

ORIGINAL

UNITED STATES NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF:

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INVESTIGATIVE INTERVIEW
OF
P. GERARD MAUS

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EXH 9

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
OFFICE OF INVESTIGATION

GPUN Headquarters
100 Interpace Parkway
Parsipanny, New Jersey

The Investigative Interview convened at 9:05 a.m.,

Richard A. Matakas, presiding.

PRESENT:

F. GERARD MAUS, Interviewee
Engineer, 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

P R O C E E D I N G S

MR. MATIKAS: The date is April 25, 1985, and the time is 9:05. Present for this interview are myself, Richard A. Matakas, investigator, United States Nuclear Regulatory Commission; Bob LaGrange, section leader in the NRC EQ branch office of NRR; and Mr. F. Gerard Maus, engineer, in engineering assurance for GPUX. The purpose of this interview is to discuss facts and circumstances leading to GPU submittals to the NRC involving the environmental qualification of electrical equipment at TMI Unit 1.

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

THE WITNESS: No. Absolutely not.
Whereupon,

P. GERARD MAUS

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

EXAMINATION

BY MR. MATIKAS:

Q Mr. Maus before you came here today were you given any instructions on how to testify or what you should say or shouldn't say?

A Instructions? No. We have a standard format. I have testified before for GPU.

1 Q Who do you meet with? Did you meet with someone
2 before you came here?

3 A I didn't meet with anybody. I spoke to the
4 lawyer over the telephone. He asked me if I had any
5 questions. I asked him specifically what you gentlemen
6 were going to discuss. All right?

7 Q Did he give you any instructions on telling the
8 truth?

9 A Yes. A regular -- we have a standard
10 instruction format; yes.

11 Q Which states essentially what?

12 A Tell the truth, answer all the questions,
13 cooperate fully. That's the company's position.

14 Q All right. For the record, would you again
15 state your full name and business address, please?

16 A P. Gerard Maus, GPU Nuclear, 100 Interpace
17 Parkway, Parsippany, New Jersey.

18 Q What telephone number can we reach you at?

19 A Area code 201-299-2063.

20 Q Would you give us a general overview of your
21 education and work history?

22 A I have two degrees. I have a degree in
23 aeronautical engineering, I have a degree in physics. I
24 have taken a couple of graduate programs at Stevens
25 Institute of Technology. I have over 20 years' experience

1 in the nuclear industry. Before I came to GPU I worked on
2 nuclear controls for submarines and aircraft carriers.

3 Q Specifically with GPU, when did you start with
4 GPU and when were you assigned --

5 A May 20, 1974.

6 Q Okay. How did you become involved in the EQ
7 program and what were your positions in that program?

8 A When GPU decided to start an in-house -- I guess
9 the word "start" is not correct. When they changed the
10 formatting of the internal group, which was in April of
11 1981, they asked me to replace the then-current supervisor
12 of the group.

13 Q Supervisor of the environmental qualification
14 section?

15 A Yes, sir.

16 Q That was in 1981?

17 A Yes, sir.

18 Q Do you know the approximately time period?
19 Month?

20 A April.

21 Q And your title was EQ supervisor?

22 A Manager. Before we go any further, I don't know
23 if you want me to say this for the record or not, I would
24 like a copy of this transcript. Is that agreeable to you
25 gentlemen?

1 Q That's agreeable to us unless we are instructed
2 to do otherwise.

3 A When would you know that?

4 Q You know, certain circumstances, there have been
5 occasions -- I don't know that it will happen in this case,
6 but there have been occasions when the U.S. Attorney has
7 taken control of case in which case we are instructed not
8 to give transcripts out. I'm not saying that it will
9 happen in this case, but there are situations where it has
10 happened.

11 A Okay. I would also like to make this available
12 to the company.

13 Q What you do with your transcript after we send
14 it to you is your business.

15 A I just want to state that for the record. I
16 intend to do that.

17 Q Getting back to April 1981 time period, when you
18 were assigned as EQ manager --

19 A Yes, sir.

20 Q -- how did you formulate your section? Or did
21 you have any say in who would be working for you and
22 would their responsibilities be?

23 A The section had already been established; all
24 right?

25 Q And when you took over, what did it consist of?

1 A What do you mean "what did it consist of?" Are
2 you talking about personnel? Facilities? Or what?

3 Q Well, you had two nuclear facilities, you had
4 TMI and you had Oyster Creek.

5 A That's correct.

6 Q How did you cover those facilities with the EQ
7 program with the people that you had?

8 A Well, that was not the start of the EQ efforts.
9 The EQ effort had started years before. It's back to 1978.

10 What I took over was a continuation and completion of
11 the EQ effort. There already had been files established,
12 personnel had been assigned to the two facilities, the
13 program was --

14 Q Then what program did you take over? Would you
15 describe it to me?

16 A The completion of the environmental
17 qualification. The environmental qualification was not
18 complete for either facility at that time.

19 Q So, what did that program look like when you
20 took it over in April? How many people did you have
21 working?

22 A How many people? There were two people, at that
23 time in April, two people full time.

24 Q Would you identify them and what their
25 responsibilities were?

1 A Yes. We had a responsible engineer for TMI.
2 His name was Paul Boucher, and a responsible engineer for
3 Oyster Creek. At that time -- it was Scott Simoniz.

4 Q What were your responsibilities as the EQ
5 supervisor?

6 A To complete the environmental qualification
7 program for those two facilities.

8 Q What did that entail, to your understanding?

9 A As I said, submittals had been made for both
10 facilities, and we indicated that there were items for
11 which the environmental qualification had not been
12 completed.

13 We had also indicated in the submittals whether we
14 planned to try and qualify the existing components or
15 whether we intended to replace them.

16 Q In other words, to qualify the components
17 important to safety within the guidelines of IE Bulletin
18 79-01 B, 10 CFR 50.49 and --

19 A Wait a minute. You are going too fast. Okay?

20 At that time it was, as far as TMI was concerned, it
21 was IE Bulletin 79-01 B. As far as Oyster Creek was
22 concerned it was a SEP topic; 79-01 B did not apply to
23 Oyster Creek at that time. It didn't apply to any SEP
24 plant.

25 Q I tried to restrict my questions today to TMI-1?

1 A Well, you asked about both facilities. If you
2 want to talk strictly about TMI-1, fine.

3 Q From 1981, April, when you took over as EQ
4 manager, up until -- well, how long did you remain in a
5 position as EQ manager? When were you taken out of that
6 position or when did you leave that position?

7 A July of '84.

8 Q Between April '81 and July '84, did you have any
9 other responsibilities other than EQ?

10 A No.

11 Q What I would like to show you is two GPU Nuclear
12 letters to the Office of Nuclear Reactor Regulation. The
13 first letter is dated May 20, 1983, and the GPUN letter
14 control number is 5211-83-157. With the exception of the
15 handwritten notes in some of the margins and some of the
16 markings, I would like you to take a look at it and ask
17 you if you recognize the document?

18 A I recognize it.

19 Q The second document is dated February 10, 1984.
20 It's also a letter from GPUN to the office of Nuclear
21 Reactor Regulation, the GPUN control number is 5211-84-2038.
22 I would like you to take a look at the letter and I ask
23 you if you recognize it.

24 A Who did you say might object to the transcript
25 being given to us?

1 Q I'm not saying anybody may object.

2 A Who did you say might?

3 Q As an example I gave the Justice Department.

4 A Justice Department. Okay. I forgot to make a
5 note of that.

6 Yes, I recognize this document.

7 Q Do you know who drafted both of these documents?

8 A No. I don't know who drafted both of them. I
9 know who drafted one of them.

10 Q Which one?

11 A February 10, 1984 document.

12 Q Who drafted that document?

13 A As far as I know, Roy Harding.

14 Q Did you have a conversation with Mr. Harding
15 regarding this February 10 document?

16 A Yes.

17 Q What was -- what did that conversation entail?
18 What input was he asking you for?

19 A Many and various.

20 Q Would you tell us, please, what he was asking
21 you to input?

22 A What the status was with respect to answering
23 the TER questions.

24 Q What did you inform him? Did you inform him
25 that the TER deficiencies had been answered?

1 A We answered -- my response to him was on a
2 component-by-component basis. We tried to group them into
3 sections; our responses grouped into sections according to
4 the way the deficiencies are numbered in the TER. But
5 there really is no blanket answer.

6 Q The last sentence in this February 10 letter
7 states: "It is GPUN's position that TMI-1 is currently in
8 compliance with the environmental qualification rule 10
9 CFR 50.49 as applicable in TMI-1.

10 Did you provide input to Mr. Harding, where he would
11 get that impression and draft that information? Or did
12 you specifically tell him that you were in compliance with
13 10 CFR 50-49?

14 A Could you repeat the first part of that question
15 about Mr. Harding's impressions?

16 (The reporter read the record as requested.)

17 THE WITNESS: I will answer the question. I
18 can't answer for Mr. Harding's impressions; okay? That's
19 subjective. I can't answer that question.

20 I told him that as far as environmental qualification
21 engineering was concerned, the information we had, we were
22 in compliance, from an engineering standpoint; yes.

23 BY MR. MATAKAS:

24 Q Then it was your intention to -- well, let me
25 ask that a different way.

1 At the time, did you agree with this statement, "It is
2 GPU's views that TMI is in compliance with" -- et cetera.
3 Did you agree with that part of it?

4 A Yes.

5 Q Did you provide this input to Mr. Maus --

6 A Wait a minute. I am Mr. Maus.

7 Q -- with Mr. Boucher, when you were talking with
8 Mr. Harding about the EQ program?

9 A Did I discuss the conclusion?

10 Q Did you discuss -- yes, your conclusions? Was
11 Mr. Boucher present in these conversations with
12 Mr. Harding?

13 A About my conclusion?

14 Q About the EQ program, when you discussed
15 whatever you discussed with Mr. Harding?

16 A Yes. On many instances.

17 Q Okay. After the February 10 letter was drafted,
18 did you have an opportunity to review it?

19 A Yes.

20 Q Did you see any problems with the letter?

21 A There were some typos in it but no major
22 problems; no.

23 Q On the May 20, 1983 letter, do you know why
24 this --

25 A Just a minute, please. Okay.

1 Q On the May 20, 1983 letter, do you know what
2 that was in response to?

3 A No. I honestly -- I still don't know.

4 Q Are you familiar with 10 CFR 50.49?

5 A Yes.

6 MR. MATAKAS: Why don't we take about a couple
7 of minutes break here.

8 (Discussion off the record.)

