in the nature of the
16 question, didn't you realize that the question seemed to
17 assume that a DCA review was taking place at -- and an
18 ingredient that the question presumed was supposed to be
19 part of it wasn't part of it?

20 A No, sir.

21 Q That didn't occur to you?

22 A No, sir.

23 Q Now, starting at answer 14, you begin to
24 describe the meeting that took place between Mr. Tolson
25 and Mr. Allen, which I take it you attended throughout the

1 whole meeting; correct?

2 A Yes, sir.

3 Q Can you try, as best you can now, to tell me the
4 order of the events as they transpired? Exactly what
5 happened from the moment that you got to the door to
6 Mr. Tolson's office with Mr. Allen?

7 A Okay. Mr. Tolson had someone in his office when
8 Corry came up. We wade out in the hall for just a couple
9 of minutes and when he left Mr. Tolson saw me standing in
10 the hall. He motioned me in.

11 Q Excuse me, let me stop you for a second. Did
12 you and Mr. Allen have a conversation either at the time
13 when he asked you.

14 You asked him to come to Mr. Tolson's office or while
15 were you walking there or after you got there?

16 A I honestly don't remember. I'm sure we said --
17 we had some standing in the hall. By like I said, we were
18 standing there for just such a short time anyway, I just
19 don't remember, Mr. Roisman.

20 Q Did Mr. Allen seem nervous or --

21 A No, not really.

22 Q -- ill at ease or anything?

23 A This is the second time I met Corry. He had
24 been in the QA/QC orientation the day before. I don't
25 know if he was nervous or what his normal nature was. He

1 didn't appear nervous at the time; no, sir.

2 JUDGE BLOCH: I take it this was sort of an
3 official relationship. You didn't see this as an
4 opportunity to meet him? You were taking him somewhere
5 and --

6 THE WITNESS: In a manner of speaking; yes, sir.
7 I had met him the day before, like I said, in the
8 orientation class, which is -- it's an informal-type
9 indoctrination. So I had met him the day before and I
10 didn't see anything unusual in his nature the next day.
11 Nor did I really see it as an official-type process. It
12 was just -- I was trying to get a question answered for
13 him.

14 BY MR. ROISMAN:

15 Q So you and he, maybe, had some chitchat while
16 you waited?

17 A Probably. But I don't -- at this point I don't
18 remember what the nature of it was.

19 Q Okay. So that -- I'm sorry I had interrupted
20 your flow.

21 A That's okay.

22 Q You had been waiting the couple of minutes and
23 then what happened?

24 A When the people in Mr. Tolson's office left he
25 motioned me in. We walked in. And I introduced Corry to

1 Mr. Tolson. I told Corry this was Ron Tolson, the QA
2 manager, TUGCO QA manager.

3 At that point Mr. Tolson asked us to sit down and he
4 asked me to stay.

5 Then he said: "Corry, I understand you have a question."

6 Corry repeated the question to him. And at that point
7 Mr. Tolson explained the DCA initiation and review process
8 on-site, before it went to Gibbs & Hill for review and
9 approval.

10 Q And then what happened?

11 A Well, nothing, really happened. Mr. Tolson went
12 through, explained, like I said, the review process. He --
13 they had some small talk, really, you know, about the job
14 site in general.

15 Q What do you mean by that?

16 A I believe Mr. Tolson asked Corry how he liked
17 the area, how he liked the job site, a couple of things of
18 that nature. Like I say, it progressed to the point where
19 Mr. Tolson explained the review cycle.

20 Q Wait. I'm sorry. I thought the first thing you
21 did was explain the review cycle.

22 I'm really interested in the order of the conversation
23 after he told both of you to sit down and told you to stay --

24 A Yes, sir.

25 Q -- the first thing that happened was Mr. Allen

1 stated his question; is that correct?

2 A Yes, sir, I believe so.

3 Q And the next thing that happened was the small
4 talk? Or that Mr. Tolson gave him the answer to that
5 question?

6 A No, Mr. Tolson gave him the answer to his
7 question.

8 Q Okay. And did Mr. Allen ask any questions after
9 the answer that related to what Mr. Tolson had just said?

10 A Not that I remember.

11 Q Okay. So, after the answer was done, who talked
12 next after Mr. Tolson?

13 A I believe, after Mr. Tolson gave him his answer,
14 he asked, you know, Corry how he liked the, you know, the
15 area. And how he liked Comanche Peak. That was it,
16 really.

17 Q Did -- when Mr. Tolson finished the answer, did
18 he ask Mr. Allen: "Does that answer your question,
19 Mr. Allen?" Or anything to find out whether he --

20 A I don't remember anything like that; no, sir.

21 Q So, after the small talk then what happened?

22 EXAMINATION

23 BY JUDGE BLOCH:

24 Q The small talk, do you remember, did he ask him
25 how was Comanche Peak?

23 A There was a little -- amount of small talk going
24 on. And Mr. -- something was said, I'm not sure right now,
25 Mr. Roisman -- and Mr. Tolson just -- the meeting ended.

1 It died a natural death, I guess you would say. And we
2 left.

3 Q On page 4 of your testimony, answer 17, you say,
4 "I specifically remember Mr. Tolson saying that he wanted
5 Mr. Allen to concentrate his efforts in the inspection
6 area."

7 A Yes, sir.

8 Q When you just now were recounting the
9 conversation to me I don't remember your mentioning that
10 particular point. Where did that fit in?

11 A I specifically remember him saying it but at
12 what point it was injected I can't answer. I believe it
13 was toward the end of the meeting but I can't be sure.

14 I just specifically remember that statement.

15 Q And these sort of, as you remember, these sort
16 of amenities, about "Hey, how do you like it here, Corry,"
17 and so forth, all happened after Mr. Tolson and Mr. Allen
18 discussed the merits of Mr. Allen's question? That's your
19 understanding?

20 A To the best of my knowledge; yes, sir.

21 Q Now you indicate in your question at answer 14
22 in the bottom of page 3, "In short, Mr. Tolson tried to
23 provide Mr. Allen with a full explanation of how DCAs were
24 initiated and approved."

25 A Yes, sir.

1 Q How long would you say Mr. Tolson took in giving
2 that explanation?

3 A The entire meeting to the best of my knowledge
4 lasted about five minutes.

5 Q So, it couldn't have been more than, what would
6 you say, maybe a couple of minutes at most?

7 A Two, three minutes max.

8 Q And when you say "gave a full explanation of how
9 DCAs were initiated and approved," I assume you don't mean
10 that literally?

11 A Not in the literal sense; no, sir. It satisfied,
12 I feel -- had I have asked the question, it would have
13 satisfied my question.

14 Q Did he talk specifically about the ALARA review?
15 Did that --

16 A He mentioned the ALARA review. "ALARA" is "as
17 low as reasonably achievable." And he went through the
18 process of how a DCA is initiated on-site. It's reviewed
19 and reviewed by the initiators, in the initiator's review
20 cycle. From there it's sent to Gibbs & Hill, New York --
21 at the time it was sent to Gibbs & Hill -- reviewed and
22 approved.

