

October 30, 2015

IA-15-061

Mr. Mawuena Gnamavo  
[HOME ADDRESS DELETED  
UNDER 10 CFR 2.390(a)]

SUBJECT: NOTICE OF VIOLATION – INVESTIGATION REPORT 2-2014-033

Dear Mr. Gnamavo:

This refers to the investigation completed by the U.S. Nuclear Regulatory Commission's (NRC) Office of Investigations on June 10, 2015 regarding your activities at the Columbiana Hi-Tech (CHT) facility located in Greensboro, NC. The purpose of the investigation was to determine whether you, in your 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 a deliberate violation of NRC requirements occurred. The violation is cited in the enclosed Notice of Violation (Notice) (Enclosure 1). The violation involves the failure to comply with the requirements of 10 CFR 71.8(b)(2), "Deliberate Misconduct." In this case, the NRC concluded that you engaged in deliberate misconduct that caused CHT, an NRC certificate holder, to be in violation of 71.7(a) for failure to maintain complete and accurate information. Specifically, shortly after you were hired by CHT on January 30, 2012, you provided CHT with falsified training and experience documents. They consisted of (1) a certificate from Plumstead Qualification and Training Services certifying you 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 stating you were 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 you as a Level II Visual Examination Inspector on February 17, 2012 and a Level II Dye Penetrant Examination Inspector on May 16, 2012. You then performed NDE inspections on important to safety welds of NRC-licensed Part 71 and 72 components fabricated by CHT until November 2013. Enclosure 2 includes a copy of the letter and Non-Cited Violation issued to CHT. Given the significance of the underlying issue and the deliberate nature of your actions, this violation has been categorized in accordance with the NRC Enforcement Policy at Severity Level IV.

In determining the appropriate sanction to be issued in this case, the NRC considered issuing an Order prohibiting your involvement in NRC-licensed activities as a result of your actions. However, after consultation with the Director, Office of Enforcement, and after considering the circumstances of this case, including: (1) the significance of the falsified documents on approving your certification, (2) your position while employed at CHT, and (3) the prompt corrective actions taken by CHT including removal of your access to their facility, I have decided to issue the enclosed Notice of Violation. You should be aware that if you are involved

in NRC-licensed activities in the future, additional deliberate violations could result in more significant enforcement action or criminal action.

You are not required to respond to this letter; however, if you have additional information that you believe the NRC should consider, you may provide it in a response to the Notice.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosures, 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, proprietary, or safeguards information so that it can be made available to the Public without redaction. The NRC also includes significant enforcement actions on its Web site at <http://www.nrc.gov/reading-rm/doc-collections/enforcement/actions>. In addition, this letter will be maintained by the Office of Enforcement in an NRC Privacy Act system of records, NRC-3, Enforcement Actions Against Individuals. This system, which is not publicly-accessible, includes all records pertaining to individuals who are being or have been considered for enforcement action, whether such action was taken or not. The NRC-3 system notice, which provides detailed information about this system of records, can be accessed from the NRC Web site at <http://www.nrc.gov/reading-rm/foia/privacy-systems.html>.

Please feel free to contact Mr. Jeremy Tapp of my staff at 301-415-8047 if you have any questions.

Sincerely,

**/RA/**

Mark Lombard, Director  
Division of Spent Fuel Management  
Office of Nuclear Material Safety  
and Safeguards

Enclosures: 1. Notice of Violation  
2. Non-Cited Violation to CHT

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

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Please feel free to contact Mr. Jeremy Tapp of my staff at 301-415-8047 if you have any questions.

Sincerely,

**/RA/**

Mark Lombard, Director  
Division of Spent Fuel Management  
Office of Nuclear Material Safety  
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OFFICE	NMSS	NMSS	OGC	OE	NMSS	NMSS
NAME	JTapp*	RSun*	LSreenivas*	DCylkowski*	PSilva	MLombard
DATE	9/23/15	9/23/15	10/14/15	10/14/15	10/23/15	10/30/15

\*via email

## NOTICE OF VIOLATION

Mr. Mawuena Gnamavo  
[HOME ADDRESS DELETED  
UNDER 10 CFR 2.390]

IA-15-061

During an NRC investigation completed on June 10, 2015, a violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

10 CFR 71.8(b) states, in part, that an employee of a certificate holder who knowingly provides to a certificate holder any services that relate to a certificate holder's activities subject to 10 CFR Part 70 may not deliberately submit to a certificate holder information that the person submitting the information knows to be inaccurate in some respect material to the NRC.

Contrary to the above, you, an employee of a certificate holder, Columbiana Hi-Tech (CHT), knowingly submitted inaccurate quality and nondestructive examination (NDE) inspector training and experience documents to CHT. Specifically, shortly after your initial hire date of January 30, 2012, you provided falsified documents to CHT, consisting of a letter of recommendation and a training certificate. These documents were used by CHT as part of the basis to certify you as a qualified inspector in both visual examination and dye penetrant examination. You then inspected and approved important to safety welds on Part 71 and Part 72 equipment and components without the required qualifications.

This is a Severity Level IV violation (Section 6.9).

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 the associated letter to this Notice. Therefore, you are not required to respond to this Notice 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 this enforcement action, you should provide a response to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001 and marked "Open by Addressee Only," with a copy to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001, with a similar marking, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation; IA-15-061" and should include the basis for disputing the violation.

Your response, if you choose to contest this violation, will be made available electronically for public inspection in the NRC Public Document Room and in the NRC's Agencywide Document 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, proprietary, or safeguards information so that it can be made available to the public without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your

response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.390(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21. This Notice will be maintained by the Office of Enforcement in an NRC Privacy Act system of records, NRC-3, Enforcement Actions Against Individuals. This system, which is not publicly-accessible, includes all records pertaining to individuals who are being or have been considered for enforcement action, whether such action was taken or not. The NRC-3 system notice, which provides detailed information about this system of records, can be accessed from the NRC Web site at <http://www.nrc.gov/reading-rm/foia/privacy-systems.html>.

Dated this 30<sup>th</sup> day of October 2015

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

Enclosure 2

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