9 MR. MATAKAS: During that break I showed
10 Mr. Maus a copy of 10 CFR 50.49, specifically section G.

11 BY MR. MATAKAS:

12 Q Mr. Maus, after reviewing that section, do you
13 recall that the May 20, 1983 response was in response to
14 10 CFR 50.49?

15 A Would you be a little more explicit, please?

16 Q Well, the first paragraph of the May 20, 1983
17 letter says, "In accordance with 10 CFR 50.49(g) and NRC
18 letter dated March, 1983, GPUN is supplying the following
19 information to identify electrical equipment important to
20 safety within the scope of section 50.49(g) that is
21 already qualified, and to submit schedules for
22 environmental qualification or replacement of the
23 remaining equipment that is important to safety as defined
24 in 10 CFR 50.49."

25 A Okay. We have talked about 10 CFR 50.49

1 paragraph G. We have not discussed this NRC letter. I
2 don't know what this letter is.

3 Q Okay. I don't know what the letter is either.

4 A Fine. Then how --

5 Q Do you know that this response -- it is very
6 clear in 10 CFR 50.49(g) that it says you have to respond
7 by May 20, 1983?

8 A Okay.

9 Q Do you know that this was at least in part a
10 response to 10 CFR 50.49(g)?

11 A Okay. Yes. I would say it is.

12 Q Did you know that -- have you ever reviewed this
13 document?

14 A No.

15 Q Were you ever asked for input into it, that you
16 recall?

17 A Not that I'm aware of.

18 Q And you never reviewed it subsequent to the
19 document going out?

20 A Subsequent to it going out?

21 Q That's correct. Within the immediate time
22 period of May 20, 1983?

23 A No.

24 MR. MATANAS: Let's take another couple of
25 minutes break.

1 (Discussion off the record.)

2 BY MR. MATAKAS:

3 Q I would like to go back to the February 10
4 letter.

5 A Sure.

6 Q Do you know what that was in response to? Why
7 that letter was drafted?

8 A It was in response to the SER of December 10,
9 1982 for TMI.

10 Q Okay. I would like to show you another document,
11 it's a March 1, 1983 letter, GPUN to the Office of nuclear
12 Regulatory Regulation -- Nuclear Reactor Regulation. The
13 letter number is 5211-83-054.

14 I would like you to take a quick look at this letter
15 and I ask you if you recognize it?

16 A Yes, I do.

17 Q Did you have any input or did you make any
18 requests or request to have this letter drafted? If you
19 would, just generally, would you just give me the
20 background, what you know about this letter?

21 A When we received the SER and the TER, we went
22 through every TER item and we tried to understand exactly
23 what the deficiencies were and we could not do it.

24 Some of the categories, for instance, used in the TER
25 could be multiple deficiencies and they were not

1 identified as to which of the exact deficiencies they were
2 talking about. So, we could not understand enough of the
3 comments in the TER on our own so we requested a meeting
4 with the NRC to get additional information on exactly what
5 was meant on these deficiencies.

6 Q Did you have that meeting?

7 A No, sir.

8 Q Did you have a meeting with the NRC on October 5,
9 1983?

10 A I'm not sure about the date. I know we had a
11 meeting with them. I don't recall the exact date, but we
12 did have a meeting.

13 Q Was it approximately October 5?

14 A Yes, sure.

15 Q Did you discuss the TER deficiencies?

16 A Yes.

17 Q Did you air your questions?

18 A Yes.

19 Q Were your questions answered?

20 A Yes.

21 Q After this meeting, what specific actions did
22 you take to assure that the TER deficiencies that were
23 identified were corrected? I'm talking about between the
24 October 5th meeting -- well, let's go all the way back to
25 December 10, 1982, when the SER/TER was issued. You had

1 the meeting on -- in October or thereabouts, 1983.

2 A Yes.

3 Q And then you had another NRC inspection in March
4 20-21, 1984.

5 Between that time what actions did you take to assure
6 that each of these TER deficiencies were corrected?

7 A We continued to get additional information on
8 items that were not qualified, from vendors. We got later
9 test reports, whatever information we needed to complete
10 the qualification. We made internal calculations, such as
11 Arrhenius calculations. And the results of this work were
12 reflected by revising the SCEW sheets and the master list
13 and resubmitting these to the NRC.

14 Q Did you personally go over each component file
15 to assure that the TER deficiencies were corrected?

16 A No. "I" did not.

17 Q Who did you assign that responsibility to?

18 A The lead engineer; Mr. Paul Boucher, basically.
19 However, I did review a number of them. And also a number
20 of these were reviewed by Mr. Harding, in Licensing. But
21 I couldn't swear that I went through every one.

22 MR. LA GRANGE: Gerry, you said the SCEW sheets
23 were resubmitted to the NRC. When did that occur; do you
24 recall?

25 THE WITNESS: In what time frame? What time

1 period are you talking about?

2 BY MR. LA GRANGE:

3 Q That's what I was interested in. You said the
4 SCEW sheets had been revised and the master list had been
5 updated and the SCEW sheets were resubmitted to the NRC.

6 A What time period are you talking about, Bob?

7 Q Well, the same time period you were just talking
8 about.

9 A Okay. All right. You are right. I guess we
10 didn't have any -- that's when you told us we didn't have
11 to submit any more; right?

12 Q That was the SCEW sheet modification you were
13 talking about? So, actually, they never did get submitted;
14 right?

15 A You are right. That's right. After that time
16 period, that's right.

17 Before that time period we had resubmitted them.

18 Q Yes.

19 A Okay. We are just talking about the time period
20 between --

21 Q Between the TER and --

22 A Oh, no. The TER we submitted many times or a
23 couple of times after we received the TER.

24 BY MR. LA GRANGE:

25 Q After you submitted the TER you submitted new

1 SCEW sheets?

2 A Yes, revised SCEW sheets. Yes. Yes. And a
3 master list.

4 Q So, between December 10, '82, subsequent to that
5 you made new submittals of SCEW sheets?

6 A And master lists; yes.

7 Q I don't recall ever seeing them.

8 A Well, I'm sure if you guys want the dates on
9 those letters you could get them from Licensing.

10 BY MR. MATAKAS:

11 Q Would you have submitted them to licensing for
12 submittal to --

13 A Yes. Licensing makes all our submittals.

14 BY MR. LA GRANGE:

15 Q Do you know for a fact that licensing sent them
16 to the NRC?

17 A Absolutely.

18 Q Were they big packages of a lot of revised SCEW
19 sheets, do you recall? Or was it one or two SCEW sheets?

20 A Big packages. A lot of them, like NUREG 7007.
21 We had a big submittal on that. Did you ever see those?

22 Q Once the rule came out we were basically
23 interested in the 197 equipment. Instead of calling it
24 NUREG --

25 A No, I'm just trying to think of things that

1 might help you recall if you had seen them or not.

2 BY MR. MATAKAS:

3 Q Do you recall that at the meeting in October
4 1983 or thereabouts --

5 A Whatever. Sure.

6 Q -- that you were asked to respond once again to
7 the TER deficiencies?

8 A Yes.

9 Q Do you correlate that with the February 10
10 submittal?

11 A Yes. Yes.

12 Q Okay.

13 A Yes. That was the intent.

14 Q So, basically, then, you were relying on the
15 limited inspection that you did of the documentation
16 within the files, input from Mr. Boucher to you regarding
17 what he had been doing with the files, and Mr. Harding
18 himself had looked at some of the files?

19 A I did more than a limited inspection. I just
20 didn't do 100 percent on everything; okay? "Limited" is
21 not a good characterization of my involvement. It was
22 much more than limited; okay? But it wasn't 100 percent.

23 Q But basically that was the basis for this
24 February 10 letter and the feeling that you were in
25 compliance with 10 CFR 50.49?

1 A That's correct. That's right.

2 Q Who was your supervisor during the '83-'84 time
3 period?

4 A My direct supervisor is Richard Chisholm.

5 Q And he reported to Mr. Cronenberger who
6 ultimately reported to Mr. Wilson?

7 A That's correct.

8 Q What active participation did Mr. Chisholm take
9 in the EQ program between 1981 -- between the time period
10 that you were involved in EQ?

11 A He had the overall responsibility that the
12 department met its goals, what they were supposed to do;
13 that we had adequate resources.

14 Q Did you confer regularly with him on the status
15 of the environmental qualification program?

16 A Yes.

17 Q Could you give us some idea of what that
18 entailed and what those discussions entailed?

19 A Primarily, what we discussed with him were the
20 problem areas where we had problems with equipment and
21 what the course of action might be.

22 Q Did you have any such conversations with
23 Mr. Cronenberger?

24 A Very seldom; but, yes.

25 Q Do you recall a meeting in the early part of

1 1984, I believe QA also attended the meeting, where Mr. --

2 A A meeting where, Rich?

3 Q Mr. Alatary, from QA, took the notes and the
4 physical location of the meeting I'm not sure --

5 A But it was a GPU meeting? It wasn't a meeting
6 with the staff or anything like that?

7 Q Right. It was more of a QA/Tech Functions-type
8 meeting?

9 A Okay.

10 Q And Mr. Chisholm made a comment about the
11 possibility, raised the possibility of hiring consultants
12 to assist in the EQ program. Mr. Chisholm made that
13 statement -- I'm sorry. I don't remember what I said.

14 Do you recall any such meeting? If you don't recall --
15 we are on the record.

16 A I don't understand your question.

17 Q That's fine. We don't have to go off the record
18 for that.

19 A Okay.

20 Q I'll repeat the question.

21 A Just the beginning part of the question.

22 Q Do you recall attending a meeting -- let's
23 forget who-all attended --

24 A I do not recall attending such a meeting.

25 Q -- where Mr. Chisholm made that statement?

1 A Yes. However, it is possible that I was at that
2 meeting; all right? But, in all honesty, I don't recall
3 attending that meeting.

