

October 30, 2015

EA-15-144

Mr. Curt Crissman
Vice President of Engineering
Columbiana Hi Tech, LLC
1621 Old Greensboro Road
Kernersville, NC 27284

SUBJECT: COLUMBIANA HI TECH, LLC – INVESTIGATION REPORT 2-2014-033

Dear Mr. Crissman:

This letter refers to the investigation completed by the U.S. Nuclear Regulatory Commission's (NRC) Office of Investigations on June 10, 2015, regarding activities of a former employee, Mr. Mawuena Gnamavo, at the Columbiana Hi Tech (CHT) facility located in Greensboro, NC. The purpose of the investigation was to determine whether Mr. Gnamavo, in his capacity as a non-destructive examination (NDE) inspector at the time, willfully falsified qualification documents of prior experience and training to attain certification from CHT to perform NDE on important to safety welds.

Based on the information developed during the investigation, the NRC has determined that Mr. Gnamavo deliberately provided inaccurate information to CHT. Shortly after Mr. Gnamavo was hired by CHT on January 30, 2012, he provided CHT with falsified training and experience documents. They consisted of (1) a certificate from Plumstead Qualification and Training Services certifying him as a Non-Destructive Testing (NDT) Level II in Visual Testing, Leak Testing, and Liquid Penetration Testing; and (2) a letter of recommendation from a former employer of his stating he was a NDT Level II from March 2009 to October 2010 in Visual, Magnetic Particles, and Liquid Penetrant Testing. This information was used in part by CHT to certify him as a Level II Visual Examination Inspector on February 17, 2012 and a Level II Dye Penetrant Examination Inspector on May 16, 2012. He then performed NDE inspections on important to safety welds of NRC-licensed Part 71 and 72 components fabricated by CHT until November 2013.

Therefore, from February 2012 to November 2013, CHT failed to maintain complete and accurate information required by the Commission's regulations, contrary to 10 CFR 71.7(a). The NRC has determined that this constitutes a Severity Level IV violation of NRC requirements. This violation was evaluated in accordance with the NRC Enforcement Policy included on the NRC's website at <http://www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html>. This violation is being treated as a Non-Cited Violation (NCV) because all of the criteria in Section 2.3.2 of the NRC's Enforcement Policy were met: you identified the violation, the violation was not repetitive as a result of inadequate corrective actions, and you initiated prompt and comprehensive corrective actions to prevent recurrence. When the issue was identified by CHT in November 2013, Mr. Gnamavo did not return to work at CHT and his employment was terminated. Subsequently, CHT performed NDE inspection of the accessible welds Mr. Gnamavo had inspected that were still on-site, which was performed by CHT's Level III NDT

inspector and found to be acceptable. This included over 46,000 inches of welds that were re-inspected by CHT.

The NRC has concluded that information regarding: (1) the reason for the violation; (2) the corrective actions that have been taken and the results achieved; and (3) the date when full compliance will be achieved is already adequately addressed on the docket in Inspection Report No. 71-00179/2014-201 and this letter. Therefore, you are not required to respond to this letter unless the description herein does not accurately reflect your corrective actions or your position. In that case, or if you choose to provide additional information, you should follow the instructions specified below.

If you contest the violation or the significance of the NCV, you should provide a response within 30 days of the date of this letter, with the basis for your denial, to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington DC 20555-0001, with a copy to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and your response, if you choose to provide one, will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy or proprietary information so that it can be made available to the Public without redaction.

Sincerely,

/RA/

Patricia Silva, Chief
Inspections and Operations Branch
Division of Spent Fuel Management
Office of Nuclear Material Safety
and Safeguards

Docket No. 71-0179

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Patricia Silva, Chief
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Docket No. 71-0179

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