



NUREG-1830, Vol. 14

Office of Investigations Annual Report FY 2017

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Office of Investigations Annual Report FY 2017

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ABSTRACT

This report provides the U.S. Nuclear Regulatory Commission with an overview of the Office of Investigations' (OI's) activities, mission, and purpose, along with the framework of case inventory with highlights of significant cases that OI completed during fiscal year 2017 (see Staff Requirements Memorandum COMJC-89-8, dated June 30, 1989). This is the 29th OI annual report.

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FOCUSING ON OUR MISSION

As the U.S. Nuclear Regulatory Commission's (NRC's) law enforcement arm, the Office of Investigations (OI) protects the American public by conducting criminal, civil, and administrative investigations of alleged violations by NRC licensees.

Since 1982, OI has investigated a broad range of violations, and this year the office continues to focus on the following investigative priorities:

- criminal violations that undermine the safe and secure use of radioactive materials, the common defense and security of the United States, and the protection of the environment
- criminal violations that pose a particularly significant risk of harm to the public health and safety and for which the criminal process appears to be the most effective remedy
- criminal conduct, including making material false statements to the NRC during the regulatory process, that prevents the NRC from being able to properly regulate
- criminal violations by individuals who discriminate against whistleblowers who raise and pursue certain protected activities regulated by the NRC
- criminal violations in situations where the normal regulatory process may be unable to remedy the problem
- criminal violations by individuals and organizations that attempt to introduce counterfeit, fraudulent, and suspect items into the nuclear supply chain
- proactive investigative partnerships with other Federal, State, international, and local law enforcement officials

1 FISCAL YEAR 2017 HIGHLIGHTS

During fiscal year (FY) 2017, the U.S. Nuclear Regulatory Commission (NRC) Office of Investigations (OI) recruited, hired, and maintained a mission-driven, high-performing workforce and affirmed its commitment to investigative independence, excellence, and adherence to established quality standards. OI comprises experienced Federal criminal investigators and professional support staff who continuously exceed the expectations of both internal and external stakeholders. With the goal of continuous program improvement, OI implemented several strategies that enhanced its investigative role within the NRC.

OI's significant achievements during FY 2017 included the following:

- OI closed 96 investigations. In 94 percent (90 investigations), OI developed sufficient information to reach a conclusion regarding substantiated or unsubstantiated allegations of willful wrongdoing, exceeding OI's performance measure of 90 percent.
- Of the above 96 investigations, OI closed 96 percent in 12 months or less, exceeding OI's performance measures for both reactor and materials investigations.
- Of the 19 assists to staff closed, 100 percent were closed within 90 days, exceeding OI's performance measure of 90 percent.
- OI processed 53 Freedom of Information Act requests in a timely manner.
- OI referred 100 percent of its substantiated wrongdoing investigations to the U.S. Department of Justice (DOJ) for consideration of prosecution.
- OI has coordinated program liaison positions with the International Criminal Police Organization (Interpol) and the Federal Bureau of Investigations (FBI)/Weapons of Mass Destruction.
- OI's Director represented the NRC by conducting international liaison with Interpol, the European Union's law enforcement agency (Europol), the U.S. Mission to the International Organizations in Vienna, and the International Atomic Energy Agency. While meeting with Europol, the Director participated in an exchange of seal ceremony with the Executive Director of Europol.
- OI and senior executives from the DOJ, U.S. Department of Homeland Security, FBI, Interpol, and U.S. Marshals Service participated in a plant tour focused on the security of nuclear plants.
- OI's Director participated on a panel at the 2017 International Law Enforcement Intellectual Property Crime Conference (IPCC) held at the United Nations in New York, discussing a Federal law enforcement perspective on counterfeits in the critical infrastructure.

- As part of its efforts to more effectively integrate into the law enforcement community, OI continues to work on memoranda of understanding for participation on task forces and other agency partnerships.
- OI has hired an NRC senior operations engineer to enhance the office's expertise in addressing counterfeit fraudulent suspected items.



Europol's Visit to the NRC Operations Center



Intellectual Property Crime Conference Panel at the United Nations

2 INTRODUCTION AND OVERVIEW

HISTORY

In 1982, with the support of the DOJ and the U.S. Congress, the NRC established OI as part of an agency effort to improve the quality of its investigative work and to support the NRC's overall mission. On April 20, 1982, the Commission announced the formation of OI to improve the NRC's capability "to perform credible, thorough, timely and objective investigations." OI was given the responsibility to conduct independent investigations either at the request of specific NRC officials or on its own initiative. OI subsequently hired experienced Federal criminal investigators, a practice it continues today, who investigate alleged wrongdoing in accordance with DOJ guidelines and Quality Standards for Investigations established by the Council of Inspectors General on Integrity and Efficiency.