4 Q Did Mr. Boucher ever bring to your attention
5 that he thought the EQ job, or his function in EQ was more
6 than he could handle and he needed help?

7 A Yes.

8 Q How often did he bring that to your attention?

9 A Periodically.

10 Q Between the time you were manager of EQ?

11 A Yes.

12 Q Did you personally feel that he needed help?

13 A Yes.

14 Q Did you inform anybody of that fact?

15 A Yes.

16 Q Who did you inform?

17 A Mr. Chisholm.

18 Q And how often did you inform him of that feeling?

19 A Occasionally.

20 Q From —

21 A Well, when we reviewed schedule commitments and
22 things like that; that we needed more help.

23 Q Did you feel that Mr. Boucher understood what
24 was needed for qualification, as far as documentation went,
25 that was in the files?

1 A Yes.

2 Q At what point, if any, do you feel that
3 management became involved in EQ program, as far as
4 getting the assistance and actively taking an active look
5 at what the program was all about?

6 A That's more than one question. Do you want to
7 split them? I'll answer each one separately.

8 Q At what point, if any, did you feel that
9 management took an active role in the EQ program?

10 A From the beginning of the EQ program.

11 Q And what did that participation consist of?

12 A I was not involved at EQ at that time. However,
13 initially management made a decision to go to an outside
14 contractor for EQ at TMI. That's the way it started.

15 Q But I'm talking about when you were EQ manager.
16 What active participation did management take in the EQ
17 program, during the time that you were EQ manager?

18 A They periodically reviewed the status of the
19 program. They made sure that we had proper procedures in
20 place for the program.

21 Q At what point did they start giving you some
22 assistance in the program?

23 A Do you mean additional assistance? Is that what
24 you mean?

25 Q Other than Mr. Boucher and Mr. Banua?

1 A What was done during that period of time, if we
2 had an immediate need, an engineer would be assigned from
3 another department to assist us.

4 Q Then are you saying that when Mr. Boucher
5 requested assistance, and you relayed that request to
6 Mr. Chisholm, that you were given assistance?

7 A No. On occasion; yes.

8 Q Not always? Is that what you are saying?

9 A That's a better choice. Not always.

10 Q Were you asking Mr. Chisholm for permanent help?
11 Did you ever?

12 A Yes.

13 Q Were you ever given permanent help?

14 A No.

15 Q What I would like to show you is an interoffice
16 memorandum, GPU Nuclear interoffice memorandum dated June
17 25, 1981, QA/4161, to Mr. R.F. Wilson from Mr. Stromberg.
18 And, attached to that is a QA audit report number
19 O-TMI-81-02. I would like you to take a look at it.
20 Again, ignore any of the handwritten notes, but I ask you
21 if you have ever seen that audit before, and the cover
22 letter.

23 A Yes. I have seen these documents before.

24 Q I would like you to take a look at page 10 of 10,
25 under "Recommendations." Number 1 says: "Documented

1 direction be generated in order to assure meeting the
2 requirements of the bulletin to include organizations,
3 departments, sections, and individuals, (headquarters and
4 site personnel). This should include interface
5 responsibilities and define the corporate position on the
6 bulletin."

7 Do you recall that particular recommendation?

8 A Yes.

9 Q What was done about that recommendation?

10 A A procedure was generated to make sure that we
11 complied with it.

12 Q What procedure was that?

13 A EP-31.

14 Q Was that procedure accepted by quality assurance?

15 A Yes.

16 Q I would like you also to take a look at finding
17 number 1, 1 of 11. It says: "No evidence of management
18 direction to correlate the effort of intersectional
19 effort in establishing the master list and qualification
20 documentation file."

21 Was this finding ever resolved?

22 A I'm not sure. I don't know what the current
23 status is on that finding.

24 Q To your knowledge you do not know if it was ever
25 resolved or not? Was it ever resolved before you departed

1 the EQ section?

2 A I don't know. I could find out but I don't know.

3 Q Well, let me show you a revised response to
4 audit 81-02. It's dated August 21, 1981. The number on
5 it is EP&I 81/0176. Audit finding 1 of 11.

6 Do you recognize that document?

7 A Yes.

8 Q What is the corrective action on there?

9 A You want me to read what this says?

10 Q Is this your signature down at the bottom as the --

11 A Yes.

12 Q Under "Corrective Action"?

13 A Yes.

14 Q It again references -- is that engineering
15 procedure 0-31?

16 A 31 -- yes. It also mentions that this is to
17 become a corporate procedure. Yes.

18 Q Did you personally take this corrective action
19 to Mr. Magitz for sign off? How did does that work?

20 A No, I did not personally take that to Mr. Magitz.
21 That would have been given to Mr. Magitz by Mr. Stromberg,
22 who was his supervisor.

23 Q Did you ever have meetings with quality
24 assurance during the time period that you were EQ manager
25 regarding the corrective action on findings 1 through 11?

1 A Yes.

2 Q Who attended those meetings from QA? I realize
3 it's going to be different people attended different
4 meetings, but essentially what is the same core of people?

5 A No.

6 Q It wasn't essentially the same core?

7 A Essentially it was not the same core of people.

8 Q Did you have meetings where Mr. Guimond attended?

9 A Yes.

10 Q Was Mr. Guimond the team leader for audit 81-02?

11 A Yes.

12 Q Did he voice his dissatisfaction with the
13 corrective action of audit number 1?

14 A Yes.

15 Q Did he voice his dissatisfaction with the
16 corrective action on any of the other audits?

17 A Yes.

18 Q Were you aware of any documented memorandums
19 that Mr. Guimond may have sent through his section,
20 voicing such dissatisfaction?

21 A I'd say "yes."

22 Q Why weren't his recommendations followed?

23 A Because we didn't believe they were correct or
24 we believed we had followed them.

25 Q What I would like to show you is another

1 memorandum. If you would excuse this first page. This is
2 what I was sent, so I got a clean page -- this is page 1.

3 A Okay.

4 Q But it's dated April 4, 1984. The number on it
5 is PDA/84-107. It's to Mr. Stromberg from Mr. Guimond.

6 I would like you to take a look at that.

7 A Okay.

8 Q Do you recognize this memorandum?

9 A Yes.

10 Q Just for the record, Mr. Guimond states in his
11 memorandum that findings 1, 3, 5a, 6a, 10, 11.4, 11.8, and
12 11.14 are still considered open.

13 What I would like to ask is why had it taken so long
14 for Mr. Guimond's findings to be closed? They were still
15 not closed as of April 4, 1984, and they were identified
16 back in April -- let me see, March and April of 1981.

17 A The overall answer to that question is: I
18 honestly don't know.



6,7c, portions

1 A All right. So it was after that. So, then my
2 original answer stands: I really don't know why it took
3 this long.

4 Q You mentioned earlier that you didn't agree with
5 some of his findings. Wasn't he stating all along that
6 the documentation was not adequate and there was no
7 management direction during these meetings that you had?

8 A That was his opinion.

9 Q You didn't share that opinion?

10 A Absolutely not.

11 Q During the October 5th meeting that you had with
12 the NRC, October 5, 1983 --

13 A Yes?

14 Q -- didn't they tell you that your documentation
15 was lacking?

16 A I'm not sure whether they said that or not. I
17 don't recall.

18 Q Prior to the October 5th meeting he indicated,
19 at least in your March 1st letter, March 1, 1983, that you
20 didn't understand what the TER was requesting?

21 A Some of the TERs. Some of it.

22 Q Some of what the TER requests. Was that in the
23 area of the documentation?

24 A Yes. That was one area.

25

1 BY MR. LA GRANGE:

2 Q As a result of the discussions that took place
3 during the October '83 meeting with us, did you then
4 realize that additional documentation would be necessary?
5 Or that some equipment would have to be replaced?

6 A At that meeting?

7 Q As a result of the discussions that took place
8 at that meeting?

9 A No.

10 Could we take a break? I heard the coffee bell.

11 (Discussion off the record.)

12 MR. MATAKAS: When we finished, Bob, you were
13 talking to Mr. Maus and I believe he wanted to finish
14 some questions?

15 BY MR. LA GRANGE:

16 Q Yes. I asked a few minutes ago whether, based
17 on the discussions that took place at your meeting with us
18 on October 5, 1983, you felt that any additional
19 documentation was needed or that any equipment would have
20 to be replaced to make sure the equipment was qualified.
21 I think you said "no."

22 A I can't recall that we -- yes -- based on that
23 meeting, that anything was apparent.

24 Q Was any work done to the files? Or did the
25 qualification status of any of the equipment change?

1 Between the October 5, 1983 meeting and the March, I
2 believe it was March 8, 1984 meeting?

3 A Yes. The answer to both -- both things were
4 yes.

5 Q Why was work done on the files in between that
6 period of time?

7 A Because we had not completed the qualification
8 of all items.

9 Q But the discussions that took place at the
10 October meeting, October '83 meeting, had nothing to do
11 with the additional work that was done on the files at
12 that time?

13 A No. I wouldn't say that. What we got at the
14 meeting was guidance on how to proceed on certain items.
15 And that certainly would affect the files -- did affect
16 the files.

17 Q I thought you said that it was your opinion that
18 no additional documentation was needed as a result of the
19 October meeting?

20 A At that meeting; directly at that meeting. You
21 know, there was apparent lack that, you know, we needed
22 additional documentation for this item.

23 I don't recall that anything specific was said.

24 For example, I don't recall that somebody said: You
25 don't have the latest Limitorque report. That's what I

1 thought, you were asking a different type of question. Maybe I
2 misunderstood your question.

3 Q Well, maybe I should rephrase it.

4 A Okay.

5 Q When you came back from the October 1983 meeting,
6 based on what you had -- the guidance you were given
7 during the October '83 meeting, did you believe that
8 additional documentation was necessary to show the
9 equipment was qualified?

10 A I'd say yes. Yes.

11 MR. LA GRANGE: Okay.

12 BY MR. MATAKAS:

13 Q Just to clarify that a little bit more --

14 A Surely.

15 Q -- what I have here, I received this from
16 Mr. Harding. It was in the file regarding the the meeting
17 that you had with the NRC on October 5th. I'll just read
18 from it, then I'll show it to you.

