

March 24, 2017

Victor McCree, Executive Director for Operations  
United States Nuclear Regulatory Commission  
Washington, DC 20555-0001

**SUBJECT: Supplement to 10 CFR 2.206 Petition re: System One Solutions Event Notification**

Dear Mr. McCree:

On behalf of the Union of Concerned Scientists (UCS), I submitted a petition dated February 22, 2017, pursuant to §2.206 in Title 10 of the Code of Federal Regulations (hereafter 10 CFR). We petitioned the Nuclear Regulatory Commission (NRC) to take enforcement action in the form of Demands For Information regarding the submittal to the NRC under 10 CFR Part 21 as reported in NRC Event Number 52383 dated November 21, 2016.<sup>1</sup> As of March 22, 2017, I had received neither acknowledgement of nor response to our petition.

On or about March 10, 2017, System One Solutions, LLC (System One) provided information to the U.S. Department of Labor's Occupational Safety & Health Administration regarding a complaint filed by an individual named in the event notification. That response referred to information likely to reside within that individual's personnel file at System One. We supplement the scope of the Demands for Information we sought in our February 22, 2017, petition by expanding the records to be demanded from System One to include the personnel file for [REDACTED]

**Justification for Enforcement Action Requested**

UCS has received information from [REDACTED] that calls into question information in the Part 21 report submitted by System One to the NRC. Based on publicly available information, UCS is unable to independently determine whether the information is accurate or not. The Demands For Information will produce the records needed to fact-check the Part 21 report. If the information reported to the NRC is inaccurate, the records produced by the Demands for Information will enable the determination of the source of the inaccuracies.

It is our understanding that the NRC closed Allegation No. [REDACTED] by email dated January 30, 2017. [REDACTED] initiated that allegation regarding the System One event notification. Based on this indication that the NRC did not have an active, ongoing inquiry into the matter, UCS submitted our petition on February 22, 2017, seeking to see the matter to its full

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<sup>1</sup> Online at <https://www.nrc.gov/reading-rm/doc-collections/event-status/event/2016/20161122en.html#en52383>

conclusion. We have heard second-hand that the NRC re-opened Allegation [REDACTED] within 72 hours of our petition's receipt. Because we've seen a copy of Ms. Dori L. Willis' email indicating that the NRC had closed the allegation and have only heard rumors of its re-opening and haven't received any response, not even a rumor, to our petition, this supplement is needed for us to obtain the information necessary to fully understand this matter.

### **Petition Logistics**

UCS requests the opportunity to meet with the members of the Petition Review Board (PRB) before they convene to determine whether our request can be processed as a petition. We do not anticipate this meeting to require more than 30 minutes. In addition to highlighting the enforcement action requested by our petition and its justification, UCS may also be able to arrange to have [REDACTED] participate and outline the information suggesting the Part 21 report is inaccurate. UCS requests that our participation in this meeting be via a phone bridge.

Sincerely,

A handwritten signature in blue ink that reads "David A. Lochbaum". The signature is fluid and cursive, with the first name "David" and last name "Lochbaum" clearly legible.

David A. Lochbaum  
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