

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
OFFICE OF INVESTIGATION

GPUN Headquarters
100 Interpace Parkway
Parsippany, New Jersey

The Investigative Interview convened at 8:50 a.m.,

Richard A. Matakas, presiding.

PRESENT:

RAYMOND J. GUIMOND, Interviewee
QA Auditor, GPU

RICHARD A. MATAKAS, Investigator
Region I
Nuclear Regulatory Commission
King of Prussia, Pennsylvania

ROBERT C. LA GRANGE
Section Leader
EQ Branch
Office of Nuclear Reactor Regulation

Information in this record was deleted
in accordance with the Freedom of Information
Act, exemptions b7c
FOIA- 87-696 B/36

P R O C E E D I N G S

MR. MATAKAS: The date is April 4, 1985, and the time is 8:53. Present for this interview are myself, Rich Matakas, investigator with the United States Nuclear Regulatory Commission; Bob La Grange, section leader in the NRC's EQ branch, Office of Nuclear Reactor Regulation; and Mr. Raymond J. Guimond, QA auditor for GPU.

The purpose of this interview is to discuss facts and circumstances leading to GPU's submittals to the NRC involving the environmental qualification of electrical equipment at TMI Unit 1.

Mr. Guimond, do you have any objection to providing this information under oath?

THE WITNESS: No.

Whereupon,

RAYMOND J. GUIMOND

was called as a witness and, having been first duly sworn, was examined and testified as follows:

EXAMINATION

BY MR. MATAKAS:

Q Sir, for the record, would you give us your full name, please?

A Raymond J. Guimond.

Q And your business address?

A 111 Interpace Parkway, Parsippany, New Jersey.

1 Q And what is your telephone number we could reach
2 you at here?

3 A 299-2224.

4 Q Generally speaking, what I would like you to do
5 is give me just a little bit of an overview of your
6 education and work history?

7 A Well, education, just a high school graduate.
8 History, my working history is, worked shipyard, Navy,
9 submarines; worked Aerospace; and then utility.

10 Q Specifically, with GPUN, when did you start, sir?

11 A With GPU, 1975 I was a contractor, in the vendor
12 surveillance group.

13 Q When did you come aboard with GPU?

14 A November 1, 1977.

15 Q And what was your position at that time?

16 A Vendor surveillance.

17 Q When did you get into the auditor program, or
18 auditing program?

19 A Oh, I believe it was in 1980, when I transferred
20 into the audit section.

21 Q And you have been in the audit section ever
22 since?

23 A Yes.

24 Q Specifically, during 1980 through 1984 time
25 period, who were your supervisors?

1 A Well, we had some changes.

2 Matt Stromberg was the manager of the section. Then,
3 eventually when we merged with Jersey Central, Bruce Bader
4 became my immediate supervisor.

5 Q I notice on some of the audits that we are going
6 to be talking about that you were listed as team leader.

7 A Yes.

8 Q Is that something that you have to qualify for?

9 A Yes, you have to be certified for team leader.

10 Q Is there a time period involved also?

11 A Yes. Well, we got to meet the ANSI standard,
12 N45.2.23.

13 Q Mr. Guilmond, what I would like to do is
14 introduce some documents into the record and have you take
15 some time to look them over, because these are the
16 documents that mainly we'll be talking about today.

17 First, I would like to show you a GPUN interoffice
18 memorandum dated June 25, 1981. It has a QA number of
19 QA4161. It's to Mr. R.F. Wilson, vice-president, Tech
20 Functions; and it's from Mr. M.J. Stromberg, manager of
21 the QA program development and audit.

22 Attached to this memorandum is an audit report number
23 0-TMI-81-02, which we'll refer to as audit 81-02.

24 I would like you to take a look at this and, ignoring
25 some of the scratchings around the side, if you recognize

1 the document? Do you recognize this document?

2 A Yes.

3 Q What does it represent to you?

4 A That was the audit that was performed on the
5 effort, GPU's efforts in answering IE Bulletin 79-01B.

6 Q Were you the team leader on this audit?

7 A Yes.

8 Q I've also asked for the response from Tech
9 Functions to this audit, the first response. And it
10 cannot be located. But what I do have and what I have
11 been provided is another interoffice memorandum dated June
12 21, 1981; the subject is audit 81-02. This is a QA
13 response to the Tech Functions response which, from what I
14 have been told, reiterates the initial response of Tech
15 Functions.

16 I would like you to look over that document and tell me
17 if you recognize it?

18 A Yes.

19 Q What does this represent?

20 A That is our answer back to Tech Functions, after
21 our review, that their corrective action was unacceptable
22 to us.

23 Q Okay. And what I would like to show you now is
24 what I have been told is a revised response to the
25 document that I have just handed you. It's dated August

1 21, 1981. It's from Mr. Maus to Mr. Stromberg, and the
2 number on it is E&I 81-0176. Do you also recognize this
3 document?

4 A I've seen it; yes.

5 Q Did you yourself review this revised response?

6 A No, I did not.

7 Q Okay. On the initial audit, 81-02, for the most
8 part, were you responsible for the drafting of that audit?

9 A Yes.

10 Q And on the response to the Tech Functions
11 response, were you basically responsible for --

12 A The kickback.

13 Q -- for the kickback of that response?

14 A Yes.

15 Q Now we go to this revised response from Tech
16 Functions. Why was this not provided to you as team
17 leader?

18 A I have no idea, sir.

19 Q I notice most of these things are either
20 accepted or rejected by Mr. Maglitz?

21 A Magitz.

22 Q Magitz?

23 A That's correct.

24 Q Is he within your section?

25 A Yes. He's the audit supervisor.

1 Q Is this unusual, for Mr. Magitz to review a
2 response such as this and not the team leader?

3 A He would normally interface with the team leader
4 before making a determination.

5 Q Before making the acceptance or --

6 A If it's a rejection.

7 Q In this case, did he interface with you?

8 A No.

9 Q The last document I would like to show you that
10 we'll be talking about is dated April 4, 1984. It's a GPU
11 Nuclear memorandum and the subject is "Open Audit Findings"
12 regarding audit 81-02. It's from yourself to
13 Mr. Stromberg.