AUTHORITY

The Commission delegated to the Director of OI the authority to take the necessary steps to accomplish the OI mission, as described in Title 10 of the *Code of Federal Regulations* (10 CFR) 1.36, "Office of Investigations." (See Section 161(c) of the Atomic Energy Act of 1954, as amended (42 U.S.C. 2201(c)) and Section 206 of the Energy Reorganization Act of 1974 (42 U.S.C. 5846).) OI jurisdiction extends to the investigation of alleged wrongdoing by licensees, certificate holders, permittees, or applicants; by contractors, subcontractors, and vendors of such entities; and by management, supervisory, and other employed personnel of such entities who may have violated the Atomic Energy Act, the Energy Reorganization Act, and rules, orders, and license conditions issued by the Commission.

Additionally, during investigations, OI may uncover issues that are potentially significant to safety that may, or may not, be related to wrongdoing. In these instances, OI promptly gives this information to the technical staff for appropriate action. OI also provides professional investigative expertise to the NRC staff in the form of assists to staff. Generally, these assists to staff are associated with matters of regulatory concern for which the NRC staff has requested OI's investigative expertise but that do not initially involve a specific indication of wrongdoing.

MISSION

As stated in the NRC's Strategic Plan for FYs 2014–2018, the agency's mission is to license and regulate the Nation's civilian use of radioactive materials to protect public health and safety, promote the common defense and security, and protect the environment. The NRC's vision is to carry out its mission in a manner that ensures it remains a trusted, independent, transparent, and effective nuclear regulator. The NRC's Strategic Plan defines the strategic goals and objectives that will allow the agency to carry out its mission and identifies activities that will contribute to achieving these goals.

OI aligns with the agency's regulatory programs and strategic values and goals to provide for the safe use of radioactive materials and nuclear power for civilian use. OI's national investigations program consistently operates under the agency's principles of good regulation, openness, efficiency, clarity, and reliability to support regulatory actions that are effective, realistic, and timely.

3 THE OFFICE OF INVESTIGATIONS

The Director of OI reports to the Deputy Executive Director for Materials, Waste, Research, State, Tribal, and Compliance Programs and supports the reactor and materials programs.

OI is an independent, national investigations program, which consists of four regionally co-located field offices led by special agents in charge, who report directly to OI senior executives located at OI headquarters. Federal criminal investigators (special agents (GG-1811)) and professional support personnel staff OI field and headquarters offices.

All NRC OI special agents have extensive backgrounds and experience in Federal criminal investigations. During FY 2017, the professional cadre of OI special agents had an average of 18 years of Federal law enforcement experience. OI special agents have previously served at Federal law enforcement agencies including the Secret Service, Department of Energy, Naval Criminal Investigative Service, Department of Labor, Air Force Office of Special Investigations, FBI, Drug Enforcement Administration, and various offices of Inspectors General.

OI plans and conducts investigations of allegations of wrongdoing to determine whether there are willful and deliberate actions in violation of NRC regulations and criminal statutes. OI also develops and implements policies, procedures, and quality control standards for investigations. OI conducts investigations in accordance with the Quality Standards for Investigations established by DOJ guidelines and Quality Standards for Investigations established by the Council of Inspectors General on Integrity and Efficiency. Additionally, OI maintains proactive investigative partnerships with other Federal, State, and local law enforcement officials.



2017 OI Inservice Training

4 QUALITY ASSURANCE REVIEWS

OI quality assurance reviews (QARs) are annual self-assessments of OI's national investigations program. QARs are conducted for OI headquarters and each OI field office to support the goal of continuous improvement and to assess three major focus areas: operations, management, and administration.

QARs include meetings with OI personnel to discuss current OI headquarters' initiatives and activities, policy and procedural focus, and special or regional items of interest. During these self-assessments, OI personnel are interviewed to obtain timely feedback about operational matters and to discuss any issues of particular interest to the employee. Additionally, the QAR team meets with internal stakeholders, including the Regional/Deputy Regional Administrator, Regional Counsel, Enforcement Coordinator, Allegation Coordinator, and other regional staff, as appropriate.

At the conclusion of the reviews, the QAR team conducts an exit briefing with the OI field office special agent in charge to discuss the team's findings and recommendations. OI headquarters conducts a final review of the QAR findings to identify and implement best practices with a view toward continuous program improvement and investigative excellence.

