

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 (16)

I N D E X

WITNESS

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1 Sworn statement of HARRY WILLIAMS, taken before
2 Marcia B. Hall, a Registered Professional Reporter,
3 commencing at 3:35 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.

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7

8 MR. GRIFFIN: For the record, this is an
9 interview of Harry Williams who is employed by Dravo
10 Constructors, Inc. The location of this interview is the
11 32nd floor conference room of One Oliver Plaza, Pittsburgh,
12 Pennsylvania.

13 Present at this interview are for the NRC, H.
14 Brooks Griffin and Don D. Driskill.

15 The interviewee is Mr. Harry Williams. He is
16 represented by John S. Kinzey, a Dravo attorney, also Mr.
17 Williams' representative in this interview.

18 I need to swear you to the contents of this
19 interview. If you would stand again. Since we are doing two
20 separately.

21 (The witness was first duly sworn.)

22 THE WITNESS: First one doesn't count?

23 MR. GRIFFIN: For our convenience.

24 MR. KINZEY: For the record, there was a
25 colloquy among counsel during the interview which Mr. Griffin

1 undertook immediately preceding this one. I don't believe we
2 need to go through that again, and incorporate it here by
3 reference.

4 MR. GRIFFIN: All right.

5 MR. DRISKILL: I agree to that. There is no
6 problem with that.

7 HARRY WILLIAMS, being first duly sworn, was
8 examined and testified as follows:

9
10 EXAMINATION

11
12 BY MR. DRISKILL:

13 Q. Harry, I would like to find out when did you
14 leave Comanche Peak?

15 The last day working there?

16 A. Now, see what day did Labor Day fall on? 4th,
17 5th? The 2nd. Friday the 2nd.

18 Q. September the 2nd?

19 A. '83

20 Q. 1983. Okay. What I would like to discuss with
21 you relates to the termination of Ronald Dunham, D-u-n-h-a-m,
22 who was employed as a protective coatings quality inspector.

23 I believe he was terminated on August 26, 1983,
24 just prior to your leaving. That was on a Friday, August 26?

25 A. Yes.

1 Q. I guess Friday prior to your leaving?

2 A. Right.

3 Q. Holiday, I guess prior to your leaving, or
4 Friday.

5 Before we discuss this at any length, I would
6 like to ask you, have you discussed this matter with anyone
7 since you have left Comanche Peak?

8 A. Attorney.

9 MR. KINZEY: Aside from --

10 BY MR. DRISKILL:

11 Q. Aside from counsel, have you discussed it with
12 Tugco counsel, with Brown and Root lawyers? There were a
13 number of people conducting investigations into this matter.
14 Have they called you on the phone and talked to you about it?

15 A. I talked to Rick --

16 Q. Nick?

17 MR. KINZEY: Mr. Walker, the other attorney who
18 was here.

19 THE WITNESS: Him and Nick Reynolds.

20 BY MR. DRISKILL:

21 Q. Did you talk to Peter McClaine, an attorney for
22 Brown and Root, Houston?

23 A. I don't know Peter McClaine.

24 Q. Did you talk to -- I don't know the guy that
25 works for Tugco who conducted -- anyway, he conducted an

1 investigation into this matter and interviewed a number of
2 people? Tony Vega?

3 A. Vega?

4 He called me one day on the phone. Let me think.

5 Q. That would have probably been shortly after you
6 left?

7 A. Yes. Because I didn't talk to anybody really
8 about Dunham.

9 Q. After you left?

10 A. Right. Yes.

11 Wait a minute -- let me think about it. He
12 called.

13 Q. Were you already in San Diego?

14 A. I was in California, yes. Trying to think of
15 the discussion. Can't recall right now.

16 Q. Okay. It may come to you.

17 A. Yes.

18 Q. Have you since talked to Gordon Purdy, Ronald
19 Tolson, Tom Brandt?

20 A. No.

21 Q. Or any of those people?

22 A. I have talked to Tom Brandt, but not discussing --
23 just talking golf.

24 Q. Okay. A lot of good golf courses in San Diego?

25 A. Yes. The Acey Four.

1 Q. Quite frankly we go down to San Diego, too.

2 I think that we can all agree on the fact here,
3 at least the ones that want to know about it, that Dunham's
4 termination was predicated on what was perceived to be his
5 conduct in a meeting which was conducted on the Wednesday,
6 August 23, I believe was the date?

