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March 30, 1988

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Re: Texas Utilities Electric Company, et. al.
Docket Nos. 50-445-OL and 50-446-OL

Dear Administrative Judges:

As we have previously informed you, TU Electric is engaged in litigation with its co-owners in CPSES. In the course of discovery in that proceeding, the other owners have taken the deposition of Ms. Nancy Williams, Project Manager for Cygna Energy Services' review of Comanche Peak, on February 17, 18, and 19, 1988, and March 15, 1988, and large quantities of materials have been produced by Cygna from its files.

By letter dated March 30, 1988, copy enclosed, we have made available to the NRC Staff and to CASE the opportunity to review the transcripts of the depositions and exhibits thereto, as well as all of the materials that were copied from Cygna's files. All of these materials have been compiled in the Document Room at TU Electric's office in Dallas.

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Administrative Judges
March 30, 1988
Page Two

In view of the Board's interest in the Cygna review, we are enclosing for your information a copy of Defendant's Exhibit 18, introduced into the record by counsel for one of the co-owners during Ms. Williams' deposition of February 18, 1988, and pages 190 to 195 and 464-465 of the transcript, which represent the entire contents of the deposition concerning the Exhibit.

Exhibit 18 consists of 16 pages, which Ms. Williams confirmed to be in her handwriting (except for the last sentence on the last page). It appears that these notes were written by Ms. Williams in February or early March, 1985. As the Board will note, Ms. Williams' notes reflect, inter alia, a number of concerns that she had at that time concerning her relationship with Mr. David Wade, TU Electric's project manager for the Cygna review. At about the time Ms. Williams' notes were written, Cygna's senior management informed TU Electric that Ms. Williams was experiencing difficulty in her personal dealings with the TU Electric project manager, and promptly thereafter Mr. Jack Redding assumed the project manager role. TU Electric's management is not aware of any continuing or similar concerns on the part of Cygna since early 1985.

Respectfully submitted,



Jack R. Newman

cc: Service List

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
before the
ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	Docket Nos. 50-445-OL
)	50-446-OL
TEXAS UTILITIES ELECTRIC)	
COMPANY et al.)	
)	(Application for an
(Comanche Peak Steam Electric)	Operating License)
Station, Units 1 and 2))	
)	

CERTIFICATE OF SERVICE

I, Thomas A. Schmutz, hereby certify that the foregoing letter was served this 30th day of March 1988, by mailing copies thereof (unless otherwise indicated), first class mail, postage prepaid to:

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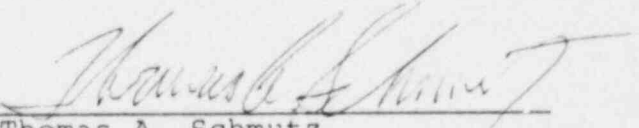
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Dated: March 30, 1988

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March 30, 1988

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Washington, D.C. 20555

Ms. Juanita Ellis
President, CASE
1426 South Polk Street
Dallas, Texas 75224

Re: Texas Utilities Electric Company, et. al.
Docket Nos. 50-445-OL and 50-446-OL

Dear Ms. Moore and Ms. Ellis:

As you are aware, TU Electric is involved in litigation with the minority owners of CPSES in Texas state court. During the course of discovery in that proceeding the minority owners reviewed the files of Cygna Energy Services, Inc., ("Cygna") and copied a number of documents contained therein. In addition, the minority owners deposed Nancy Williams, the Cygna project manager, on February 17-19, 1988 and March 15, 1988. This letter is to advise you that TU Electric has obtained copies of the documents obtained from Cygna's files as well as the transcripts of Ms. Williams' deposition, including the exhibits to the deposition, and will make those documents and transcripts available for review by the parties to this proceeding.

Because all of these documents are being made available for review, no attempt has been made to determine whether any of these documents or the information contained therein is responsive to previous discovery requests.