In addition to the QARs, the OI Director or Deputy Director conducts annual visits to each of the OI field offices, which are co-located in the four NRC regional offices. During these visits, OI senior executives emphasize effective communication among OI staff and internal stakeholders to promote organizational excellence. The Director's visit may include individual meetings with each OI employee to discuss a variety of subjects and to address any concerns or questions. Additionally, investigative and support staff at OI headquarters may accompany the Director or Deputy Director during visits to OI field offices, which provide opportunities for effective knowledge transfer and increased operational and programmatic awareness. These visits facilitate, encourage, and demonstrate an open exchange of ideas and expressions of differing views between OI senior management and its field office personnel, as well as between OI and regional senior management.



Law Enforcement Partners Visit Calvert Cliffs Nuclear Power Plant

5 CASES

Figure 1 shows the OI case inventory, which includes all investigations and assists to staff conducted during FY 2013 through FY 2017. The total case inventory in FY 2017 was 209, down 10 percent from 231 in FY 2016. This includes 187 investigations, 93 of which were carried over from FY 2016. Also included are 22 assists to staff, 1 of which was carried over from FY 2016.

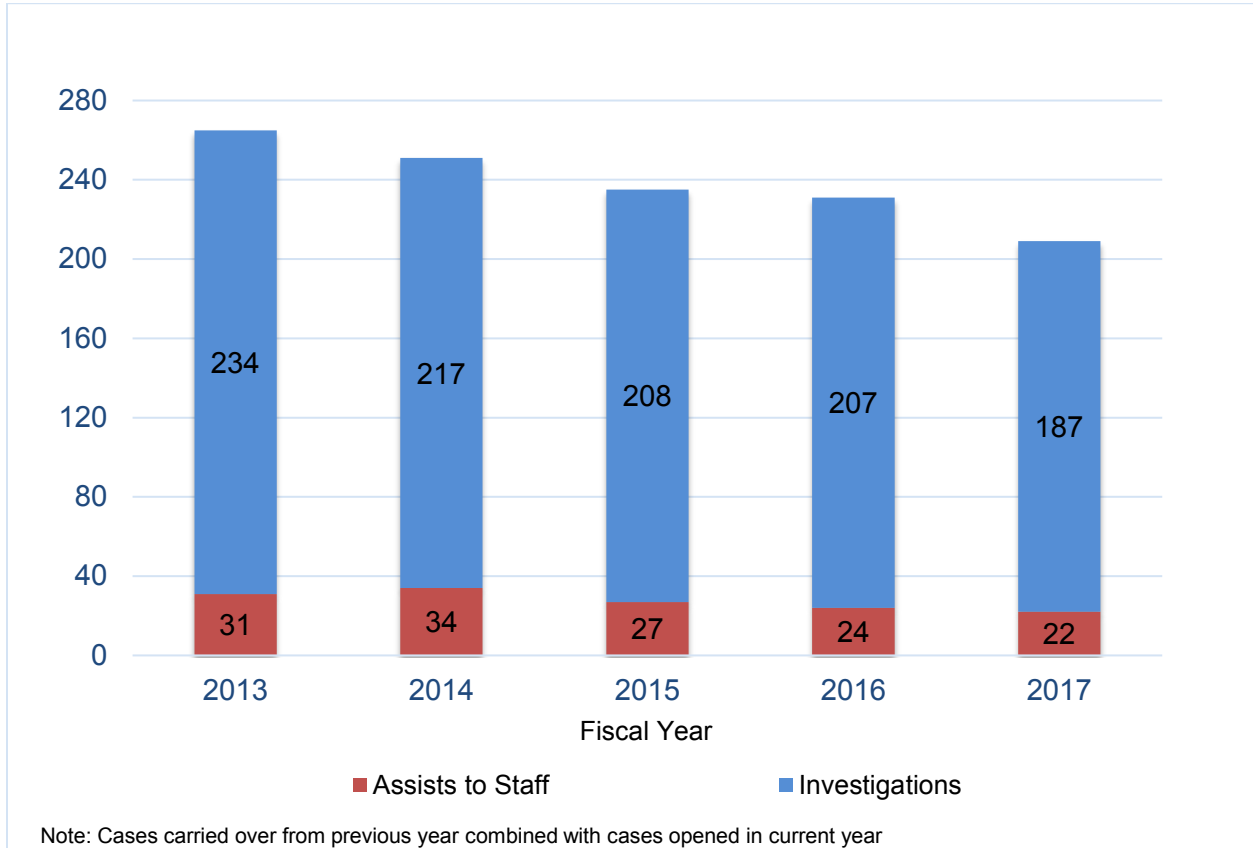


Figure 1 Case Inventory

The total number of cases in the OI inventory during FY 2017 was 209, which was a 10 percent decrease from 235 in FY 2016.

