

NOTICE OF VIOLATION

System One Solutions, LLC
Cheswick, PA

Docket No. 99902058
EA-18-045

During an U.S. Nuclear Regulatory Commission (NRC) investigation conducted at System One Solutions, LLC, between November 2016 and October 2017, a violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

Appendix B to Title 10 of the Code of Federal Regulations (10 CFR) § 50 “Quality Assurance Criteria For Nuclear Power Plants” Criteria IX Control of Special Processes requires in part that procedures including ... nondestructive testing are controlled and accomplished by qualified personnel using qualified procedures...

10 CFR § 50.5(a), “Deliberate Misconduct” provides in relevant part that any contractor (including a supplier or a consultant), subcontractor, or employee of a contractor or subcontractor of a licensee that knowingly provides to any licensee, contractor, or subcontractor, any goods or services related to a licensee’s activities in this part may not:

- (1) Engage in deliberate misconduct that causes or would have caused, if not detected, a licensee or applicant to be in violation of any rule, regulation, or order; or any term, condition, or limitation of any license issued by the Commission; or
- (2) Deliberately submit to the NRC, a licensee, an applicant, or a licensee’s or applicant’s contractor or subcontractor, information that the person submitting the information knows to be incomplete or inaccurate in some respect material to the NRC.

Contrary to the above, on/or about October 12, 2012, the Quality Assurance Manager for System One Solutions, LLC, engaged in the forging of a training document for a nondestructive examiner, which is a violation of 10 CFR 50.5(a)(1), and resulted in the submission of an individual for employment at an NRC licensee who did not meet the requirements for employment in the position assigned, which is a violation of 10 CFR 50.5(a)(2) and could have caused the licensee to be in violation of 10 CFR Part 50, Appendix B, Criteria IX.

The willfulness of these actions has caused this violation to be evaluated as a Severity Level IV violation in accordance with NRC Enforcement Policy, Section 4.2.

The NRC has concluded that information regarding the reason for the violation, the corrective actions taken and planned to correct the violation and prevent recurrence and the date when full compliance was achieved is already adequately addressed in Inspection Report No. 99902053/2017-201, Agencywide Document Access and Management System (ADAMS) Accession Number ML17325B038 therefore you do not need to respond to this Notice.

However, you are required to submit a written statement or explanation pursuant to 10 CFR 2.201 if the description therein does not accurately reflect your corrective actions or your position. In that case, or if you choose to respond, clearly mark your response as a "Reply to a Notice of Violation; EA-18-045 and send it to the U.S. Nuclear Regulatory Commission, ATTN: Director, Office of New Reactors, Washington, DC 20555-0001 within 30 days of the date of the letter transmitting this Notice of Violation (Notice).

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.

If you choose to respond, your response will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's document system ADAMS, accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. Therefore, to the extent possible, the response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction.]

Dated this 16th day of August, 2018.