14 I would like you to take a look at this. Let's go off
15 the record for one second.

16 (Discussion off the record.)

17 BY MR. MATAKAS:

18 Q Mr. Guimond, do you recognize this April 4
19 document?

20 A Yes.

21 Q Why is it that after two years between the last
22 response from Tech Functions that you now got back into a
23 review of your original audit, 81-02? Would you explain
24 that, please?

25 A Well, like I had stated, I wasn't originally on

1 the acceptance portion of the thing and it was -- I can't
2 possibly remember when I did find out that this had
3 transpired.

4 Q When you say "this transpired," what do you mean?

5 A That the audit supervisor had accepted the
6 proposed corrective actions. I brought it to the
7 attention of the manager of the section --

8 Q That's Mr. Stromberg?

9 A -- Mr. Stromberg, that the corrective action --
10 proposed corrective action did not address the concerns.

11 I tried to, at the time, back in '82, kickback the
12 findings to Tech Functions, but for some reason my
13 supervisors did not acknowledge the memos and issue them.

14 Q Mr. Magitz and Mr. Stromberg?

15 A Mr. Bader and Mr. Stromberg.

16 Q How many memos did you write, back in 1982?

17 A There were two memos at that time. One was the
18 review of EPO 31, and the kickback of the audit findings.

19 Q EPO 31?

20 A That was their proposed corrective action,
21 answer finding number 1, Tech Functions procedure.

22 Q This was back in 1982 that you did that?

23 A That's correct.

24 Q You wrote these memos to Mr. Stromberg?

25 A No, they were actually addressed to Don.

1 Cronenberger, director of engineering.

2 Q Is it Cronenberger?

3 A That is correct.

4 Q And these memos were kicked back to you or --

5 A They were given to my immediate supervisor,
6 which then never was issued.

7 Q Meaning you don't know what happened to them or
8 you were told they were never issued?

9 A They were never issued.

10 Q That's Mr. Bader?

11 A Mr. Bader.

12 Q What did he say was the reason for not issuing
13 these things?

14 A I could not answer. I could not get a definite
15 answer on it. You'd have to ask Mr. Bader.

16 Q So your original audit of June 25 -- or, I
17 believe it was in March, March 26 through April 1, 1981;
18 you had 11 audit findings?

19 A That's correct.

20 Q And on the response, on the original response,
21 none of their corrective actions were acceptable?

22 A That is correct.

23 Q To include audit number 1 -- I mean audit
24 finding number 1?

25 A They did not include finding number 1. They

1 only addressed 2 through 11 at that time.

2 Q Audit finding number 1 was "No evidence of
3 management direction to correlate the efforts of
4 intersectional effort in establishing the master list and
5 qualification documentation file," is that correct?

6 A That's right.

7 Q Did you ever attempt to find out why they did
8 not address audit finding number 1?

9 A At that time, no. They were saying that was
10 something they still had to look at.

11 Q And who was that, that was saying that?

12 A Don Cronenberger in Tech Functions.

13 Q I see his answer for the corrective action was,
14 would this be "Emergency Procedure-031 is scheduled to be
15 issued on 9/1/1981"?

16 A That would be "engineering procedure."

17 Q Engineering procedure. And that was signed off
18 by Mr. Magitz as accepted?

19 A Yes.

20 Q Have you ever reviewed engineering procedure 031?

21 A Yes.

22 Q Does it satisfy the audit finding?

23 A No, sir.

24 Q I notice in your April 4, 1984 memorandum, that
25 you, again, address audit finding number 1 as unacceptable.

1 I was wondering about that, how all of a sudden it was
2 accepted and you rejected it again in April of 1984.

3 What went on between you? There must have been -- you
4 must have been catching some flak, and I'd like to know
5 what happened?

6 A Well, like I say, Phil, apparently, accepted it
7 based on they had finally agreed to write a procedure.

8 Q Phil?

9 A Phil Magitz. But the only problem with the
10 procedure was Tech Functions only wrote how they were
11 going to make a submittal to the NRC. They didn't assign
12 responsibilities of all the disciplines involved to make
13 the program work, and that's what I was trying to tell
14 people, was that it was inadequate. It wasn't assigning
15 responsibilities. It wasn't saying who, what, and why,
16 and when. And that's why it was inadequate to EPO-31 to
17 stand by itself to become a program in EQ.

18 Q I want to talk a little bit about audit
19 procedures. And I don't want to forget this -- I want to
20 go off the record.

21 (Discussion off the record.)

22 BY MR. MATAKAS:

23 Q What is your knowledge of how and why the
24 original audit, I'm talking about the audit that was
25 conducted back in March, March 16 through April 1st, 1981.

1 why, and by whom, was that audit requested?

2 A By Mr. Wilson.

3 Q Mr. R. Wilson, vice-president of Tech Functions?

4 A Tech Functions -- that is correct.

5 Q What was the purpose of the audit?

6 A He had, apparently, requested from Mr. Stromberg
7 that we verify that the effort was following procedures.
8 Then it was given to me to look at, and I had talked to
9 Mr. Stromberg about it, and then made the recommendation
10 that we include all the requirements of the bulletin, not
11 only the submittal, the initial submittal.

12 Q Are you talking about the bulletin DOR
13 guidelines and 10 CFR 50.49?

14 A At the time it was just the Bulletin and NUREG
15 0588.

16 Q And DOR guidelines?

17 A The DOR guidelines is part of the bulletin; yes.
18 I'm sorry. Attachment 4.

19 Q What are both QA and in this case Tech
20 Function's responsibilities for the corrective action
21 regarding the audit findings? In other words, what is the
22 responsibility to include time limits -- the audits are
23 written on certain individuals -- what is their
24 responsibility to respond and what is QA's responsibility
25 to track?

1 A Well, Tech Functions - well, any individual
2 with an audit finding against them should be writing
3 corrective action as soon as possible, and implementing
4 that corrective action in the shortest time frame possible
5 that they could.

6 QA is to track open audit findings and to assure that
7 proposals or corrective actions are being addressed in the
8 verification of the closeouts.