6 CASES OPENED

Table 1 shows the number of cases opened by category from FY 2013 through FY 2017. In FY 2017, there was a 3-percent decrease in total cases opened from FY 2016. There was a decrease of 4 percent in the number of investigations of suspected material false statements and a 3-percent increase in violations of other NRC regulatory requirements. In FY 2017, the number of discrimination investigations decreased by 11 percent, and the number of assists to staff cases increased by 5 percent. OI opened 115 cases in FY 2017 in the categories listed below.

Table 1 Cases Opened by Category

Category	FY 2013	FY 2014	FY 2015	FY 2016	FY 2017
Total	149	135	138	119	115
Material False Statements	20	35	33	24	23
Violations of Other NRC Regulatory Requirements	52	38	43	29	30
Discrimination	50	33	36	46	41
Assists to Staff	27	29	26	20	21

Note: Of the 115 cases opened in FY 2017, 20 percent consisted of material false statements, 26 percent were violations of other NRC regulatory requirements, 36 percent were discrimination, and 18 percent were assists to staff.

The graph in Figure 2 shows the distribution of cases opened during FY 2013 through FY 2017 for the reactor and materials programs. From FY 2016 to FY 2017, the overall number of reactor cases decreased by 6 percent. Reactor investigations dropped 6 percent, and reactor-related assists to staff decreased by 7 percent.

The number of materials cases increased by 10 percent, with no change in the number of materials investigations and a 40-percent increase in materials-related assists to staff.