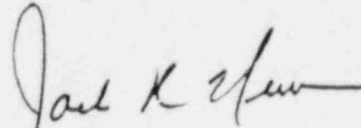
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NEWMAN & HOLTZINGER, P. C.

Janice E. Moore, Esquire
Ms. Juanita Ellis
March 30, 1988
Page Two

The Cygna materials will be placed in the Document Room in TU Electric's Dallas offices. Should CASE or the NRC Staff wish to review these materials, please contact Debra Anderson, TU Electric, telephone number (214) 814-4379, to make suitable arrangements.

Sincerely,

A handwritten signature in dark ink, appearing to read "Jack R. Newman". The signature is fluid and cursive, with a long horizontal stroke at the end.

Jack R. Newman

cc: Service List

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
before the
ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	Docket Nos. 50-445-OL
)	50-446-OL
TEXAS UTILITIES ELECTRIC)	
COMPANY et al.)	
(Comanche Peak Steam Electric)	(Application for an
Station, Units 1 and 2))	Operating License)
)	

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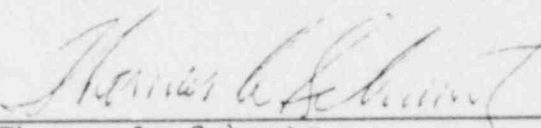
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Thomas A. Schmutz

Dated: March 30, 1988

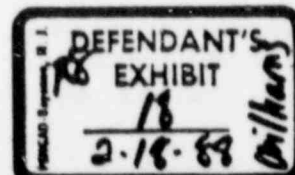
discussing the stability issue except possibly
how it relates to U-bolt cracking. I explained
that section 5.2 of the Phase 3 final report
stated that it was still open pending further
Cyprus review. He then insisted it should
have been closed in Phase 3 but was unable
to provide a basis. There was no way
we could have closed it out in Phase 3
since the affidavit on the issue wasn't issued
until 1-2 weeks before the final report was
issued.

c. Dwellish: We're going to see the hosts (E & H)!

I. TUGCO Management of the Project

- A. Inexperienced, junior personnel screened Cypra questions which inhibited meaningful communications
- B. Excessive emphasis of schedule over quality of Cypra's product - hurts TUGCO if/when ASIB hearings or NEC questions follow.
- C. TUGCO personnel attempted to prohibit Cypra from asking further questions on a subject once a response was received -- even if the response was unacceptable

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II. Intimidation

- A. D. Wade threatening to "bad mouth" Cygna to the industry if Cygna doesn't close issues out.
- B. In some cases Cygna was accused of "expanding scope" when we were trying to make a determination as to extent. (Class B piping, pipe support masses, and Fisher valve -- some of the issues have been raised by others since Cygna's review)

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1. Communications with TUGCO became difficult since D. Wade delegated interfacing with Cygna to extremely junior, inexperienced personnel from Ebasco. (G. Grace and J. Van Amerongen) These people were purported to be expeditors yet they screened Cygna questions and even argued technical points which they did not understand. (G. Grace: Tension in U-bolt)

① J. Van Amerongen has gone to the extent of insisting that once Cygna receives a response and accepts it, no further questions may be asked even if future information indicates that the response may be incorrect.

2. Several Cygna reviewers, including myself, believe that excessive pressure was placed on closing out issues. Even to the point of D. Wade threatening to "bad mouth" Cygna to the industry.

D. Wade

3. In some cases when Cygna was attempting to determine "extent" of a problem D. Wade refused to answer any questions on the subject -- accusing us of attempting to expand scope. (CLASS II, PIPE SUPPORT MASSES)

F. Wade

NV

4. Cyqua discovered through ~~the~~ our participation in the hearings that many issues were steeped in history. ~~and~~ ~~the~~

