

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

INTERVIEW

OF

HARRY WILLIAMS

Pittsburgh, Pennsylvania

November 7, 1983

Appearances:

H. BROOKS GRIFFIN,  
NRC Investigator

DONALD D. DRISKILL,  
NRC Investigator

LeBOEUF, LAMB, LEIBY & MacRAE

By: JOHN S. KINZEY, JR., ESQUIRE  
Counsel for Dravo Constructors, Inc.  
and Harry Williams

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EXHIBIT (8)

I N - C - E - X

WITNESS

|                | Examination by: | Page |
|----------------|-----------------|------|
| Harry Williams | Mr. Griffin     | 5    |

1 Sworn statement of HARRY WILLIAMS, taken before  
2 Marcia B. Hall, a Registered Professional Reporter,  
3 commencing at 2:30 p.m., on the 7th day of November 1983, at  
4 the office of Dravo Constructors, Inc., 32nd Floor, One  
5 Oliver Plaza, Pittsburgh, Pennsylvania.

6 -----

7  
8 MR. GRIFFIN: For the record, this is an  
9 interview by H. Brooks Griffin of Harry Williams who is  
10 employed by Dravo Constructors, Inc.

11 MR. WILLIAMS: Uh-huh.

12 MR. GRIFFIN: And you are presently located in  
13 El Centro, California.

14 The location of this interview is the 32nd floor  
15 of One Oliver Plaza, Pittsburgh, Pennsylvania.

16 Present at this interview are, for the NRC, H.  
17 Brooks Griffin and Don D. Driskill. We are interviewing Mr.  
18 Harry Williams.

19 And for Dravo, what is your first name?

20 MR. KINZEY: John Kinzey.

21 I am also representing Mr. Williams in  
22 connection with this interview.

23 MR. GRIFFIN: Dravo and Mr. Williams?

24 MR. KINZEY: Yes.

25 MR. GRIFFIN: This interview is being

1 transcribed by a court reporter.

2 There are a variety of subjects that are going  
3 to be covered in this interview. One of them being some QC  
4 records, and intimidation, are the basic issues I want to  
5 talk to you about.

6 Mr. Williams, if you will please stand, I want  
7 to swear you to the contents of this statement.

8 Would you stand and raise your right hand?

9  
10 (The witness was first duly sworn.)

11  
12 MR. KINZEY: Before we begin, I understand there  
13 are certain agreements that have been reached prior to going  
14 on the record with the interview.

15 Some weeks ago, Mr. Williams gave an interview  
16 and a statement to Mr. Driskill, who is present here today,  
17 at a time when Mr. Williams was not represented by counsel.

18 As I understand, he was promised a copy of that  
19 signed statement which he has not yet received.

20 It was my position at the outset today that we  
21 were not prepared to go forward with that interview on the  
22 record until Mr. Williams has been provided a copy of that  
23 statement.

24 So I will allow the interview to go forward. I  
25 believe it is the agreement of those of us present that the



4

1 subject matter as to which Mr. Williams was interviewed in  
2 the prior interview, and which was the subject of that  
3 statement, will not be covered during the course of today's  
4 interview; and that statement which he signed previously will  
5 not be used in any way to impeach him.

6 MR. GRIFFIN: That's correct.

7 MR. KINZEY: I further understand that we will  
8 be provided a copy of that signed statement by mail after Mr.  
9 Griffin and Mr. Driskill have had a chance to go back to  
10 their office.

11 MR. GRIFFIN: That's correct, also.

12 MR. KINZEY: Let's go ahead.

13 MR. GRIFFIN: Harry, before I start talking to  
14 you I want to go into, for a moment --

15 MR. KINZEY: Do you want this on the record?

16 MR. GRIFFIN: Yes, I do.

17 MR. KINZEY: I didn't mean to interrupt. Go on.

18 MR. GRIFFIN: Before I start the interview, I  
19 want to go into the relationship that exists between Mr.  
20 Kinzey and you for the record.

21 Mr. Kinzey, I pose some of the questions to you.  
22 Do you presently represent Dravo Constructors,  
23 Inc.?

24 MR. KINZEY: Yes.

25 MR. GRIFFIN: In this instance, you say you also

1 represent Mr. Williams; is that correct?

2 MR. KINZEY: Yes.

3 MR. GRIFFIN: Do you represent any of the other  
4 parties involved, like Tugco, Brown & Root?

5 MR. KINZEY: I do not represent any other party,  
6 including those two.

7

8 HARRY WILLIAMS, being previously duly sworn, was  
9 examined and testified as follows:

10

11 EXAMINATION

12 BY MR. GRIFFIN:

13 Q. Mr. Williams, the NRC allows an interviewee, an  
14 employee of a contractor, or representative in the nuclear  
15 industry that is being interviewed by the NRC, an opportunity  
16 to have with him or present with him in the interview a  
17 representative.

18 That doesn't necessarily mean counsel. It just  
19 means maybe that you want -- the intent was I believe to make  
20 you feel more comfortable in the interview and not to direct  
21 his testimony or to tell him what to say or what not to say  
22 or where to start and stop.

23 When I interviewed or when I called you on the  
24 phone earlier, you indicated that you could not be  
25 interviewed by the NRC until you had a Dravo attorney present,

1 and I believe you indicated this was company policy; is that  
2 true?

3 A. Uh-huh. That's true.

4 MR. KINZEY: Harry?

5 THE WITNESS: Yes. Excuse me.

6 BY MR. GRIFFIN:

7 Q. In this instance, are you adhering to company  
8 policy, or is it your personal preference that your  
9 representative be Mr. Kinzey?