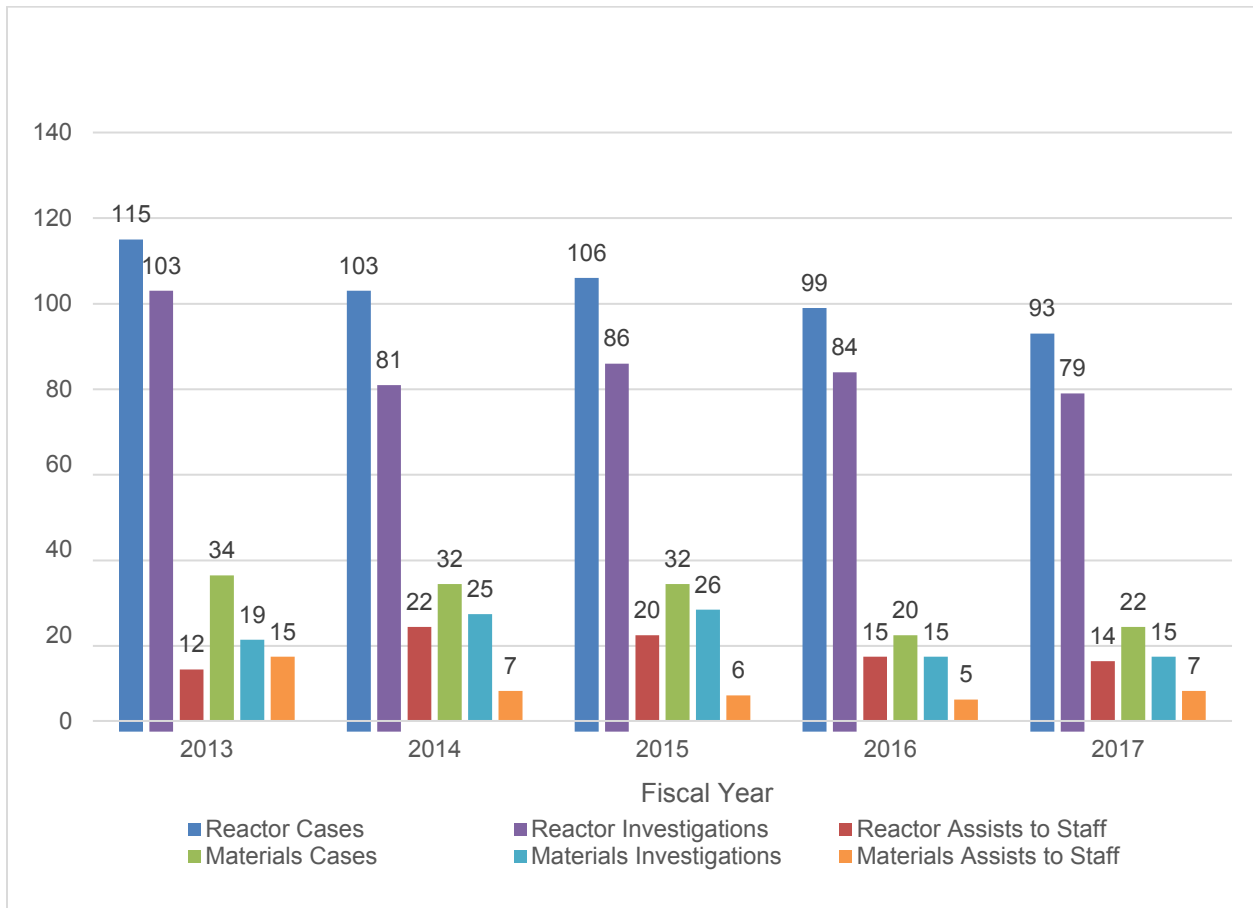


Figure 2 Cases Opened by Reactor/Material

Reactor cases: 93
Reactor investigations: 79
Reactor assists to staff: 14

Materials cases: 22
Materials investigations: 15
Materials assists to staff: 7

7 CASES CLOSED

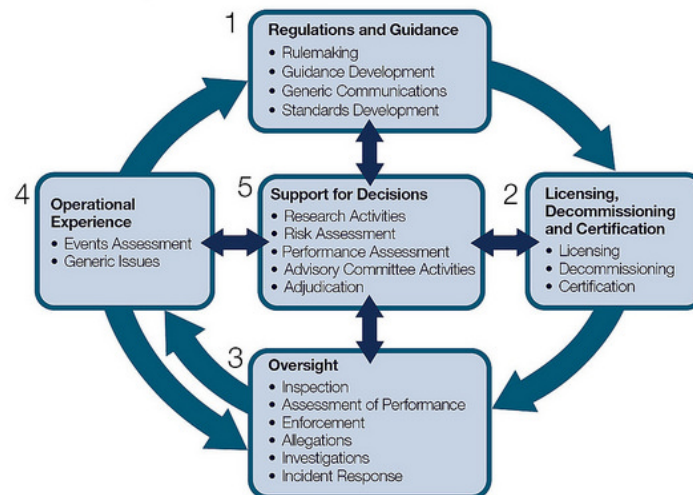
Table 2 shows the number of cases closed by category during FY 2013 through FY 2017. The total closed during FY 2017 represents a 16-percent decrease from the number closed in FY 2016. There was a 32-percent decrease in investigations of material false statements and a 38-percent decrease of investigations involving violations of other NRC regulatory requirements. Discrimination investigations increased by 27 percent and assists to staff decreased by 17 percent. OI closed 115 cases in FY 2017 in the categories listed below.

Table 2 Cases Closed by Category

Category	FY 2013	FY 2014	FY 2015	FY 2016	FY 2017
Total	149	154	123	137	115
Material False Statements	24	19	33	34	23
Violations of Other NRC Regulatory Requirements	54	50	38	42	26
Discrimination	45	52	29	37	47
Assists to Staff	26	33	23	23	19

Note: Of 115 cases closed in FY 2017, 20 percent consisted of material false statements, 23 percent were violations of other NRC regulatory requirements, 41 percent were discrimination, and 16 percent were assists to staff.

How We Regulate



1. Developing regulations and guidance for applicants and licensees.
2. Licensing or certifying applicants to use nuclear materials, operate nuclear facilities, and decommission facilities.
3. Inspecting and assessing licensee operations and facilities to ensure licensees comply with NRC requirements, responding to incidents, investigating allegations of wrongdoing, and taking appropriate followup or enforcement actions when necessary.
4. Evaluating operational experience of licensed facilities and activities.
5. Conducting research, holding hearings, and obtaining independent reviews to support regulatory decisions.

As of June 2017

The graph in Figure 3 shows the cases closed from FY 2013 through FY 2017 for the reactor and materials programs. From FY 2016 to FY 2017, the overall number of reactor cases decreased by 13 percent. There was an 11-percent decrease in reactor investigations and a 22-percent decrease in reactor-related assists to staff.

The overall number of materials cases decreased by 26 percent; materials investigations dropped 31 percent and materials-related assists to staff stayed the same.

