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14 NUCLEAR REGULATORY COMMISSION

16 IN RE: TETRA TECH, EC, INC.

) **DECLARATION OF ARCHIE R.**
) **JACKSON IN SUPPORT OF PETITION**
) **TO REVOKE THE LICENSE OF TETRA**
) **TECH EC, INC.**

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1 My name is ARCHIE R. JACKSON:

2 **Background and Work History**

- 3 1. I worked for 14 years as a Health Physics Specialist (“HP”). I started my first nuclear-
4 related job as a “deconner” (a decontamination worker) in 1987 at Con Edison in New York. I
5 took a one-week training course there. I then worked as a deconner at various sites for
6 approximately 10 years and worked my way up to become a Junior and then a Senior HP. In each
7 of my assignments at a nuclear power facility we were provided with detailed training before we
8 were allowed to begin work at the facility.
- 9 2. As a Junior HP, I worked for a Department of Defense facility at Aberdeen, Maryland, for
10 about nine months. Right after Aberdeen, I worked in Chicago at Argonne National Laboratory.
- 11 3. By 2002, having passed the CORE test (a test created by the Department of Energy for
12 testing all of the information they expect an HP to have mastered), I became a Senior HP. My first
13 job working as a Senior HP was in New Jersey at the Salem Nuclear Power Plant. I then worked
14 for the Department of Energy at its Savannah River site. The Department of Energy job lasted
15 about a year and a half. The Savannah River job involved intensive classroom and in-field training
16 that lasted several months. In 2004 I worked at Bartlett Nuclear, continuing to work as a Senior
17 HP and obtaining further training.
- 18 4. I first went to work at Hunters Point Naval Shipyard (“HPNS”) in 2004 as an employee of
19 New World Environmental (“NWE”), a radiological-staffing firm.
- 20 5. From 2004 to 2011, I worked for NWE five or six times. The first two times lasted a
21 couple of months. I do not recall the dates of the other times, except the last time, when I started in
22 May 2010.
- 23 6. Except for a 20-day period when I resigned my position and was subsequently re-hired by
24 NWE, I worked at HPNS continuously from May 2010 until December 2011. I worked first for
25 NWE from May 2010 until December 2010, and then for Aleut World Solutions (“AWS”), which
26 took over NWE’s contract, from January 2011 until December 2011, when I was laid off. At all
27 times, I was supervised by Tetra Tech supervisors.

1 7. As further detailed below, I had concerns over the workplace culture at HPNS and its
2 negative impact on the radiological (“rad”) work. Among my concerns were unqualified workers,
3 favoritism, and shoddy safety practices. I brought those concerns to my supervisors, and nothing
4 was addressed. I was frustrated, and thought it would be better to leave than continue to work
5 under the conditions at HPNS. I therefore resigned on March 8, 2011. I was rehired on March 28,
6 2011 by AWS, when Tetra Tech site management requested my rehiring. I was hoping I made a
7 statement with my resignation, and that Tetra Tech and the project would see to it that radiological
8 practices were brought in line with getting the remediation done correctly, rather than cutting
9 corners. I was hoping they’d stop employing unqualified people simply because of their personal
10 relationship with Tetra Tech management rather than due to their experience and ability to do the
11 job correctly. However, when I came back, the favoritism was still rampant and the unsafe work
12 practices continued.

13 8. My assignment at HPNS was as a “basewide” Senior HP, meaning that instead of being
14 assigned to a specific site, like the Radiological Survey Yards (“RSYs”) or their access gates, my
15 assignment covered the entire shipyard. My responsibilities included doing routine surveys to
16 confirm known radiological conditions, conducted weekly and/or monthly. My first supervisor
17 was Bryan White. Subsequently, I reported to Adam Berry. Both were Tetra Tech employees.

18 **Unqualified Workers**

19 9. There were workers at Hunters Point who were not qualified to handle their jobs. With as
20 much experience as I had amassed in the industry, I was confident I could assess other workers’
21 abilities or lack thereof.

22 10. One example of an unqualified Senior HP was Jane Taylor. It was common knowledge
23 among the HPs that Taylor falsified her resume to get her job at Hunters Point. I could tell that she
24 did not know how to use her radiation-detection instruments. It also appeared she had little
25 knowledge or experience in the proper procedures for collection of soil samples. The laborers that
26 worked under her supervision told me on several occasions that she didn’t know what she was
27 doing.

1 11. Taylor had come to Hunters Point in 2006 as a junior HP, and after working for a matter of
2 weeks, perhaps three or four months, she was promoted to senior HP. I believe she was promoted
3 not because she was qualified to be a senior but because she was in a relationship with, and
4 subsequently married to, the Construction Superintendent, Dennis McWade. This got her
5 preferential treatment at Hunters Point that far exceeded what little competence, or lack thereof,
6 she had. Tetra Tech management put Taylor in charge of critical processes for radiological
7 remediation at Hunters Point that she had no business overseeing due to her lack of training,
8 experience, and knowledge. Tetra Tech also gave her an office area in the main office that other
9 Senior HPs did not have.

