

February 15, 2017

IA-16-075

Mr. Casey Pooler  
[NOTE: HOME ADDRESS DELETED  
UNDER 10 CFR 2.390]

SUBJECT: ORDER PROHIBITING INVOLVEMENT IN NRC-LICENSED ACTIVITIES AND  
NOTICE OF VIOLATION (NRC Office of Investigations Report No. 1-2015-029)

Dear Mr. Pooler:

This letter refers to an investigation initiated on August 24, 2015, by the U.S. Nuclear Regulatory Commission (NRC) Office of Investigations (OI) at the NextEra Energy Seabrook, LLC (NextEra) Seabrook Station (Seabrook). The purpose of the investigation was to evaluate the circumstances surrounding a security response weapon that NextEra staff identified as having foreign material lodged inside the barrel. Based on the results of the OI investigation, the NRC concluded that you deliberately placed the material inside the weapon.

In a letter dated December 1, 2016 (ML16334A416<sup>1</sup>), the NRC provided you a factual summary of the OI report and informed you that the NRC had preliminarily determined, based on the OI investigation, that you violated 10 CFR 50.5(a)(1), by deliberately causing NextEra to be in violation of the NRC requirement that all firearms necessary to implement the site security plans and protective strategy be in working condition. The NRC letter also informed you that the NRC was considering escalated enforcement action against you for this apparent violation, and offered you the opportunity to discuss the violation during a pre-decisional enforcement conference (PEC) or to engage the NRC in an alternative dispute resolution (ADR) mediation session.

In a telephone call on December 13, 2016, an attorney representing you informed the NRC that you did not require a PEC or ADR and did not intend to send a written response. Therefore, based on the information developed during the investigation, the NRC maintains that, on August 14, 2015, you deliberately placed the foreign material inside of a security response weapon. As a result, from August 14, 2015, until NextEra discovered the material on August 22, 2015, the weapon may not have been in working condition. Accordingly, the NRC has determined that you violated the requirements in 10 CFR 50.5(a)(1). Given the significance of the underlying issue and the deliberate nature of your actions, this violation has been categorized at Severity Level (SL) III, in accordance with the NRC Enforcement Policy. The violation is set forth in the enclosed Notice of Violation (Notice) (Enclosure 1).

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

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<sup>1</sup> Designation in parentheses refers to an Agency-wide Documents Access and Management System (ADAMS) accession number. Unless otherwise noted, documents referenced in this letter are publicly-available using the accession number in ADAMS.

Since you no longer work at Seabrook and are not engaged in NRC-licensed activities, you are not required to respond to the Notice at this time. However, should you seek employment with an NRC licensee in the future, you will be required, pursuant to the provisions of 10 CFR 2.201, to submit a written response in accordance with the instructions provided in the enclosed Notice.

The NRC has also determined that your actions warrant issuance of an Order that prohibits your involvement in NRC-licensed activities for a period of three years because your actions have resulted in the loss of reasonable assurance that you may be relied upon, at this time, to comply with NRC requirements. This Order, which is set forth in Enclosure 2, also requires you to provide to the NRC in writing the name, address, and telephone number of the employer for your first subsequent employment in NRC-licensed activities following completion of the three year prohibition. Pursuant to Section 223 of the Atomic Energy Act of 1954, as amended, any person who willfully violates, attempts to violate, or conspires to violate, any provision of the enclosed Order shall be subject to criminal prosecution as set forth in that section. Violation of the enclosed Order may also subject the person to civil monetary penalty.

You are required to provide acknowledgement to us that you have received the Order. Additionally, you or any other person adversely affected by this Order may request a hearing on this Order within 20 days of the Order's issuance. Please see the enclosed Order for further instructions regarding acknowledging receipt of the Order and requesting a hearing. Pursuant to Section 223 of the Atomic Energy Act of 1954, as amended, any person who willfully violates, attempts to violate, or conspires to violate, any provision of the enclosed Order shall be subject to criminal prosecution as set forth in that section. Violation of the enclosed Order may also subject the person to civil monetary penalty.

If you disagree with this enforcement action, and you do not choose to contest the violation or request a hearing, you may request Alternative Dispute Resolution (ADR) with the NRC in an attempt to resolve this issue. This request must be made within 20 days of the issuance of the Order. ADR is a general term encompassing various techniques for resolving conflict outside of court using a neutral third party. The technique that the NRC has decided to employ is mediation. Additional information concerning the NRC's program is described in the enclosed brochure (NUREG/BR-0317) (Enclosure 3) and can be obtained at <http://www.nrc.gov/about-nrc/regulatory/enforcement/adr.html>. The Institute on Conflict Resolution at Cornell University has agreed to facilitate NRC's program as a neutral third-party.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be made available electronically for public inspection in the NRC Public Document Room and from the NRC's Agency-wide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. The NRC also includes significant enforcement actions on its Web site at <http://www.nrc.gov/reading-rm/doc-collections/enforcement/actions/>.