5. Mass participation was discussed with TUGCO as early as the summer of '83. At that time we were told that their engineers used judgement in evaluating the acceptability of the pipe stress results and showed us examples where the analyst saw the stress analysis beyond 33 kpsi. During Phase 3 (3/19/84) Cyqua identified ^{four} questions surrounding the mass fractions in the stress analysis. It wasn't until 6/26/84 (over 3 mos. later) that TUGCO/BEH proposed a plan which would not bring the piping analysis into compliance ^{with} the FSAR. Several iterations in the plan took place. Cyqua provided comments ~~on~~ the plan and requested additional information ~~on~~ ~~the~~ on the re-evaluation criteria. No such information was ever provided. Preliminary scoping analyses were never provided as committed to one of the plans. Extensive discussions between the lawyers took place before it was agreed that Cyqua should review the results of the program to address mass

participation. I was told by D. Wade that TUGCO did not want Cygna to review the results since we always identified problems and that Cygna already knew what was done to address the issue through the plan. When we did audit it we found there was no criteria for screening the problems, some things were missed in the re-evaluation, they still did not comply with their FSAR, certain things in the plan were not done. Our most recent letter summarizing the problems is dated Feb '85, nearly one year since we first tried to explain the problem with mass fractions. There was apparently no attempt to incorporate Cygna comments which were well documented. Meanwhile we were accused of impacting the schedule.

D. Wade

6. D. Wade had several exchanges with me in which he insisted that our methodology was not what he thought it would be. D. Wade Even though it was clearly layed out in the proposal. We never received any question on it.

4. On several instances I received telephone calls from D. Wade complaining about the details of questions being asked by Cygna reviewers making statements like: "Cygna has gone off the deep end" or "out-of-scope". D. Wade
- In some instances the questions we were told were out-of-scope and not permissible for the Cygna review, were the same questions the NRC was to ask of Cygna. TUGCO unfortunately took on a "penny-wise and pound-foolish" attitude since anytime Cygna cannot thoroughly defend ~~the~~ conclusions to the NRC, it is TUGCO loss in terms of our credibility.
- = (SNOOZE REVEAL OR DUB?)
8. On several occasions Cygna reviewers were confronted by TUGCO/G&H management level personnel and asked to provide information concerning things we were finding without the benefit of Cygna management being present.
7. Cygna has been forced to respond requests for reviews within 24 hours -- J. Minichillo D. Wade
- was sent to G&H, NYC in one day and forced to write a report on his observations in one day. When Cygna did this as requested TUGCO never ~~did~~ incorporated the comments and

6

Today the program is still unacceptable.

10. Cyqna has been accused of asking too many questions in order to ensure that we understand TUGCO's design practices and do not unfairly cite them for violations which do not exist. D. Wade

11. TUGCO personnel rarely call for clarification on questions asked yet Cyqna solicits this type of input. In the case of the V-bolt testing and analysis program, TUGCO provided sarcastic responses such as "how can we [TUGCO] respond to a question we do not understand?". Rather than causing another iteration, why didn't they call? Popular: Little bit on the left

12. One V-bolt response referenced an affidavit which was supposed to be in Cyqna's possession. When I called to request a copy D. Wade told me that there was never any intention of sending us a copy and that only appropriate pages were extracted for our review. D. Wade
~~By~~ Keeping Cyqna partially informed of current issues which we were reviewing has only made our job longer, tougher and riskier for TUGCO.

13. The U-bolt test plan was apparently developed in early March '84. We only found out about it through our participation in the hearings. Even though it was obvious from the hearings that Cygna review scope (Phase 2) was impacted by the program and that conclusions drawn from the Phase 2 review could be impacted thereby affecting Cygna's credibility, ~~we~~ we did not receive any information until mid May '84. At that time the program was already too far along to benefit from any comments. It was never Cygna's intention to ~~criticize~~ ^{criticize} TUGCO's work but rather to offer comments which would head off future problems with the acceptability of the results.
14. TUGCO ~~also~~ criticized Cygna questions on the U-bolt testing analysis program even though R. Iotti has admitted that some of the necessary information is not in the report. This got to the point of D. Wade stating ^{D.W.} that the Cygna questions were unprofessional.
15. Open items remain from original U-bolt letter and yet Cygna is continually pressured to close out the issue.