7 A. Yes. It was, correct.

8 Q. Prior to his termination?

9 A. True.

10 Q. I am not exactly sure about that --

11 A. Wednesday, Thursday.

12 Q. Did you attend that meeting?

13 A. Yes, sir.

14 Q. Would you relate to me what occurred in that
15 meeting?

16 A. ^{you have}
With ~~her~~ here?

17 Q. Sure.

18 A. He became upset in several cases. Ranting and
19 raving about how good he was and all he had done in his life
20 as a painter, and sort of got away from the program.

21 Q. Okay. This was a meeting that was being
22 conducted for what purpose?

23 A. The meeting was called because of the inspectors.
24 They wasn't satisfied with the way engineering was handling a
25 lot of the procedures that they were setting up for

1 construction and the answers back on NCIs, and what-have-you,
2 which has all been agreed with when they make it, it all has
3 to come through QA, whether it is either yeah or nay, you
4 know.

5 And they sought to find out, myself, Tom Brandt,
6 and QA involved and the QA organization, as far as not
7 backing them up.

8 And so Tom, he called in these two engineers
9 from Ebasco. Barry -- I can't think of his last name.

10 Q. ~~PERTEL~~
Curtail?

11 A. ~~PERTEL~~
Pertail, yes. And Tom Kelly.

12 And their sole purpose is to come down there and
13 discuss what engineering can do with paint to be an
14 acceptable method and not lose quality, either.

15 And that's what the whole concept of the meeting
16 was for, to put their mind at ease and say, "Hey, we are not
17 shafting you or trying to get around you or anything else.
18 We are just trying to tell you what can be done and to look
19 for maybe some changes."

20 And this is what the whole concept of the
21 meeting was for.

22 Q. Okay. Go ahead?

23 A. And they were opening it for questions. They
24 said: any comments? They would be more than glad to take
25 them from the inspectors.

1 The night shift was not there. Just strictly
2 day shift people.

3 Q. As I understand it, then, all the day shift
4 people or at least the ones available were asked to attend?

5 A. Were they? Right.

6 Q. And did they receive any instructions prior to
7 attending?

8 A. Other than the fact they were going to be here
9 to have a discussion on paint.

10 Q. Were they told if they have any questions, to
11 ask them?

12 A. Yes.

13 A. The two engineers told them that before they
14 started. The engineers, they said, "Now, we are going to
15 discuss. If you have questions, ^{feel} ~~felt~~ free to ask."

16 Q. You attended this meeting?

17 A. I was there, yes.

18 Q. What other supervisors or individuals who are
19 not protective coating inspectors were present, to the best
20 of your recollection?

21 A. My lead which was ^{Musser} ~~Mawser~~. Everett ^{Musser} ~~Mawser~~ and
22 Curly Kisler. He was there.

23 Q. Do you remember how to spell his name?

24 A. You would ask me that, wouldn't you? I think
25 K-i-s-l-e-r. I think that is right.

1 Q. So the three of you attended as well as these
2 other individuals?

3 A. Yes, sir.

4 Q. Protective coatings inspectors. And based on
5 what you said, it is your opinion that Dunham was somewhat
6 disruptive?

7 A. Yes.

8 Q. Would that be the appropriate term?

9 A. Yes.

10 Q. You felt like he dominated it?

11 A. Some respects, yes, he did dominate it. When he
12 ~~came~~^{came} forward, he was loud, boistrous, and ranting and raving.

13 Q. Was he upset?

14 A. Yes.

15 Q. Did he make comments which reflected poorly on
16 the QC program?

17 A. He made comments that the craftsman is getting
18 away with everything, and we are setting on our dumb ass
19 doing nothing.

20 And engineering was helping them along.

21 Q. With respect to what?

22 A. Not helping the craft when they buy off.

23 Q. The way the procedures are written?

24 A. Yes.

25 Q. And did any other persons ask any questions?

1 A. I think one or two of them did, but there was
2 discussions about what the engineers' drawings were about.

3 Q. Was Dunham's demeanor in meetings on other
4 occasions the same or similar to what it was on this
5 particular occasion?