Because this letter references and encloses information related to an enforcement action against an individual, this letter and its enclosures 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 considered for, 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 note that final NRC investigation documents, such as the OI report described above, may be made available to the public under the Freedom of Information Act (FOIA) subject to redaction of information appropriate under the FOIA. Requests under the FOIA should be made in accordance with 10 CFR 9.23, Requests for Records. Additional information is available on the NRC website at <http://www.nrc.gov/reading-rm/foia/foia-privacy.html> .

Sincerely,

*/RA/*

Patricia K. Holahan, Director  
Office of Enforcement

Enclosures:

1. Notice of Violation
2. Order Prohibiting Involvement in NRC-Licensed Activities
3. NUREG/BR-0317, Post-Investigation ADR Program

cc w/ enclosures:

State of New Hampshire  
Commonwealth of Massachusetts

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>.

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Sincerely,

/RA/

Patricia K. Holahan, Director  
Office of Enforcement

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1. Notice of Violation
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cc w/ enclosures:

State of New Hampshire  
Commonwealth of Massachusetts

Distribution: see next page

**ADAMS Accession No.: ML19031A365**

<b>OFFICE</b>	RI/ORA	RI/ DRS	RI/DRP	RI/DRP	RI/ DRS	RI/ORA
<b>NAME</b>	MMcLaughlin	RMcKinley	FBower	MScott	RLorson	BKlukan
<b>DATE</b>	1/05/17	1/10/17	1/11/17	1/11/17	1/13/17	1/17/17
<b>OFFICE</b>	RI/ORA	RI/RA	OE/EB	NRR	OGC	OE:D
<b>NAME</b>	BBickett	DDorman	DFurst	LCasey	RCarpenter	PHolahan
<b>DATE</b>	1/17/17	1/27/17	2/10/17	1/23/17	1/24/17	2/15/17

**OFFICIAL RECORD COPY**

ADAMS (PARS)	
SECY	RidsSecyMailCenter
OEMAIL	OEMAIL Resource
OEWEB	OEWEB Resource
V McCree, EDO	RidsEdoMailCenter
M Johnson, DEDR	
C Araguas, OEDO	
P Holahan, OE	RidsOeMailCenter
P Peduzzi, OE	
N Hilton, OE	
R Fretz, OE	
S Rodriguez, OE	
N Hasan, OE	
D Furst, OE	
W Dean, NRR	RidsNrrOd Resource
M Evans, NRR	
A Boland, NRR	
C Miller, NRR	
L Casey, NRR	
Enforcement Coordinators RII, RIII, RIV (M Kowal, R Skokowski, M Hay)	
P Moulding, OGC	RidsOgcMailCenter
R Carpenter, OGC	
H Harrington, OPA	RidsOpaMail Resource
H Bell, OIG	RidsOigMailCenter
K Howell, OI	RidsOiMailCenter
J Teator, OI	
D D'Abate, OCFO	RidsOcfoMailCenter
G Weindling, OCFO	
D Dorman, RA/RI	R1ORAMail Resource
D Lew, DRA/RI	
D Screnci, PAO-RI / N Sheehan, PAO-RI	
D Tiff, ORA / J Greives, ORA	
M Scott, DRP	R1DRPMail Resource
D Pelton, DRP	
R Lorson, DRS	R1DRSMail Resource
J Yerokun, DRS	
R McKinley, DRS	
P Cataldo, SRI	
P Meier, RI	
F Bower, DRP	
R Barkley, DRP	
B Klukan, ORA	
B Bickett, ORA	
M McLaughlin, ORA	
C Crisden, ORA	
N Warnek, ORA	
D Bearde, ORA	
Region I OE Files (with concurrences)	

ENCLOSURE 1  
NOTICE OF VIOLATION

Casey Pooler  
HOME ADDRESS DELETED  
UNDER 10 CFR 2.390]

IA-16-075

During an NRC investigation conducted between August 24, 2015, and August 5, 2016, a violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

10 CFR 50.5(a)(1) states, in part, that any employee of a licensee may not engage in deliberate misconduct that causes a licensee to be in violation of any regulation issued by the Commission.

10 CFR 73.55(k)(2) requires licensees to ensure that all firearms, ammunition, and equipment necessary to implement the site security plans and protective strategy are in sufficient supply, are in working condition, and are readily available for use.