9 Q Audit findings number 1, number 3, and number 11,
10 you wrote against Mr. Cronenberger, or wrote on
11 Mr. Cronenberger, and the remaining you wrote on Mr. Maus.

12 A Well, it was just that Mr. Maus, in the exit
13 meeting, had just acknowledged that he had signed for
14 those findings themselves. Apparently finding 1, 3, and
15 11, was going to take more of a decision by upper
16 management, and I believe -- my personal belief was that's
17 the reason why Mr. Cronenberger signed for it.

18 Q Okay. And they give you a target date?

19 A That's correct.

20 Q Okay. What happens when that target date is not
21 met?

22 A Well, it's up to the audit section to send out
23 notifications that they have missed a target date and
24 notify them that they are overdue.

25 Q You mentioned back before that you had written

1 two memoranda in '82 to Mr. Cronenberger. Was that for
2 follow-up on these items?

3 A It was, partially. It was also an agreement
4 that was reached in a meeting between Mr. Cronenberger,
5 with Mr. Stromberg, Bader, and Magitz.

6 Q That --

7 A I was not present at that meeting, but I was
8 informed that the request was made that I review EPO 31
9 and document, what I saw wrong with that procedure, where
10 it was lacking.

11 Q Okay. That's what you did do?

12 A That's what I did do. And I also drafted a memo
13 kicking back the proposed corrective actions.

14 Q Those are the two memos we are talking about?

15 A Yes.

16 Q Do you have numbers for those memos?

17 A They were never issued, sir. There wasn't a
18 number. Unofficially one of them did get a number
19 assigned, and that's how I can pinpoint it, to it. It was
20 that I needed a number for reference on one of the memos
21 referencing the other. So the secretary did assign a
22 number to it, which never was issued as an official number
23 to it. And by her log, I can pinpoint it to the day,
24 supposedly, that number was issued.

25 Q Do you have copies of those memos?

1 A Yes. In my files.

2 Q I would like to get copies of those two memos.

3 I would like to talk a little bit about your
4 recommendations as a result of audit 81-02. They show up
5 on page 10 of 10.

6 Recommendation number 1, I quote: "Documented
7 direction be generated in order to assure meeting the
8 requirements of the bulletin to include organizations,
9 departments, sections, and individuals (headquarters and
10 site personnel). This should include interface
11 responsibilities and define the corporate position on the
12 bulletin."

13 Did this directly relate to audit finding number 1?

14 A Yes.

15 Q What responsibilities would, in this case Tech
16 Functions, have in responding to your recommendations or
17 in taking your recommendations, if any?

18 A At that time?

19 Q Yes, sir.

20 A A recommendation didn't have, basically, no
21 weight. They didn't have to address it.

22 Q Okay. To your knowledge, was anything done on
23 your recommendation?

24 A Over time; yes.

25 Q When you say "over time," are we talking 1984?

1 A Yes. Yes, sir.

2 Q The second recommendation states, and I'll quote:
3 "A complete review should be taken to assure that the
4 qualification documentation is complete to support
5 adequacy of the equipment."

6 Was anything done regarding that particular
7 recommendation, to your knowledge?

8 A Well, things have transpired over the years.

9 Q Since 1984?

10 A Certain documentation has been added as such,
11 but it still did not address the findings.

12 Q And recommendation number 3, and I quote: "Tech
13 Functions take the lead in establishing a training program
14 for corporate and site personnel on the requirements of
15 the bulletin."

16 To your knowledge, was any action taken on that
17 recommendation?

18 A To my personal knowledge, none by Tech Functions.

19 Q When you talked to -- who was responsible for
20 the program during the time of the audit up until 1984?
21 I'm talking about physically, hands-on responsibility?

22 A Physically? See, my personal opinion was that
23 it was Tech Functions's responsibility to take the lead.

24 Q Starting with R.F. Wilson?

25 A That they make configuration control

1 requirements of the plan and they would have to be the
2 lead organization because that was the requirements.

3 Q But what I'm getting at, when you actually did
4 the audit did you actually talk to the people that were
5 actually implementing the program? That were, you know,
6 putting the pieces of paper in the file; that were trying
7 to conform to the bulletin?

8 A Yes. Yes. At the time --

9 Q And who were those individuals?

10 A Well, it was, at the time it was the engineers
11 that was assigned to the effort and to -- Don Cronenberger,
12 who was the director of engineering.

13 Q Who were the engineers that were responsible?

14 A Well, the initial beginning, it was George
15 Braulke and Irv Feinberg, were the two engineers assigned
16 to the initial effort for the first submittal.

17 Not too far after that, Gerry Maus was finally assigned
18 as manager. They did form, supposedly, a section, E1
19 section, with Gerry Maus, and appointed the manager.

20 Q Who worked for Mr. Maus, handling EQ -- or
21 environmental qualification, at Three Mile Island Unit 1?

22 A Paul Boucher.

23 Q When you made the recommendation that a training
24 program be established to comply with the requirements of
25 the bulletin, did you have these two individuals in mind?

1 A They, being in charge of it, would have to come
2 up with the requirements; yes, and would have input into
3 it.

4 Q I guess what I'm getting at is, did they impress
5 you as needing such training?

6 A Yes.

7 Q When -- I take it you did have conversation with
8 them during the audit?

9 A Yes.

10 Q Did they appear to know the requirements of the
11 bulletin?

12 A My personal opinion: No.

13 Q Just for the record, in your memorandum dated
14 April 4, 1984, the opening paragraph states: "The
15 verification of the proposed corrective action in
16 reference number 2, F.G. Maus to P.B. Magitz, dated
17 February 5, 1982 (latest proposed corrective action to
18 audit from Tech Functions resulted in the closure of
19 finding 7B only. Findings 1, 3, 5A, 6A, 10, 11.4, 11.8,
20 and 11.14 are still considered open."

21 Those were your findings when you reviewed everything
22 that had been done regarding audit 81-02; is that correct?

23 A That is correct.

24 Q I know I got you on the spot with your company,
25 and I don't mean for it to be that way, but that's the way,

1 it is. I don't think it's of any fault of your own. I
2 think your actions have been correct in what you've done.
3 But what I would like to know is, come right out and say
4 it -- so you know why no action was taken between 1982,
5 February, 1982 and April 4, 1984, on this corrective action?