10 12. One day at Radiological Survey Yard (“RSY”) number 2, I saw Taylor showing laborers
11 how to take soil samples. This raised all sorts of red flags in my mind. In my experience, you have
12 to go through extensive training including the use of mock-ups, before you are qualified to collect
13 samples. Every site is different and the training needs to be tailored to the needs of each particular
14 site. The class I was given at the Savannah River site for sampling and related radiological
15 activities, for example, took months. Each worker needs to be trained to make sure they know
16 what they are doing, including simulated performance and written tests and certification. But it
17 was apparent from watching them that the laborers were not properly trained to take soil samples.
18 From my observation it was clear that the laborers couldn’t even use radiation-detection scanners
19 properly.

20 13. Marie Winder was another senior HP who appeared to me to not be qualified. She often
21 worked hand-in-hand with Taylor directing the laborers. I complained separately to Bryan White
22 and Adam Berry that Taylor and Winder didn’t know how to conduct sampling even as they were
23 instructing these laborers to take samples. To the best of my knowledge, neither White nor Berry
24 took any action.

25 14. Justin Hubbard and Steve Rolfe were senior HPs and HP supervisors, but based on my
26 experience and observation of them, they too were not qualified to be Senior HPs, yet alone
27 supervisors. They simply didn’t have the knowledge or experience necessary to be a senior HP or
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1 supervise senior HPs. I also felt this way about Tina Robertson, another senior HP who wasn't a
2 supervisor. Based on my experience and observations of their work, they were qualified to be
3 junior HPs, not senior HPs.

4 **Collection of False Samples**

5 15. One time, when I was manning the Conex (a steel shipping and storage container used as
6 an office) at RSY-2 doing surveys of incoming and outgoing trucks, I noticed that Taylor and
7 Winder had laborers collecting samples. Taylor came into the Conex with two laborers. They
8 brought in samples, and they were inventorying the samples they had collected from the RSY pad.
9 I overheard the laborers say they were missing the required number of samples. Taylor told them
10 to go and get a sample "from anywhere." They went behind the Conex to another pad and got an
11 unrelated "false" sample. To the best of my recollection, the laborers were an Asian man named
12 Allen and an African American named Reggie. I do not recall their last names.

13 16. The above incident at RSY-2 was not the only time I observed laborers performing soil
14 samples, it occurred hundreds of times. Laborers were not supposed to collect samples— HPs
15 were supposed to collect samples. This was one of the work issues at Hunters Point I objected to
16 and brought to the attention of my supervisors, to no avail.

17 17. On multiple occasions, Keith Tisdale, a Tetra Tech laborer, came to see me at the RSY-2
18 gate to complain about Jane Taylor. He'd say, for example, "Jane Taylor has messed up again.
19 She's put the soil on the wrong pad." She apparently put the dirty soil on the clean pad, or the
20 other way around. According to Tisdale, this was a common occurrence.

21 **Favoritism and the Culture of Cutting Corners**

22 18. I noticed a lot of favoritism at HPNS. Bill Dougherty, Tetra Tech's Project Manager had a
23 clique that included Jane Taylor, Marie Winder, Justin Hubbard, Jeff Rolfe, and Tina Robertson.
24 They did whatever Dougherty wanted, including cutting radiological corners, and got preferential
25 treatment like being promoted to senior when they weren't qualified. I complained about this to
26 Kari Guidry, NWE's Human Resources Director, about three or four times between May to
27 December 2010, but nothing ever changed.

1 19. Jane Taylor had a daughter who used to come on site, including into Radiologically
2 Controlled Areas (“RCAs”) every now and then. I don’t remember the specific dates, but it
3 happened two or three times at least that I personally saw. I was concerned about her coming on
4 site because she did not have the training necessary to be in an RCA, and people were supposed to
5 be prohibited from coming into an RCA unless specific training on the hazards and clearance was
6 given, including the issuance of a personal dosimeter. The daughter wasn’t issued a thermo
7 luminescent dosimeter (“TLD”) that measures ionizing radiation exposure and that everyone who
8 went out into the field had to wear. Nor was her name listed on the Radiation Work Permit
9 (“RWP”) list. Anyone going into an RCA must be listed on the RWP. I complained separately to
10 Bryan White and Adam Berry that Taylor was bringing her daughter inside my area and that she
11 was not trained nor authorized to enter the area. They didn’t do anything.

12 20. There were other unprofessional practices taking place. One such practice was taking soil
13 scans too quickly. Soil was surveyed for gamma radiation on the RSY screening pads by
14 spreading the soil over a pad to a thickness of about 6 inches. A “towed array,” containing
15 radiation detection equipment was pulled over this pad by a small tractor. This had to be
16 performed at a slow speed; if it was too fast, valid results could not be obtained. But I saw HPs
17 performing the soil surveys operating the towed array too fast. I saw this happen at RSY-2, RSY-3
18 and RSY-4. My best estimate from my own observations is that scanning too fast happened
19 hundreds of times.

20 21. I talked to the NRC in February 2012 about the concerns I had about unqualified workers
21 and other safety and work issues I had seen and complained about at Hunters Point. I received a
22 confirmation letter of July 12, 2012 from the NRC. However, it failed to mention the issue of false
23 sampling that I had raised with them earlier. I followed up and talked to a lady and then a
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1 gentleman at NRC about the concerns I had with false samples. I felt that the gentleman refused to
2 hear me and blew me off.

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I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 26 2017 in 1112 Atomic RD BEECH
ISLAND SC 29842

Archie R. Jackson
Archie Jackson