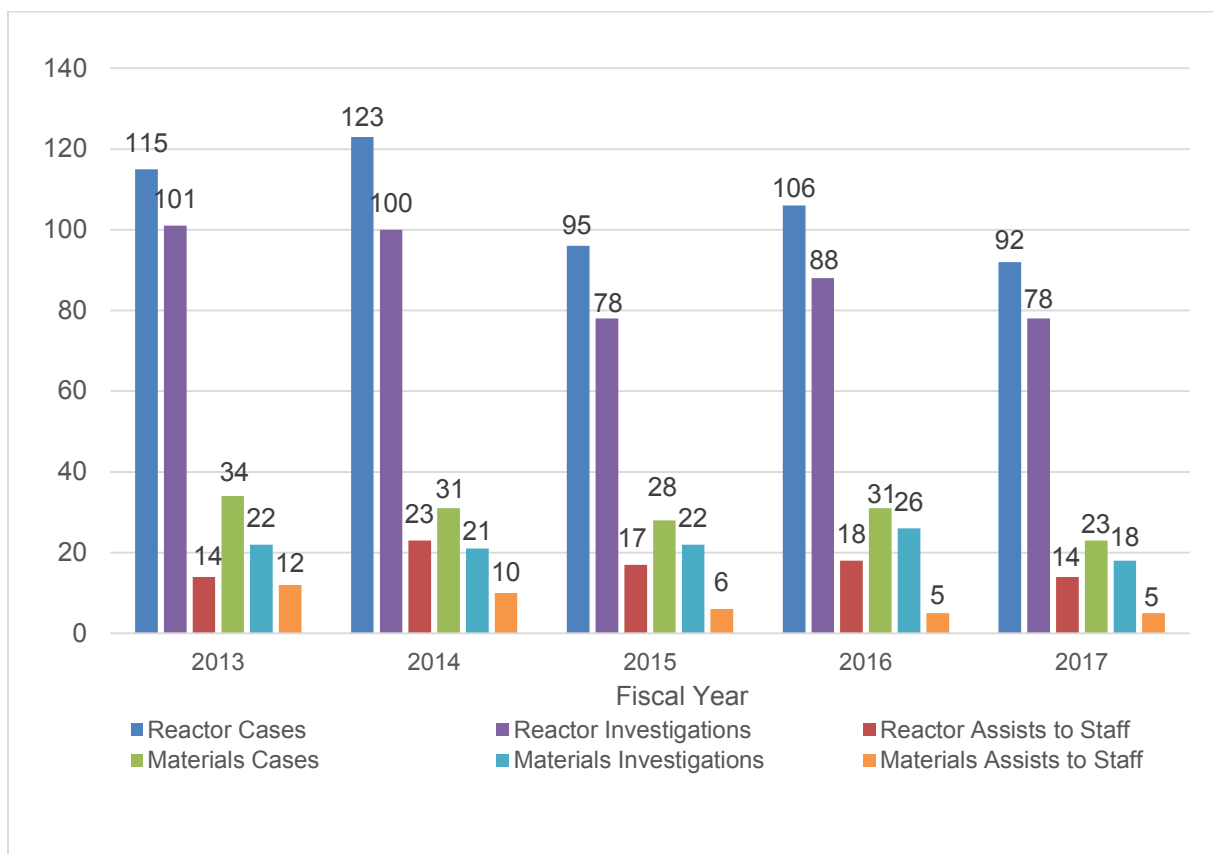


Figure 3 Cases Closed by Category

Reactor cases: 92
Reactor investigations: 78
Reactor assists to staff: 14

Materials cases: 23
Materials investigations: 18
Materials assists to staff: 5

Of the 115 cases closed in FY 2017—

- 26 investigations were closed after OI substantiated willfulness in one or more of the allegations of wrongdoing.
- 64 investigations were closed after OI investigations did not substantiate willful wrongdoing.
- 6 investigations were administratively closed.
- 19 of the cases closed were assists to staff.

8 SIGNIFICANT INVESTIGATIONS

This section highlights investigative conclusions by OI. Final enforcement action by the NRC or the DOJ is pending unless otherwise stated.

PILGRIM

An OI investigation substantiated that two instrumentation and controls (I&C) technicians at the Pilgrim Nuclear Power Station deliberately failed to follow a surveillance test procedure, which resulted in a plant event. The investigation also substantiated that the same two I&C technicians, as well as a third I&C technician, participated in a cover-up of the issue and deliberately provided the licensee with incomplete and inaccurate information material to its investigation of the event.

Specifically, the OI investigation substantiated that during performance of a surveillance test on a safety-related piece of equipment the two I&C technicians agreed that one technician would not dress out in the protective clothing required to be worn to observe the surveillance; thus, the concurrent verification required by the procedure was not performed. The technician then performed procedural steps on an incorrect component that caused the safety-related equipment to isolate, resulting in the plant entering a required limiting condition for operation and issuing an NRC Event Notification.

The results of this investigation remain under regulatory review by the NRC staff.

VOGTLE

An OI investigation substantiated that 13 non-licensed system operators deliberately failed to follow licensee procedures regarding conducting operator rounds on safety-related equipment, and deliberately falsified information material to the NRC at the Vogtle Electric Generating Plant. As background, the system operators are required to conduct rounds during each shift and inspect safety-related equipment; they are also required to electronically record the results of these inspections. NRC resident inspectors noticed that a few system operators may have failed to conduct their required rounds, despite having indicated that they did so in the electronic logs.



Vogtle Electric Generating Plant, Units 1 and 2

The OI investigation determined that all the system operators had been adequately trained and clearly understood their requirements. The licensee subsequently terminated the 13 system operators.

The results of this investigation remain under regulatory review by the NRC staff.