19 A Sure.

20 Q It was identified to me as your notes that had
21 been retyped and it appears to be your signature, the
22 signature that says "F.G. [unclear]" on the bottom?

23 A Right.

24 Q It says, "Based on our meeting we now know how
25 to respond to closeout deficiencies. These deficiencies

1 are in regard to documentation and testing and should not
2 result in any equipment changes." I don't know if that
3 refreshes your memory -- go ahead and take a look at the
4 document.

5 A Okay. I recognize this.

6 Q Just basically what you told Mr. LaGrange --

7 A I guess I misunderstood Mr. LaGrange's question.
8 But there were other occasions when we were told that we
9 really don't think you have the latest documentation on
10 this item; or we were made aware of this by things like IE
11 bulletins. There is additional documentation.

12 Also, in the TER, Franklin Research made reference to
13 documentation that we did not have; that was generic
14 documentation that they had.

15 So, we knew there was additional documentation
16 available.

17 BY MR. LA GRANGE:

18 Q Did that letter that was just shown to you, that
19 you signed, was all that work completed prior to the
20 February 10, 1984 letter being drafted?

21 A To the best of our knowledge. To the best of
22 our knowledge yes. Yes.

23 (Discussion off the record.)

24 BY MR. LA GRANGE:

25 Q As a result of the second meeting we had with

1 you, I believe it was March 8, 1984, did you as a result
2 of discussions that took place during that meeting -- did
3 you feel after that meeting that all the documentation
4 necessary to establish qualification of the equipment was
5 currently in the files at that time?

6 A Yes.

7 Q You said previously you had not known about the
8 May 20, 1983 letter, until sometime after it had been sent
9 out?

10 A Yes.

11 Q Do you know who drafted that letter?

12 A I do not know for sure.

13 Q You were not, obviously, asked to concur in that
14 letter?

15 A That's correct.

16 Q There is a statement in that letter, something
17 to the effect that GPU's -- I'll quote from the letter:
18 "Additional information we submitted in our letters dated
19 May 3, 1982, May 16, 1983, support our conclusions that
20 the components listed are qualified in accordance with the
21 DOR guidelines dated November 1979."

22 That was a statement in the May 20, 1983 letter.

23 Would you have concurred on that statement?

24 A Yes.

25 Q In your February 10, 1984 letter, there is

1 equipment identified as needing to be replaced. I think
2 there's at least three items, three places in that letter
3 where equipment will be replaced by, I believe, June 1984.
4 I can point them out to you.

5 On page 2 of the attachment to the February 10, 1984
6 letter it is stated that "ASCO solenoid valves will be
7 replaced with qualified, ASCO solenoids by June 1984."

8 On page 3 of the attachment to the letter, with regard
9 to static O ring pressure switch, it states "These
10 switches will be replaced prior to June 1984 by qualified
11 pressure switches."

12 On page 6 of the attachment to the February 10 letter,
13 "Square D switches. The MUPS480 will be replaced by
14 qualified pressure switches by June 1984."

15 Given that this letter was submitted after the May 20,
16 1983 letter, in which it is stated that the equipment is
17 qualified in accordance with the DOR guidelines, does it
18 seem consistent to you that a later letter identifies
19 certain items of equipment as requiring replacement with
20 qualified equipment?

21 A Yes.

22 Q Could you expand on that?

23 A This happens because we find out, when we take a
24 closer look at some of the data involved with the
25 qualification, we were not satisfied that the

1 documentation proved they were qualified.

2 Q You have the statement in the May 20, 1983
3 letter that clearly said the equipment was qualified in
4 accordance with the DOR guidelines?

5 A That's correct. The documentation we had at
6 that time, we believed that it demonstrated they were
7 qualified.

8 Q You are saying you went back again and looked
9 the documentation and changed your mind later on?

10 A I would say we went back and relooked at the
11 documentation, or got additional documentation and based
12 on that, we may have come to that conclusion.

13 Q Would not you have had to have had the
14 documentation prior to May 20, 1983, that showed they were
15 qualified?

16 A Yes.

17 Another thing that may have happened is that we may
18 have taken another look as to exactly how long they were
19 required to function to mitigate design basis event, and
20 come to a different conclusion.

21 One area where this happened was generically concerned
22 with post-accident operability, we had some guidance from
23 the Staff on how to look at post-accident operability, and
24 we may have changed our minds based on that.

25 Q I don't think that these three items would be --

1 A It may not have been. I'm talking generically;
2 okay?

3 Q The point I'm trying to make is: Would not all
4 this review and evaluation by GPU have had to have been
5 completed by May 20, 1983, in order to make that statement?

6 A Yes.

7 Q I think essentially you are saying it wasn't?

8 A I am not saying that. I'm saying that somebody
9 took another look at it, and specifically what the reasons
10 were on these three items, I can't tell you that by memory.

11 Q Does it seem reasonable that the response to 10
12 CFR 50.49 dated May 20, 1983, would have been issued
13 without your concurrence as manager of the staff?

14 A I can't answer that question. Because what's
15 reasonable to you may not be reasonable to me. Do you
16 want to rephrase the question, I'll answer it.

17 BY MR. MATAKAS:

18 Q Let me ask one thing. Are you familiar with
19 licensing procedure 002?

20 A Yes.

21 Q Would that call for you to concur at least to
22 have input into a letter such as this?

23 A Somebody would have to.

24 Q What do you mean "somebody"?

25 A Somebody would have to -- somebody would have to

1 concur.

2 Q Someone where? In the EQ section? What I'm
3 asking --

4 A Somewhere in the chain for the EQ section.

5 Q And you are talking about from Cronenberger down?

6 A You got it.

7 BY MR. LA GRANGE:

8 Q It's still your opinion that the statement that
9 the equipment was qualified in accordance with the DOR
10 guidelines was a valid statement?

11 A With what we knew at that time; yes.

12 Q Even in light of the fact that a later submittal
13 identified equipment as requiring replacement with
14 qualified equipment?

15 A Yes.

16 Q And nothing occurred at the March 8, 1984
17 meeting, to change your mind?

18 A On these three items?

19 Q On the status of EQ in general.

20 A Nothing occurred at that meeting that -- okay --
21 that changed -- that would have changed my mind. However,
22 as a result of that meeting we took a closer look at the
23 documentation and after that we were aware of some
24 deficiencies in the documentation. As a result of that
25 meeting, yes, we changed documentation.

1 Q As a result of the October 1983 meeting, based
2 on the guidance given to you at that time with regard to
3 resolving the TER deficiencies, would you still be able to
4 support the May 20, 1983 statement that the equipment was
5 qualified? By that I mean, that you had all the
6 documentation necessary to show it was qualified?

7 BY MR. MATAKAS:

8 Q He's talking about in retrospect. He's not
9 trying to trap you. In retrospect, based on what you
10 learned from the October 5th meeting, what was expected of
11 you.

12 A You only have limited resources; okay? You can
13 only go back so far. And my answers would be that, you
14 know: My beliefs at the October 5th meeting, based upon
15 the information they had then, were correct. The
16 statements we made were correct. As also were the
17 statements made in the subsequent letter.

18 It's the information we had at that time. What we knew
19 about it at that time. You can always go back and take a
20 second look

21 BY MR. LA GRANGE:

22 Q I understand. But in retrospect, based on the
23 guidance you were given in the October 5 meeting and the
24 March meeting, could you still support the statement made
25 in the May 20, 1983 letter, that the equipment was

1 qualified in accordance with the DOR guidelines?

2 A Yes.

3 MR. MATAKAS: Let me ask --

4 BY MR. MATAKAS:

5 Q I seem to remember, correct me if I'm wrong,
6 that you made a statement -- there was a tape-recorded
7 conversation, wasn't it? In March 8, 1984 meeting?

8 A I don't think so.

9 MR. LA GRANGE: The meeting was transcribed.
10 There was someone there taking minutes of the meeting.

11 THE WITNESS: There was?

12 MR. LA GRANGE: No, it was in Bethesda.

13 THE WITNESS: Oh, Bethesda. Okay. All right.

14 BY MR. MATAKAS:

15 Q I seem to recall you making a statement
16 something to the effect that you had been audited and
17 internal audits made sure that --

18 A Yes. We had internal audits; yes.

19 Q Before, when I talked to you about audits,
20 specifically meetings that you had throughout the period
21 that you were EQ manager, with Mr. Guimond, that you
22 didn't agree with his findings?

23 A Some of them; sure.

24 Q Wasn't he telling you all along, in the '80 -- '81
25 audit and throughout this time that he was not satisfied

1 with the documentation? He did not feel it was
2 satisfactory?

3 A I'd say "yes." He was telling us that.

4 Q And you stated that "We did not agree with some
5 of his findings"?

6 A Yes.

7 Q Was it your decision not to act on some of the
8 open audit items?

9 A No.

10 Q Whose decision was that?

11 A I'm not aware that such a decision was made. I
12 think we responded to every item. I don't know what the
13 current status is, whether they are all closed out.

14 Q Well, I can't remember, did you mention that you
15 had observed this or you had seen this April 4, 1984 --
16 (Hanging)?

17 A Yes. I had seen that; yes.

18 Q Okay. In that letter from Mr. Guimond dated
19 April 4, 1984, he states that the last corrective action
20 was received on 2/5/1982. And he states that findings 1,
21 3, 5a, 6a -- et cetera. I have already read them --
22 remain open.

23 Why weren't those acted upon?

24 A I can't answer that question. The question
25 really is: Why were they still open? Not why they

1 weren't acted upon. They were acted upon. They were
2 still open.

3 Q During these meetings throughout this time as
4 far as findings 1 and 3, I believe 3 has to do with
5 documentation. The requirement, NRC order dated 10/24/80:
6 "Order for modification of license concerning
7 environmental qualification of safety-related electrical
8 equipment, page 5 paragraph (b), states in part: "... no
9 later than December 1, 1980, complete and auditable
10 records must be available and maintained at a central
11 location. Therefore such records should be updated and
12 maintained current as equipment is replaced, further
13 tested, or otherwise further qualified.