6 A. No. He has always been calm, conservative, you
7 know.

8 Q. Cool, calm and collected?

9 A. Yes.

10 Q. During the course of this meeting, did anyone
11 make an attempt or an effort to ask him to control himself?

12 A. No.

13 Q. Nobody said anything to him?

14 A. (Witness shaking head)

15 Q. How long did the meeting last?

16 A. I am guessing, say, an hour to two hours.

17 Q. Hour and a half?

18 A. Hour and a half, something like that.

19 Q. Did ~~Bertall~~^{Furel} and Kelly have an opportunity to
20 discuss the things they wanted to bring out?

21 A. Yes.

22 Q. During the course of Dunham's questions and
23 comments, did they address any of the questions?

24 A. They addressed questions, and more or less went
25 around it because that was not the intent of their meeting.

1 Q. Some they did address?

2 A. Now, they just more or less said -- tried to put
3 it, instead, that they are not down there to discuss
4 construction problems. Trying to put him off and get on with
5 the subject that they were there for.

6 Q. I understand, now, that there was a meeting held
7 with respect to his conduct during the course of this meeting,
8 after the meeting?

9 A. Uh-huh. Yes.

10 Q. Would you mind telling me what occurred during
11 that meeting and what was -- first of all who was present?

12 A. Myself, ^{MOUSER} ~~Mouser~~ and Curly, went back into my
13 office and discussed his attitude and professionalism at the
14 meeting, you know.

15 And we all agreed that we needed to take it to
16 Tom, and it was unbecoming in front of these two men to
17 embarrass them like that and get off track of what they were
18 there for. And discuss it with Tom Brandt.

19 Q. Prior to this meeting or prior to discussing
20 with Tom Brandt, did you have an opportunity to talk with
21 either ^{F. RIGG} ~~Pertail~~ or Kelly regarding what had happened?

22 A. No. I was too embarrassed to.

23 Q. So you then went to talk to Tom Brandt about it?

24 A. Yes, sir.

25 Q. Tell me just what you can remember?

1 A. We just discussed the situation about what he
2 did, and I think it was a mutual agreement. We felt that he
3 needed counseling about his manner and that was agreed to.

4 Q. Agreed to by whom?

5 A. By Tom.

6 Q. Was this on the same day that the meeting
7 occurred or was it following that?

8 A. I think it was the following morning we went and
9 talked about it because by the time we got there, it was late
10 and the bell had rung.

11 Q. So did you later discuss this matter with Gordon
12 Purdy, or situation with Gordon Purdy?

13 A. Gordon and Tom, yes. He was there the following
14 day.

15 Q. Was Ron Tolson there?

16 A. I don't recall.

17 Q. Where was the meeting held?

18 A. In Brandt's office.

19 Q. Was it just you and Gordon and Brandt?

20 A. Curly.

21 Q. And Curly?

22 A. Yes.

23 Q. So Tolson wasn't there?

24 A. No.

25 Q. And it was agreed that he would be counseled?

1 A. And I think they was going to, at that time, I
2 think they was going to give him a three days cooling off
3 period.

4 Q. In other words, three days leave without pay?

5 A. Yes.

6 Q. Whose idea was that?

7 A. I think it was mutual agreement by everybody.

8 Q. Did anybody believe he should be fired?

9 A. I don't know. I personally, I didn't believe it,
10 no.

11 Q. Based on what?

12 A. His past performance.

13 Q. And his past performance had been what?

14 A. Been good.

15 Q. He was a supervisor?

16 A. He was my lead in the back fit group.

17 Q. Did you believe that he was a good lead?

18 A. Yes.

19 Q. Did you have any problems with him handling the
20 people that were working for him?

21 A. None whatsoever.

22 Q. Any problems with his attitudes or opinions
23 prior to that time?

24 A. None whatsoever.

25 Q. So then you agreed that -- did you agree that he

1 should be given three days off?

2 A. I agreed, yes.

3 Q. Did any, to your recollection, did anybody
4 disagree with that?

5 A. No. Like I said, it was all mutual agreement on
6 it.

7 Q. Did you assist in the preparation of the
8 counseling report that was prepared?

9 A. No, I didn't.

10 Q. Did you ever see it?

11 A. No.

12 Q. Who has that?

13 A. I don't know.

14 Q. Did you know when it was prepared?

15 A. I assume it has to be according to procedure,
16 you have to.

17 Q. It is my understanding based on comments made
18 from other several, or people that you were not present on
19 the Friday that this counseling and his termination occurred?