16. On many issues Cygna has not been informed of activities transpiring with CASE, the ASIB or the NRC. In some cases documents have been revised (Richmond Insect Affidavit) and Cygna was never notified. It is virtually impossible to do a thorough and fair review in this environment. ~~It certainly does not benefit TUGS in the long run if Cygna loses credibility.~~

17. Cygna has been told how work will be accomplished even though the requests made by D. Wade may not be in the interest of efficiency. In one instance I was told I would not be allowed to leave CASES until all issues are closed on the cable tray supports. Cygna reviewers were put in a trailer and forced to work for two weeks straight. When it became apparent that this situation would do nothing more than burn out all people involved Cygna insisted on two days off to gather our thoughts away from the pressure. During this time I frame the "expeditor". I saw Ameringer, insisted that any answer constituted closure of an issue. Arguments followed.

D. Wade
G. Ameringer

18. Cyana had difficulty finding the appropriate person to receive a consistent and well thought out response. In some cases (class 5 piping) we were told they would not answer the question because it was out of scope and Cyana just wanted more money. However, we cannot address extent on one of our systems, phase 4, observations without the information. D. Wade

19. D. Wade has ordered Cyana not to complete studies questioned by the ASLB. An issue, mass of pipe supports in the stress analysis, has surfaced as a question from D. Landes (NEC consultant). D. Wade

20. Cyana has received ~~incomplete~~ consistently incomplete answers which add to the number of iterations involved in resolving the issue.

21. On several occasions Cyana has received deceptive answers (DEC audit results we were told the errors didn't exist and the cable tray 1.5 factor analysis was technically dishonest).

22. TUGCO never assigned a knowledgeable person to ~~check~~ track the status of questions. It was Cygna's burden to ensure that all questions were answered. In some cases (Fisher valves) this has caused extensive delay in closing items out (8 mos: 3/12/84 - 10/30/84)
23. The numerous technical ~~errors~~ errors in the responses have forced Cygna to expend more review hours -- (1.5 factor)
24. Lack of adequate documentation made reviews extremely difficult -- causing delays in resolving issues (RELAP/ANSYS & mass participation)
25. TUGCO accounting-department made it a practice to bounce legitimate invoices. After spending many hours preparing basis for the charges (principally travel expenses) TUGCO was shown to be incorrect $\approx 70-80\%$ of the time.
26. There was never any attempt to ensure that Cygna agreed with the testing program for Assistant prior to essentially completing it. When we did receive the procedure at the end

of the testing we found many problems with it. In fact, they had not even addressed the problems with the stitch welding cited in our letter to them.

27. There has never been any attempt by TUGCO to address cumulative effect when conducting major reanalyses such as mass participation. This leads to more Cygna questions.

28. We are continually accused by D Wade of "going off the deep end" and told that he would not recommend us for work if ~~we~~ ~~another~~ another utility call for his opinion.

29. GEH did not provide all of the cable tray calculations for our review scope even though they were asked. In some cases it was through an unordinate amount of paper review or by accident that Cygna would find cable tray studies which had a profound impact on the acceptability of the cable tray supports.

30. During the cable tray support review, TUGCO/GEH would continually run out and perform analyses even though Cygna warned against this practice.

since the question of cumulative effect would remain. We were extremely unsuccessful at making TUGCO/G&H understand the big picture and/or allow us the quiet time, away from pressure, to give them a good summary of the issue before they undertook and studies. G&H/TUGCO never involved Cygna in any discussions on the dynamic analysis prior to starting it. This is poor coordination on their part since it is bound to lead to problem after a lengthy program is complete. Again Cygna will be accused of holding up the schedule.

31. Cygna has found that TUGCO commits to programs or studies in response to NRC questions and never informs Cygna — removal of stability trumpeers. This is ★
 either miss management on their part or a deliberate attempt to keep Cygna in the dark since we look foolish when we're asked questions on the issue.