23 Q And -- I'm sorry, go ahead.

24 A Mr. Tolson just went through that process with
25 Corry, assuring Corry that, even though the DCA he had in

1 his hand did not show the complete signature review cycle,
2 that the DCAs were reviewed and approved.

3 Q The DCA that who had in his hand?

4 A Corry, when he came to my office, had a specific
5 DCA in his hand.

6 Q You mean when he came to your office the first
7 time?

8 A When he came to the office the first time. When
9 he came back he had the same DCA.

10 Q That DCA was in the meeting room at the time?

11 A Yes, it was.

12 Q When Mr. Allen stated his question, did he
13 proffer the DCA to Mr. Tolson?

14 A Yes, sir, he did. He showed Mr. Tolson the DCA;
15 yes, sir.

16 Q Did the conversation center around that
17 particular DCA in some way?

18 A I don't think it centered around the DCA as much
19 as it centered around what Corry was concerned with; the
20 lack of apparent signatures, review signatures on the DCA.
21 I do not remember the DCA, what it was about. I don't
22 remember reading it.

23 Corry was concerned that all he saw was the initiator's
24 signature. And I believe there was one other signature on
25 it.

1 Q Do you remember how Mr. Tolson described the --
2 how the ALARA input came into the DCA review process?

3 A No, sir. Not really.

4 Q Do you, yourself, understand what the question
5 was that Mr. Allen was asking about the ALARA, and its
6 implications for a DCA in the coatings area?

7 A I do now. At the time I don't think I fully
8 understand Mr. -- I fully understand Corry's question.

9 Q Did you think that Mr. Tolson did?

10 A I would have hoped Mr. Tolson did; yes, sir.

11 Q I mean, it wasn't that Mr. Allen was
12 inarticulate in asking it? It is merely that it assumed
13 some information that you didn't have of your own
14 knowledge?

15 A Yes, sir.

16 MR. WATKINS: Mr. Chairman, excuse me. Could I
17 just have a moment to advise Mr. Manning to wait until the
18 question is finished before answering. There was some
19 interruption going on.

20 BY MR. ROISMAN:

21 Q You had been in Mr. Tolson's presence on a
22 number of occasions, both before and after the time that
23 Mr. Allen met with him; is that correct?

24 A Yes, sir.

25 Q In terms of Mr. Tolson's moods, I take it you

1 would not say that it was an incorrect statement that
2 Mr. Tolson at sometimes could be short, or even appear to
3 be a little gruff in his manner, would you?

4 MR. WATKINS: I'm sorry, I'm not sure the answer
5 will be comprehensible, given the "incorrect" and "correct."

6 BY MR. ROISMAN:

7 Q Would you agree that Mr. Tolson at times can
8 appear to be abrupt and a little gruff in his manner?

9 A He can appear to be; yes, sir.

10 Q As you recollect the meeting of that day, to
11 which end of the spectrum of appearances that Mr. Tolson
12 showed would you describe Mr. Tolson for that day?

13 A Mr. Tolson did not appear gruff or irritated at
14 all. He was very -- in my opinion, he was very personable.
15 He smiled a lot and just didn't appear to me gruff.

16 Q Did he say anything to Mr. Allen about his
17 reaction to the fact that Mr. Allen had raised the
18 question at all?

19 A No, sir.

20 Q He didn't compliment him for being interested?

21 A Not that I remember.

22 EXAMINATION

23 BY JUDGE BLOCH:

24 Q Did he answer the question about the particular
25 DCA in the course of the questioning?

1 A I'm not sure about that particular DCA, sir. I
2 don't remember. I don't remember what that DCA was about.
3 I don't think I ever read it.

4 So, whether Corry got an answer to his question on that
5 particular DCA, I do not know.

6 Q Was there a disposition on that DCA?

7 A I don't remember.

8 Q But you seem to remember that Mr. Tolson didn't
9 discuss that particular DCA at all?

10 A As to whether he discussed that one, I really
11 don't know. I believe that Corry had the DCA in his hands
12 more as an example than anything else.

13 Q Did Mr. Tolson read it?

14 MR. WATKINS: Mr. Chairman?

15 THE WITNESS: Yes, sir, he did.

16 BY JUDGE BLOCH:

17 Q He took it and read it?

18 A Yes, sir.

19 MR. WATKINS: Mr. Chairman, to make the record
20 clear, you said "disposition of DCAs". It was not an NCR.
21 It was a design change authorization.

22 THE WITNESS: No.

23 BY JUDGE BLOCH:

24 Q Was there an indication that the DCA had been
25 approved?

1 A On that particular one I don't believe there was
2 because Corry had a copy of it.

3 Q Had work been done under it?

4 A I have no idea.

5 Q Did Mr. Allen know whether work had been done
6 under it?

7 A I have no idea, sir.

8 JUDGE BLOCH: Mr. Roisman?

9 EXAMINATION (Continued)

10 BY MR. ROISMAN:

11 Q You may have answered this but I'm not sure I
12 remember it. Mr. Allen did not respond to Mr. Tolson's
13 explanation of the question that Mr. Allen had asked?

14 A I don't remember any response but -- I'm not
15 sure what you mean by "respond."

16 Q Did he say "oh, now I see;" or "wait, what about";
17 or anything that indicated that he was satisfied with the
18 answer or it still remembered another question for him?

19 A I don't remember anything of that nature; no,
20 sir.

21 Q Did that strike you then or now as surprising?

22 A No, sir.

23 Q On page 4 you are asked a question, at question
24 15 regarding a statement made by Mr. Allen in his
25 testimony. "He (Tolson) essentially wanted to know why I

1 was asking the Brown & Root quality instructor questions
2 about DCAs." "Did Mr. Tolson ask Mr. Allen this question? "
3 Do you see that? And then your answer: "No."

4 A Yes, sir.

5 Q Did Mr. Tolson say anything to Mr. Allen that
6 was remotely related to that statement by Mr. Allen in his
7 testimony?

8 A I don't remember anything.

9 Q When you tell me you don't remember, does that
10 mean you are not sure whether he did or he didn't? Or
11 your sure that he didn't?

12 A I'm sure that he didn't ask it.

13 Q Didn't ask --

14 A That Mr. Tolson didn't ask, or didn't want --
15 ask Corry why he was asking me those questions.

16 Q But the question that you are asked in your
17 testimony, it said, "in his testimony Mr. Allen stated,
18 'he -- and then brackets -- Tolson, essentially wanted to
19 know why I was asking the Brown & Root quality instructor
20 questions about DCAs' did Mr. Tolson ask Mr. Allen this
21 question?"

22 Your answer: "No."

23 There isn't a question there?

24 A That's right.

25 Q I don't know what you are answering "no" to;

1 what question? What you are reading from the testimony of
2 Mr. Allen was a statement. What question did you
3 understand you were answering "no" to?