6 A I have asked myself that over and over again.

7 Q There is no -- no one has come out and told you
8 that, hey, we don't think this program is that important,
9 or TMI is not going to start up anyhow -- has anybody in a
10 responsible position given you any reason? I don't know
11 what it could be.

12 A It has never been said that way.

13 Q Has it been said any other way?

14 A Well, the actions speak for themselves -- lack
15 of.

16 Q You refer to the inactions speak for themselves?

17 A The lack of actions speak for themselves.

18 Q In your conversations with either Mr. Mals,
19 Mr. Boucher -- did they ever indicate to you that they
20 needed help implementing the program?

21 A No.

22 Q Did you feel that they needed help?

23 A Oh, definitely.

24 Q Other than your audit findings that you have
25 written up, did you ever indicate to management -- meaning

1 when I say "management" I'm talking about Mr. Wilson,
2 Mr. Cronenberger, or Mr. Chisholm -- didn't you ever
3 indicate to them that you felt they needed help or
4 direction, other than the audit findings that speak for
5 themselves that you have written down?

6 A I do not remember speaking to those individuals.

7 Q Would you have indicated this to Mr. Stromberg?

8 A Yes.

9 Q Did he ever relate to you that he passed this
10 information on to his level of supervision in the Tech
11 Functions side?

12 A It had come out in meetings, in QA, you know,
13 section meetings, staff meetings.

14 Q Between QA and Tech Functions?

15 A QA itself.

16 Q Within QA?

17 A Yes.

18 Q In other words, that he had passed this
19 information on?

20 A That was discussed.

21 Q Well, I'm not clear on this: That he was going
22 to pass it on or he had --

23 A Well, there was no indication that way. If you
24 are saying to pass it on to his boss?

25 Q Yes, I'm saying to pass it on to the Tech

1 Functions side?

2 A No.

3 Q Do you think the program has been turned around,
4 environmental qualification program?

5 A It is going in the right direction, but it
6 hasn't been turned around.

7 Q Can you give me a point where something happened,
8 a turning point in the program, that at least got this
9 thing going in the right direction?

10 A Well, when Tech Functions finally issued their
11 1000 procedure, where EPC-31, they revamped it, and did
12 start addressing responsibilities of different divisions
13 and what their responsibilities would be.

14 Q And when was this? Just approximate time period?

15 A Well, this was in the process at the end of '83
16 or so, it was in a review cycle that I know of. When the
17 procedure finally got rewritten -

18

19

20

21

22

23

24

25

How did you come to reflect in this program?

6. 7. 8. +

1 April of 1984? I'm still a little hazy on that.

2 I mean, you evidently reviewed Tech Functions'
3 responses to 81-01 and you drafted your April 1984 memo.

4 How was it that you came to relook at this program?

5 A In April?

6 Q April 4, 1984 is when your memo is drafted.

7 A Yes. Okay. That was to -- well, right along I
8 was actually holding, supposedly, the title of the EQ
9 coordinator for the QA department. So I was following the
10 EQ program right along. I technically never left it.

11 Q Was there a time you became a little
12 disenchanted or less than enthusiastic regarding your
13 title?

14 A Yes.

15 Q Other than the memos that you mentioned, was
16 there any other action that was taken that actually
17 thwarted what you were trying to do?

18 A Well, meetings were taking place with different
19 individuals, different sections, site, as such, to try to
20 bring it to their attention what their responsibilities
21 would be.

22 Q You were having meetings at the site?

23 A Gerry Maus and myself were having meetings with
24 the engineering groups, the maintenance groups, the QA
25 groups.

1 Q At the site?

2 A At the site.

3 Q And who else -- go ahead.

4 A Well, we were pushing to try to get something
5 done, hoping that the site would see the concerns.

6 Q But the ultimate responsibility was here in
7 Parsippany, wasn't it, with Tech Functions?

8 A That's my personal opinion; yes.

9 Q What was the purpose of trying to go to the site?
10 Just because you couldn't get any action at this level
11 here?

12 A Well, it was to try to bring them up to speed,
13 of what their responsibilities were. My contention was,
14 under that basis, is that if you were talking to
15 maintenance and you brought maintenance what the concerns
16 of EQ were and what impact it had on them, they might take
17 some action on their own.

18 Q But did they have any written guidance? Up to
19 this point there was no written guidance for them, was
20 there?

21 A Not that I know of.

22 Q It was just a matter of hoping that they would
23 take action.

24 Did you ever meet with Mr. Toole or Mr. Hukill?

25 A Myself? No.

1 Q Did anybody else?

2 A I'm not sure, but I believe Gerry might have,
3 Gerry Maus.

4 MR. MATAKAS: Why don't we take a couple of
5 minutes break.

6 (Recess.)

7 BY MR. MATAKAS:

8 Q I would like to backtrack a little bit about
9 open audit findings. Were these things, in effect, closed
10 out based on Magitz' sign-offs? Or did they still remain
11 open? Or --

12 A What I believe, right now there's only two open
13 findings left, right now.

14 Q Okay. Right now, 1984. But I'm talking about
15 the revised response that's dated August 21, 1984. I
16 would like to talk about that -- dated August 21, 198⁴~~7~~.
17 Let's take a couple of minutes break and look over the
18 audit findings and see when they were closed out.

19 (Discussion off the record.)

20 BY MR. MATAKAS:

21 Q In looking these over, audit findings 1 through
22 11, they all show that they were accepted by Magitz in
23 August 1981. So, did that, in effect, close this audit?

24 A No, sir. That's where, you see, my other
25 series -- when I ended up realizing that this did take place

1 a memo was issued, kicking them back and retaining them
2 open, as far as I was concerned.

3 Q Right. But what I'm talking about is, those
4 were never issued, so as far as Tech Functions were
5 concerned, they -- were they closed?

6 A Under our system you might accept the proposed
7 corrective action, but until they are verified and
8 actually closed out here (Indicating), they are still
9 considered open.