14 "Finding, existing GPU procedures, engineering
15 standards and engineering procedures do not provide
16 appropriate guidance nor is there a program initiated to
17 complete the above requirements."

18 Basically what he's talking about is documentation.
19 And that is one of the audit items that remained open
20 until at least April 4, 1984. I don't know if it has been
21 closed yet. I can look here. That is finding 3 of 1
22 and in 6/29/1984 it was closed out.

23 A Rich, I've told you three or four times, I don't
24 know why it took so long and I can't answer that question.

25 If you are asking in my opinion did it take much time

1 long, the answer is: Yes. It did.

2 Q Well, when you were having these meetings with
3 QA, and they were telling you about these problems all
4 along, why weren't they acted upon is what I'm trying to
5 figure out. Did you take it upon yourself --

6 A As far as I know, whatever engineering inputs
7 were required, were generated.

8 Did I take it upon myself? Yes. I even had a meeting
9 with the head of QA, Mr. Kazanas, about closing out these
10 open items. I initiated that meeting.

11 Q When did that take place?

12 A I believe it was early in 1984. I'm not 100
13 percent certain.

14 Q Was this after the UCS petition?

15 A I don't recall.

16 Q Were you directed to have that meeting?

17 A No. I insisted on a meeting because I felt
18 these open items were just open too long. There was no
19 reason for them to be open. They should have been closed
20 out.

21 Q Finding number 1 of 11 says, "No evidence of
22 management direction." And the finding is acknowledged by
23 Mr. Cronenberger. I believe that's his signature.

24 A Yes.

25 Q Was there any discussion with Mr. Cronenberger

1 or Mr. Wilson or Mr. Chisholm regarding that particular
2 audit item?

3 A Discussions among whom?

4 Q With yourself and those individuals?

5 A Yes. Yes.

6 Q Was there any discussion that that item was too
7 critical to management?

8 A Too critical? I don't quite understand what you
9 mean by that, Rich.

10 Q Well, was this -- I noticed -- I don't have the
11 direct response to audit items 1 through 11. They cannot
12 be found.

13 I have -- let's take a one-minute break.

14 (Discussion off the record.)

15 BY MR. MATAKAS:

16 Q Before we went off the record we were talking
17 about audit finding number 1. Throughout these documents
18 regarding audit 81-02, I noticed that the original
19 findings, audit numbers 1, 3, and 11, were signed for by
20 Mr. Cronenberger and the remaining of the 11 findings were
21 acknowledged by yourself, Mr. Maus.

22 A That sounds -- that agrees with my recollection.
23 Yes. Okay.

24 Q And I was asking you if there was any discussion
25 about audit number 1 being too critical on management.

1 A Right.

2 Q I noticed that -- I was telling you before that
3 when I attempted to get Tech Functions' response to the
4 original audit it could not be located, however they gave
5 me a memorandum dated June 25, 1981, QA/41-86, which, in
6 effect, reiterates the initial responses of Tech Functions
7 regarding the audit findings. And I notice that in
8 reviewing this document, QA/41-86, that finding number 1
9 is not addressed.

10 What I would like to ask you is: Do you have any
11 information as to why it was not addressed? Was it
12 addressed in the initial response back to quality
13 assurance? Or was there some agreement not to address it
14 at that time?

15 A I don't know why it is not addressed in this
16 document QA/48-16. I don't know of any agreement as to
17 how it was going to be disposed of, other than we would
18 generate a procedure for environmental qualification work.

19 Q And that was engineering procedure 031?

20 A That's correct.

21 Q And, subsequent conversations with Mr. Guimond,
22 who was the audit team leader, he disagreed that that
23 satisfied the requirement of the audit finding; is that
24 correct?

25 A Partially.

1 Q What do you mean "partially"?

2 A It did not completely satisfy the audit
3 requirement: the audit finding.

4 Q Do you recall what part it did not satisfy and
5 what part it did satisfy?

6 A No. EP-31 has been through several revisions in
7 order to get this satisfied and a lot of this is
8 subjective: It's in the eyes of the reviewer, as to
9 exactly what the words mean.

10 Q We were talking a little bit before about the
11 April 4th letter from Mr. Guimond to Mr. Stromberg where
12 he states "The last proposed directive action was dated
13 February 5, 1982." You mentioned that you did contact
14 Mr. Kazanas in early 1984.

15 A I believe it was early 1984. I'm not --

16 Q We are still talking about an approximate
17 two-year time period, where I'm trying to determine what
18 was done to correct these deficiencies, specifically audit
19 deficiencies 1 and 3, which remained open as of April 4,
20 1984?

21 A Well, specifically with regard to 1, a procedure
22 was written, issued, revised, commented on, implemented.
23 I would say in regard to finding number 1, Mr. Guimond did
24 not feel that the procedure answered this finding 100
25 percent.

1 Q And there was disagreement in that?

2 A That's an opinion. That was his opinion.

3 Q Finding 3 noted on the April 4, 1984 letter says
4 "Existing GPU engineering standards and procedures do not
5 provide appropriate guidance in the development and
6 maintenance of EQ documentation file."

7 How was that acted on between 1982 and 1984?

8 A The composition of the file was changed in that
9 the file was divided into separate sections for TMI and
10 Oyster Creek; the documentation was changed to be based on
11 a component basis rather than a vendor basis; the
12 documentation into and out of the file was on a controlled
13 basis through DRFs, documentary release forms.

14 Q Were those changes covered in GPUN standards and
15 procedures? The finding says "Existing GPUN standards and
16 procedures do not provide development guidance in the
17 development and maintenance of EQ documentation file."

18 A I'm not sure what the latest revision of that
19 procedure shows; whether it reflects all of this.

20 In addition to the procedure there were letters
21 generated by Mr. Cronenberger that define how the file
22 should be changed.

23 Q I noticed on proposed corrective action in the
24 August 21, 1981 memo that we had talked about from
25 yourself to Mr. Stromberg, that on 1, 3, and 11 audit

1 findings, numbers 1, 3, and 11, that corrective action was
2 provided by yourself and Mr. Boucher, and not
3 Mr. Cronenberger.

4 Why is that? I mean, was it -- was that responsibility
5 delegated to you, to answer those audit findings?

6 A Yes.

7 Q Who delegated that responsibility?

8 A Mr. Cronenberger.

9 Q Did he give you any direction?

10 A No.

11 Q Did he review the corrective action --

12 A Not to my knowledge.

13 Q -- on 1 through 11? I was going to finish my
14 question.

15 A I'm sorry.

16 Q Did he give you any direction regarding the
17 corrective action on findings 1 through 11;
18 Mr. Cronenberger?

19 A Yes.

20 Q What was that guidance?

21 A You'd have to be more specific. It was
22 different for each one.

23 We sat down and we discussed, you know, an approach to
24 closing these out.

25 Q Okay. How about finding number 1?

1 A He, initially, took care of finding number 1
2 himself. At a subsequent point in time he said as far as
3 he was concerned that finding was -- the information was
4 available to close it out. Make sure it's closed out.

5 Q Was that procedure, 031, engineering procedure
6 031?

7 A Yes. That's correct.

8 At that time it may have been a corporate procedure.
9 It may have been changed to a corporate procedure. It's
10 known as 031; okay?

11 Q In any event, were you advised that that
12 procedure was not -- that QA, namely Mr. Guimond, the
13 audit team leader, did not accept that as the corrective
14 action?

15 A Once again, he did not accept it as being 100
16 percent corrective action. However, that procedure was
17 accepted by his superiors. It was concurred to by his
18 superiors.

19 Q Then why did it remain open until April?

20 A I cannot answer that question.

21 Q Was there a meeting that that was concurred upon?
22 How do you know that?

23 A It's signed off; the signatures on the procedure.

24 Q It's signed off as accepting the procedure, but
25 was it signed off as accepting the procedure for the

1 corrective action on this audit?

2 A No.

3 Q The procedure was accepted?

4 A The procedure was accepted by QA supervision;
5 yes.

6 Q But it wasn't necessarily accepted as the
7 corrective action to this audit finding?

8 A I don't know how they viewed it.

9 Q So, what I said before on audit finding number 1:
10 Mr. Guimond -- there had been meetings that were attended
11 by Tech Functions and QA, where it was discussed that this
12 was not acceptable; engineering procedure 031, in the eyes
13 of QA?

14 A No. In the eyes of Mr. Guimond. Not in the
15 eyes of QA.

16 Q Who in QA said it was acceptable --

17 A That the procedure was acceptable?

18 Q -- as corrective action to that audit finding?

19 A I don't know.

20 Q Did anybody, to your knowledge?

21 A I don't know.

22 Q You mentioned before that, as far as
23 Mr. Cronenberger was concerned, it was the answer?

24 A Yes. Yes.

25 Q Did he tell you this?

1 A Yes.

2 Q When did he tell you that?

3 A I'd say the first quarter of '84.

4 Q How did the discussion even come up? Because it

5 was still an open item?

6 A Discussion about what?

7 Q Audit finding number 1. And the procedures

8 stated as corrective action -- proposed corrective action?

9 I notice it wasn't closed out until June 29, 1984, based

10 on 031 being issued as 1000 ADM-7317.01?

11 A Besides Mr. Guimond's comments on the procedure,

12 there were other comments on the procedure like, from the

13 site itself. This procedure was revised under the

14 personal direction of Mr. Cronenberger. It was his

15 conclusion that this procedure satisfied what was open

16 against it -- both site comments and QA comments.

17 Q Okay. Was there a response made? I take it QA

18 somehow has to close their books on this audit finding.

19 They have a responsibility to follow up on that audit

20 finding?

21 A So far as I know, that's correct.

22 Q Was there something documented and sent to Q

23 telling them: Hey, we don't agree, and this is why?

24 A I don't know.

25 Q Okay. Audit finding number 3. This had to do

1 with the finding "Existing GPU procedures do not provide
2 appropriate guidance nor is there a program initiated to
3 meet the above requirements." The "above requirements"
4 referred to "Complete and auditable records must be
5 available and maintained."