20 A. True.

21 Q. Was it as a result of the fact that he was going
22 to be counseled on that particular occasion?

23 A. No, the fact that I couldn't get out of bed.

24 Q. You were sick?

25 A. Sick. I couldn't move my back. I was in bed

1 all weekend.

2 Q. So it was determined that he would be given
3 three days off? That was in agreement?

4 A. To the best of my knowledge, yes.

5 Q. That was in agreement between Gordon and Tolson,
6 basically?

7 A. Basically.

8 Q. And then he would return and be a lead inspector
9 once again; right?

10 A. Wouldn't change his position, no.

11 Q. Then you came back on Monday, and he was gone?

12 A. True.

13 Q. Did you talk to anyone about it on that
14 particular occasion?

15 A. Just what happened.

16 Q. Who told you what happened?

17 A. Well, just by hearsay what happened. I wasn't
18 there. So I really don't know. I am just going by what
19 people said.

20 Q. You didn't talk to Brandt about it?

21 A. Brandt wasn't there either.

22 Q. Brandt wasn't there the following Monday?

23 A. He was there the following Monday. But he
24 wasn't --

25 Q. Did you talk to Purdy? Did anybody tell you

1 what had happened to your lead inspector?

2 A. Curly did.

3 Q. What did he say?

4 A. He told me he was terminated.

5 Q. Did he tell you why?

6 A. Uh-huh.

7 Q. What was that reason?

8 A. That he ranted and raved up there just like he
9 does in the meeting.

10 Q. Did he tell you that Dunham had refused to sign
11 the counseling report?

12 A. Yes.

13 Q. Did he tell you that Gordon Purdy had given him
14 the option of either signing the counseling report or being
15 fired?

16 A. He said he gave him the option to sign it.

17 He asked him to sign it. He said he wouldn't.
18 Blankety, blank, blank.

19 Q. Well, that was the reason he was fired was
20 because he wouldn't sign it; right?

21 A. I think a few other things that were said that
22 caused his termination.

23 Q. So he was terminated for some of the other
24 things he said in addition?

25 A. In addition to that.

- 1 Q. And how do you know that? Did Gordon tell you
- 2 that?
- 3 A. Like I said, from the third-party again.
- 4 Q. ~~Mawser~~^{Musser}?
- 5 A. ~~Mawser~~^{Musser}, yes.
- 6 Q. Who was present at the meeting?
- 7 A. Uh-huh.
- 8 Q. Did ~~Mawser~~^{Musser} tell you what he said?
- 9 A. Yes.
- 10 Q. Would you relate that to me?
- 11 A. With her here?
- 12 Q. That's okay. She can handle it.
- 13 A. He said, "Take me to the fucking gate. I ain't
- 14 signing nothing."
- 15 Q. ~~Mawser~~^{Musser} said that's what he said?
- 16 A. That's right.
- 17 Pardon me, ma'am.
- 18 Q. And according to ~~Mawser~~^{Musser}, that's what happened?
- 19 A. Apparently he said that several times. That's
- 20 what I have been told.
- 21 Q. Did you ever talk to Kelly or ~~Pertail~~^{Firtel}?
- 22 A. On this?
- 23 Q. With respect to what happened in the meeting?
- 24 A. No.
- 25 Q. You never discussed it with either of them?

1 A. No.

2 Q. At any time did you ever discuss it after the
3 fact with either Brandt, Purdy or Tolson?

4 A. Just the following day is all.

5 Q. On Monday?

6 A. No. On that following day, after the meeting.
7 Only time I discussed it after that, I dropped it. It is in
8 their hands.

9 Ain't going to ride a sore horse.

10 Q. You never saw the counseling report?

11 A. No, sir.

12 Q. Do you believe that what happened was the proper
13 thing to have done?

14 A. What do you mean?

15 Q. Did you have any feeling that perhaps he
16 shouldn't have been terminated?

17 A. Now you put me on the spot to answer that.

18 Q. Well, the reason I ask that is that he worked
19 for you?

20 A. True.

21 Q. You knew him a lot better, and perhaps his
22 performance was a separate issue aside from -- I am not
23 asking you to second-guess what anybody else has done. But I
24 am just asking you: how do you feel about it?

25 A. Well, a man's performance is one thing, but when

1 he conducts himself in another way, I know what would happen
2 to me if I conducted myself that same way.