10 Q In other words at the bottom of the page 1
11 notice number 11 of 11 is not closed out until June 1984;
12 10 of 11 is still not closed out; 9 of 11 was closed out
13 by yourself in January 1982 --

14 A Yes.

15 Q -- 8 of 11 was closed out by yourself in January
16 '82; 7 of 11 was closed out by yourself in April '82; 6 of
17 11 is still not closed out; 5 of 11 was closed out in June
18 1984 by Magitz; 4 of 11 was closed out by yourself in
19 January 1982; 3 of 11 was closed out by Magitz in June
20 1984; 2 of 11 was closed out by yourself in January '82;
21 and 1 of 11 was closed out by Magitz in June '84.

22 Are you satisfied with these closeouts that we went
23 over?

24 A No, sir.

25 Q Which ones do you consider still open? Besides

1 the ones that we have stated are open?

2 A 1, as it stands right now, could be closed out
3 in the issuance of a procedure of assigning
4 responsibilities as such. But 3 would be -- would stay
5 open for the implementation of it.

6 Q That has to do with documentation; is that
7 correct?

8 A The documentation and the program that would be
9 needed to retain the qualification at the sites. It's,
10 like I told my boss when I came back, it's either one or
11 the other. If you want to close out 3, then 1 stays open;
12 close out 1, then 3 would stay open.

13 Q Okay. When he accepts -- when these things were
14 accepted as, you know, the proposed corrective action back
15 in 1981, how were they followed after that time? You say
16 you followed them?

17 A Well, that was -- he had accepted this proposed
18 corrective action --

19 Q We are looking at audit finding number 1 right
20 now?

21 A That's right. That is correct.

22 I knew nothing about this until, I don't know for some
23 reason I went back into the files. I can't remember when
24 the date was, and I had noticed that this had been
25 accepted, that proposed corrective action. That was the

1 first time when I had noticed it that I brought it to the
2 attention of his boss and my boss, that this had
3 transpired and there was a mistake being made here.

4 Q And that's when you wrote the memos that we are
5 talking about?

6 A That is correct.

7 Q Had you had any adverse action taken against you
8 regarding those memos? Or your actions at all, regarding
9 this environmental qualification program?

10 A No.

11 Q Are there any requirements? You wrote the memos
12 and you attempted to follow up on these findings. Are
13 there any requirements that were violated regarding the
14 follow-up, on the accepted proposed corrective action?

15 In other words, it seems that there should be something
16 in place, that these things should have been corrected
17 before, so to speak, "the shit hit the fan"?

18 A That is correct.

19 Q And was there anything in place?

20 A System-wise? Yes.

21 Q And what is that?

22 A It was the escalation; the program does have
23 that mechanism in there that, if you can't get the proper
24 corrective action then these things should have been
25 escalated to upper management.

1 Q And that was the purpose of the memo?

2 A With the memos; yes. And the meetings.

3 Q How far did this thing get? We got to the level --
4 well, is Mr. Wilson aware of your thwarted efforts?

5 Mr. R.F. Wilson?

6 A I cannot say personally.

7 Q What about Mr. Cronenberger?

8 A Yes.

9 Q How was he aware?

10 A Of having sit-down meetings and bringing it to
11 his attention that corrective action was needed for these
12 open findings.

13 Q Were these documented meetings?

14 A I'd say -- I cannot say if they ever were
15 documented. The ones that I was involved in, I don't
16 remember being documented.

17 Q What time period are we talking about these
18 meetings?

19 A From the time of the issuance of this audit
20 finding through '84.

21 Q In other words, there were continual meetings on
22 the findings that you stated in 81-02?

23 A That's correct.

24 Q Do you think you got a response from Tech
25 Personnel and your own management, regarding your findings?

1 A No.

2 Q At these meetings, was Mr. Baier, Mr. Stromberg
3 and Mr. Magitz present? At some of these meetings?

4 A Yes.

5 MR. MATAKAS: Do you have anything else in this
6 area, Bob, before we leave this area? Any questions? Why
7 don't you go ahead.

8 BY MR. LA GRANGE:

9 Q Ray, you had made a statement, I think, that the
10 EQ program was going in the right direction but had not
11 turned around?

12 A Yes, that was a statement that was made to me.
13 Things have progressed since day 1. That's what I was
14 trying to say. But all the vital, I'd say, my personal
15 opinion -- all the vital requirements that's needed for
16 the program to make it function is still not in place.

17 Q Are you talking procedure-wise or technically,
18 as far as the documentation?

19 A Well, I can't talk documentation any longer
20 because I haven't been involved since the IMPELL emergency
21 feed water situation; I haven't been involved in that to
22 look at that portion. I'm talking procedure-wise -- site
23 programs, maintenance, warehousing still, training.

24 MR. LA GRANGE: Okay.

25 BY MR. MATAKAS:

1 Q At what point -- when I asked you has the
2 program turned around, what I was trying to get at is at
3 some point SFO hired consultants and, you know, outside
4 individuals to come in and look at this environmental
5 qualification program.

6 What point -- what happened -- are you aware of when
7 this happened and why it happened? You may not be.

8 A Well, it was mentioned just prior to the NRC
9 coming in to look at the emergency feed water, the Union
10 of Concerned Scientists petition.

11 Q In other words, as a result of the UCS petition?

12 A Yes. The company was going to hire an outside
13 consultant to verify the documentation files.

14 Q Okay. Now, what I'm getting at is: What level
15 of management are we talking about?

16 A This was mentioned in a meeting. And it was
17 managers level. It was Dick Chisholm who made the
18 statement in the meeting.

19 BY MR. LA GRANGE:

20 Q Was this discussed before the first NRC audit,
21 the hiring of consultants?

22 A Yes. Before they first came in; yes. Just
23 before they came in. It was talk about bringing someone
24 in.

25 BY MR. VOLTANIEL:

1 Q What was the reason for that? Or was there a
2 reason?

3 A You'd have to ask them.

4 Q I thought -- at the meeting they didn't state a
5 reason?

6 A No. They didn't state the reason.

7 Q To your knowledge, at any these meetings up
8 until the time period we are talking about right now, was
9 anybody at the level of Mr. Clark or Mr. Dick Wilson --
10 was anybody at any of these meetings that would have been
11 made aware of these problems in the area of environmental
12 qualification?