32. On one instance (cable tray support A.H. Detail 1) G&H refused to do calculations due to schedule constraints.

33. D. Wade was never close enough to the daily work to understand the specifics of Cygna's work. All input to his reports to management reflected an antagonistic view of ~~un~~unknowable parties such as J. Nantamirga. Such things as Cygna's ~~refusal~~ ^{refusal} to accept an uncoiled response equated to Cygna refusing to expedite the schedule to close out open items or Cygna's lack of manpower.
34. D. Wade took issue with Cygna reviewing any of ^{the} affidavits associated with Cygna's questions even though the Phase 3 charter was to review the piping/pipe supports with the Walsh/Dahe allegations in mind.
35. D. Wade called me up and ordered me to change and clarify a statement made by me in the NEC telephone conference call. Even the discussion was factual. He threatened upper management pressure. D. Wade
36. During the cable tray reviews many of the meetings were argumentative and defensive rather than G&H/TUGCC attempting to understand the Cygna concerns. This just drags the schedule out.

37. TUGCO (D Wade) refused to provide Cygna with any information surrounding how the performing the 50:55(c) evaluation for single fueling of the CCW valve. D. Wade refused to hold a meeting to discuss the issue as well as refused to allow the Cygna reviewer to discuss the issue with site people other than himself. D Wade accused Cygna of not knowing what they were talking about and expanding scope. Cygna's only recourse was to notify the commission.

38. When I asked D. Wade what the agenda for the meeting on Mar. 11 was he responded by stating that TUGCO wished to tell Cygna everything that was wrong with the Cygna valve. He would not go into it any ~~deeper~~ greater depth because it would only make him more angry. Further, he and TUGCO management were concerned that Cygna "had gone off the deep end." ~~He also mentioned to~~ I also mentioned to D. Wade that it had come to my attention that some affidavits had been received (Richmond Invents) and that it would be more efficient for Cygna to get copies of the revisions to close out outstanding questions. He replied by stating "Cygna has no business receiving affidavits". This doesn't make any sense since TUGCO's position on some issues is only available in an affidavit. D. Wade further insisted that Cygna had no business (over)

1 about in the context of an IDVP. I think that you would
2 perhaps find them a little more oriented to operations and
3 maintenance though, where the IDVP's are for new
4 construction.

5 MR. PIGOTT: Would this be a good time to take a
6 short break?

7 MR. PLOCKI: Q. Let me ask one more question and
8 then we can take a break.

9 Q. We don't necessarily have to take a look at the
10 exhibit, because I think you will recall that it was Exhibit
11 18, which was the handwritten memo by you, that had a
12 sentence at the end that referred to a certain statement made
13 by David Wade regarding Gibbs & Hill.

14 I would just like to know if you recall
15 whether -- I believe you have testified that he had, at least
16 on one occasion, made a statement to you about, as ascribed
17 in that sentence, about suing Gibbs & Hill. Do you recall
18 when he made that statement?

19 MR. ELLIS: Objection to the form of the question,
20 and the mischaracterization of prior testimony.

21 MR. PLOCKI: Q. Would it help to take a look at the
22 exhibits? It is easy enough to take a look at them.

23 THE WITNESS: A. Which number was that?

24 MR. TRAUGER: 18.

25 MR. ELLIS: I think the testimony previously was

1 that the handwriting on that particular statement was not
2 hers. It was someone else's.

3 MR. PLOCKI: That's right. I didn't mean to suggest
4 otherwise.

5 MR. ELLIS: Well, that was the only reason for my
6 objection.

7 MR. PLOCKI: I agree with your characterization,
8 Counsel. It was not her handwriting. And it was on the last
9 page.

10 THE WITNESS: A. Most of those type of comments
11 were probably in the late 1983, early 1984 timeframe, but I
12 am kind of sketchy on that. It was during the timeframe when
13 we were documenting a significant number of findings in the
14 cable tray and pipe stress area that those type of comments
15 were made.