4 A That, did Corry ask Mr. Question -- Mr. Tolson,
5 or did Mr. Tolson ask Corry, why he was asking me a
6 question of that nature, essentially indicates to me
7 "implied." And Mr. Tolson never implied that he wanted to
8 know why Corry was asking this question, of anyone. Not
9 just of me, but of anyone.

10 Q So there was no -- nothing that Mr. Tolson said
11 or did from which you would have interpreted -- from which
12 you did interpret at the time it happened, that he was
13 even curious about how it happened that Mr. Allen was
14 raising the question?

15 A No, sir.

16 EXAMINATION

17 BY JUDGE BLOCH:

18 Q Mr. Manning, what did Mr. Tolson say prior to
19 the time that the DCA was handed to him and he read it, so
20 that he obtained information that the DCA was relevant?

21 A Well, nothing was really said. When Corry
22 walked in and sat down and I introduced him, he had the
23 DCA rolled up in his hand. And Corry asked the question.
24 When he did, he handed the DCA to Mr. Tolson. Mr. Tolson
25 took it and read it and started his explanation.

1 Q So Mr. Allen didn't explain what about the DCA
2 interested him?

3 A No, sir. Not --

4 Q If I were a teacher, and a student had a
5 question I might naturally ask them: Well, why are you
6 interested," so I'd know what the problem was.

7 A I don't remember Mr. Tolson asking any such
8 question; no, sir.

9 Q Well, not remembering is interesting.
10 Remembering something that long ago is something that
11 we can do. But you are not only saying you remember it,
12 you are saying you remember what didn't happen.

13 Are you sure about that part?

14 A Well, I can't be sure about what didn't happen;
15 no, sir. I'm saying that I personally do not remember
16 Mr. Tolson asking Corry why he was interested.

17 Q Okay. But in the course of what you might have
18 felt was relatively unimportant at the time, could that
19 have happened?

20 A It could have; yes, sir. But like I say, I did
21 not look on it -- the meeting in maybe the same light that
22 Corry did.

23 Q So you might have remembered different things
24 than he did?

25 A That's possible; yes, sir.

1 Q And both of you may have actually remembered
2 what happened?

3 A Yes, sir.

4 EXAMINATION (Continued)

5 BY MR. ROISMAN:

6 Q I take it from your earlier testimony that at
7 the time of the meeting this was really just a very
8 non-exceptional experience for you; is that correct?

9 A Non-exceptional?

10 Q Yes. In other words there was nothing about it
11 that was so unique that it would have been real likely
12 that a year or so after the event you would have any
13 particular reason to remember it at all?

14 A It was non -- yes. But it was, like you say,
15 non-exceptional. But I remember the meeting; yes.

16 Q But that -- for instance, if Mr. Allen and
17 Mr. Tolson had really had a fabulous time and spent the
18 whole time playing cards or doing something that was
19 really totally out of the ordinary in the plant site, it
20 would have been more likely to have stuck in your memory?

21 A Yes, sir.

22 Q Than a meeting in which a question was asked and
23 answer was given and everybody left the room in five
24 minutes?

25 A Yes, sir.

1 Q On page 5 of your testimony you indicate in
2 answer to question 18 that Mr. Allen did not ask
3 Mr. Tolson for a copy of appendix B.

4 Is that, again -- do you know that he didn't? Or do
5 you not remember that he did?

6 A I know for a fact he did not, because he asked
7 me for the copy before we ever went into the meeting at
8 the first -- when he first came up to the office that
9 morning. He asked me for a copy at that time and I gave
10 him a copy.

11 Q When you were on your way to the meeting or when
12 he first showed up in your office?

13 A The first time that morning.

14 Q Did you make him the copyright, then, that first
15 time in the morning?

16 A Yes, sir. I went and got the 10 CFR 50 out of
17 Mr. Tolson's office and Xeroxed him a copy.

18 Q And did Mr. Tolson at the meeting --

19 JUDGE BLOCH: Was Mr. Tolson there when you --

20 THE WITNESS: No, sir. He was not.

21 BY MR. ROISMAN:

22 Q At the time of the meeting, when you say that
23 you do not remember Mr. Tolson even knowing that Mr. Allen
24 had requested a copy of appendix B, what is it that you
25 base that knowledge on? Did you and Mr. Tolson at any

1 time discuss the question of whether Mr. Tolson at the
2 time of the meeting knew or didn't know that Corry Allen
3 had requested a copy of appendix B?

4 A No, sir.

5 Q When you say that Mr. Tolson didn't ask
6 Mr. Allen why "I," meaning Mr. Allen, was trying to get a
7 copy of appendix B, are you saying that you know Mr.
8 Tolson didn't ask that question? Or you can't remember
9 that he asked it?

10 A He never asked the question.

11 Q And you are certain? I mean you remember that
12 that didn't happen?

13 A I remember that it -- Corry never asked
14 Mr. Tolson for a copy of 10 CFR 50.

15 Q Look at question 18. The question isn't "did he
16 ask him for it?" The question is "did Mr. Tolson ask why
17 he was trying to get one."

18 A Tolson never asked Corry why he wanted it. To
19 the best of my knowledge -- well, I know for a fact Tolson
20 didn't even know Corry had wanted a copy of it.

21 Q You can't know that for a fact, can you? If you
22 and Mr. Tolson never --

23 A Unless Mr. Tolson had asked Corry before the
24 meeting.

25 Q Well, all I'm saying is you just testified that

1 you know for a fact that Mr. Tolson didn't know.
2 Previously you said that you and Mr. Tolson never
3 discussed Mr. Allen's request for appendix B. So how do
4 you know that Mr. Tolson didn't know?

5 A Well, in that light, sir, I don't. You are
6 right.

7 EXAMINATION

8 BY JUDGE BLOCH:

9 Q Did someone see you Xerox appendix E?

10 A I'm sure they probably did.

11 Q Did someone see you returning it to your office?

12 A No, sir --

13 Q To his office. To Tolson's office?

14 A I put the book back in Tolson's office.

15 Q Someone could have seen that happen?

16 A Could have; yes, sir.

17 Q And do you know whether the copy of appendix B
18 was under the DCA at the time that Mr. Allen handed the
19 DCA to Mr. Tolson?

20 A Corry had a single sheet of paper in his hand.

21 Q Well, what did he do with the copy of appendix B
22 that you handed to him?

23 A I assume he left it in his office when he went
24 back out the first time. I gave Corry the copy of 10 CFR 50
25 when he came to my office the first time that morning.

1 Q He came back a second time, apparently, without
2 it?

3 A Yes, sir.

4 EXAMINATION (Continued)

5 BY MR. ROISMAN:

6 Q In the course of this meeting -- and again I
7 just want to be clear, that I know what it is you don't
8 remember as opposed to what it is you remember and know
9 for certain -- do you know for certain that there was no
10 discussion at the meeting about why Mr. Allen had asked
11 for a copy of appendix B?