3 Q. What?

4 A. I would be out there kicking cans up the street.
5 Looking for a job.

6 I would expect it. Be a damn fool if I didn't.

7 Q. So you don't believe that he should have
8 expected any more than what he got out of it?

9 A. He asked for it.

10 Q. But based on -- aside from that particular issue
11 you would have had no objection to him working for you from
12 now on; right?

13 A. No.

14 Q. At least --

15 A. The consideration of his past, no, I had no
16 problem.

17 MR. DRISKILL: Okay.

18 MR. GRIFFIN: I have one other question.

19 MR. DRISKILL: I am through with him.

20

21 BY MR. GRIFFIN:

22 Q. You have indicated a change of attitude by Mr.
23 Dunham.

24 Do you know what events led up to this change of
25 attitude that caused him to be that way?

1 A. Wish I did. I would be making more money than I
2 did now.

3 Q. Do you have any personal knowledge of the
4 incident or confrontation or anything anybody has told you
5 since all these events occurred, which may shed some light on
6 his attitude, his action and his attitude during that meeting
7 and the meeting within which his termination resulted?

8 Did you ever hear anything as to why?

9 A. No, I haven't. It just befuddled me, I will be
10 honest with you.

11 Q. When this meeting was called --

12 A. Which one?

13 Q. The meeting in which the two engineers were
14 there.

15 A. Okay.

16 Q. When Mr. Dunham was, you say, ranting and raving,
17 was he ranting and raving and posing questions? Or was he
18 asking questions of engineers?

19 A. He wasn't asking questions pertinent for the
20 reasons they were there.

21 They were there to discuss, like I said, what
22 engineering can really do with the paint, how far they can go
23 with it and still get a quality product. And the changes
24 that may come down from DBA tests, whatever, that may change
25 the program. And still have a good sound product.

1 This is where I think QC was getting their -- I
2 don't know what to call it -- bewilderment because they felt
3 nobody was backing them up.

4 And they were going to -- they wasn't shying the
5 program, is what I am trying to say, and still getting a good
6 product.

7 Our procedures were changing daily. They were
8 changing damn near weekly at times because of the different
9 stuff engineer was incorporating and what we were doing.

10 And they were just ticked because they didn't
11 feel I was backing them.

12 Tom Brandt wasn't backing them up and QA. But
13 QA is approving what engineering is doing.

14 The reason we brought the engineers in was to
15 discuss this. The why's, and the for's and so on about it.
16 Try to put their mind at ease and say, "Hey, you are going to
17 get a good product. Still doing our procedurals with it.
18 This what is we can do. This is what you may see coming."

19 Q. This is for the benefit of the QC inspectors?

20 A. Yes.

21 To put their mind at ease.

22 Q. Besides the way in which Mr. Dunham presented
23 his grievances, what was the nature or was it ever defined of
24 the nature of his concerns? What was he upset about? Based
25 on what he said in the meeting, what was his major concern?

1 A. Well, his concern was that, from what I gathered,
2 that he couldn't do anything wrong. He didn't give a shit
3 who knew it. He was in the craft. He said, "I done
4 everything, God damn thing in the craft."

5 Q. Let me reask the question again. Without
6 characterizing what he was thinking -- what do you think his
7 major concern was as related to his job?

8 What was he complaining about?

9 A. That he just felt the craft was getting by with
10 murder.

11 Q. Did you perceive while you were in the meeting
12 that Mr. Dunham's concerns in this area were also shared by
13 the other QC inspectors?

14 A. Nobody else spoke up about the same subject.

15 Q. I am just asking your opinion?

16 A. I don't know. I am assume that they all -- I
17 don't know, to be honest with you. By looking at their face?

18 Q. Yes. I am just asking for your opinion.

19 A. I couldn't tell. One of the gentlemen in the
20 group asked the question and his question was particularly
21 about the painting and why the engineers were there. He
22 answered it and that was it.

23 MR. GRIFFIN: Okay.

24 BY MR. DRISKILL:

25 Q. Let me go back a second. There is one other

1 thing I wanted to ask you about.

2 Were you aware that Dunham had gone and had a
3 private meeting with Gordon Purdy several weeks prior to that
4 occasion with regard to some of the things he was unhappy
5 about?

6 A. No. I don't remember.

7 Q. And were you aware that he had then been called
8 to Ron Tolson's office?

9 A. I knew he had been with Ron Tolson.

10 Q. With respect to comments he had made about
11 intimidation and so on?

12 A. I didn't know what it was about.

13 Q. Did Tom Brandt ever discuss a meeting that he
14 and Tolson had with Dunham in Tolson's office several weeks
15 prior to this?