Contrary to the above, on August 14, 2015, while employed by NextEra Energy Seabrook, LLC (NextEra) as a contract security officer at Seabrook Station, you engaged in deliberate misconduct that caused NextEra to be in violation of an NRC regulation until identified by NextEra contract security personnel at Seabrook on August 22, 2015. Specifically, you placed foreign material into the barrel of a rifle that had been staged at a security post. While the foreign material was in the barrel, the licensee could not ensure that the rifle would fire properly. As a result, NextEra did not ensure that all firearms necessary to implement the site security plans and protective strategy were in working condition.

This is a Severity Level III violation (Example 6.11).

Since you are no longer contracted to work at Seabrook Station and are not engaged in NRC licensed activities, you are not required to respond to the Notice of Violation at this time. However, should you seek employment with an NRC licensee in the future, you will be required, pursuant to the provisions of 10 CFR 2.201, to submit a written response. This reply should be clearly marked as a "Reply to a Notice of Violation; IA-16-075" and should include: (1) the reason for the violation, or, if contested, the basis for disputing the violation; (2) the corrective steps that have been taken and the results achieved; (3) the corrective steps that will be taken; and (4) the date when full compliance will be achieved. If you contest this enforcement action, you should also provide a copy of your response, with the basis for your denial, to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

Your response will be made available electronically for public inspection in the NRC Public Document Room and in the NRC's Agency-wide 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 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> .

Dated this 15<sup>th</sup> day of February, 2017.



was returned to the armory on August 21, 2015, for routine cleaning. While cleaning the weapon, the armorer found that a foam earplug insert and two pieces of rolled up paper had been stuffed in the barrel. NextEra notified the NRC Senior Resident Inspector at Seabrook, who in turn, informed regional staff and management. The region immediately dispatched security inspectors and investigators and, on August 24, 2015, formally launched a high-priority investigation by the NRC Office of Investigations (OI).

During initial interviews, Mr. Pooler acknowledged to OI that he had stood watch in the position with the affected rifle on two occasions during the subject period. However, he testified that he had not placed the materials in the weapon and that he had no information about how the materials got inside of it. Afterward, Mr. Pooler made several comments to other security officers indicating that he may have been involved in tampering with the rifle. He asked a coworker to contact the OI agents and ask them to meet him at an off-site location. Although OI agents contacted Mr. Pooler, he declined to meet with them at that time.

On multiple occasions between August 27 and September 24, 2015, OI attempted to re-interview Mr. Pooler, but he declined each request. On October 19, 2015, Mr. Pooler spoke with OI and stated that he believed he placed the materials in the weapon. He told OI that he did not know why he did it, and adamantly stated that he was not trying to hurt anyone or to assist anyone with gaining access to the site. He acknowledged that it was reasonable to assume that he didn't come forward about what he had done because he was afraid of being fired. Mr. Pooler also affirmed that he was not aware of adverse issues with any other weapons or equipment at the site.

Based on the OI investigation, the NRC determined that Mr. Pooler committed an

apparent violation (AV) of 10 CFR 50.5(a)(1), in that his deliberate actions caused NextEra to be in violation of 10 CFR 73.55(k)(2), which requires licensees to ensure that all firearms necessary to implement the site security plans and protective strategy are in working condition. Specifically, Mr. Pooler placed foreign material into the barrel of a rifle staged at a Seabrook security post that was established to implement the site protective strategy. Because of the foreign material, the licensee could not ensure that the rifle would fire properly.

In a letter dated December 1, 2016, the NRC described the AV and informed Mr. Pooler that the NRC was considering escalated enforcement action against him. In the letter, the NRC also offered Mr. Pooler the opportunity to discuss the AV during a pre-decisional enforcement conference (PEC) or to engage the NRC in an alternative dispute resolution (ADR) mediation session or to provide a written response before the NRC made an enforcement decision. In a December 13, 2016, telephone call with NRC Region I Enforcement staff, Mr. Pooler's attorney informed the NRC that he neither required a PEC or an ADR mediation session, nor intended to submit a written response, but that Mr. Pooler was willing to cooperate with the NRC's intended enforcement action.

### III.

Based on the above, it appears that Casey Pooler, a contract employee of the Licensee, engaged in deliberate misconduct that caused the Licensee to be in violation of 10 CFR 73.55(k)(2). Casey Pooler's action has raised serious doubt as to whether he can be relied upon to comply with NRC requirements. Consequently, the NRC lacks the requisite reasonable assurance that licensed activities can be conducted in compliance with the Commission's requirements and that the health and safety of the public will be protected if Casey Pooler were

permitted at this time to be involved in NRC-licensed activities. Therefore, Casey Pooler is prohibited from any involvement in NRC-licensed activities for a period of three years from the date of this Order. Additionally, Casey Pooler is required to notify the NRC of his first employment in NRC-licensed activities for a period of one year following the prohibition period.