12 A There was no discussion about appendix B at the
13 meeting.

14 Q So you remember the meeting well enough to know
15 that that wasn't one of the things discussed?

16 A Yes, sir.

17 Q Now, you indicate in answer 19, still on page 5
18 "what was the atmosphere of the meeting?" "It was
19 friendly, but businesslike."

20 A My definition is it was cordial; no slanders or
21 slurs thrown in either direction, and it was an open
22 meeting -- friendly.

23 Q I understand the friendly side of it. But your
24 answer is, you set off "friendly" against "businesslike."
25 "It was friendly, but businesslike." As though it could

1 have been friendly and unbusinesslike.

2 So I'm trying to understand what did you mean by
3 "businesslike" as a "but" to "it was friendly."

4 A At this point I'm not sure. I could have just
5 as easily left off the "businesslike." It was just a
6 friendly meeting.

7 Q How long had you known Mr. Tolson at the time
8 this meeting took place?

9 A About three years, more or less.

10 Q And had you had fairly regular dealings with him
11 over that three-year period?

12 A Fairly regularly; yes, sir.

13 Q Did you socialize with him at all, off the plant
14 site?

15 A No, sir.

16 Q Did you eat lunch with him on the plant site?

17 A No, sir.

18 Q Would you say you saw him once a week?

19 A Yes.

20 Q Saw him to communicate with him; I don't mean "saw
21 him," but really communicated with him?

22 A It -- that's a fair assumption; yes, sir.

23 Q Can you remember back to when you first met
24 Mr. Tolson?

25 A Not the first time; no, sir.

1 Q Around the first time when you met him?

2 A Sometime in '79; yes, sir.

3 Q And what position did you hold at the plant when
4 that happened, when you first met him?

5 A I worked for Brown & Root at the time. And I
6 did their time records for the inspectors, for about a
7 one-month period. And then I moved into the personnel
8 assistant position after about a month.

9 Q Would it be fair to say that in those early days
10 whether you were first at the plant that you were fairly
11 low on the totem pole --

12 A Yes, sir.

13 Q -- in terms of your relative position to
14 Mr. Tolson?

15 A Yes, sir.

16 Q Did you feel at all a little ill at ease in the
17 presence of any of the superior people at the plant site?
18 That is, people way up the chain from you, such as
19 Mr. Tolson?

20 A No, sir, not at all.

21 Q You felt really relaxed?

22 A Yes, sir.

23 Q Like you are now?

24 A Yes, sir.

25 JUDGE BLOCH: Is that true? Is that a fair

1 comparison, the way you feel now and the way you would
2 have felt with Mr. Tolson?

3 THE WITNESS: I don't feel any different now
4 than I would have felt then; no, sir.

5 JUDGE BLOCH: Okay. Good.

6 MR. ROISMAN: No further questions for the
7 witness.

8 JUDGE BLOCH: Mr. Treby?

9 MR. TREBY: Mr. Berry will conduct the Staff
10 cross-examination.

11 EXAMINATION

12 BY MR. BERRY:

13 Q Mr. Manning, do you remember having your
14 deposition taken on July 19, 1984?

15 A Yes, sir, I do.

16 Q At transcript page 61, volume 3 of the Manning
17 deposition taken July 19, 1984, in Glenrose, you were
18 asked a question:

19 "Question: What is your present position?

20 And you answered

21 "Answer: I am the non-ASME training coordinator at
22 Comanche Peak."

23 Do you remember that?

24 A Yes, sir.

25 Q In your prefiled testimony you state that your

1 position, and also in your deposition you had been asked
2 how long you held this position and you stated "since
3 September of '72."

4 A '82.

5 Q Yes. And in your prefiled testimony you state
6 that your position is "Training Quality Engineer and
7 Procurement Quality Engineer --"

8 A Yes, sir.

9 Q And that you had basically been in that capacity
10 since -- in the Training Quality Engineer since October of '82
11 and procurement since May '82.

12 My question to you is just to clarify the record.
13 Could you explain for the board here the difference, if
14 any, between a Training Quality Engineer and a non-ASME
15 training coordinator?

16 A There's none at all. It was a title change on
17 our organization chart, I guess, in lieu of a pay raise.

18 Q Do you remember when that change took place?

19 A That change took place in about mid-September
20 someplace -- maybe -- maybe early September. I'm not sure,
21 exactly.

22 MR. WATKINS: What year?

23 THE WITNESS: This year, '84.

24 JUDGE BLOCH: And was there any change of
25 responsibility?

1 THE WITNESS: None whatsoever. They just
2 changed the titles, is all they did.

3 BY MR. BERRY:

4 Q Mr. Manning, could you explain for the board,
5 and for me, also, what exactly a Training Quality Engineer
6 does? I mean, what are your duties?

7 A I maintain all the records, training records for
8 the inspectors, the non-ASME inspectors at the plant, as
9 far as certification, recertification. We schedule and
10 coordinate formal training, informal training, and
11 maintain their records, like I said.

12 Q Is there any instruction provided to the
13 inspectors?

14 MR. WATKINS: Objection. Mr. Chairman, this is
15 ground that has been plowed. It was plowed on July 19. I
16 believe this information is in the record.

17 JUDGE BLOCH: Is this a foundation for something
18 you are getting to quickly? Or -- do you want to review
19 what Mr. Watkins is referring to?

20 MR. BERRY: I'll move on, your Honor.

21 BY MR. BERRY:

22 Q Mr. Manning, who is your present supervisor?

23 A My supervisor is the quality engineering
24 supervisor, Michael Warner.

25 Q And how long has he been your supervisor?

1 A Since the end of July of this year.

2 Q Who was your supervisor, your immediate
3 supervisor back in early 1983, when you met with Mr. Corry
4 Allen?

5 A That was Mr. Tolson.

6 Q Mr. Tolson was your immediate supervisor?

7 A Yes, sir.

8 Q Where, if any place, did Mr. Brandt fit in the
9 chain of command?

10 A Mr. Brandt was the QC supervisor. He was under
11 Mr. Tolson, also, but to a higher level.

12 Q Higher level than what?

13 A Than myself.

14 Q So if I understand you, there was you, and then
15 you reported to Mr. Tolson --

16 A Oh, I'm sorry. I understand what you are saying
17 now, sir.

18 No, sir, I worked for Bob Scott at the time. He was on
19 the same level as Mr. Brandt, I believe, reporting
20 directly to Mr. Tolson.

21 Organization chart-wise, Mr. Tolson was at the top and
22 then the people fell under him and I'm not sure who everyone
23 was at that time, now, but I worked for Bob Scott.

24 Q Mr. Manning, on page 2 of your testimony,
25 question and answer 9, you state that "as part of the

1 orientation, I instruct the trainees that they should feel
2 free to come to me with any questions that they have about
3 the QC program."