10 In other words, are you doing it because Dravo  
11 says you will, or are you doing it because he is your  
12 personal representative?

13 A. He is my representative.

14 Q. So he speaks not for you because that's not our  
15 intent here today, but he is your representative under the  
16 term representative, as put forward by the NRC; is that your  
17 understanding?

18 A. Yes.

19 MR. GRIFFIN: Mr. Kinzey, I do not know how  
20 involved you will become in these proceedings, but when you  
21 speak, will you be speaking for Mr. Williams, or for Dravo?

22 MR. KINZEY: I will be speaking for Mr. Williams.

23 MR. GRIFFIN: Mr. Kinzey, you said that, I  
24 believe, you indicated that when the NRC interviews Dravo  
25 employees, it is their company policy that they be

Harry Williams

1 represented by Dravo counsel; is that correct?

2 MR. KINZEY: That is not their stated policy, no.

3 MR. GRIFFIN: Would you explain it to me  
4 briefly?

5 MR. KINZEY: My understanding of the policy is  
6 that prior to speaking to any attorney for another party or  
7 any enforcement agency, it is Dravo Company policy that the  
8 potential witness or interviewee is to contact corporate  
9 legal department here in Pittsburgh who will advise the  
10 witness at that point as to whether he needs a lawyer, to  
11 give him a choice of lawyer, if he wants one, or to represent  
12 him if that is what seems appropriate in the circumstances.

13 MR. GRIFFIN: You say if that is what seems  
14 appropriate.

15 Tell me this, did Mr. Williams before the outset  
16 or before today have a choice as to whether he could have a  
17 Dravo attorney or not? Does he have a choice?

18 MR. KINZEY: He most certainly does. We spoke  
19 with Mr. Williams last night and told him what his options  
20 were, and under Dravo bylaws, he had the right to retain any  
21 counsel he chose, and the company would reimburse him for  
22 that expense.

23 MR. GRIFFIN: It is your understanding that Mr.  
24 Williams -- it is his choice that you be present here today?

25 MR. KINZEY: Yes.

Harry Williams

1 MR. GRIFFIN: I think you told me earlier, Mr.  
2 Kinzey, who implemented this policy. Do you know?

3 MR. KINZEY: I don't personally know, no.

4 It is my understanding Mr. Glen Burns, who is  
5 Dravo's Corporate attorney, initiated this policy some period  
6 of time back.

7 MR. GRIFFIN: And it is your understanding that  
8 this policy will be uniformly applied?

9 MR. KINZEY: Yes.

10 MR. GRIFFIN: To other employees as these issues  
11 come up as they relate to the nuclear industry and contact  
12 with the NRC and others?

13 MR. KINZEY: Yes. It is not limited to the NRC.

14 MR. GRIFFIN: Okay.

15 Mr. Kinzey, have you been given any instructions  
16 that relate to a potential conflict between what Mr. Williams  
17 might be saying in his testimony and what Dravo Company's  
18 policy might be? Do you understand my question?

19 MR. KINZEY: No.

20 MR. GRIFFIN: Has anybody instructed you as to  
21 how to represent Mr. Williams in this matter?

22 MR. KINZEY: No.

23 MR. GRIFFIN: No?

24 MR. KINZEY: No. I am not quite sure what your  
25 point is, but I would simply observe as a lawyer if a

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1 conflict arises and there is an attorney, he has an ethic  
2 obligation to deal with that.

3 I am here today because we don't perceive an  
4 conflict between Mr. Williams and the company.

5 MR. GRIFFIN: The NRC does not have an offic  
6 policy on this that I am aware of. We have already discu  
7 this. But the NRC does see a potential conflict between  
8 company attorney representing an interviewee, and the com  
9 has its own interests in mind during the interview.

10 We are proceeding with this interview in spite  
11 of my concerns in that area.

12 MR. KINZEY: If we are going to go into this,  
13 which I think is burdening the record unnecessarily, I jus  
14 observe that, as I understand it, Mr. Williams has the rig  
15 in any informal administrative procedure to have counsel o  
16 his choice.

17 If there is a potential conflict between the  
18 witness and another entity that the lawyer may represent,  
19 really, it isn't necessarily something of the NRC's concern

20 MR. GRIFFIN: The NRC is concerned about wheth  
21 the testimony received is an accurate recreation or portray  
22 of the events and knowledge of the witness, rather than a  
23 reflection of the company's perceived or desired portrayal  
24 recreation of the events, and that's where the concern lies

25 MR. KINZEY: I can understand that is a concern



Harry Williams

1           A.     Supervisor.

2           Q.     The term, supervisor, is that the same as, like,  
3     superintendent?

4                     Were you a superintendent part of that time?

5           A.     I don't feel like -- I was a supervisor most of  
6     the time.

7           Q.     You were a Dravo supervisor. Did you supervise  
8     Brown & Root employees?

9           A.     Yes.

10          Q.     Were you employed in other than coatings, QC  
11     inspections? Did you have other jobs also?

12          A.     Well, supervisor with another group, yes.

13          Q.     What other group was that?

14          A.     Concrete. QC.

15          Q.     Did you hold that position at the same time you  
16     held the position as coatings QC supervisor?

17          A.     Yes.

18          Q.     Did you hold that same position during the  
19     entire time you were employed there?

20          A.     . With the concrete, yes.

21          Q.     And coatings is just a portion of the title?

22          A.     Yes.

23          Q.     When did you start or when did you become a  
24     supervisor over coatings?

25          A.     I believe it was June '81.



1 Q. And did you hold that position until you left?

2 A. Yes.

3 Q. And when did you leave Comanche Peak?

4 A. September, let me think, the first of September.

5 Q. 1983?

6 A. '83.

7 Q. What is your present position?

8 A. QA at the Heber site.

9 Q. H-e-b-e-r?

10 A. H-e-b-e-r.

11 Q. What type facility is that?

12 A. That's a geothermal system.

13 Q. All right.

14 In the fall of 1982, among the other groups that  
15 you supervised, did you supervise the QC coatings group at  
16 Comanche Peak in which Robert Hamilton was the supervisor or  
17 the foreman?