#### IV.

Accordingly, pursuant to sections 103, 161b, 161i, 182 and 186 of the Atomic Energy Act of 1954, as amended, and the Commission's regulations in 10 CFR 2.202, and 10 CFR 50.5. IT IS HEREBY ORDERED, EFFECTIVE UPON THE DATE OF ISSUANCE, THAT:

1. Casey Pooler is prohibited for three years from the date of this Order from engaging in, supervising, directing, or in any other way conducting NRC-licensed activities. NRC-licensed activities are those activities that are conducted pursuant to a specific or general license issued by the NRC, including, but not limited to, those activities of Agreement State licensees conducted in the NRC's jurisdiction pursuant to the authority granted by 10 CFR 150.20.
2. If Mr. Pooler is currently involved with another licensee in NRC-licensed activities, he must immediately cease those activities; inform the NRC of the name, address and telephone number of the employer; and provide a copy of this order to the employer.
3. For a period of one year after the three-year period of prohibition has expired, Mr. Pooler shall, within 20 days of acceptance of his first employment offer involving NRC-licensed activities or his becoming involved in NRC-licensed activities, as defined

in Paragraph IV.1 above, provide notice to the Director, Office of Enforcement, U. S. Nuclear Regulatory Commission, Washington, DC 20555-0001, of the name, address, and telephone number of the employer or the entity where he is, or will be, involved in the NRC-licensed activities. In the notification, Mr. Pooler shall include a statement of his commitment to compliance with regulatory requirements and the basis why the Commission should have confidence that he will now comply with applicable NRC requirements.

The Director, Office of Enforcement, or designee, may, in writing, relax or rescind any of the above conditions upon demonstration by Mr. Pooler of good cause.

V.

The NRC has determined that Mr. Pooler's communications with the NRC, both during the investigation and subsequently through his attorney, are sufficient to constitute an answer to the Order. Therefore, to satisfy the requirements of 10 CFR 2.202, Mr. Pooler need only acknowledge to the NRC that he has received the Order. This may be done by Mr. Pooler or through his attorney, and may be accomplished by telephone call or electronic mail message to the NRC Region I Senior Enforcement Specialist Marjorie McLaughlin ((610) 337-5240 or [Marjorie.mclaughlin@nrc.gov](mailto:Marjorie.mclaughlin@nrc.gov)). Any person adversely affected by this Order may submit a written answer to this Order within 30 days of its publication in the *Federal Register*. In addition, Mr. Pooler and any other person adversely affected by this Order may request a hearing on this Order within 30 days of its publication in the *Federal Register*. Where good cause is shown, consideration will be given to extending the time to answer or request a hearing. A request for extension of time must be made in writing to the Director, Office of Enforcement, U.S. Nuclear

Regulatory Commission, Washington, DC 20555-001, and include a statement of good cause for the extension.

## VI.

All documents filed in NRC adjudicatory proceedings, including a request for hearing and petition for leave to intervene (petition), any motion or other document filed in the proceeding prior to the submission of a request for hearing or petition to intervene, and documents filed by interested governmental entities that request to participate under 10 CFR 2.315(c), must be filed in accordance with the NRC's E-Filing rule (72 FR 49139; August 28, 2007, as amended at 77 FR 46562, August 3, 2012). The E-Filing process requires participants to submit and serve all adjudicatory documents over the internet, or in some cases to mail copies on electronic storage media. Detailed guidance on making electronic submissions may be found in the Guidance for Electronic Submissions to the NRC and on the NRC Web site at <http://www.nrc.gov/site-help/e-submittals.html>. Participants may not submit paper copies of their filings unless they seek an exemption in accordance with the procedures described below.

To comply with the procedural requirements of E-Filing, at least 10 days prior to the filing deadline, the participant should contact the Office of the Secretary by e-mail at [hearing.docket@nrc.gov](mailto:hearing.docket@nrc.gov) or by telephone at 301-415-1677, to (1) request a digital identification (ID) certificate, which allows the participant (or its counsel or representative) to digitally sign submissions and access the E-Filing system for any proceeding in which it is participating; and (2) advise the Secretary that the participant will be submitting a petition or other adjudicatory document (even in instances in which the participant, or its counsel or representative, already holds an NRC-issued digital ID certificate). Based upon this information, the Secretary will

establish an electronic docket for the hearing in this proceeding if the Secretary has not already established an electronic docket.