13 A Not in the meetings that I attended.

14 Q Or any other meeting?

15 A I couldn't say for other meetings. I didn't
16 attend all of them.

17 Q So, it was Stromberg and below and Cronenberger
18 and below? That level of management?

19 A Well, yes. It was Matt's boss, director of QA,
20 and Don Cronenberger, at their levels, directors' levels.

21 Q When you say "Matt's"?

22 A Kazanas.

23 Q He's Mr. Stromberg's boss?

24 A That's right. He's the director of quality
25 assurance.

1 Q And he was at some of these meetings?

2 A Yes.

3 Q How do you spell the name?

4 A K-a-Z-a-n-a-s.

5 Q Now we are at the stage of prior to the UCS
6 petition has come out, prior to the NRC audit, and in
7 between that period -- this would be early 1984 -- I
8 believe the UCS petition came out in January 1984. We
9 have Mr. Chisholm mentioning, you know, hiring of outside
10 consultants.

11 What progressed from there, regarding these consultants
12 coming in?

13 A Well, this is where I cannot help you

14 [REDACTED]
15 Q [REDACTED]

16 A [REDACTED]

17 Q The NRC inspection took place in March, March 20th
18 and 21st, 1984. And then your memorandum dated April 4,
19 1984, followed.

20 So that's basically your last contact within the
21 program?

22 A Yes.

23 Q What was the talk or what was the result of the
24 NRC findings for the April -- or the March meeting?

25 A From the draft that I was getting was that the

6,7C, returns

1 were basically agreeing with my audit finding and the
2 assessment we had done in December and the beginning of
3 the year; that the files were inadequate to support the
4 submittal.

5 Q In other words, that NRC findings were the same
6 as your findings in audit 81-02?

7 A Right.

8 MR. MATAKAS: Also, for the record, just now
9 Mr. Guimond has turned over to me two documents that I'll
10 make part of his transcript.

11 BY MR. MATAKAS:

12 Q Number 1 is dated -- that's 8/82?

13 A That is my handwriting to say -- it would have
14 been 8/5/82 was the date that that was typed.

15 Q Okay. The subject is "Engineering Procedure-031
16 equipment environmental qualification, to:

17 Mr. Cronenberger."

18 It's a three-page document.

19 And the second document has a handwritten notation at
20 the top --

21 A That's the same date: 8/82.

22 Q 8/8/82?

23 A August '82, I was trying to say.

24 Q And the subject was "Proposed corrective action
25 to audit 1-TM-81-10," and it is also to Mr. Cronenberger.

1 This is a two-page document?

2 A That is correct.

3 MR. MATAKAS: For the record, I'll just put my
4 initials, date and time on them.

5 (Discussion off the record.)

6 MR. MATAKAS: Before we leave the area of audit
7 inspection reports, is there anything else you have, Bob?

8 MR. LA GRANGE: I don't know if we covered this,
9 but the two memos that were never issued, that were just
10 introduced into the record here.

11 BY MR. LA GRANGE:

12 Q Did Cronenberger see them?

13 A To the best of my knowledge, I can't answer. I
14 can't remember. That was a request made by Don for me to
15 tell them what was wrong, that I was telling them it was
16 inadequate right along.

17 Q But you can't say for certain that he actually
18 saw it?

19 A I can't say that.

20 BY MR. MATAKAS:

21 Q In other words, you have seen the proposed
22 corrective action that was signed off by Magitz.

23 Mr. Cronenberger asked you to write a memo, documenting
24 what you thought was wrong?

25 A Well, apparently -- see, I wasn't at the meeting.

1 The request was made to Mr. Stromberg, Mr. Bader, and
2 Mr. Magitz in their meeting with Don, that he had made the
3 request that I review his procedure and tell him exactly
4 what was wrong with it, where it was lacking.

5 Q That's EP-031?

6 A That's correct. And I was told this when they
7 came back from this meeting, to review it and draft the
8 memo.

9 Q What precipitated the other memo? The one that
10 was essentially the same as your April 4th?

11 A Right. That was the same, my philosophy of --
12 that the proposed corrective actions were inadequate and
13 was trying to get it off the QA books, that they had
14 answered our audit findings, and was trying to put it back
15 into their ball park; that it was inadequate.

16 Q Were you requested to write that memo?

17 A No. That was just the normal scheme of things.

18 Q The responsibility that you felt you had as a
19 result of the original audit?

20 A They had made a submittal to us.

21 Q Okay. Who has seen those memos, to your
22 knowledge?

23 A The only one I can truthfully say would be
24 Mr. Bader.

25 Q Okay. Did he tell you that those memos --

1 he give you a reason for the return of the memos?

2 A When I would ask he was saying he was going to
3 be talking to Mr. Stromberg about it and they were going
4 to decide who was going to sign them.

5 Q And the issue was eventually just dropped?

6 A That is correct.

7 Q Then was there -- there was no other follow-up
8 until your April memo regarding audit 81-02, except verbal
9 meetings that you had with --

10 A To the best of my knowledge, that's correct.

11 Q At these meetings that took place throughout
12 1982-1983, you mentioned Mr. Cronenberger was at some of
13 them. Who was below Cronenberger in Tech Functions?

14 A At that time, it would have been Dick Chisholm.

15 Q And then Maus works for Chisholm?

16 A Right.

17 Q And then, in your chain of command, it would
18 have been Mr. Bader, Mr. Magito and Mr. Stromberg.

19 Essentially were you stating the same thing that you
20 stated in the memos in the meetings?

21 A Yes.

22 Q So, essentially those individuals were aware of
23 the contents of those memos, even though it wasn't
24 officially put in writing?

25 A In that way, yes. That is correct.

1 MR. MATAKAS: Anything else?

2 BY MR. LA GRANGE:

3 Q You mentioned something about you heard there
4 was some discussion about hiring consultants as a result
5 of -- was it as a result of the UCS 2.206 petition, or did
6 it just happen to coincide with the fact that it was
7 discussed about the same time?