18 A. Yes.

19 Q. Do you recall an instance which occurred in  
20 March of 1982, in which I believe Mr. Hamilton, Mr. Krolack,  
21 Mr. Shelton, were asked by you, I believe, to perform an  
22 inspection at, I believe they described it as high on the  
23 ring in the containment, Unit 1? Do you recall that incident?

24 A. Yes, sir.

25 Q. Were you the supervisor of Mr. Hamilton at that

1 time?

2 A. Yes.

3 Q. And Mr. Shelton and Krolack, were they on Mr.  
4 Hamilton's crew?

5 A. Yes.

6 Q. Were Krolack, Hamilton and Shelton subsequently  
7 terminated as a result of their unwillingness to perform an  
8 inspection on that ring?

9 A. Yes.

10 Q. Whose decision was it to terminate them?

11 A. My supervisor.

12 Q. Who was that?

13 A. Tom Brandt.

14 Q. Were you the one that instructed Hamilton to  
15 perform the inspection?

16 A. I gave word that he needed to go up there, him  
17 or he and his people.

18 Q. Who originated this inspection? Who decided  
19 this inspection had to be made? Was it routine?

20 A. Construction.

21 Q. Construction. So they were at a point where  
22 that needed to be inspected?

23 A. Needed to be inspected.

24 Q. Do you remember which one you asked to go up  
25 first?

1           A.       I didn't ask any of them personally. I told the  
2 supervisor to send somebody up there.

3           Q.       You told Hamilton?

4           A.       I told Neil Britton and he relayed a message to  
5 Hamilton.

6           Q.       I see. There were a couple other paint  
7 inspectors whose names I am familiar with. Fazi and Gunn,  
8 are you familiar with those two gentlemen?

9           A.       Yes.

10          Q.       Were they also asked to make this inspection?

11          A.       Gunn wasn't.

12          Q.       Was Fazi?

13          A.       I don't know.

14          Q.       Do you recall, or is it your personal knowledge  
15 that Krolack and Shelton were asked to make this inspection?

16          A.       I don't know if they --

17          Q.       Is your knowledge of this instance based on  
18 having been there yourself or just related to you through  
19 some third-party?

20          A.       They were told to go up there to inspect. And  
21 they refused to go.

22          Q.       But the instructions came -- originated with you,  
23 went through Britton to these guys?

24          A.       Uh-huh.

25          Q.       Did Hamilton ever have any personal conversation

1 with you about refusing to perform this inspection?

2 A. Hamilton came to me and said it was unsafe, or  
3 he said it was unfair.

4 Q. Hamilton did?

5 A. Uh-huh.

6 Q. Do you recall what your comments were or what  
7 your response was?

8 A. Yes.

9 Q. What did you tell him?

10 A. I said, "I will go up to the Safety Department  
11 and have a look at it."

12 Q. Did the Safety Department look at it?

13 A. Yes.

14 Q. And what was their --

15 A. They said it was safe. No problem with it.

16 Q. Do you know if Hamilton was the first one that  
17 was asked to perform his inspection? Or did Krolack and  
18 Shelton precede him; do you know?

19 A. I don't know.

20 Q. After Safety decided that it was a safe  
21 inspection, did you make any further -- give Hamilton further  
22 instructions?

23 A. I informed Neil that the Safety Department said  
24 it was safe; that they were to go up and do their job.

25 Q. I presume Mr. Hamilton continued to refuse, is

1 that right?

2 A. Yes.

3 Q. Did he tell you this personally, or written, as  
4 related to you?

5 A. He told Britton, and he related it to me.

6 Q. What happened next?

7 A. I went to my supervisor.

8 Q. Brandt?

9 A. Yes.

10 Q. And what did Brandt say?

11 A. He said that they are to perform that inspection  
12 And if not, he wanted to see them in his office.

13 Q. Did Brandt subsequently see them in the office?

14 A. Yes.

15 Q. Was it Shelton, Hamilton and Krolack?

16 A. Yes.

17 Q. What did Brandt do, now?

18 A. He had also Gordon Purdy there, and they had  
19 prior discussed this to them getting there. And he gave them  
20 one more chance to go up and inspect it.

21 Q. And they refused?

22 A. Yes.

23 Q. Then what happened?

24 A. They were terminated.

25 Q. By Brandt?

1 A. (Witness nodding head)

2 Q. During that time, were you present for that  
3 conversation?

4 A. I was in the area, yes.

5 Q. Do you recall Hamilton, Krolack or Shelton  
6 recalling or relating any prior history on this particular  
7 inspection? Do you recall him saying that a previous  
8 supervisor by the name of Hawkins had already made a  
9 statement that this was an unsafe inspection?

10 Do you recall that statement?

11 A. Yes, sir.

12 Q. Do you recall any comments by yourself, Brandt,  
13 or Purdy as it relates to that?

14 A. No. I don't.

15 Q. Did the statement that Hawkins, the previous  
16 supervisor, had said that this was an unsafe inspection, did  
17 it carry any weight, or did it influence anybody to your  
18 knowledge to believe that this was an unsafe inspection?