16 Q. When you say, "Those types of comments," what
17 other comments are you referring to?

18 A. Well, I think that this exhibit pretty much
19 speaks for itself that way.

20 Q. Okay. In other words, comments that are
21 discussed in the exhibit?

22 A. Yes.

23 Q. Okay. Why don't we take a break.

24 (recess taken).

25 MR. PLOCKI: Q. You testified earlier today, Miss

IN THE DISTRICT COURT OF DALLAS COUNTY, TEXAS

14th JUDICIAL DISTRICT

---oOo---

TEXAS UTILITIES ELECTRIC COMPANY,)

Plaintiff,)

vs)

No. 86-6809-A

TEX-LA ELECTRIC COOPERATIVE)
OF TEXAS, INC., TEXAS)
MUNICIPAL POWER AGENCY AND)
BRAZOS ELECTRIC POWER)
POWER, INC.,)

Defendants.)

DEPOSITION OF:
NANCY WILLIAMS
VOL. II, Pgs. 154-278
February 18, 1988

COPY

REPORTED BY:

BRIDGET M. GASPERETTI, CSR NO. 7162

ROTH & ASSOCIATES
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PACIFICA, CALIFORNIA 94044
(415)/355-9664

1 A. Something over two years ago.

2 MR. TRAUGER: Can we have this marked, please?

3 (WHEREUPON Defendants' Exhibit 18
4 was marked for identification.)

5 MR. TRAUGER: Q. While Counsel is reviewing our
6 next exhibit, let me ask you, Miss Williams: Have you
7 reviewed any additional documents since the close of the
8 deposition yesterday as further preparation for this
9 deposition?

10 THE WITNESS: A. No, I haven't.

11 Q. Have you talked with anyone other than your
12 counsel about the subject matter of the deposition in
13 preparation for this continuing deposition?

14 A. No, I haven't.

15 Q. Have you received any communications directly or
16 indirectly from TU for this deposition or what you might say
17 in it?

18 A. No, I haven't.

19 Q. I have asked to have marked as Exhibit 18 a
20 16-page document of handwritten material. The first page
21 starts with heading, "TUGCO Management of the Project."

22 MR. ELLIS: If you are going to ask questions about
23 it, I think she ought to have a copy in front of her. But I
24 am not finished reviewing the copy.

25 MR. TRAUGER: I am only identifying the document.

1 MR. ELLIS: Okay.

2 MR. TRAUGER: There is another unnumbered page, and
3 then it is follow by 14 pages that are numbered in
4 handwriting in the upper right-hand corner. It is not signed
5 and is not dated.

6 MR. ELLIS: I think we ought to copy that one before
7 we review it.

8 (discussion off the record).

9 MR. TRAUGER: Q. While off the record have you had
10 an opportunity to read the document we have marked as Exhibit
11 18, Miss Williams?

12 THE WITNESS: A. Yes, I have.

13 Q. Do you recognize the document?

14 A. Yes, I do.

15 Q. Have you reviewed this document at any time
16 between the time the minority owners of Comanche Peak made
17 their document request to Cygna and today?

18 A. No.

19 Q. Prior to this morning?

20 A. No.

21 Q. Did you write the document we have marked as
22 Exhibit 18?

23 A. Yes, I did, all except for the last sentence on
24 the last page.

25 Q. The rest of the document is in your handwriting?

1 A. Yes, it is.

2 Q. Do you recognize the handwriting of the last
3 sentence on the last page?

4 A. I am not sure whose that is to tell you the
5 truth.

6 Q. Do you remember that someone added that sentence
7 to this document after you prepared it?

8 A. No.

9 Q. You just don't remember seeing that sentence
10 before at all?

11 A. No. Well, it's been an awful long time since I
12 have seen this document, and I don't recall.

13 Q. What does the last sentence say?

14 MS. O'CONNELL: I will object on the basis the
15 document speaks for itself.

16 MR. ELLIS: She also said it's not her handwriting.
17 You are asking her to interpret someone else's handwriting.

18 MR. TRAUGER: Q. You may answer.

19 THE WITNESS: A. I believe it says, although it's a
20 poor copy, "Dave Wade, colon: We are going to sue those
21 bastards, open parens, G & H, close parens, exclamation
22 point."