4 Is there any limit on the type of questions, or the
5 particular type of questions that they should come to you
6 with?

7 A No, sir. I don't impose any limits at all.

8 Like I said, if there's something I can't answer for
9 them, or get for them, or do for them, I will find someone
10 who can answer it.

11 Q Mr. Manning, have you ever been a QC inspector?

12 A No, sir.

13 Q Do you have any technical background in quality
14 or coatings area?

15 A No technical background at all; no, sir.

16 Q And that means in any of the quality -- quality
17 disciplines?

18 A Yes, sir.

19 (Recess.)

20 JUDGE BLOCH: The hearing will come to order. I
21 would like to ask, before we continue any further, I am
22 aware through newspapers that there are some claims by the
23 technical review team of irregularities of training
24 records or certification of quality personnel. I would
25 like to know if Applicants -- whether any of those relate

1 to records that were in Mr. Manning's testimony?

2 MR. TREBY: I don't know the answer to that. I
3 do know there was a board notification that there was some
4 information that would be made available to the board, in
5 camera, ex parte. I have not seen that information and I
6 can't tell you what the extent of that information is.

7 MR. WATKINS: Your Honor, I'm going to object to
8 any interrogation of Mr. Manning on that subject. He's
9 not prepared to do so and in candor I don't know what the
10 issue TRT may have raised or not raised is.

11 MR. TREBY: I would assume when it has language
12 like "in camera ex parte," the party that raised that
13 matter probably is the Office of Investigation, so I think
14 don't that it's something that TRT initiated as a board
15 notification.

16 JUDGE BLOCH: So it may have been OI?

17 MR. TREBY: That's correct. But that's just
18 speculation on my part due to the language of "in camera
19 ex parte."

20 JUDGE GROSSMAN: Were you objecting to the
21 question posed now or were you saying you were going to
22 object to further questions?

23 MR. WATKINS: To any and all questions,
24 including that one.

25 JUDGE BLOCH: I don't have to ask that one of

1 the witness if counsel is going to inform us whether there
2 are allegations. The problem is, if there are, it could
3 relate to the credibility of the witness.

4 MR. WATKINS: I do not know the allegations
5 about which you are speaking. Are they TRT allegations?

6 JUDGE BLOCH: We know they may be OI allegations.

7 MR. WATKINS: Is this a matter under
8 investigation?

9 JUDGE BLOCH: I think that one question can be
10 asked. It's not that we will go into it at all.

11 Mr. Manning, do you know whether there are now
12 allegations from any part of the NRC concerning the
13 irregularities in the records under your control?

14 THE WITNESS: No, sir, not that I know of.

15 BY MR. BERRY:

16 Q Is that no, there are no allegations or no, you
17 don't know of any?

18 A I don't know of any.

19 Q Mr. Manning, before the break I had asked you if
20 you had any technical background in quality control. And
21 you answered "no."

22 I guess I have a little difficulty understanding this.
23 When you say that you invited the QC inspectors to come to
24 you with questions, I mean why -- what kind of questions
25 would they come to you with? They couldn't be technical,

1 could they?

2 A I don't have a technical background as far as
3 inspection in the QC area. When I tell people at the
4 orientations if they have any questions come see me
5 concerning the QC program, I'm in reference to the ANSI
6 standards, 10 CFR 50, if they are having a hard time with
7 that.

8 Most of our people that go through this orientation are
9 new people on-site. They don't know who to get in touch
10 with for copies of anything. Maybe the ANSI standard
11 pertinent to their job, IEEE standards -- it's in
12 reference to questions of that nature. Just, in general,
13 anything they have trouble with concerning our QC program.

14 Q Mr. Manning, is familiarity with appendix B,
15 would that be pertinent to a QC inspector's job?

16 A No, sir, not really.

17 Q Could you explain why not?

18 A Well, appendix B is the 18 criteria which really
19 doesn't get into actual day-to-day inspection. I don't
20 consider it -- even though it is a governing document, and
21 they should be well aware of it, I don't feel that it is
22 something that they work with on a daily basis and
23 inspection.

24 Q So I take it, then, that you don't provide QC
25 inspectors copies of appendix B as a matter of course?

1 A No, sir, we make appendix B available to everyone
2 in the orientation. I have a stack of them that I take
3 out with me.

4 Q Well, if I heard you correctly, you state that
5 you -- copies of appendix B are made available, provided
6 to --

7 A Yes, sir.

8 Q -- all the QC inspectors at the orientation
9 session. Why, then, did Mr. Allen come and ask you for a
10 copy if he already had one?

11 A I have no idea.

12 EXAMINATION

13 BY JUDGE BLOCH:

14 Q Excuse me. If you had a stack, why did you have
15 to go into Mr. Tolson's office to retrieve one of his --
16 his copy to Xerox?

17 A The -- there's a little cutdown versions, I call
18 them. They are just about so small, and I had left them
19 all in the other office. It was just simpler going to Mr.
20 Tolson's office and Xerox, or get the bound version and
21 just Xerox it out of there instead of going back over to
22 the personnel office, getting the key to unlock the door,
23 and going in and get it.

24 Q Can you remember in this course what it is that
25 you told inspectors about their responsibilities under the

1 regulations of the NRC?

2 A No, sir. I cannot.

3 Q Did you explain the regulatory scheme to them at
4 all?

5 A I do not know, sir. We have a slide
6 presentation that gets into that.

7 Q Did you talk to them about when they should or
8 should not go to the Nuclear Regulatory Commission with
9 problems?

10 A I do not at all, sir. No, sir.

11 Q Did you talk to them about when they should or
12 should not go to their supervisors about problems?

13 A No, sir, I do not.

14 EXAMINATION (Continued)

15 BY MR. BERRY:

16 Q Do you provide any instruction or guidance to
17 any members or attendees of these sessions as to what is
18 required or what the company requires of the QC inspector?

19 A No, sir.

20 Q None at all?

21 A None.

22 EXAMINATION

23 BY JUDGE BLOCH:

24 Q Do you discuss the ANSI standards in the
25 training?

1 A The ANSI standards are brought up in the slide
2 presentation. We go into mainly 45.2.9, which is records
3 keeping. I like to emphasize that because, as you are
4 well aware, some of these inspectors -- I like to refer to
5 them as future doctors, you have a hard time deciphering
6 their handwriting. I like to emphasize the importance of
7 being neat and concise with their records, maintaining
8 those records so that, you know, they are available.
9 That's what I get into, mainly. We branch off into some
10 of the other ANSI standards if they are brought up.

11 Q You say that's important but appendix B is not?

12 A No, sir. I didn't say that. I said that in
13 retrospect, or in reference to their actual day-to-day
14 inspection, that appendix B does -- is -- it's important
15 but it doesn't play as big a role in the day-to-day actual
16 inspection.