19 A. I don't remember. I don't know.

20 Q. Did it cause you to question whether this was a  
21 safe inspection?

22 A. No.

23 Q. In other words --

24 A. I walked it.

25 Q. You did?

1 A. Yes.

2 Q. At that time?

3 A. At a time before they went to the office.

4 Q. Did anybody else walk it?

5 A. Yes.

6 Q. Who?

7 A. Mike Foote and Neil Britton and I all went up  
8 there.

9 Q. Do you have an opinion beyond these facts as to  
10 why these men were not performing inspections?

11 Or do you feel like they were being honest in  
12 that they thought it was an unsafe inspection?

13 A. I don't know.

14 Q. Do you recall if anybody else voiced an opinion  
15 as to why these men were not to perform this inspection?

16 A. No. The reason they gave was unsafe.

17 Q. You said Brandt actually terminated Hamilton,  
18 Krolack and Shelton. Was anybody else involved in the  
19 decision to terminate them?

20 A. Gordon Purdy was there.

21 Q. But Brandt was the one that made the decision?

22 A. I am assuming. I can't put words in their mouth.

23 Q. All I want to know is what you personally know.  
24 I am not asking for hearsay or speculation in this instance.

25 A. I don't know. You would have to talk to them on



1 that.

2 Q. But you were present if, for instance, if Purdy  
3 had said "Tom, fire him"? That's why I am asking the  
4 question.

5 A. Tom and I discussed it. And I am assuming that  
6 he discussed it with Gordon, you know.

7 Q. But it was Brandt's decision?

8 A. Yes. It might have been both of their  
9 decisions, I don't know.

10 Q. Do you ever recall anybody in your presence  
11 telling Mr. Hamilton, or had you ever told to Mr. Hamilton  
12 that he was conducting his inspections too well? Quote,  
13 "too well," unquote?

14 A. No.

15 Q. You never made that statement?

16 A. (Witness shaking head negatively).

17 Q. Harry, I want to move onto a different subject:  
18 Ron Tolson.

19 Harry, do you recall an incident while you were  
20 I believe the QC superintendent of HP in which Darlene Stiner  
21 refused to sign off on a hanger? And she voiced this to you,  
22 indicated she refused to sign off on it? Do you recall that  
23 incident?

24 A. No, I don't.

25 Q. Do you ever recall telling Mrs. Stiner when she

1 refused to perform an inspection to buy off the hanger, you  
2 would find somebody else who would? Do you ever recall  
3 making that statement to Mrs. Stiner?

4 A. No, I don't.

5 Q. Do you ever recall substituting Randy Smith to  
6 perform an inspection that Darlene Stiner had indicated she  
7 would not perform?

8 A. No.

9 Q. Have you ever heard of this incident that I am  
10 trying to --

11 A. No, I haven't.

12 Q. Has anybody ever told you that this incident was  
13 testified to before the ASLB hearing board?

14 A. No.

15 Q. Do you recall another instance in which a  
16 foreman by the name of James Sturbridge instructed Mrs.  
17 Stiner to weld a leg on a hanger that did not contain a  
18 drawing with the dimensions in the traveler? Do you recall  
19 that incident?

20 A. No, I don't.

21 Q. Do you recall that instance yourself?

22 A. I don't.

23 Q. Do you recall that?

24 A. No, I don't recall that.

25 Q. Would it be in violation of procedure?

1           A.       Pardon?

2           Q.       Would it be in violation of Brown & Root's  
3       procedure to add a leg? You understand what I mean by leg?

4           A.       Yes. I know what you mean.

5           Q.       A hanger without proper documentation?

6           A.       Yes, it would be.

7           Q.       If such thing had occurred, do you think you  
8       would recall it? The incident?

9           A.       I think I would.

10          Q.       You do not recall it?

11          A.       I don't recall it right now, no.

12          Q.       Do you recall any incident in which a leg was  
13       welded on a hanger without proper documentation, in which QC  
14       discovered the welding in process, and brought a halt to it,  
15       involving Mrs. Stiner?

16          A.       Not to my knowledge.

17          Q.       A separate issue now, do you recall in 1982,  
18       when Mrs. Stiner was instructed to perform inspections  
19       relating to torqueing of Hilti bolts? Do you recall her  
20       inspections in that area?

21          A.       Well, she inspected the bolts as she inspected a  
22       hanger.

23          Q.       Do you recall an instant in which Mrs. Stiner  
24       was instructed to accept the torque on Hilti bolts without a  
25       sign-off on the traveler?

1 A. Sign off on the traveler?

2 Q. Yes.

3 A. No. She accepted them. She signed off on the  
4 traveler for them.

5 Q. So it would have been her responsibility?

6 A. It would have been her responsibility to sign  
7 that, yes.

8 Q. Is it possible that her -- let me rephrase my  
9 question. In her inspection of Hilti bolts, they had already  
10 been installed, which only her inspections involved the  
11 torqueing.

12 Did you ever recall an incident in which there  
13 had not been a sign-off of the installation of the Hilti  
14 bolts in the traveler?

15 I am just trying to jog your memory as to an  
16 incident.

17 A. If the traveler is present when you go up to  
18 inspect the hanger, if the torqueing is not signed off at  
19 that time, they are to do it with the inspection of the  
20 hanger at that precise time.

21 Q. In other words, let me see if I understand this.

22 You are saying if the traveler does not show the  
23 installation of the Hilti bolt, then the fact that they are  
24 just inspecting torqueing at that point, that the QC  
25 inspector can go back and sign off on the installation that

1 has previously occurred?

