

**COMMISSION OF INQUIRY INTO THE DIAPHRAGM WALL AND PLATFORM
SLAB CONSTRUCTION WORKS AT THE HUNG HOM STATION EXTENSION
UNDER THE SHATIN TO CENTRAL LINK PROJECT**

**REPLY WITNESS STATEMENT OF CHAN KIT LAM
FOR
MTR CORPORATION LIMITED**

I, **CHAN KIT LAM**, of AECOM, 8/F, Tower 2, Grand Central Plaza, 138 Shatin Rural Committee Road, Shatin, Hong Kong, **WILL SAY AS FOLLOWS**

1. I am the same Kit Chan (the former Construction Manager) who gave a statement on 13 September 2018 **[B1/B262-B319]**.
2. In this witness statement in reply, I shall address a few matters arising from the witness statements of Mr. Leung Man Ho (also known as Jonathan Leung) dated 7 September 2018 (“**Jonathan Leung’s WS**”) **[G3/G2075-G2087]** and Mr. Lok Pui Fai dated 13 September 2018 (“**Lok’s WS**”) **[H7/H2187-H2213]**. I shall also clarify a minor matter that is contained in my witness statement dated 13 September 2018 **[B1/B262-B319]**.
3. I confirm that the contents of this statement are true to the best of my knowledge and belief. There are occasions when I can only speak to matters by reference to MTRCL’s documents due to the lapse of time, in which case I believe the contents of those documents are true and correct.
4. At §§31-34 of Jonathan Leung’s WS **[G3/G2083-G2085]** and at §74 of Lok’s WS **[H7/H2208]**, references are made to an unauthorized cutting of existing beam supporting the existing concourse in May 2015. I shall briefly clarify below the circumstances of this incident.
5. On 6 May 2015, I was informed by the staff of Leighton of an incident involving cutting of a steel member at the concourse level. Together with my team and the Design Management Team of MTRCL, I went on site to inspect the affected steel member. I was very surprised to discover that the affected steel member was part of the existing

structure supporting the podium (the “**Non-Conformity**”). I was advised by the Design Management Team that propping was required to support the affected steel member as soon as possible.

6. On the same day, Mr. Kwok Tsz Chung, the T3 responsible for the podium modification under the AP/RSE stream, submitted **Form B of the Code of Practice for Site Supervision (Non-Conformity and Rectification Reports)** **[Tab CC1]** to Mr. Chan Chi Kong of Atkins, the RSE, as a notification of the Non-Conformity.
7. On the same day, Leighton erected a temporary scaffolding under the cut section and fenced off the corresponding area at the concourse level **[Tab CC3]**.
8. By **letter dated 7 May 2015** **[Tab CC1]**, Mr. Chan Chi Kong of Atkins notified BD of the Non-Conformity together with his instructions to Leighton for immediate rectification.
9. By **Contractor’s Submission Form on 14 May 2015 (1112-CSF-LCA-STAT-000001)** **[Tab CC2]**, Leighton submitted to MTRCL the “*Incident Report- Cutting of Beam A2-3 Flange at GL 23/K-M on 6 May 2015*” reporting the Non-Conformity.
10. On 20 May 2015, a joint inspection was conducted by the representatives of BD and Mr. WC Lee of Atkins for the Non-Conformity **[Tab CC5]**, during which Mr. WC Lee was verbally required to submit to BD a report on the Non-Conformity (the “**Incident Report**”).
11. On 22 May 2015, Atkins submitted the requested **Incident Report** **[Tab CC4]** to BD to report the cause of the Non-Conformity. It was reported in the Incident Report that in the early hours on 6 May 2015, during the lifting operation from ground floor through a small opening in the podium slab, the crane jib was jammed against the bottom flange of an existing beam A2-3. The subcontractor of Leighton, STAM, cut a notch (approx. 320mm x 160mm) off the bottom flange to free the jib. MTRCL was not informed or consulted until after the incident.
12. The proposed remedial details to reinstate the beam to original condition, as contained in the **Incident Report** **[Tab CC4]**, consisted of replacing the cut notch with same grade

and thickness of steel plate and welded to flange with full penetration butt welds after the removal of existing fire protection material.

13. By letter dated 10 June 2015 [Tab CC6], BD provided its comments on the Incident Report.
14. By letter dated 23 June 2015 [Tab CC7], Atkins informed BD that reinstatement works had been carried out and provided the documentation for such reinstatement works. As noted at §34 of Jonathan Leung's WS [G3/G2084-G2085] and at §74 of Lok's WS [H7/H2208], the Non-Conformity was considered rectified after completion of the reinstatement works to the existing steel beam.
15. Further, I note that in my witness statement dated 13 September 2018 at §13(i) [B1/B265-B266], I made a reference to "*item 6 of the minutes of the meeting held on 6 May 2015*". I would like to clarify that the reference is meant to be made to "*item 5*" of the same minutes.
16. Finally, I repeat the final paragraph of my witness statement dated 13 September 2018 [B1/B286-B287].

Dated 12 October 2018



CHAN Kit Lam