17 Q Doesn't appendix B have the same kinds of
18 record-keeping requirements as the ANSI standard?

19 A It does, but it's not in as broad or as
20 definitive terms.

21 EXAMINATION (Continued)

22 BY MR. BERRY:

23 Q Mr. Manning, did you ever --

24 JUDGE BLOCH: Judge Grossman?

25 EXAMINATION

1 BY JUDGE GROSSMAN:

2 Q Perhaps you have answered this. You indicate in
3 answer 9 on page 2, that shortly after the orientation
4 session, Mr. Allen came to you with a question concerning
5 the review process. Where were you at this time?

6 A In my office.

7 JUDGE GROSSMAN: Okay.

8 EXAMINATION (Continued)

9 BY MR. BERRY:

10 Q Have you ever had conversations with Mr. Tolson
11 regarding, I guess, your performance or your performance
12 as a quality -- Training Quality Engineer?

13 A No, sir.

14 Q How about Mr. Brandt?

15 A No, sir.

16 JUDGE BLOCH: Mr. Scott?

17 THE WITNESS: It would be in reference to what?
18 Mr. Scott and I have talked about these orientations
19 before. He likes to know how they were going, stuff of
20 that nature. But we have never had any, I guess you would
21 call in-depth discussions in them; no, sir.

22 BY MR. BERRY:

23 Q Did Mr. Scott ever indicate to you how you
24 should answer if -- strike that.

25 Did Mr. Scott or Mr. Brandt or Mr. Tolson, did any of

1 them ever indicate to you how you should answer a QC
2 inspector if he raised the question: What does the
3 company expect of me? What are my duties?

4 A No, sir.

5 Q So I take it, then, no one ever told you that
6 you should indicate to QC inspectors that they should
7 concentrate on inspections, and not question procedures or
8 specifications?

9 A No, sir. No, sir.

10 EXAMINATION

11 BY JUDGE BLOCH:

12 Q After you heard Mr. Tolson say that, did you
13 make that part of your training?

14 A No, sir.

15 Q Why not?

16 A I didn't feel it was my responsibility to tell
17 an inspector to concentrate his effort on inspection.

18 Q Weren't you trying to train in what company
19 policy was?

20 A No, sir. We were trying to indoctrinate new
21 employees with the QA/QC orientation.

22 Q Was that inconsistent with the QA/QC orientation?

23 A I'm sorry, I don't understand what you are
24 saying, sir.

25 Q Was an instruction that they were to concentrate

1 on inspections inconsistent with what you were trying to
2 indoctrinate?

3 A No, sir, but I never told the inspectors in this
4 orientation to concentrate their efforts.

5 Q What does that mean to you, "concentrate your
6 efforts on inspection"?

7 A To me it indicates to give it your best shot at
8 inspections.

9 Q As contrasted to what?

10 A I don't think I could put a contrast on it, sir.

11 EXAMINATION (Continued)

12 BY MR. BERRY:

13 Q Mr. Manning, you indicated in response to a
14 question by Mr. Roisman that Mr. Tolson did not ask
15 Mr. Allen why he wanted a copy of appendix B. Do you
16 remember that?

17 A Yes, sir.

18 Q Could you state again how you can be sure? How
19 do you remember that?

20 A I can't tell you how I remember it. I remember
21 that, you know, Mr. Tolson just didn't ask him that.

22 Q Could that be because he already knew it?

23 MR. WATKINS: Objection. Calls for speculation.

24 JUDGE BLOCH: Overruled.

25 THE WITNESS: It could be. But I don't believe

1 that to be the case; no, sir.

2 BY MR. BERRY:

3 Q When you went to Mr. Tolson and left Mr. Allen
4 in your office to discuss this problem with him, how long
5 did that meeting last?

6 A I never left Mr. Allen in my office and went and
7 talked to Mr. Tolson. Mr. Tolson was not in the office
8 when Mr. Allen was there.

9 Q I'm sorry. The meeting that you had with
10 Mr. Tolson that you testified to earlier this morning?

11 A That's this meeting; yes, sir. Of which
12 Mr. Allen was a part of.

13 Q Wasn't there a meeting before when you talked to
14 Mr. Tolson?

15 A I'm sorry, when I went in and talked to
16 Mr. Tolson.

17 Q Explained to him the problem --

18 A Yes, there was. I'm sorry.

19 Q How long did that meeting last?

20 A Gosh -- maybe a minute or less.

21 Q Are you sure in that meeting you didn't indicate
22 to Mr. Tolson that Mr. Allen had wanted a copy of appendix
23 B?

24 A Yes, sir, I'm sure.

25 Q Was there anything special about that that makes

1 you remember that, or makes you be so certain about that?

2 A No, sir.

3 EXAMINATION

4 BY JUDGE BLOCH:

5 Q Could you recollect the events at that meeting?

6 A Like I said, Mr. Tolson was on the phone. When
7 he hung up I tapped -- he was standing up. And I tapped
8 on his window and he motioned me in.

9 And I said: Mr. Tolson, there's an inspector who has a
10 question concerning the ALARA reviews on DCAs.

11 He said: Okay. Call him and get him to come up.

12 JUDGE BLOCH: He didn't say: Who is it?

13 THE WITNESS: I don't believe he asked me who it
14 was; no, sir. I may have told him that there was an
15 inspector, Corry Allen. I believe that I did mention
16 Corry's name. But he did not ask anything else; no, sir.

17 JUDGE BLOCH: Did he ask you why you thought he
18 was asking that?

19 THE WITNESS: No, sir.

20 JUDGE GROSSMAN: And you had just borrowed one
21 of his books to Xerox something --

22 THE WITNESS: Earlier that morning.

23 JUDGE GROSSMAN: And you didn't tell him that?

24 THE WITNESS: No, sir. I go frequently to get
25 the FSAR, or something like that. Those books are in his

1 office but they are open to anyone that needs them.

2 JUDGE GROSSMAN: You said it took about a minute
3 but you gave us maybe seven seconds worth. Did it really
4 take a minute?

5 THE WITNESS: It could have taken less.

6 JUDGE BLOCH: Do you remember anything other
7 than what you told us?

8 THE WITNESS: No, sir.

9 EXAMINATION (Continued)

10 BY MR. BERRY:

11 Q Mr. Manning, is Mr. Tolson familiar with the
12 operations of the training, the training department or
13 your department?

14 A Yes, sir.

15 Q So then he -- so, wouldn't you expect -- so
16 Mr. Tolson should have known that Mr. Allen already had a
17 copy of appendix B, shouldn't he?

18 A He may have assumed it; yes, sir.

19 Q Then why would he even have to assume it, if you
20 state it is your practice to distribute copies of appendix
21 B to QC inspectors as a matter of course?

22 A In that aspect, yes, sir; he did know already.
23 If you take that aspect of it or in light of that; yes.

24 EXAMINATION

25 BY JUDGE BLOCH:

1 Q In your training, did you instruct these people
2 about the importance of their inspection efforts for the
3 safety of the plant?