23 Q. Did you ever hear Mr. Wade make such a statement?

24 A. Yes.

25 Q. While we were off the record, I called your

1 attention to a page numbered 3, which is the fifth page of
2 this document where I had found a reference to the date
3 February 1985 in the sentence that begins in the middle of
4 the page. Quote, "Our most recent letter summarizing the
5 problems is dated February '85," close quote, and the
6 sentence continues.

7 Can you tell us when this Exhibit 18 was written,
8 with the exception of the last section you have indicated you
9 didn't write?

10 A. This was written prior to a meeting held on, I
11 believe March 11th, and I was trying to remember the year.
12 You may infer from the reference that you just cited that
13 it's March of '85, and I suppose that's reasonable, but I
14 don't know if it was March of '85 or March of '86.

15 Q. When you wrote Exhibit 18, leaving aside the last
16 sentence on the final page, did you intend for it to be an
17 accurate description of the situation that existed at the
18 time?

19 A. Yes, I did.

20 Q. What did Mr. Wade tell you about TU's intent to
21 sue Gibbs & Hill?

22 A. I don't recall anything of greater detail than
23 just that statement.

24 Q. Was TU dissatisfied with the quality of
25 engineering work, design work that Gibbs & Hill had done?

1 MR. ELLIS: Objection to form. It calls for her to
2 speculate on what was in TU's management's head about quality
3 of design work.

4 MS. O'CONNELL: We join in that objection.

5 THE WITNESS: The only thing I can say is that they
6 were witness to all of the findings that Cygna had
7 identified. There was difficulty resolving them on a
8 technical level. Some of them were not that
9 straightforward. But beyond that, I don't know anything
10 about Texas Utilities' intentions with regards to Gibbs &
11 Hill.

12 MR. TRAUGER: Q. Let me change the question and ask
13 you about what you know from what Mr. Wade told you. Did
14 Mr. Wade tell you that TU was dissatisfied with the quality
15 of engineering design work that Gibbs & Hill had done?

16 A. I don't recall anything that specific. I know
17 that Dave was dissatisfied. Why Dave was dissatisfied, I
18 can't articulate.

19 Q. Can you summarize for us the contents of Cygna's
20 findings with respect to Gibbs & Hill's design work for
21 Comanche Peak?

22 A. You would like me to summarize this -- the
23 findings? There is quite a few of them.

24 Q. All right. Yes, if you can.

25 A. Is there a particular discipline you would like

1 to visit first?

2 Q. As you choose.

3 A. Okay. Let's take pipe stress. There was an
4 issue with what we call mass participation. It is also
5 referenced in Exhibit 18 that we had before us. That would
6 be characterized as an extensive observation in that it
7 applied to a majority of the piping systems.

8 In fact, if we refer to Exhibit 12 from
9 yesterday, the most straightforward way to go through them
10 would be to turn to Attachment A, which is the observation
11 log from Phases 1 and 2. Now, we did do further type stress
12 reviews in Phases 3 and 4, but this will give you a sense for
13 the type and nature of the observations, I believe.

14 On sheet 4 of 21 of the observation logs, those
15 observations starting with the prefix "PI" would be
16 associated with pipe stress, and there are 10 of those. Do
17 you want me to go through them?

18 Q. No, that's fine to identify where they are at
19 this point. Are there other Gibbs & Hill findings in Exhibit
20 12 before we get to Phases 3 and 4?

21 A. Yes. There are some design control findings
22 starting on sheet 3 of 21, and those would be the
23 observations designated DC-02, 02 being the prefix for
24 Gibbs & Hill and DC standing for design control. And there
25 are three of those.