8 A I like to think it was my assessment, but I
9 can't truthfully answer that.

10 Q You can't say for sure --

11 A What was the reason.

12 Q -- that the reason was the UCS petition?

13 A Yes. I couldn't say that.

14 Q But it was sometime after the petition had been
15 submitted to the Commission?

16 A It was in that time frame. See, that's the only
17 thing -- using -- me leaving the company there for a while,
18 it was that time frame I remember sitting in a meeting.
19 We were discussing some letter that was going to go back
20 to the NRC for TDR's concerns on the submittal. And we
21 had a meeting on this, on the letter that was going to go
22 back to the NRC. And that's where this came up, that
23 there was going to be a consultant -- was going to be
24 hired to do an independent verification of the files.

25 BY MR. MATAKAS:

1 Q Was this TDR concerning Limitorque valves?

2 A I can't really remember. I'd have to look,
3 really, probably, at the minutes of that meeting. I can't
4 really say truthfully what piece of equipment we were
5 talking of. All I remember is we were talking about the
6 test chamber. That I do remember; about wire coming out
7 of a test chamber, and the potting compound.

8 Q The what compound?

9 A The potting compound, where you bring the wires
10 out of the test chamber.

11 (Discussion off the record.)

12 MR. LA GRANGE: That's "potting."

13 BY MR. LA GRANGE:

14 Q This discussion about hiring consultants, would
15 that have been January of '84?

16 A It was in that time span. I can't specifically
17 say without going back and trying -- and looking at the
18 minutes of that meeting. I believe there were minutes of
19 that meeting.

20 Q There was a meeting and minutes were taken?

21 A I believe so.

22 Q You don't recall whether the meeting was in
23 January?

24 A No. I cannot recall exactly.

25 MR. MATARAS: Let's take a couple of minutes

1 break.

2 (Discussion off the record.)

3 BY MR. NATANAS:

4 Q This meeting we are talking about, where
5 Mr. Chisholm made the statement about the possibility of
6 hiring consultants, exactly how was the statement worded?
7 That they were going to hire consultants? That they
8 needed help, so let's hire some consultants? Or we should
9 look into hiring consultants?

10 A I can't truthfully remember what the drift was,
11 what brought it up. But as far as QA was concerned, the
12 records never could support -- we ~~always~~ had concern that
13 the records couldn't support the submittal, and that might
14 have been the thing that came up.

15 Q You are talking about the February 10 submittal?

16 A Saying -- no.

17 Q You are talking about, after the fact I'm saying?

18 A Right.

19 Q In other words, you don't understand how they
20 could ever say that they were in compliance with 51.49
21 based on what you had seen all along?

22 A What was in those files; yes, sir.

23 BY MR. LA GRANGE:

24 Q I think the submittal you are referring to here
25 is the March 1971 submittal. The previous

1 submittals?

2 A Yes.

3 BY MR. MATAKAS:

4 Q And submittals in the '82 time period?

5 A Yes. The '80 -- '81, the '81 submittal. Well,
6 the '80 submittal. The first submittal that was required
7 December 1st. The files just didn't support it.

8 Q What I would like to show you now is two GPUN
9 submittals. The first one is dated May 20, 198³₂, the
10 letter, GPU number is 52-11-82-157. Specifically our
11 concern is with section 1, the second -- first paragraph,
12 second sentence states:

13 "The additional information we submitted in our letters
14 dated May 3, 1982, and May 16, 1983, support our
15 conclusions that the components listed are qualified in
16 accordance with DOR guidelines dated November 1979."

17 Basically what I would like you to do is just take a
18 look at the document and see if you recognize it?

19 A Well, I couldn't really say I recognize it, but
20 it probably crossed my desk.

21 Q Prior to it going out?

22 A No. No. After the issuance.

23 Q Okay. The second document I would like to show
24 you is dated February 10, 1984. And the letter number is
25 52-1-84-2036. It is addressed to the NRC. In the last

1 sentence -- it's a one-page letter -- the last sentence
2 states: "It is GPU's position that TMI-1 is currently in
3 compliance with environmental qualification rule 10 CFR 50.1
4 as applicable to TMI-1."

5 I would like to ask you to take a look at that letter
6 and say if you have ever seen it?

7 A Recently; yes.

8 Q You didn't see it before it went out?

9 A No, sir.

10 Q What I would like to ask you is: Based on your
11 audit or inspections between 1980 and 1984, and your
12 knowledge of the TMI-1 environmental qualification program,
13 are these true statements?

14 A My personal belief is this is not a true
15 statement.

16 Q And now you are talking about the February 10,
17 1984 letter that states "It is GPU's position that TMI-1
18 is currently in compliance -- "

19 A In compliance. Yes, sir. QA assessment of the
20 files in December of '83 and the beginning of '84 would
21 not support this statement.

22 Q May 20, 1983?

23 A The May 20th letter.

24 Q Is basically the reason for this the lack of
25 documentation in the files?

1 A That's one of the reasons.

2 Q What else?

3 A Inadequate documents. It was a lack of, and
4 appropriate -- there was a lot of reasons.

5 Q I would like to know what they are.

6 A Well, I'm just trying to think back.

7 At that time there was still no evidence that our
8 engineering group had reviewed that documentation and had
9 blessed it ourselves, outside of just being in the files.
10 There were a lot of summary reports without the backup
11 document test data to support those summary reports.

12 There were letters in the files that were being
13 referenced as the backup documentation. The letter itself
14 just saying: My equipment is qualified.

15 Q Again we are talking about, basically,
16 documentation?

17 A Documentation; yes. The correlation wasn't
18 there, in a lot of cases.

19 Q I guess what we are really getting down to in
20 this area is that, based on testimony that we have so far,
21 that the input for those statements came from Mr. Maus and
22 Mr. Boucher.

23 What I would like to ask you is if you have any
24 information or insight which would indicate that either of
25 these two individuals intentionally lied? Or do you have

1 any information or insight or mitigating information that
2 would indicate the opposite; that, you know, they didn't
3 know what they were doing? Or what are your thoughts in
4 this area, why this would have been submitted to the NRC?