6 Did Mr. -- either Mr. Chisholm or Mr. Cronenberger or
7 Mr. Wilson give you any guidance concerning this
8 particular audit finding?

9 A Yes.

10 Q What was that?

11 A Mr. Cronenberger wrote a couple of memos as to
12 what the composition of the file would be.

13 Q Who did he write the memos to?

14 A I don't recall.

15 Q Are they filed anywhere?

16 A I'm sure they are.

17 Q Where would they be filed?

18 A I don't know.

19 Q The obvious question is, you know --

20 A I don't know where Mr. Cronenberger files his
21 correspondence; okay?

22 Q Well, he had to write them to somebody. And, if
23 they were for action for someone else to take they should
24 be filed somewhere, and that's what I'm asking. Where can
25 I find them? I take it he wrote them to EQ, if they

1 involved EQ files.

2 A That's a logical assumption.

3 Q So, my question is: Did you file them somewhere,
4 were they written to you? Or were they written to
5 Mr. Boucher?

6 A As I recall they were not addressed to either
7 myself or Mr. Boucher.

8 Q Who were they addressed to?

9 A I don't recall.

10 Would you like me to tell you what those memos were?
11 Identify them?

12 Q Sure.

13 A Fine. I can do that. I don't have that
14 information with me, but I can do that.

15 MR. MATAKAS: Let's go off the record for a
16 second.

17 (Discussion off the record.)

18 BY MR. MATAKAS:

19 Q During any of the meetings with Tech Functions
20 and quality assurance, after those meetings or during
21 those meetings, or was there ever any agreement in those
22 meetings that Tech Functions, specifically EQ, could
23 ignore or put aside the audit findings that were noted in
24 audit 81-02?

25 A Not to my knowledge.

1 Q Did you ever even get that impression from any
2 of your supervisors?

3 A No.

4 Q Whose responsibility was it to correct these
5 audit items?

6 A I would say it was a mutual responsibility
7 between quality assurance and environmental qualification.

8 Q Specifically, who? Bodies?

9 A The bodies changed. At one time -- specifically
10 at one time Mr. Cronenberger assumed responsibility for
11 finding number 1. Later on he passed that on to me. Okay?

12 Q Okay. Any other? What about the remaining, 2
13 through 11, findings? We can go through these one at a
14 time, if you want, or you can just go ahead and explain it
15 to me.

16 A Well, what you don't realize, that there were
17 changes in assignments as to -- in the EQ department and
18 in the quality assurance department and the
19 responsibilities shifted when these assignments were
20 changed.

21 Q When? You already told me that Mr. Cronenberger
22 assigned you a short time after the finding came out,
23 audit finding number 1.

24 A Right.

25 Q What about audit findings 2 through 11? Were

1 they your responsibility with any exceptions? And, if
2 there were exceptions, what were they?

3 A Well, in the beginning I think, as the record
4 shows, there were three that Mr. Cronenberger was going to
5 take care of, right? And I don't know how many of those
6 remained open that weren't closed out. The rest were my
7 responsibility.

8 Q Okay. Did those three eventually get passed on
9 to you?

10 A I don't know.

11 Q Did number 1 eventually get passed on to you?

12 A Yes.

13 Q Did number 3 eventually get passed on to you?

14 A I don't recall.

15 Q On the revised response, for the corrective
16 action dated 8/31/81, your name and Mr. Boucher's name are
17 typed in.

18 A Okay.

19 Q Do you have any knowledge of why they are typed
20 in? Were you, in fact, acknowledging that finding or did
21 someone else type your name in?

22 A No. We acknowledged that this was the
23 corrective action for that finding.

24 Q The proposed corrective action?

25 A The proposed corrective action.

1 Q You do recall that?

2 A Yes. I recall this.

3 Q Does that mean that this is your responsibility?

4 The responsibility had shifted from Mr. Cronenberger to
5 you?

6 A I'd say "yes."

7 Q On audit finding number 11; the same thing.

8 A Okay. I'd say "yes," then, the responsibility
9 had shifted to me.

10 Q You don't recall him verbally giving you that
11 responsibility?

12 A No. The only one I recall verbally was on
13 finding 1. And there was one other finding, which I can't
14 recall which one it was. But he verbally gave me the
15 responsibility in those two findings; one of which was
16 finding 1.

17 In fact, the responsibility was not verbal. He put it
18 in a memo.

19 Q Were you aware that prior to February 10 --
20 prior to the February 10 submittal, February 10, 1984,
21 that both the DOR guidelines and 10 CFR 50.49 required
22 that complete and auditable records be available for
23 qualification?

24 A Yes.

25 Q Did you have complete and auditable records on

1 March 20 and 21, during your inspection, in retrospect?

2 A I am not going to answer any retrospect
3 questions.

4 Q Did you have complete and auditable records on
5 February -- on March 20 and 21st, when the NRC audited
6 your files?

7 A In our opinion, yes.

8 Q Who is "our"? Are you speaking for someone else?

9 A I am speaking for the environmental
10 qualification department.

11 Q Were you replaced in your position as
12 environmental qualification manager? Or did you ask to be
13 replaced?

14 A I was replaced.

15 Q Why were you replaced?

16 A I don't know.

17 Q Who replaced you?

18 A Mr. Cronenberger.

19 Q Testimony that I have, and inspection and audit
20 reports by the NRC and by -- by the NRC, indicate that you
21 did not have documented auditable files when you were
22 audited on March 20th and 21?

23 A That's not my recollection. My recollection is
24 they said the information was there. It was not in an
25 easily retrievable form. That's my recollection. And

1 that's what was put in writing, as far as I recall.

2 MR. LA GRANGE: That doesn't agree with what
3 recall, Gerry.

4 You've got a letter from the NRC dated April 25th, 4,
5 where the attachment to that letter indicated deficiencies
6 that we had found in the files; things that had not been
7 addressed, inadequate documentation in our opinion.

8 Does that sound like --

9 THE WITNESS: Is that the letter as a result of
10 the first audit?

11 BY MR. LA GRANGE:

12 Q This letter?

13 A Yes.

14 Q This letter is a result of our first audit;
15 that's correct.

16 A And what's the statement on the first page of
17 that?

18 Q The first statement says --

19 MR. MATAKAS: Why don't you give it to Mr. ?

20 MR. LA GRANGE: Well, I can read it to him.

21 BY MR. LA GRANGE:

22 Q "In general we believe that the files contain
23 documentation that can be utilized to provide the basis
24 for demonstrating that the EFW equipment is qualified
25 one exception. The exception is noted as the Square

1 diodes."

2 A That's the statement I'm referring to.

3 Q "Most of these detail comments were provided to
4 GPU Staff during the audit or at the exit interview. We
5 believe that the comments pertain to the EFW system should
6 be expeditiously resolved." It goes on.

7 Then the letter goes on to talk about EQ files
8 containing "no indication other than SCEW sheets and brief
9 handwritten sheets that the documentation has been
10 reviewed by GPU. The handwritten material is neither
11 signed nor dated. The files are not identified as
12 requiring post-accident operating time."

13 It goes on further, "On each item of equipment that was --
14 for which documentation was reviewed by the NRC at that
15 time"; and gives fairly specific comments about the lack
16 of documentation in those files or comments on the
17 documentation in those files.

18 You have seen this?

19 A Yes. So you are saying that in the detail you
20 don't agree with the statement made in the opening
21 paragraph?

22 Q No. I agree with the statement made in the
23 opening paragraph.

24 A Okay. Fine.

25 Q And that statement means that there was

1 documentation there that can be utilized to provide a
2 basis for the qualification of that equipment.

3 A At this point in time this was still a common
4 file. What they looked at were files that contained
5 information on both TMI and Oyster Creek. And it was
6 difficult, you know, to go through those files and pull
7 out the germane information for TMI-1. I admit that.
8 Subsequent to that we changed the setup of the files.

9 Q But subsequent to that, Gerry, wasn't a massive
10 amount of documentation added to the files to address
11 these comments?

12 A No.

13 Q That's -- that --

14 A Can I explain that?

15 Q Yes.

16 A Okay. What happened was that we had, for
17 example, we had a file on Limitorque motor operators,
18 which contained the documentation for -- the qualification
19 documentation for most of the Limitorque motor operators.
20 That was a file by vendor.

21 When we changed the file over on a component basis, we
22 had Limitorque operators in containment, Limitorque
23 operators in the auxiliary building; Limitorque operators
24 in the intermediate building.

25 Each one of those files had the majority of the

1 Limitorque documentation in that file that was in one
2 folder to begin with. Now it's in three folders. It has
3 been repeated. And that's why the files appear to be so
4 massive right now.

5 Q I disagree.

6 A Fine.

7 Q If you look at those files you'll see a lot of
8 information in those files dated much beyond the time of
9 our first audit.

10 Why would that documentation have been added?

11 A Clarification.

12 BY MR. MATAKAS:

13 Q Mr. Maus, I sat down here on April 11th with
14 Mr. Boucher and on approximately 8 to 11 items, TER items,
15 stated what the TER said; what the NRC inspection said --

16 A Yes.

17 Q -- which was the same thing, lacking in one way
18 or another, mainly in documentation --

19 A Okay.

20 Q -- and asked him: What do you have that now
21 qualifies this in this particular area?

22 A Yes.

23 Q And in each case it was a letter -- I shouldn't
24 say "in each case," but in the majority of cases it was a
25 letter or some document or some event that took place

1 subsequent to the March audit.

2 I don't think it's necessary to --

3 A Fine. I still stick by what I said to Bob.

4 Many of those items are just clarification. That's all.

5 Q You were hanging very heavily in the first
6 statement in the April 25th letter to --

7 A Do you want to change that word "hanging"?

8 Q Stressing very much the first statement, and I'm
9 very aware that UCS was stressing that first statement too.
10 But if you read the document it's very clear that you were
11 not getting a clean bill of health as a result of that
12 audit.

13 A Which document are you referring to?

14 Q The April 25th document.

15 A Okay.

16 Q And what bothers me is partly what Bob just read
17 on the attachment to that letter, number 1 states that:

18 "The EQ files contain no indication, other than SCEW
19 sheets (some of which were in the process of being revised)
20 and some brief handwritten sheets, that the documentation
21 had been reviewed by GPU or" -- "that the documentation
22 has been reviewed by GPU, nor that it has been concluded
23 by GPU that the equipment is qualified.