2 A. Well, now you are saying two different things.

3 Q. Am I?

4 A. Yes. Installation is installing the bolt.

5 Q. Right.

6 A. Okay. That is done on a random basis by QC  
7 people.

8 Q. Okay.

9 A. They have separate IR's for those Hilti bolts as  
10 being installed in the wall.

11 The bolts are preset by construction.

12 Q. But if you are inspecting just the torqueing on  
13 them and you find that they have not been bought off by QC on  
14 the installation, did you proceed with the torqueing  
15 inspection?

16 A. Yes. Because they may not have inspected those  
17 certain bolts on installation.

18 Q. Because it is a random?

19 A. Yes. A random-type sampling, yes.

20 Q. This was a part of the procedure at Comanche  
21 Peak for Brown & Root?

22 A. Yes, at that time.

23 Q. So it is not unusual to see a traveler package,  
24 say, during an inspection of Hilti bolts for torqueing in  
25 which QC has not bought off the installation of that Hilti

1 bolt?

2 A. Well, now, yes.

3 Q. Do you recall an incident in which Mrs. Stiner  
4 declined to perform inspections of torqueing on Hilti bolts,  
5 and made this declination or declined to do it to you,  
6 indicated to you that she would not do this?

7 A. No, I don't.

8 Q. Do you recall Mrs. Stiner at all?

9 A. Sure.

10 Q. Darlene Stiner?

11 A. Yes, I know her.

12 Q. Do you recall an argument with Mrs. Stiner over  
13 this issue, at all?

14 A. No.

15 Q. Do you recall ever indicating to Mrs. Stiner  
16 that if she did not trust you, that you would replace her?

17 A. No.

18 Q. Do you recall ever making such a statement to  
19 her?

20 A. No.

21 Q. Harry, in 1982, do you recall asking Mrs. Stiner  
22 to work on inspections of vendor welds on diesel generators  
23 with Randy Smith?

24 A. Yes.

25 Q. Do you remember any statements or any position

1 that Mrs. Stiner related to you as to her feelings about  
2 conducting these inspections?

3 A. Yes. She said she wasn't familiar with the  
4 drawings of the diesel generator.

5 Q. Did she indicate she would rather not perform  
6 these inspections?

7 A. Yes.

8 Q. What were your instructions to her?

9 A. At the time, I told her to help out Randy as  
10 much as she could until we could get caught up, and then  
11 Randy Smith took over and just run it by himself.

12 Q. Do you recall instructing Mrs. Stiner to go  
13 forward with the inspections even though she indicated she  
14 did not want to?

15 A. No. She preferred that she'd help; do what she  
16 could.

17 Q. Did she conduct inspections?

18 A. Yes.

19 Q. During your conversation in which she indicated  
20 that she didn't know about them, was not familiar with them,  
21 did you make any statements to her to the point that she  
22 could conduct the inspections, or go home?

23 A. No.

24 Q. So you did not threaten her with that?

25 A. No.



1 Q. In any manner?

2 A. (Witness shaking head)

3 Q. You did not indicate that her employment hinged  
4 on her conducting these inspections?

5 A. No.

6 Q. Do you recall an incident in which Mrs. Stiner  
7 wrote an NCI on some large doors in the containment plates,  
8 and put hold tags on welds on these doors. Do you remember  
9 that incident?

10 A. I don't know. On some welds on a door?

11 I am in the dark here.

12 Q. Okay. I think they may have been vendor welds  
13 on some preconstructed doors.

14 I am just trying to jog your memory.

15 A. There is -- well, I know there was some doors  
16 out there that we had to redo. But I am not, I am not saying  
17 these are those. I am not sure.

18 Q. Do you recall Mrs. Stiner putting tags on those  
19 doors, hold tags?

20 A. No.

21 Q. Were you present when Mr. Brandt told Randy  
22 Smith to tell Darlene Stiner that she would perform the  
23 inspections and buy off on the doors, or she would be gone?

24 A. Who made that statement?

25 Q. Were you present when Mr. Brandt indicated that

1 Mrs. Stiner -- indicated to Mr. Smith -- that Mrs. Stiner  
2 would perform the inspections, or be gone?

3 A. No.

4 Q. Were you present when Mr. Smith related to Mrs.  
5 Stiner that she would perform the inspections or be gone?

6 A. No. Because at that time, Smith didn't work  
7 with Stiner.

8 Q. Since you do not recall the incident, how do you  
9 know what time we are talking about?

10 A. Because when you said Brandt, the names changed  
11 when he took over.

12 Q. Did your position change?

13 A. Yes, sir.

14 Q. What did your job title become when Brandt moved  
15 in?

16 A. My job title stayed the same. Just had less  
17 people to worry about.

18 Q. You didn't have --

19 A. I didn't have Stiner, Smith and Britton.

20 Q. Were you present for any of the interviews or ..  
21 counseling sessions? I don't know exactly how to term it,  
22 which, while Mrs. Stiner was pregnant, and still working she  
23 was called into Mr. Tolson's office, the QA manager, and  
24 conducted discussions with him on her health and her  
25 pregnancy?

1 A. No.

2 Q. You were not present for any of these?

3 A. No.

4 Q. Were you aware of these interviews by third  
5 parties or talk around?

6 A. Just talk.

7 Q. Do you know how many times Mrs. Stiner was  
8 called into Mr. Tolson's office?

9 A. No, I don't.

10 Q. Do you have any idea? One or more times?

11 A. No, I don't.

12 Q. Did Mr. Tolson or Mr. Brandt ever convey to you  
13 or tell you about these sessions?

14 A. No?

15 Q. Different subject now: Do you recall the woman  
16 who I believe is now Robert Hamilton's wife, Cordella  
17 Hamilton; do you recall her?