5 A After all these years my personal feeling is, I
6 definitely believe that they believed what they were doing
7 was correct. But they had no inkling, really, what they
8 were supposed to be doing.

9 Q Their supervisors, Chisholm, Cronenberger, were
10 at the meetings where you were telling them the opposite
11 is that correct? That they were not in compliance?

12 A That the findings were not in -- would not
13 support the company.

14 Q In your original audit Mr. Cronenberger signed
15 for -- I think we talked about this a little earlier --
16 signed for audit findings 1, 3, and 11, which, in your
17 April letter, you found to be still open.

18 Does Mr. Cronenberger have a responsibility to respond
19 to those findings? Or can he delegate the responsibility?

20 A No. He delegated the responsibility.

21 Q In other words, anyone could sign for those
22 particular findings?

23 A Yes. As long as management, responsible person,
24 could acknowledge the finding; yes. It would be the
25 proper people would address the concerns.

1 Q At any time between 1980 and the current time,
2 have you had any conversation with Mr. Clark regarding the
3 environmental qualification program?

4 A No, sir.

5 Q Mr. R.F. Wilson?

6 A No, sir.

7 Q Anyone in the management level above Mr. Clark
8 or Mr. Wilson?

9 A Yes.

10 Q Who would that be?

11 A Mr. Long, the vice-president, nuclear assurance.

12 Q What's Mr. Long's first name? I have talked to
13 him before -- I think it's Robert?

14 A Bob -- Robert -- Bob Long; yes.

15 Q When did you have conversation with him?

16 A It was a little after our assessment of the
17 files, in the beginning of '84. So --

18 I After April of '84?

19 A It was in that time span, March, April of '84.
20 I would have to look at my records to give you an exact
21 date. I could give you the exact date --

22 Q It was after the February 10th submittal?

23 A I couldn't say "yes" or "no." I'd have to look
24 at my calendar to see when the meeting took place.

25 Q What was the purpose of that? Was this a

1 meeting or just a cafeteria-type thing?

2 A Well, the meeting was to bring our concerns to
3 our management people that the documentation files still
4 weren't supporting the submittals; that we still had
5 problems with documentation and the assessment was proving
6 that out.

7 Q What was Mr. Long's response?

8 A He had taken notes. That's all I can say. He
9 had taken notes.

10 Q Who else was at the meeting?

11 A Mr. Kazanas -- I can't remember exactly
12 everybody that was there. I wouldn't be sure, to mention
13 names.

14 Q Okay. That's fine. Was Mr. Long's secretary
15 there?

16 A No.

17 Q Where was the meeting at?

18 A In Dr. Long's conference room -- in his office.
19 I'm sorry. It was in his office.

20 Q Why would you go to a person of the position of
21 Mr. Long? Was it the QA section going to Mr. Long?

22 A Well, my personal feeling was trying to get the
23 problem escalated to Mr. Clark's level or Mr. Wilson's
24 level.

25 Q So Mr. Kazanas, is that the reason for him being

1 at the meeting?

2 A Well, he's the director of our department.

3 MR. MATAKAS: Anything else in that area?

4 MR. LA GRANGE: No. Could we go over the record
5 for a second?

6 (Discussion off the record.)

7 BY MR. MATAKAS:

8 Q We've talked about the meeting with Dr. Long.
9 Getting back to the meeting that we were talking about
10 earlier, where Mr. Chisholm made the statement about
11 hiring consultants, or a statement to that effect, could
12 you tell us who may have taken the minutes for that
13 meeting?

14 A I believe it was Bruce Alatary, the QA design
15 and procurement manager.

16 Q And you never have seen any minutes of the
17 meeting with Dr. Long?

18 A No. I'm positive there were no minutes taken at
19 that meeting. We were just, preliminary, talking about
20 our assessment that we had just completed.

21 Q Would that have been the April assessment?

22 A Assessment: yes.

23 Q So then we are talking about right after April,
24 just before you took sick leave?

25 A Yes. Yes, sir.

1 Q In your observation, up until the April '84 time
2 period, what active participation did Mr. Chisholm take in
3 the EQ program, in your observation?

4 A Gerry Maus seemed to be running the show.

5 Q Regarding Mr. Chisholm, Mr. Cronenberger,
6 Mr. Wilson, within that chain of command, going up the
7 ladder, you observed no active participation?

8 A Oh, I didn't mean to say he didn't because I did
9 have interface with him; when I didn't get something done
10 or didn't see eye to eye with Gerry, I would go to Dick.

11 Q Dick Chisholm?

12 A Dick Chisholm; yes. But Gerry, for all
13 practical purposes, was the man in charge.

14 MR. MATTHEAS: Anything else at all on any
15 subject, Bob?

16 BY MR. LA GRANGE:

17 Q In the meeting with Dr. Long, do you know that
18 he passed that information on to anybody in Tech Functions?

19 A I could not say. I have no idea.

20 Q Was there anybody from Tech Functions at that
21 meeting?

22 A No

23 MR. LA GRANGE: I don't have anything else.

24 BY MR. MATTHEAS:

25 Q Mr. Galtman, is there anything else that you

1 would like to state before we close the transcript?

2 A No, sir.

3 MR. MATAKAS: I would like to say I very much
4 appreciate your candor and your cooperation that you have
5 given us today. I would like to ask you a few questions --

6 BY MR. MATAKAS:

7 Q Have any promises or threats been made, promises
8 made to you or threats extended against you about this
9 interview today?

10 A No, sir.

11 Q Have you provided information freely and
12 voluntarily?

13 A Yes, sir.

14 MR. MATAKAS: The time is 10:45. This will
15 conclude the interview.

16 (Whereupon, at 10:45 a.m., the interview was
17 concluded.)

18

19

20

21

22

23

24

25

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: INVESTIGATIVE INTERVIEW OF
RAYMOND GUIMOND

DOCKET NO.:

PLACE: PARSIPPANY, NEW JERSEY

DATE: WEDNESDAY, APRIL 24, 1985

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

(sig) Joel Breitner
(TYPED)

JOEL BREITNER
Official Reporter
ACE-FEDERAL REPORTING, INC.
Reporter's Affiliation