16 A. Yes. But then they had another meeting right
17 after that with me in there.

18 Q. What occurred there, or what did they say?

19 A. That Dunham and a few others were in there.
20 Tolson told them that he would back me up in any way I said.
21 That I was doing what he wanted, and that is the way it was
22 going to stand.

23 Q. Was it subsequent to that meeting that Tom
24 Brandt personally interviewed all of the protective coatings
25 inspectors?

1 A. He was interviewing them prior to that.

2 Q. Prior to the meeting with you?

3 A. Yes. He had been interviewing them off and on
4 for quite awhile. I knew that.

5 Q. During the late spring, late summer?

6 A. Subsequent to my leaving?

7 Q. Subsequent let's say to August, okay.

8 Late spring. Early summer?

9 A. On the same subject?

10 Q. Yes. The subject being their perception that
11 they were being intimidated?

12 A. I don't know about intimidated I know that they
13 were not getting the backing they wanted. That's why we
14 called the engineers in. I think that's why Tom called them
15 in. The same consensus from all of them.

16 Q. But you were aware that Ron Tolson had met with
17 Dunham and talked to him about this particular topic?

18 A. Yes.

19 Q. Did you know if it was a result of Dunham's talk
20 about these problems, having talked about these problems to
21 Gordon Purdy?

22 A. No, I didn't.

23 Q. Had Dunham ever expressed to you any unhappiness
24 with the way the meeting with Tolson went?

25 A. No.

1 Q. In your discussion with Brandt and Purdy on the
2 day prior to Dunham's being terminated, was there any
3 discussion of his being terminated if he wouldn't accept the
4 counseling and sign the counseling report?

5 A. I don't recall at the time. The only thing we
6 discussed was that he was going to get three days off.

7 Q. Did anyone think that he might not sign that or
8 might not accept that?

9 A. I don't think -- figure they --

10 Q. Pardon?

11 A. I think they figured they might have a problem
12 with him.

13 Q. And they said that?

14 A. Uh-huh.

15 Q. And what if they had a problem with him with
16 respect to that?

17 A. I don't know.

18 Q. They didn't say that they would fire him?

19 A. No. You can't make that assumption. You need
20 to see what is going to come up first.

21 Q. Do you recall who made the statement indicating
22 that there might be problems with him as a result of
23 disciplinary action?

24 A. Gordon and Tom both felt that.

25 Q. What did they base that assumption on?

1 A. I am just assuming that meeting with the
2 engineers.

3 Q. I am saying did they assume that they may have
4 some problem with him accepting this disciplinarian action as
5 a result of the fact that they knew him --

6 A. I don't know.

7 Q. -- knew what kind of a guy he was or --

8 A. They knew more about about him than I did, I
9 guess. Because I had no problem with him.

10 Q. But they did anticipate that there may be some
11 problems with him?

12 A. Yes.

13 Q. To your knowledge, there was no discussion that
14 if he gives you a bad time about this, "We will just fire him
15 or if he won't accept that"?

16 A. I am assuming that, you know, to fire somebody
17 like that they would have to take into consideration what he
18 would do, what he would say, and the kind of position he put
19 himself in.

20 Because they are not -- it could be just the
21 other way. He could have went up there and signed the damn
22 thing and left.

23 Q. Taken his three days?

24 A. Yes. And had a job.

25 Q. What alternative would he have had if he had

1 wanted to keep his job?

2 A. Wouldn't have affected his job.

3 Q. No. I am saying is there some manner of appeal
4 that he would have prior to being given three days off?

5 In other words, it is either take it or leave it?

6 A. Yes. Basically.

7 Q. So it was understood that if he didn't want the
8 three -- if he didn't want to accept the disciplinarian
9 action, didn't want to sign the counseling reports and accept
10 the disciplinarian action, the only other alternative, he
11 would be terminated?

12 A. I think they would have told him he is going to
13 get three days without pay regardless and then he wouldn't
14 come back.

15 MR. DRISKILL: I don't have any other questions.

16 MR. GRIFFIN: I don't either.

17 BY MR. GRIFFIN:

18 Q. Mr. Williams, has Mr. Driskill and myself -- has
19 anyone threatened you in any manner or offered you any
20 rewards in return for this statement?