18 A. Yes.

19 Q. I believe her job was document clerk QA, QC  
20 coating, is that correct?

21 A. Clerk.

22 Q. For coatings; is that correct?

23 A. Yes.

24 Q. And in this position, was she also under your  
25 supervision?

- 1 A. Yes.
- 2 Q. But there was a foreman over her?
- 3 A. Which was Hamilton.
- 4 Q. Robert Hamilton?
- 5 A. (Witness nodding head)
- 6 Q. Did you ever give direct instructions to
- 7 Cordella Hamilton as relates to her performing her duties?
- 8 A. That time is when he came in with the IR system.
- 9 She needed help with that. I sent another clerk down there
- 10 to help set up a logbook.
- 11 Q. Do you ever recall giving Mrs. Hamilton any
- 12 instruction in performing her duty?
- 13 A. As a clerk?
- 14 Q. Yes.
- 15 A. No.
- 16 Q. Do you recall ever telling Mrs. Hamilton that
- 17 she needed to perform her document review, which I believe is
- 18 what she was involved in? Well, let me start over. Let me
- 19 start: did her duties involve document review of coating
- 20 inspection records for adequacy?
- 21 A. Records?
- 22 Q. Yes.
- 23 A. No.
- 24 Q. What was her job as you knew it to be?
- 25 A. As a clerk, just to log them in.

1 Q. Log what in?

2 A. The IR's at the time we started them.

3 Q. The inspection check list?

4 A. Yes. At that time when Brandt went there, then  
5 we went into the CR system.

6 Q. Did she work there prior to the time Brandt was  
7 there?

8 A. Yes.

9 Q. Were you her supervisor prior to the time Brandt  
10 came?

11 A. As far as that goes, Hamilton fell under me from  
12 the simplicity of just people to hire or to fire.

13 Technically, problems went to Hawkins.

14 Q. Did you ever tell Mrs. Hamilton prior to Mr.  
15 Brandt's arrival on site and changing to IR's, did you ever  
16 instruct Mrs. Hamilton to conduct her clerking duties in a  
17 more timely manner?

18 A. No.

19 Q. Did you ever counsel her or give her  
20 instructions as relates to speeding up her document clerking  
21 activities?

22 A. No.

23 You are saying prior to Brandt now?

24 Q. Right.

25 A. No.

1 Q. Do you recall giving her instructions after  
2 Brandt came to hurry up or speed up her clerking duties?

3 A. No.

4 Q. Now, just in a kind of small review here, we  
5 have talked about an instance involving Robert Hamilton,  
6 Darlene Stiner, and Cordella Hamilton.

7 If I am remembering correctly, other than the  
8 Hilti bolt, torqueing of Hilti bolts incident, which I  
9 related to you and possibly the large doors, you don't have  
10 any recollection of the incidents that I have questioned you  
11 about, is that right?

12 A. That's correct.

13 Q. Based on my questions -- do you believe that  
14 these incidents that I am telling you as they have been  
15 related to me, which is the foundation for these questions,  
16 have these people truthfully related these instances to me,  
17 or are these pure fabrications?

18 MR. KINZEY: That's an unfair question to ask  
19 this witness.

20 THE WITNESS: I don't know.

21 MR. GRIFFIN: I am trying, Mr. Kinzey, I am  
22 trying to -- we have quite a few incidents here of  
23 confrontations that have been related to us. And Mr.  
24 Williams indicates he has little or no memory of them.

25 And he may have an opinion that I am trying to



1 elicit as to whether the NRC has been provided with false  
2 information. He may have a clear recollection that these  
3 instances have never occurred, or I am trying find out if  
4 they ever did occur, or he just has no memory of them. I  
5 would appreciate an answer on that.

6 MR. KINZEY: Do you understand the question?

7 THE WITNESS: I understand the question.

8 BY MR. GRIFFIN:

9 Q. Do these represent real events that occurred?

10 A. I don't have recall of them. Put it that way.

11 Q. You don't recall them?

12 A. No.

13 Q. Let me elicit your opinion then for a moment:  
14 Do you believe that these events may have been real, or are  
15 they fabrication? Do you have an opinion?

16 A. No. I don't have an opinion.

17 Q. Switch to a different subject now: In that you  
18 were the supervisor over coatings records, when did you first  
19 start as superintendent over coatings, or as the supervisor  
20 over coatings? Do you remember what year?

21 A. When did we determine -- to the best of my  
22 recollection, I would say 1982.

23 Q. You started handling --

24 A. I would say '82.

25 Q. Okay.



1 Q. Harry, when were you involved?

2 A. June.

3 Q. June '82?

4 A. Something like that.

5 MR. DRISKILL: I believe you said earlier June '81.

6 THE WITNESS: Did I say '81? No.

7 Jim Hawkins was still there.

8 MR. DRISKILL: Okay.

9 BY MR. GRIFFIN;

10 Q. To the best of your recollection, it would be  
11 like June of '82?

12 A. I am just sorting that out. I am not sure.

13 Q. Who was the supervisor at that time over  
14 coatings, QC?

15 A. Hawkins was at that time.

16 Q. This is prior to their switching to the IR  
17 system, is that right?

18 A. Yes. They just had a check list.

19 Q. Were you during 1983 --

20 A. (Witness shaking head)

21 Q. -- involved, or did you participate in a  
22 document review conducted by Mr. Britton of these old  
23 coatings inspection check lists?