24 "2, Most of the handwritten material in the files is
25 not signed or dated and shows no indication that the

1 statements/information contained on these sheets has ever
2 been verified by a checker, or approved."

3 In going back to internal audit 81-02, in March of 1981,
4 on page 7 of 10 -- if you would like to look at it --
5 under number 1 it says: "No evidence of direction for GPU
6 review of qualification data. This concern is related to
7 the extent of GPU review, comment, resolution of comments,
8 approval, and incorporation of vendor documents. Examples
9 of evidence examined which cause this concern are --" and
10 it goes A through D.

11 "A. EDS calculation -- is not properly signed and
12 approved by EDS.

13 "B. EDS project instruction in volume 1A are not
14 signed and approved by EDS.

15 "C. Limitorque reports number 600198 dated 1/2/69 is
16 not properly signed and approved by Limitorque for the
17 motor operators.

18 "D. GE report EPA Q-Q47 (qualification data for
19 radiation) on the electrical penetration assemblies model
20 FO1 is not signed and/or approved by General Electric."

21 And on, IE Bulletin requires that the complete and
22 auditable records must be available and maintained at
23 central location and must be updated and maintained
24 current as equipment is replaced, further tested, or
25 otherwise further qualified."

1 What I have looked at here is an internal document and
2 subsequent to your later NRC inspection, that's really
3 telling you the same thing.

4 A Okay. As that document you just read said, the
5 only thing that they found that were up to date were the
6 SCEW sheets. At the time of that audit we were required
7 under law to submit those SCEW sheets for the docket. As
8 far as we were concerned those were the legal documents
9 that demonstrated the qualification of the components, and
10 that information that was referred to on those SCEW sheets
11 was in our file system.

12 Q And when you say "as far as we were concerned"
13 are you talking about as far as you?

14 A GPU Corporation was concerned. The basis for
15 the documentation for any component was the SCEW sheet and
16 the reports that were listed on the SCEW sheet.

17 Q And you didn't have to have the reports or --

18 A The reports were in a file. They were not in an
19 EQ file per se.

20 For instance, if a calculation was referred to on the
21 SCEW sheet, it was in our calculation file, not in the EQ
22 file.

23 Subsequent to that, we have changed our file system.
24 The calculations are now in a component file. That's
25 something else that builds up the size of those files.

1 BY MR. LA GRANGE:

2 Q But a lot of those calculations and information
3 are dated well beyond March 20-21?

4 A And a lot of them are dated before. That's
5 right. Both ways. We made some subsequent calculations.

6 BY MR. MATAKAS:

7 Q Made some subsequent walkdowns to identify motor
8 manufacturers?

9 A Yes.

10 BY MR. LA GRANGE:

11 Q Determined subsequently that the EFW pump motor
12 terminations were not qualified.

13 A Would you read the whole thing? That doesn't
14 make sense to me.

15 Q During the opening GPU's review of their EQ
16 documentation, while the NRC was reviewing and addressing
17 the UCS 2.206 decision, GPU determined that the EPW pump
18 motor terminations were not qualified.

19 A Okay.

20 Q Would that review not have been required to be
21 done prior to then, in order to determine that those
22 terminations were qualified?

23 A Okay. As far as field walkdowns, prior to that
24 point they were done on a sampling basis. They were not
25 done 100 percent.

1 Q I don't think this had anything to do with the
2 field walkdown, though?

3 A I'm sorry. Then I don't understand your
4 question, Bob.

5 Q Well, the point is that there was a lot of work
6 done subsequent to the first meeting in Bethesda on
7 October 8, 1984, to document the qualification of the
8 equipment at TMI-1. And if it's your opinion that in May
9 20, 1983, the equipment was qualified for the DOR
10 guidelines, what was the purpose of all the work that has
11 been done on those files since October 8, 1983?

12 A There are a couple of purposes. One was to
13 assemble the information by component package.

14 Q Is not a lot of the information in there dated
15 fairly recently? I can go to the files right now and
16 point out calculations and analyses and reports and
17 letters that are very current and necessary, and I want to
18 emphasize "necessary," to document the qualification of
19 that equipment.

20 A Okay. And the word "necessary" is in your
21 opinion.

22 Q It's in my opinion. That's correct.

23 A Okay. Fine. All right.

24 Q In your opinion, then, for instance, on
25 Limitorques, when we came up here the first time and found

1 that the profiles that had to be -- that were generated to
2 show what the temperatures would result -- temperatures
3 and pressures that would result from accidents, and to
4 which that equipment must be qualified, analyses to show
5 that that equipment was qualified for those profiles was
6 dated fairly recently.

7 Would that analysis not have had to have been in there
8 in order to show that was qualified, back in May 20, 1983
9 or at any time previous to that? And, if not, why not?

10 A Do you want to give me those questions one at a
11 time?

12 Q The major point is, Gerry, I still want to get
13 back to the question of why, back in May 20, 1983, was it
14 stated this equipment was qualified in accordance with the
15 DOR guidelines?

16 A Because we believed it was.

17 Q Then you believe that all the documentation put
18 in those files subsequent to then is unnecessary to
19 demonstrate the equipment is qualified?

20 A No.

21 Q There seems to be an inconsistency in the two
22 statements.

23 A You have defined some additional information
24 that you wanted to see in the file that, as far as I
25 recall --

1 Q I'm asking your opinion, though. You don't feel
2 that information has to be in there in order to show that
3 equipment is qualified?

4 A I didn't say that.

5 Q What would you say, then, with regard to all the
6 additional documentation that's now in the files?

7 A Some of it is required to show the qualification
8 to the extent that you are looking for it today, which is
9 not the extent that you were looking for back in 1983.

10 Q I don't understand. What has changed?

11 A Post-accident time.

12 Q I don't understand what's changed. Are not the
13 requirements, the criteria for TMI-1 for a large majority
14 of equipment in that plant, the DOR guidelines?

15 A Yes.

16 Q Have they changed since May 20, 1983?

17 A The DOR guidelines? No. Have you issued
18 clarification on them?

19 Q Not since May 20, 1983.

20 A What clarifies what you want for post accident
21 operating time? Where is that stated, that you should
22 show that?

23 Q Post-accident operating time was shown on the
24 SCEW sheets that were issued with IE Bulletin 79-01 B.

25 A Which were subsequently taken out; right? As a

1 sample?

2 Q No. The SCEW sheets, sample SCEW sheets were
3 attached to 79-01 B --

4 A You deleted that; right? You deleted that
5 attachment later on.

6 Q Not that I'm aware of.

7 A I believe so.

8 Q I simply want to know once again --

9 A Yes.

10 Q -- if there was any necessary documentation in
11 your opinion that has been added to that file to show that
12 equipment was qualified subsequent to May 20, 1983, then
13 what was the statement in the May 20, 1983 letter,
14 referring to when it said all equipment was qualified in
15 accordance with the DOR guidelines?

16 A Because we had no guidance previously to that,
17 as to the degree of information you were looking for in
18 the files.

19 Q Would you agree that documentation would have to
20 be in those files to show that the equipment is qualified
21 for the temperature and pressures it would see during an
22 accident?

23 A Yes.

24 Q Do you agree that the subsequent evaluations in
25 the Limitorque files to address that issue were

1 unnecessary to show that it was qualified?

2 A I don't know.

3 Q I know you don't want to answer questions in
4 retrospect. You stated you are -- don't want to --

5 A I am not going to answer any questions in
6 retrospect. I made that statement.

7 Q Wouldn't it be fair to say based on what you
8 know today that that statement on the May 20, 1983 letter
9 could not be supported by the documentation in the files?

10 A I will not answer that question.

11 (Discussion off the record.)

12 BY MR. MATAKAS:

13 Q Mr. Maus, what I have here is an extract from
14 the meeting in March 1984. You were present, Mr. Le,
15 Mr. LaGrange was there, and Le makes a statement, and I
16 quote: "Any deficiency identified in this, page by page,
17 we expect that you have the answer to those deficiencies.
18 When the inspector goes out there, the TER will serve as a
19 guide to inspect." He's referring to the TER.

20 "Mr. Maus:" I quote: "That has been our premise.
21 That is what we tried to do, to be sure that we had the
22 information in the file.

23 "Mr. Le: Did you make that commitment? If you made
24 that commitment, then we will proceed.

25 "Mr. Maus: We even had a trial assessment on our file

1 by our own QA to make sure that this kind of information
2 is in there. We had independent verification, if you will."

3 I have asked for all the QA audits from 1984 back to
4 1981. And the only thing that comes close to this time
5 period is the April 4th letter here which may have been as
6 a result of an earlier look-see by Mr. Guimond, into the EQ
7 files.

8 Is there another audit that I'm not aware of? Or what
9 audit were you referring to? Or what look-see --

10 A Does it say "audit" there?

11 Q What "look-see"?

12 A There was another "look-see" I was referring to.

13 Q What, by whom, and when was that?

14 A It was jointly done by QA and Tech Functions.

15 It was, as best I recall, in the summer of 1983.

16 Q By whom?

17 A Specific individuals?

18 Q Yes, sir.

19 A Mr. Guimond, Mr. Maus, Mr. Boucher -- there were
20 a number of people involved. There were upwards of 10
21 people involved in this.

22 Q Mr. Guimond -- did he say the files were then
23 adequate?

24 A No. In his opinion.

25 Q Well, what's the use of having a QA look see.

1 you know, if you are not going to agree with what he says?
2 What have been going through here, it seems like for the
3 past three years, everyone that looks at the files outside
4 of yourself says that everything that I've seen says that
5 you're lacking in documentation. And you sit there and
6 tell me: Well, that's their opinion. I don't understand
7 that?

8 A You can always improve upon documentation. You
9 can always make it better. The question is: When is it
10 sufficient? That's the question you have to answer. And
11 that is strictly subjective. Your opinion is different
12 than mine, which is different than Mr. Guimond's. And
13 it's a strictly opinion.