21 A. No.

22 Q. Have you give this statement freely and
23 voluntarily?

24 A. Yes.

25 Q. Is there anything further you would care to add

1 to the record?

2 A. No.

3 (Whereupon, the proceedings were concluded at
4 4:10 p.m.)

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 11th day of November

9 1983.

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12 Marcia B. Hall

13 Notary Public
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RESULTS OF INTERVIEW WITH EVERT RAYMOND MOUSER
AS RECORDED BY NRC INVESTIGATOR D. D. DRISKILL
ON NOVEMBER 15, 1983

On November 15, 1983, Evert Raymond MOUSER, Civil Quality Control (QC) Inspector employed by Scientific Applications, Incorporated, and working for Consumers Power Company at Midland Nuclear Plant Project, Midland, Michigan, was interviewed by NRC Investigator D. D. DRISKILL at the Midland project. MOUSER stated he was employed by Ebasco Services, Incorporated, as a Non-ASME QC supervisor at the Comanche Peak Steam Electric Station (CPSES) from January 19, 1983 to October 1983.

When questioned concerning the termination of Ronald A. DUNHAM by Brown & Root, Inc., (B&R) on August 26, 1983, MOUSER stated he was present on the occasion DUNHAM was terminated. MOUSER also stated he attended the meeting for protective coatings QC inspectors which was held on about August 24, 1983, during which DUNHAM became loud and dominated the meeting with questions and comments. MOUSER stated the purpose of the meeting was for two Ebasco engineers to discuss and answer questions concerning technical protective coatings concerns. MOUSER stated he felt DUNHAM was "out of line" in displaying such conduct in the presence of "guests" (the Ebasco engineers).

MOUSER stated that following the meeting, one of the engineers (no further identification) talked with Harry WILLIAMS, Carly KRISHER and himself. MOUSER stated the engineer said this isn't what "we're here for." MOUSER stated he commented that he was embarrassed about what had happened.

MOUSER stated the following day WILLIAMS, KRISHER and he were talking with Tom BRANDT in BRANDT's office and discussed DUNHAM's conduct in the meeting. MOUSER stated BRANDT called Gordon PURDY, who then came to BRANDT's office. MOUSER stated that KRISHER explained to them in detail what had occurred. MOUSER stated he does not recall discussion of any disciplinary action at that time.

MOUSER stated that on August 26, 1983, KRISHER told him (MOUSER) that a decision had been made to counsel DUNHAM, and give him 3 days off without pay.

MOUSER stated that later that day, KRISHER told him the 3 days off portion of the disciplinary action had been disregarded since the action had not been taken in a more timely manner. He stated KRISHER said this was the decision of Ron TOLSON. MOUSER stated KRISHER instructed him to bring DUNHAM to PURDY's office at about 4 o'clock p.m. that day.

MOUSER stated that at 4 o'clock p.m., August 26, 1983, he accompanied DUNHAM to PURDY's office. MOUSER stated PURDY and KRISHER were also there. MOUSER stated that upon their being seated, PURDY gave DUNHAM the counseling report which DUNHAM looked at for only a few seconds. He stated that DUNHAM then became very upset and said, "Fuck it, I won't change. Just walk me to the gate. I won't sign it." MOUSER stated PURDY tried to calm DUNHAM down, without success. MOUSER stated PURDY then said, "Ok," and got up and walked from the room. MOUSER stated PURDY returned and said, "If that's the way it is, just walk him to the gate." MOUSER stated DUNHAM then got up and left. MOUSER stated PURDY instructed him to go with DUNHAM.

MOUSER stated he then accompanied DUNHAM to the QC office to gather his (DUNHAM's) personal effects, subsequent to which DUNHAM went to the B&R Time Office to check out.

MOUSER stated it was his impression that DUNHAM had quit. MOUSER stated he had expressed this opinion to other coatings inspectors on that day. MOUSER stated that on Monday, August 29, 1983, he learned that DUNHAM was fired rather than resigning.

When queried concerning the counseling given to DUNHAM during the counseling session, MOUSER stated it was on an 8 1/2 x 11 counseling form (not a three-part memorandum) which he believed was typed.

END OF RESULTS OF INTERVIEW WITH EVERT RAYMOND MOUSER ON NOVEMBER 15, 1983

SIGNATURE: _____

D. D. DRISKILL, Investigator
OI Field Office, Region IV