24 A. Did I personally review them?

25 Q. Yes.

Harry Williams

1 A. No.

2 Q. Were you aware that Mr. Britton was conducting  
3 such?

4 A. Yes.

5 Q. But you did not actually look at any of the  
6 documents?

7 A. I looked at them, but that was it.

8 Q. I mean, did you look at them in relation to this  
9 review process?

10 A. No.

11 Q. Did Mr. Britton ever bring these documents to  
12 you to request a comment or explanation for any of them?

13 A. These documents were all reviewed by Ebasco  
14 people first.

15 Q. Who was that, do you recall the names of those  
16 people?

17 A. Mike Foote was one, and Dick Cummings.

18 Q. Do you know if they looked at all of them?

19 A. They looked at every one of them. Never  
20 involved. I put them in the vault.

21 Q. Where did you acquire the records?

22 A. Out of the QC shack.

23 Q. Which one?

24 A. Hamilton's.

25 Q. That is on the hill?

1 A. (Witness shaking head)

2 Q. The other one that is down there close to the  
3 admin. building?

4 A. No. Those are down at the intake structure.  
5 Excuse me. The service water tank.

6 Q. Okay.

7 Do you recall when you put those QC records in  
8 the vault?

9 A. Right after I found out what shape they were in.  
10 I am not -- it isn't -- shortly after Tom Brandt took over.

11 Q. In the summer of '82?

12 A. Gee, shortly after.

13 Q. Do you have any idea when Foote and Cummings  
14 conducted their review of these records?

15 A. That same year, in the fall.

16 Q. Was it at your instruction that this review was  
17 conducted?

18 A. No.

19 Q. Do you know what the purpose of their review was,  
20 Cummings and Foote?

21 A. See what they could find that would amount to  
22 anything.

23 Q. Was this review that they conducted as a result  
24 of an NRC notice of violation? Do you know that?

25 A. I don't know that.

1 Q. So you don't know what the origins of this  
2 document review were?

3 A. (Witness shaking head)

4 Q. Do you know what the findings were of Foote and  
5 Cummings' review?

6 A. Yes. One massive back fit program.

7 Q. Were NCIs issued as a result?

8 A. Yes.

9 Q. Were they this issued after Foote and Cummings  
10 got the review or prior to this?

11 A. They issued it at the time.

12 Q. During then?

13 A. Well, shortly, I can't say it was right at that  
14 time or you know. They were issued after their findings.

15 Q. After Cummings and Foote's findings?

16 A. (Witness nodding head)

17 Q. Do you know what the recommendation was?

18 Or did they make one? Did Cummings and Foote  
19 make a recommendation as relates to these records?

20 A. No.

21 Q. Who decided that there would be a massive back  
22 fit program?

23 A. I think Tolson did.

24 Q. Is that your personal knowledge or just assuming  
25 that?

1 A. I am just assuming. Went full scale into it.

2 Q. Do you know why Mr. Britton was then asked to do  
3 a review of these same documents?

4 A. Because he was doing a back fit. He was the  
5 back fit person at that time.

6 Q. He was the supervisor in charge of the back  
7 fitters?

8 A. Yes.

9 Q. Is it your understanding that the back fit was  
10 to be for all coatings inspections prior to a certain period?

11 A. Prior to --

12 Q. Is it April '81, does that sound right?

13 A. March; April, somewhere in that time.

14 Q. I have heard that before.

15 A. Yes, right.

16 Q. I think March, April?

17 A. Right, yes.

18 Q. So while Mr. Britton was conducting his back fit,  
19 he was also reviewing these old documents. Is that your  
20 understanding?

21 A. When they started the back fit, Cummings and  
22 Foote hadn't got through the initial documents yet. So I am  
23 not familiar with when you are talking about written review  
24 on these documents.

25 Q. Are you aware that Britton -- are you aware that



1 he reviewed the documents?

2 A. He reviewed some to draw up a map.

3 Q. He mapped the locations of it?

4 A. That's right. The ones that we could map.

5 Q. As a result of his mapping, were any of these  
6 old inspections deemed -- or inspection records, I am talking  
7 about records, were any of these old inspection records  
8 deemed or found to be satisfactory and excluded from a back  
9 fit?

10 A. Some were.

11 Q. Who made the determination as to which records  
12 were to be accepted as satisfactory?

13 A. I believe Foote and Cummings were.

14 Q. Based on?

15 A. Based on the review. That they could get back to  
16 it.

17 Q. How was -- how did they transmit this  
18 information to Britton or any other inspectors for the back  
19 fit as to which inspections were adequate, and which were  
20 inadequate?

21 A. By their maps.

22 Q. Did they make entries on the map that indicated  
23 inspections in a certain area were adequate?

24 A. Yes.

25 Q. Therefore, it did not have to be included in the

1 back fit?

2 A. Yes.

3 Q. And did the inspectors conducting the back fit,  
4 did they have access and did they refer directly to these  
5 maps?

6 A. They referred to the maps on the back fit.

7 Q. Were the inspectors permitted to use or were  
8 they permitted access to these old inspection records for the  
9 back fit?

10 A. Yes. In the meeting.

11 Q. On these maps, whole areas that were represented  
12 as being adequate documentation, they were not to be back  
13 fitted; is that correct?

14 A. That's right.

15 Q. I am asking you for your best estimate now, what  
16 percentage of the old records were found to be inadequate so  
17 that they had to be back fitted? If you had to guess, just  
18 asking for a rough guess?

19 A. 98.

20 Q. Most of it had to be back fitted?

21 A. Yes.

22 Q. Was Mr. Britton primarily responsible for making  
23 the maps or was it Foote and Cummings?

24 A. After Foote, Cummings had done theirs, then we  
25 started up our IR program. And we were doing the back fit at



1 the time.

2 And Neil was making up his maps for the back  
3 fitting to show what he had covered. Then we started the  
4 same process with it ongoing, and he gets the maps.

5 Q. Did Mr. Britton himself make any representation  
6 indicating which documents were adequate and which were  
7 inadequate?