SIEMENS HEALTHCARE DIAGNOSTICS

A joint investigation by OI and the U.S. Department of Commerce's Bureau of Industry and Security determined that Siemens Healthcare Diagnostics (Siemens) shipped radioactive material to Syria, an embargoed destination, without a specific export license from the NRC. This investigation was initiated based on a prior OI investigation with the U.S. Department of Homeland Security, Immigration and Customs Enforcement (ICE), where Siemens unsuccessfully attempted to export to Iran a medical device containing radioactive material (germanium-68), which was intercepted by ICE in Atlanta, GA. After the conclusion of the OI-ICE, investigation, Siemens disclosed that it had identified 37 additional shipments of radioactive material, in the form of radioimmunoassay (RIA) kits, from Los Angeles, CA, to Syria.

The evidence developed through this investigation determined that Siemens made at least 46 shipments of radioactive material to a licensed consignee in Syria without seeking or obtaining a specific license authorizing the export as required by NRC regulations. Moreover, the shipments incorporated 385 RIA kits that contained iodine-125, a byproduct material regulated by the NRC. This investigation established that as early as 2005, Siemens, through corporate-level authorization, executed plans to ship its RIA kits to Syria via an alternate export-licensing channel with the U.S. Department of Commerce. However, documentary and testimonial evidence uncovered that, in some instances, Siemens shipped the radioactive materials to Syria with direct knowledge of NRC export-license requirements.

The results of this investigation remain under regulatory review by the NRC staff.

MILLSTONE

An OI investigation substantiated that an I&C technician at Millstone Power Station, Unit 2, was deliberately discriminated against by multiple Millstone managers for raising safety concerns and engaging in an additional NRC protected activity.

Specifically, the OI investigation substantiated that because the I&C technician raised safety concerns and engaged in an additional NRC protected activity, the technician received a lower performance appraisal rating, which resulted in the technician not receiving a merit pay increase. Licensee management determined merit pay increases subsequent to the administration of licensee employees' performance appraisals. The technician previously received a merit pay increase each year he or she worked at Millstone.

The results of this investigation remain under regulatory review by the NRC staff.

MILLSTONE

An OI investigation substantiated that a Millstone Power Station contract security department employee deliberately falsified pertinent records regarding the accountability, testing, and maintenance of emergency response equipment used by security personnel at Millstone. The investigation also substantiated that on more than 200 occasions, a contract security department

employee deliberately failed to perform required duties pertaining to the accountability, testing, and maintenance of emergency response equipment at Millstone. Additionally, OI obtained information during the investigation, which it shared with the NRC staff, indicating a lack of program oversight by the licensee.

Based on the deliberate violations of NRC regulations, the staff and the licensee engaged in the agency's alternative dispute resolution process. This resulted in an agreement in principle for the licensee to implement significant fleet-wide corrective actions. The tentative agreement is being finalized in a confirmatory order.

CHICAGO BRIDGE & IRON

An OI investigation substantiated that a quality assurance (QA) specialist deliberately falsified a hydrostatic test report at the Chicago Bridge & Iron (CB&I) facility in Laurens, SC. The QA specialist, who supervised other QA personnel, signed the test report using a quality control manager's signature in order to submit the report without delay. OI obtained testimonial evidence that the manager of the QA specialist instructed, and even warned, employees not to sign documents for other individuals, as this would create a falsified document. During the OI interview, the QA specialist initially claimed to have received permission from the quality control manager to sign the document. Only after being challenged with the facts did the QA specialist admit to signing the document without permission. This admission, in addition to the evidence received from the investigation, proved the hydrostatic test report had been falsified.

On September 11, 2017, the NRC issued a letter notifying CB&I that the NRC was exercising enforcement discretion, in accordance with the NRC's Enforcement Policy (see Agency-wide Documents Access and Management System Accession No. ML17241A087).

FARLEY 1

An OI investigation substantiated that radiation protection managers at the Joseph M. Farley Nuclear Plant, Unit 1, deliberately directed the placement of an unauthorized cover over the power button of a powered air-purifying respirator. Specifically, the radiation protection managers agreed, against regulations, to place the cover over the power button to prevent a recurring problem of inadvertent bumping, which previously shut off the respirator. When a contract worker wore the unauthorized device, he bumped the power button, which crushed the cover and prevented the worker from restarting the respirator. This, in turn, forced the contract employee to conduct an emergency extraction in order to breathe during an operation in the spent fuel transfer canal.

The results of this investigation remain under regulatory review by the NRC staff.