Information about applying for a digital ID certificate is available on the NRC's public Web site at <http://www.nrc.gov/site-help/e-submittals/getting-started.html>. Once a participant has obtained a digital ID certificate and a docket has been created, the participant can then submit adjudicatory documents. Submissions must be in Portable Document Format (PDF). Additional guidance on PDF submissions is available on the NRC's public Web site at <http://www.nrc.gov/site-help/electronic-sub-ref-mat.html>. A filing is considered complete at the time the document is submitted through the NRC's E-Filing system. To be timely, an electronic filing must be submitted to the E-Filing system no later than 11:59 p.m. Eastern Time on the due date. Upon receipt of a transmission, the E-Filing system time-stamps the document and sends the submitter an e-mail notice confirming receipt of the document. The E-Filing system also distributes an e-mail notice that provides access to the document to the NRC's Office of the General Counsel and any others who have advised the Office of the Secretary that they wish to participate in the proceeding, so that the filer need not serve the document on those participants separately. Therefore, applicants and other participants (or their counsel or representative) must apply for and receive a digital ID certificate before adjudicatory documents are filed so that they can obtain access to the documents via the E-Filing system.

A person filing electronically using the NRC's adjudicatory E-Filing system may seek assistance by contacting the NRC's Electronic Filing Help Desk through the "Contact Us" link located on the NRC's public Web site at <http://www.nrc.gov/site-help/e-submittals.html>, by e-mail to [MSHD.Resource@nrc.gov](mailto:MSHD.Resource@nrc.gov), or by a toll-free call at 1-866-672-7640. The NRC Electronic

Filing Help Desk is available between 9 a.m. and 6 p.m., Eastern Time, Monday through Friday, excluding government holidays.

Participants who believe that they have a good cause for not submitting documents electronically must file an exemption request, in accordance with 10 CFR 2.302(g), with their initial paper filing stating why there is good cause for not filing electronically and requesting authorization to continue to submit documents in paper format. Such filings must be submitted by: (1) first class mail addressed to the Office of the Secretary of the Commission, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, Attention: Rulemaking and Adjudications Staff; or (2) courier, express mail, or expedited delivery service to the Office of the Secretary, 11555 Rockville Pike, Rockville, Maryland, 20852, Attention: Rulemaking and Adjudications Staff. Participants filing adjudicatory documents in this manner are responsible for serving the document on all other participants. Filing is considered complete by first-class mail as of the time of deposit in the mail, or by courier, express mail, or expedited delivery service upon depositing the document with the provider of the service. A presiding officer, having granted an exemption request from using E-Filing, may require a participant or party to use E-Filing if the presiding officer subsequently determines that the reason for granting the exemption from use of E-Filing no longer exists.

Documents submitted in adjudicatory proceedings will appear in the NRC's electronic hearing docket which is available to the public at <https://adams.nrc.gov/ehd>, unless excluded pursuant to an order of the Commission or the presiding officer. If you do not have an NRC-issued digital ID certificate as described above, click cancel when the link requests certificates and you will be automatically directed to the NRC's electronic hearing dockets where you will be able to access any publicly available documents in a particular hearing docket. Participants are

requested not to include personal privacy information, such as social security numbers, home addresses, or personal phone numbers in their filings, unless an NRC regulation or other law requires submission of such information. For example, in some instances, individuals provide home addresses in order to demonstrate proximity to a facility or site. With respect to copyrighted works, except for limited excerpts that serve the purpose of the adjudicatory filings and would constitute a Fair Use application, participants are requested not to include copyrighted materials in their submission.

If a person other than Mr. Pooler requests a hearing, that person shall set forth with particularity the manner in which his interest is adversely affected by this Order and shall address the criteria set forth in 10 CFR 2.309(d) and (f). If a hearing is requested by Mr. Pooler or a person whose interest is adversely affected, the Commission will issue an Order designating the time and place of any hearings. If a hearing is held, the issue to be considered at such hearing shall be whether this Order should be sustained. In the absence of any request for hearing, or written approval of an extension of time in which to request a hearing, the provisions specified in Section IV above shall be final 30 days from the date this Order is published in the *Federal Register* without further order or proceedings. If an extension of time for requesting a hearing has been approved, the provisions specified in Section IV shall be final when the extension expires if a hearing request has not been received.

Dated at Rockville, Maryland, this 15<sup>th</sup> day of February 2017.

For the Nuclear Regulatory Commission.

*/RA/*

Patricia K. Holahan, Director  
Office of Enforcement.