8 A. Yes.

9 Q. Was this reflected on the maps?

10 A. Yes.

11 Q. I presume those that were found to be  
12 satisfactory were not to be back fitted?

13 A. Yes.

14 Q. I have seen those maps. And a large -- tell me  
15 if I am wrong, a large area or a large percentage of the  
16 spaces on those maps indicated documents were adequate. And  
17 I find that in conflict with your saying 98 percent were  
18 inadequate?

19 A. I am just guessing. You say it was high?

20 Q. Those that hadn't already been back fitted? I  
21 just think I saw one of those maps.

22 A. You might have seen the ongoing map

23 Q. That may be that is it.

24 A. The back fit map, we back fitted that whole line  
25 of plates.

- 1 Q. Did you back fit any of the other things? Like  
2 cable tray supports?
- 3 A. Yes.
- 4 Q. Was that completely back fitted?
- 5 A. Yes.
- 6 Q. How about miscellaneous steel?
- 7 A. Miscellaneous steel. Hangers.
- 8 Q. But in individual inspections, in those areas,  
9 was there some division that were acceptable based on the  
10 earlier document review?
- 11 A. Some.
- 12 Q. So it just was --
- 13 A. Spotty.
- 14 Q. It varied from inspection to inspection then?
- 15 A. Yes.
- 16 Q. Do you still, as you recollect, you think the 98  
17 percent is still an accurate figure?
- 18 A. About. I just threw that out.
- 19 Q. Did Foote or Cummings ever characterize to you  
20 the state or the condition that they found those records in?  
21 As to whether they were adequate or quality  
22 documents? Did they ever express an opinion to you?
- 23 A. Yes.
- 24 Q. What was that?
- 25 A. Not good.

1 Q. That the documents were not adequate as quality  
2 records?

3 A. Most of them.

4 Q. How about Mr. Britton, did he ever indicate to  
5 you his feelings as to whether these things were -- would  
6 stand up as quality documents, these same inspection records?

7 A. Basically.

8 Q. Did he say they would or would not, to you?

9 A. Wouldn't.

10 Q. Would not. Do you know if the QA Department,  
11 the QA at Comanche Peak, if it was their intention to use the  
12 inspection records, or those that they labeled as adequate?  
13 Do you know if it was their intention to do a complete back  
14 fit or to accept as adequate documentation a portion of those  
15 old inspection records?

16 A. I don't know.

17 Q. They never conveyed that to you?

18 A. No.

19 Q. While you indicated a massive back fit, was the  
20 back fit intended to be a total back fit of all inspections  
21 conducted to April '81, or was it going to be selectively  
22 determined based on the adequacy of old documentation?

23 A. I think the intent of it was, it was going to be  
24 a complete back fit with exception of what old documentation  
25 on the old check list that they could use.

1 Q. When you left there, was that still the  
2 prevailing --

3 A. Still going on.

4 Q. -- the prevailing idea of what the intention was  
5 of the QA Department?

6 A. Yes.

7 Q. You say you were not involved in the document  
8 review at all; is that correct?

9 A. That's correct.

10 Q. Do you have any knowledge, any personal direct  
11 knowledge that any additional entries were made on any of  
12 these old records that any values or entries existing on the  
13 records were changed? Or that xeroxed copies were made and  
14 substituted into these records to up grade them or make them  
15 adequate records?

16 A. Not -- no.

17 Q. Is it your understanding then that these people  
18 like Cummings and Foote, Britton, were simply reviewing them  
19 for adequacy, as opposed to upgrading them?

20 A. Yes, sir.

21 Q. I asked you a moment ago if you had any personal  
22 knowledge. You said you didn't.

23 Have you heard from any source at any time that  
24 anybody had made additional entries on those records and used  
25 white-out to change entries on them, or had xeroxed copies of

1 other records and made them a part of these individual  
2 packages to make them adequate?

3 A. No.

4 Q. Thereby falsifying the documents?

5 A. No.

6 Q. You have no personal knowledge, nor any  
7 secondhand knowledge, so to speak?

8 A. No.

9 Q. Third-party comments? Never heard anything like  
10 that?

11 A. No. Never heard anything about that.

12 Q. Do you believe that those records represent the  
13 original inspections conducted by the inspectors during I  
14 believe '77, '78, '79 and '80?

15 A. Yes.

16 Q. As far as you know?

17 A. As far as I know. Yes.

18 MR. GRIFFIN: Okay. I believe that's all for me,  
19 Donald.

20 Go off the record.

21 (Discussion off the record)

22 MR. GRIFFIN: Let me go back on.

23 BY MR. GRIFFIN:

24 Q. To conclude my portion of this interview, Mr.  
25 Williams, have I or Mr. Driskill or anybody else involved in

1 this proceeding threatened you in any manner or offered you  
2 any rewards in return for this statement?

3 A. No.

4 Q. Have you given this statement freely and  
5 voluntarily?

6 A. Yes.

7 Q. Is there anything further that you would care to  
8 add to your testimony while we are on the record?

9 A. No.

10 MR. GRIFFIN: Okay.

11 (Whereupon, the proceedings were concluded at  
12 3:35 p.m.)

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1 COMMONWEALTH OF VIRGINIA AT LARGE, to wit:

2 I, Marcia B. Hall, a Notary Public in and for  
3 the Commonwealth of Virginia at Large, of qualification in  
4 the Circuit Court of the City of Norfolk, Virginia, do  
5 certify that the foregoing statement of HARRY WILLIAMS was  
6 taken and sworn to before me at the time and place  
7 aforementioned.

8 Given under my hand this 11<sup>th</sup> day of November  
9 1983.

10  
11  
12 Marcia B. Hall

13 Notary Public  
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