4 A I do not get into that at all, sir. No, sir.

5 Q Did someone else get into that?

6 A Their supervisors do in their -- this training
7 that we are in reference to now is an indoctrination.
8 They get much more in-depth in their individualized
9 certification training; yes, sir.

10 Q So that's on the job?

11 A Yes, sir. It's on the job. It's also classroom.

12 Q So there is classroom instruction in the
13 relationship between safety issues and what their job is
14 that you indoctrinated them in?

15 A I don't indoctrinate them in their job; no, sir.
16 What we have is a generalized orientation. We have, in
17 that orientation, we may have welding inspectors, we may
18 have electrical inspectors, we may have protective
19 coatings inspectors.

20 It's not a form -- it's not a general -- I mean a
21 specific indoctrination is what I'm getting at.

22 EXAMINATION (Continued)

23 BY MR. BERRY:

24 Q Just one follow-up to that. You say that you
25 are the training coordinator. What kind of training is

1 being provided in these sessions?

2 A The indoctrination into quality assurance/quality
3 standards, to give them an overview of QA/QC.

4 If they are new inspectors, someone hired right off the
5 street or out of trade school or tech school or something,
6 then it's probably new information to them.

7 A lot of the inspectors come from other job sites and
8 it's not new information, then. They have seen it before
9 and they have had it before.

10 Q So it's not an o.ientation to the effect: This
11 is how we do it at Comanche Peak?

12 A No, sir.

13 Q Mr. Manning, do you know -- I mean do you, from
14 personal knowledge, know the duties of the QC inspector
15 and what his job function is?

16 A That's a very difficult question for me to
17 answer. I know, you know, the functions of the QC
18 inspector. However, never having been an inspector, I may
19 not be able to give you the answer that you want.

20 Q Well, I mean, is it part of a QC inspector's job
21 to get involved in engineering matters?

22 A I have no idea.

23 Q So you don't know?

24 A Not on that aspect.

25 Q Is it a QC inspector's job to -- or part of his

1 job, to question procedures?

2 MR. WATKINS: Objection. This is well beyond
3 the scope of the direct. Mr. Manning has testified he is
4 the administrator of an orientation program. These
5 questions are better directed, and have been directed, to
6 other people within the organization.

7 MR. BERRY: Your Honor, if I could proceed with
8 this line, I have only a couple of more questions -- I
9 think they are relevant. It will become apparent --

10 JUDGE BLOCH: What is the relevance? What did
11 you say, a couple of more questions --

12 JUDGE GROSSMAN: He said in a couple of more
13 questions the relevance will become apparent.

14 JUDGE BLOCH: You may continue.

15 MR. BERRY: Could you read back the last
16 question?

17 (The reporter read the record as requested.)

18 THE WITNESS: To that, I have no idea again.

19 BY MR. BERRY:

20 Q The question that Mr. Allen brought to you, what
21 kind of question would that be? What category would that
22 fall under? Is it an engineering question?

23 A Engineering; yes, sir.

24 Q Questioning procedures also?

25 A No, sir.

1 JUDGE BLOCH: Mr. Manning, in the time you have
2 been directing these courses, has anyone ever asked you
3 what the purpose of their job is?

4 THE WITNESS: No, sir.

5 BY MR. BERRY:

6 Q Mr. Manning, would you turn to page 4 of your
7 prefiled testimony, question 16. I would like you to read
8 question 16, where, quoting Mr. Allen's testimony, it is
9 stated that "I, brackets, Allen, was expected to work
10 out --"

11 That paragraph there. And then read your answer, and
12 question and answer 17.

13 A Okay, sir.

14 Q Could you explain to me, I mean the difference,
15 if any, between what Mr. Allen is saying and what your
16 testimony is, that Mr. Tolson stated that he wanted
17 Mr. Allen to concentrate his efforts on the inspection
18 area?

19 A I can't tell you the difference in them because
20 I can't tell you what Mr. Allen had in his mind.
21 Mr. Allen has presumed --

22 Q Excuse me --

23 A I'm sorry?

24 JUDGE BLOCH: Let the witness finish.

25 THE WITNESS: Mr. Allen has stated that

1 Mr. Tolson had told him to remain in his work area until
2 the day was more or less finished. That is not what was
3 said.

4 Mr. Tolson did make the statement, not in a harsh tone
5 or a demeaning tone, that Mr. Allen had been hired as a QC
6 inspector. Or that Mr. Allen -- he wanted Mr. Allen to
7 concentrate his areas in the inspection area.

8 MR. BERRY: I have nothing further, your Honor.

9 EXAMINATION

10 BY JUDGE GROSSMAN:

11 Q Well, what exactly do you recall his saying in
12 that respect?

13 A I recall Mr. -- you mean -- are you referring to
14 Mr. Allen or Mr. Tolson, now, sir?

15 Q Mr. Tolson, now.

16 A Mr. Tolson told him that he wanted him to
17 concentrate his efforts in inspection, in the inspection
18 area.

19 Q You also said he told him he had been hired as a
20 QC inspector. Did he say something to the effect that "you
21 have been hired to be a QC inspector and I want you to
22 concentrate your efforts in --"

23 A I don't remember those words. I may have been,
24 when I said what I did just now, I may have been jumping
25 the gun. I don't remember him saying "you have been hired

1 as an inspector and I want you to concentrate your efforts
2 in that area." He could have.

3 What I remember was the words: "I would like you to
4 concentrate your areas in the inspection area" -- "or your
5 efforts in the inspection area."

6 Q Well, was there any implication, then, in his
7 statement, that perhaps Mr. Allen was not doing that?

8 A I did not perceive that; no, sir. I did not get
9 that out of that statement.

10 JUDGE BLOCH: You can see how Mr. Allen might
11 have, though; right?

12 THE WITNESS: I can't. I couldn't delve into
13 Mr. Allen's mind; but yes, sir, he could have perceived
14 that; true.

15 BY JUDGE GROSSMAN:

16 Q Well, it wasn't a form of a greeting, was it?
17 Like "good morning." It was in the context of something,
18 wasn't it?

19 A Yes, sir.

20 Q Well, what was the context, then, of his saying
21 that?

22 A Well, I don't know.

23 Like I said, Mr. Allen could possibly have taken it as
24 the answer to his -- to question 16. But I can't be sure
25 of that.

1 Q Well, what had they been discussing immediately
2 before that statement by Mr. Tolson, about concentrating
3 his efforts in the inspection area?

4 A I believe that right immediately to that they
5 had still been discussing the ALARA review of the specific
6 DCA that Mr. Allen had in his hand.

7 Q Was that a function of a QC inspector?

8 A I do not know; sir.

9 Q Well, did it appear to you that the implication
10 of what Mr. Tolson was saying was that questions in that
11 area are not to the effect of concentrating an effort in
12 the inspection area?