ALLEN COUNTY CARDIOLOGY

An OI investigation substantiated that a nuclear medicine technologist (NMT) at Allen County Cardiology in Fort Wayne, IN, deliberately failed to perform required daily ambient surveys and weekly contamination surveys from August 2016 to October 2016 and subsequently falsified the surveying records in violation of NRC regulations. The OI investigation established that the NMT falsified the daily and weekly survey records to indicate the surveys were conducted and provided these records to an NRC inspector. In testimony to OI, the NMT admitted to deliberately failing to perform the daily surveys because of being too busy and distracted by personal events. During the interview, the NMT admitted filling out the survey log after an NRC inspector left the clinic on

October 18, 2016. The NMT stated that when the inspector returned on October 21, 2016, the NMT provided the records as accurate documentation of having performed the surveys. Given the NMT's training and experience in the field, the evidence showed that the technologist had the requisite knowledge of the regulations. During the interview, the NMT also provided false information to the OI investigator by claiming to have conducted the weekly surveys. The NMT later contacted OI and confessed that the weekly surveys had not been performed even though the NMT had documented them as having been completed.

On September 5, 2017, the NRC imposed a notice of violation (EA-17-048) and proposed imposition of a \$7,000 civil penalty on the licensee.

HAYRE MCELROY & ASSOCIATES, LLC

An OI investigation substantiated that Hayre McElroy & Associates, LLC (HMA) acted in careless disregard when it failed to obtain an NRC license prior to using nuclear gauges in Hawaii, an area of exclusive Federal jurisdiction. The OI investigation established that HMA opened an office in Oahu, HI, in October 2010, and within the first few months of 2011, began sending nuclear gauges from its Redmond, Washington, office to its Oahu office. The OI investigation determined through interviews, as well as an NRC inspection, that HMA was using nuclear gauges in Hawaii from 2011 to 2015 under reciprocity of its valid Agreement State license. The OI investigation revealed that HMA exceeded the limits of reciprocity by using and permanently storing its nuclear gauges in Hawaii beginning in 2011. Such use and storage of the nuclear gauges in Hawaii required an NRC license, for which HMA had never applied. It was determined that HMA failed to apply for an NRC-specific license before exceeding 180 days of possession and use of portable gauges in an area of NRC jurisdiction. HMA also failed to request approval from the NRC for changes in work locations or activities different from the information contained in the initial reciprocity applications during calendar years 2011–2015.

On May 11, 2017, the NRC issued a Severity Level III notice of violation to the owners of HMA, which included a \$7,000 civil penalty.

AVERA MCKENNAN

An OI investigation substantiated that Avera McKennan Hospital (Avera) deliberately transported and received bulk quantities of licensed material that was conveyed on public highways to a location identified on its license without properly packaging, marking, and labeling the package, and without shipping papers, in violation of NRC regulation and licensee procedures. Although Avera identified and self-reported the violation, the OI investigation revealed the violations had continued for an extended period of time (2013–2015). The OI investigation determined through testimony that the supervisor of Avera's nuclear medicine department deliberately failed to follow established procedures for safe transport of nuclear material. Additionally, OI determined that staff within Avera's nuclear medicine department believed it was acceptable to deviate from established procedures for safe transport of nuclear material and routinely failed to package, label, transport, and receive the nuclear material in accordance with licensee procedures. OI independently developed evidence that determined members of Avera's staff were concerned with the poor radiation safety practices, but failed to report their concerns to the appropriate level of management.

The results of this investigation remain under regulatory review by the NRC staff.

GRAND GULF

An OI investigation substantiated that a former exam proctor employed at the Grand Gulf Nuclear Station deliberately provided inappropriate assistance to licensee contract trainees and influenced exam results on various general employee-training modules. OI initiated the investigation based on information that trainee test results for exams monitored by the exam proctor exhibited suspiciously short completion times and high scores. OI obtained documentary evidence that revealed more than 50 trainees with questionable test results linked to the exam proctor. When retested by the licensee, a significant number of these trainees failed the exams and took longer to complete them. OI obtained information that revealed the exam proctor, in fact, compromised exams by wrongly providing answers or assistance leading to answers to test questions. The exam proctor admitted to OI that trainees gained access to the licensee's computer network system by using the exam proctor's employee logon credentials. The trainees would later enter the licensee's third-party testing site to be monitored by the exam proctor. A subsequent interview with the third-party testing vendor, coupled with an analysis of the vendor's exam database, linked the exam proctor's logon credentials with additional questionable trainee exams.

The results of this investigation remain under regulatory review by the NRC staff.



Grand Gulf Nuclear Station, Unit 1

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10. SUPPLEMENTARY NOTES

11. ABSTRACT (200 words or less)

This report describes Office of Investigations case activities during FY 2017.

12. KEY WORDS/DESCRIPTORS (List words or phrases that will assist researchers in locating the report.)

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