14 Q But it appears that Mr. Guimond, of QA, and the
15 NRC, during this time period, has been saying that what
16 your opinion may be must not be adequate because they are
17 telling you that you don't have adequate documentation.

18 A That's what they are saying.

19 Q Well, did you just say, you know: Well, the
20 hell with you guys, I think I do have adequate
21 documentation?"

22 A Obviously not. As Bob says, we have been
23 updating the files. We have done it. We are still
24 updating the files.

25 Q Since 1984.

1 A Since 1980.

2 Q Since the audit in 1984.

3 A No. No.

4 Q That's what Bob was talking about, the
5 documentation subsequent to the March 20-March 21st audit?

6 A I'm talking about all updating of the files.
7 Those files are a dynamic thing. And, as I told you,
8 we've changed the composition of the files. The files are
9 now on a plant component basis, which they weren't before.

10 Q I understand this is a big job. This has been a
11 big job; EQ, or it wouldn't have had the deadlines
12 extended like they have been extended.

13 A Right. And there were no, or very little firm
14 guidelines.

15 How familiar are you with the EQ program?

16 Q I'm not a technical person. I'm not sure.

17 A All right. Well, Bob will tell you there were
18 regional meetings, national meetings, individual meetings
19 with licensees. This is not a clearcut program. It's a
20 very complex program. It's a very difficult thing to do
21 and we are learning as we go along.

22 Q I am not trying to attack you as an individual,
23 Mr. Maus.

24 A Fine. I am not implying that you are. I am
25 trying to tell you why files have to change.

1 Like today, we still get reports like: We have changed
2 our qualification documentation from somebody like
3 Rosement. This report that we gave you now, we would like
4 you to supersede this report. We've got a better report.

5 Q Could you have possibly accomplished what was
6 being asked of you by your own QA and by the NRC with
7 physical -- with the physical resources that you had? Do
8 you feel that you could have possibly done it?

9 A Up to what point in time?

10 Q Up to March 20, 1984.

11 A Yes.

12 Q You feel that you could have?

13 A Yes.

14 Q With you, Mr. Boucher, and Mr. Maus?

15 A I'm Mr. Maus.

16 Q Then why was Mr. Boucher asking for help and you
17 asking Mr. Chisholm for help?

18 A Because we needed more help. I'm not just --
19 you told me you are directing your questions to TMI; right?

20 Q Yes.

21 A Okay.

22 Q Well, you were asking for help for TMI; is that
23 correct?

24 A Yes. I just want to make sure we understand
25 what we are talking about.

1 There were some unscheduled items that you couldn't
2 plan for. Like, for instance, the UCS petition. We
3 didn't know about that ahead of time. That took a lot of
4 effort. That was unplanned work.

5 Q Well, even prior to the UCS petition,
6 Mr. Boucher had asked you for assistance; is that correct?

7 A Yes. Yes, he had.

8 Q And you had related those concerns onto
9 Mr. Chisholm?

10 A Yes.

11 BY MR. LA GRANGE:

12 Q But when you say "unplanned work," had all that
13 equipment been documented as qualified at the time the UCS
14 petition had been submitted, there would not have been any
15 need for subsequent work; is that correct?

16 A No. Because that system is being modified. It
17 is still being modified today. The system is not complete;
18 the environmental qualification of that system is not
19 complete. The installation of that system is not complete.

20 Q Weren't at least the majority of those
21 components also identified in response to 79-01(B)?

22 A I'm not sure whether a majority were or not.

23 Q Well, the majority had TER items?

24 A I'm not sure what's going to -- I'm really not
25 sure on that question. I'm not hedging. I'm not sure.

1 Q Well --

2 A That's a system that's gone through a lot of
3 changes and is still being changed.

4 Q The paper trail associated with this 2.206
5 review will show that they do have TER item numbers
6 associated with them; the majority of that equipment.
7 That TER was issued December 10th, with our SER. I
8 believe the TER is dated November 5, 1982. The UCS
9 petition was submitted approximately January '84.

10 Would not all that equipment as of May 20, 1983, have
11 been qualified to the DOR guidelines, therefore resulting
12 in no additional effort in response to the 2.206 petition?

13 A I'm telling you as of that date, and even to
14 this date, the equipment in that system is not finalized.
15 So the qualification of that system is not finalized.

16 Q But would the qualification of the equipment
17 identified prior to the 2.206 petition have been qualified?

18 A I'm not sure.

19 Q If you are not sure, then how come the May 20,
20 1983 letter says it's qualified in accordance with the DOR
21 guidelines?

22 A Once again, and this is the last time I'm going
23 to say it, that system is not complete. It was not
24 complete then, it is not complete now. We are just
25 repeating the same thing.

1 BY MR. MATAKAS:

2 Q Mr. Maus, did you ever intentionally provide
3 false information --

4 A No, sir.

5 Q -- to --

6 A I'm sorry. I thought you were done with the
7 question.

8 Q -- to licensing, or knowingly allow false
9 information in any type of document generated by GPUN
10 going to the NRC? Did you knowingly allow such a document
11 to go to the NRC? Both questions.

12 First of all, did you ever intentionally lie to
13 Licensing, specifically regarding information going to the
14 NRC?

15 A Is that the end of the question?

16 Q Yes.

17 A The answer is "no."

18 Q Did you ever review any licensing document going
19 to the NPC that you believed had false information and
20 allowed that false information to be transmitted to the
21 NRC?

22 A No.

23 MR. MATAKAS: Do you have anything else, Bob?

24 BY MR. LA GRANGE:

25 Q You said previously that it was felt that you

1 needed help in the EQ area; you needed more resources.
2 Based on the additional work that has been -- knowing the
3 additional work that has been done over approximately the
4 last year on these files, could you and Mr. Boucher have
5 accomplished that work by yourselves without additional
6 resources?

7 A That's a retrospect question; right? I will not
8 answer that question.

9 Q In the February 10, 1984 letter, where GPU's
10 position is stated that the plant is in compliance, TMI-1
11 is in compliance with the requirements of 10 CFR 50.49,
12 based on your recent statement here that the EFW system is
13 still being worked on, how could that statement have been
14 made on February 10, 1984?

15 A Because we have told you that the EFW system was
16 undergoing a major modification. There's other
17 correspondence on that. You are well aware of that.

18 Q Would then all the individual -- all the
19 individual equipment items that are included in the
20 Franklin TER have been, in your opinion, qualified as of
21 February 10, 1984?

22 A I'm not sure what our position was on all those
23 items.

24 MR. MATAKAS: Let's take a one-minute break.

25 (Discussion off the record.)

1 BY MR. MATAKAS:

2 Q Mr. Maus, correct me if I'm wrong -- Bob, didn't
3 you just ask if all the --

4 MR. LA GRANGE: I asked if all of the EFW
5 equipment that had TER items associated with them, would
6 have been qualified as of February 10, 1984. I believe
7 Gerry responded he's not sure.

8 BY MR. MATAKAS:

9 Q And getting back to this meeting in March 1984,
10 essentially what Mr. Le is asking you about TER items,
11 they expect to have answers to those deficiencies, and you
12 state: "That has been our premise. That's what we tried
13 to do to be sure that we had the information in the file.
14 We even had a trial assessment on our file by our QA, to
15 make sure this kind of information was in there."

16 Could you clarify why you were not sure that all the
17 information was not in there?

18 A Because there's other correspondence that
19 describes the changes on the EFW system, okay? And that's
20 on the docket, as to what the changes we made on that
21 system were, and when we would have the system in
22 compliance with regulations, including EQ.

23 Q But he's talking specifically TER items now, TER
24 deficiencies?

25 A He's talking EFW TER deficiencies.

1 Q Right. Which would have been --

2 BY MR. LA GRANGE:

3 Q Which would have been equipment that existed in
4 the plant and was included in the EQ program, at February
5 10, 1984, and May 20, 1983.

6 BY MR. MATAKAS:

7 Q But the deficiencies that existed back in '82
8 would remain the same deficiencies?

9 A No. That equipment may not even be used in this
10 system today.

11 Q Then the deficiency is no longer valid; is it?

12 A That's right.

13 Q It's no longer a deficiency?

14 A That's right.

15 Q But we are talking about the deficiencies. That
16 is one way to get rid of a deficiency; isn't it? To
17 replace the piece of equipment with a qualified --

18 A I didn't say "replace" it. I said "It's no
19 longer used." That's not "replace."

20 Q Well, deleted or however you want to say it?

21 A The point is the system is under redesign; okay?
22 And the redesign of the equipment is not complete nor the
23 installation of the system nor the qualification of the
24 system. And I'm not going to change that statement so
25 please don't ask it any more.

1 MR. MATAKAS: Bob, do you have any further
2 questions?

3 MR. LA GRANGE: No.

4 BY MR. MATAKAS:

5 Q Mr. Maus, did you appear here today of your own
6 free will?

7 A Yes, I did.

8 Q Have any promises been made to you or have any
9 threats been directed towards you?

10 A No, sir.

11 MR. MATAKAS: Okay. The time is 11:55. This
12 concludes the interview.

13 Thanks a lot, Mr. Maus.

14 (Whereupon, at 11:55 a.m., the interview was
15 concluded.)

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CERTIFICATE OF OFFICIAL REPORTER

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

NAME OF PROCEEDING: Investigative Interview of:

F. GERARD MAUS

DOCKET NO.:

PLACE: Parsippany, New Jersey

DATE: Thursday, April 25, 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/DW
(TYPED)

Joel Breitner
Official Reporter
Acc-Federal Reporters, Inc.
Reporter's Affiliation

2/11/84
E-8-81
for Dehon

(31)

14/10/84 9 AM '84

Meeting of R Guinand, R Wagon,
M Stenby, B Baden, M Wagon
and RLL

Re: Environmental Qualification of
Plant Equipment

Assessment Report prepared by
Guinand, Liscorn, and Stokewicz

~ 3 of SCEW sheets inadequately
sorted up by documentation
+ procedures
- Filing inadequate

NRC inspection coming in next
few weeks to look at EQ of
EFW systems

Plant has not been walked down
to look at loop where components
are installed - nor to look at
present condition.

RLL to give RFW back up

FOIA-87-696

B/31

release

EXHIBIT 11A