13 A I can't answer that, sir. I don't know what was
14 in Mr. Tolson's thought process or mind.

15 JUDGE BLOCH: Mr. Grossman, I have a follow-up
16 on what you just asked.

17 EXAMINATION

18 BY JUDGE BLOCH:

19 Q I heard you just say that you thought the
20 context for that remark was after the discussion of the
21 specific DCA Mr. Allen had in his hand; is that correct?

22 A I believe it was, yes, sir.

23 Q Something in the course of what was said may
24 have refreshed your recollection about that discussion.
25 Can you tell me what they said about that DCA?

1 A No, sir. I can't remember it -- I mean tell you
2 exactly what they said.

3 Like I said, Mr. Tolson had the -- or Corry had handed
4 Mr. Tolson the DCA. Mr. Tolson was reading it, discussing
5 the -- or telling Corry how the review process worked
6 on-site. And through the small talk, if you will,
7 Mr. Tolson said something, or something was said -- I'm
8 not sure exactly what -- but Mr. Tolson said, you know:
9 Corry, I would like -- you know -- I would like for you to
10 concentrate your effort in inspection.

11 Q What did you mean when you said they had a
12 discussion of the specific DCA?

13 A The specific one that he had in his hand. He
14 had a DCA in his hand.

15 Q Did they talk about something on that paper?

16 A No, sir. Not -- no. I don't mean that they
17 discussed specifics of that DCA. What I was referencing
18 to, the one he had in his hand.

19 Q So your testimony remains that when Mr. Tolson
20 read that DCA and Mr. Allen brought it in --

21 A Yes, sir.

22 Q -- that they nevertheless talked about anything
23 on that particular DCA?

24 A No, sir, they did not. I don't have any idea
25 what the DCA was even about. They did not discuss the DCA

1 in particular.

2 Q Is it possible that they discussed the specific
3 DCA but since you hadn't read it you sort of tuned it out?

4 A That is possible; yes, sir.

5 EXAMINATION

6 BY JUDGE GROSSMAN:

7 Q Did you, in preparing your testimony, discuss
8 with the attorneys the fact that copies of appendix B were
9 generally, as a matter of standard operating procedure,
10 given out to QC inspectors?

11 A Yes, sir, I believe we did.

12 Q In answering question 18 on page 5, you discuss
13 Mr. Allen's statement about Mr. Tolson asking him about a
14 copy of appendix B. But you don't make any mention of
15 that standard procedure.

16 Was it your decision not to include anything about that
17 in this answer to question 18?

18 A Yes, sir.

19 Q Did you ask your attorneys, the attorneys for
20 the company, whether you should?

21 A No, sir.

22 Q And, since you had told them that that was the
23 standard procedure -- well, let me strike that.

24 You had -- well, you just okayed that you had told them
25 that, and they didn't suggest to you that you include

1 anything about that in your answer?

2 A No, sir.

3 JUDGE GROSSMAN: All right.

4 JUDGE BLOCH: Mr. Berry? You have rested.

5 Mr. Roisman?

6 MR. ROISMAN: Mr. Watkins?

7 JUDGE BLOCH: I'm sorry. Save you up for last.

8 Sir?

9 EXAMINATION

10 BY MR. WATKINS:

11 Q Sir, did Mr. Allen use the ALARA review of the
12 DCA as an example?

13 A I believe he had that as an example; yes, sir.

14 Q Regarding the copies of appendix B at the
15 orientation sessions, do you distribute those to each and
16 every inspector? Or do you simply make them available?

17 A I make them available.

18 MR. WATKINS: Nothing further.

19 JUDGE BLOCH: Mr. Roisman?

20 EXAMINATION

21 BY MR. ROISMAN:

22 Q Mr. Manning, who are the recipients of the
23 training that you referred to in answer 5, that you are
24 the Training Quality Engineer?

25 A Mr. Roisman, that title is more of a title than

1 anything else. The training engineer is in reference to --
2 I'd say is the same thing as the training coordinator, if
3 you will. It is a title bestowed upon me, I guess you'd
4 say, as the keeper of the records.

5 We hold all the records for the non-ASME training; it
6 would be, like I say, formal training, classroom testing,
7 testing, certification, recertification, OJT, revision
8 training to procedures. Thereby, the title "training" is
9 in reference to everyone in the non-ASME department,
10 really.

11 Q Do the new quality engineers go through this
12 training?

13 A They go through this orientation; yes, sir.

14 Q So they are part of the people that get the
15 training that you are the Training Quality Engineer for?

16 A Yes, sir.

17 Q And yet, in that capacity you do not have
18 personal knowledge about the way in which DCAs are
19 processed on the plant site?

20 A I know. But, like I say, it's not a specific
21 function of my job; no, sir.

22 Q But I thought that you weren't able to answer
23 Mr. Allen's question about why there weren't more
24 signatures on the DCA?

25 A At the time I did not know the specifics behind

1 it; no, sir.

2 Q You didn't know that it went to Gibbs & Hill and
3 their signatures went on after the quality engineering
4 department had done its sign-off?

5 A I presumed that, presumed that. But --

6 Q I'm sorry, I couldn't hear whether you said you
7 presume it or you presumed it?

8 A I presumed it, at the time. But I didn't feel
9 that I could adequately give a correct answer to his
10 question.

11 Q You didn't suggest that to him at all, say:
12 Corry, I think it's probably that. Give him --

13 A I don't remember doing that; no, sir.

14 Q You indicated that this title was in lieu of a
15 pay raise?

16 A No, sir. That was --

17 Q Well, I understand you said it somewhat
18 jocularly?

19 A Yes.

20 Q But tell me, since the date of getting the title,
21 have you gotten a pay raise?

22 A No, sir.

23 Q And did you get one at the time you got the
24 title?

25 A No, sir. I was being facetious.

1 Q Well, I'm sure company management will read that.
2 I'm glad you put that in.

3 A (Laughing) Well, in that case maybe it will work.

4 JUDGE BLOCH: Off the record a second.

5 (Discussion off the record.)

6 MR. ROISMAN: I have no further questions.

7 MR. BERRY: I have no questions.

8 MR. WATKINS: Nothing further.

9 JUDGE BLOCH: Mr. Manning, it's a pleasure for
10 me to tell you that your traveling days are over. Thank
11 you for helping us out here today.

12 (Whereupon, at 10:50 a.m., the deposition was
13 concluded.)

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CERTIFICATE OF OFFICIAL REPORTER

This is to certify that the attached proceedings before the UNITED STATES NUCLEAR REGULATORY COMMISSION in the matter of:

NAME OF PROCEEDING: TEXAS UTILITIES GENERATING COMPANY,
et al.

(Comanche Peak Steam Electric
Station, Units 1 and 2)

DEPOSITION OF CECIL MANNING

DOCKET NO.: 50-445-OL2, 50-446-OL2

PLACE: Washington, D. C.

DATE: Tuesday, December 18, 1984

were held as herein appears, and that this is the original transcript thereof for the file of the United States Nuclear Regulatory Commission.

(sig)

(TYPED)

JOEL BREITNER
Official Reporter
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