

CASE No. **1-92-052F**



**United States
Nuclear Regulatory Commission**

Report of Investigation

SUSQUEHANNA STEAM AND ELECTRIC STATION.:

**Possible Falsification of Security Testing/Training
Records**

Office of Investigations

Reported by OI: **RI**

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SYNOPSIS

This investigation was initiated on October 1, 1992, to determine the veracity of allegations that a Susquehanna Steam and Electric Station (SSES) Security Shift Supervisor (SSS) deliberately and improperly provided assistance to some members of his shift in answering questions during a written recertification examination. In addition, it was alleged that the SSS provided a copy of a graded emergency preparedness drill scenario to several shift members prior to the actual drill, which was later determined not to be a violation. The OI investigation sought to determine whether any other security and/or site managers knew of, directed, or condoned such actions and whether such activities extended to any other shifts. This case was upgraded to a full field investigation on November 18, 1992.

The investigation substantiated that the SSS, who was proctoring a recertification examination, deliberately and improperly provided assistance in answering questions to some members of his shift taking the examination. The investigation did not substantiate that other security or site managers knew of, directed, or condoned such actions. The investigation also did not disclose evidence that other shift supervisors were improperly providing assistance on recertification examinations.

During the course of the investigation, additional allegations surfaced against the same SSS concerning potential wrongdoing on other recertification examinations. There was insufficient evidence to substantiate those allegations.

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ACCOUNTABILITY

The following portions of this Report of Investigation (Case No. 1-92-052R) will not be included in the material placed in the PDR. They consist of pages 3 through 30.

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APPLICABLE REGULATIONS

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Allegation No. 1: As to Whether [REDACTED] Intentionally and Improperly Provided Assistance to Some Members of His Shift During a Written Recertification Examination

10 CFR 50.5(a): Deliberate Misconduct (1992 Edition)

(a) Any licensee or any employee of a licensee; and any contractor (including a supplier or consultant), subcontractor, or any ~~employee~~ of a contractor or subcontractor, of any licensee, who knowingly provides to any licensee, contractor, or subcontractor, components, equipment, materials, or other goods or services, that relate to a licensee's activities subject to this part; may not:

(1) Engage in deliberate misconduct that causes or, but for detection, would have caused, a licensee 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, or a licensee's contractor or subcontractor, information that the person submitting the information knows to be incomplete or inaccurate in some respect material to the NRC.

73.55(b)(4)(i)(ii) (1992 Edition)

(i) . . . Each guard, watchman, armed response person, and other member of the security organization shall requalify in accordance with appendix B to this part at least every 12 months. This requalification must be documented. The licensee shall retain the documentation of each requalification as a record for three years after the requalification.

(ii) Each licensee shall establish, maintain, and follow an NRC-approved training and qualifications plan outlining the processes by which guards, watchmen, armed response persons, and other members of the security organization will be selected, trained, equipped, tested, and qualified to ensure that these individuals meet the requirements of this paragraph . . .

10 CFR 73, Appendix B, II.E. (1992 Edition)

E. Requalification-Security personnel shall be requalified at least every 12 months to perform assigned security-related job tasks and duties for both normal and contingency operations. Requalification shall be in accordance with the NRC-approved licensee training and qualifications plan. The results of requalification must be documented and attested by a licensee security supervisor. The licensee shall retain this documentation of each individual's requalification as a record for three years from the date of each requalification.

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LIST OF INTERVIEWEES

EXHIBIT

[REDACTED] Susquehanna Steam and Electric Station (SSES),
Senior Security Officer/Controller (SSOC) 2 & 12

[REDACTED] SSES, Security Officer (SO) 22

[REDACTED] SSES, Security Shift Supervisor (SSS) 41

[REDACTED] SSES, SO 35

[REDACTED] SSES, SSS 42

[REDACTED] SSES, SO 21

[REDACTED] SSES, SO 15

[REDACTED] SSES, SO 16

[REDACTED] SSES, SSOC 23

[REDACTED] SSES, SO 33

GALLAGHER, George, SSES, Training Instructor 27

[REDACTED] SSES, SO 13

[REDACTED] SSES, SO 17

[REDACTED] SO 30

[REDACTED] SSES, SSS 40

[REDACTED] SSES, SO 32

[REDACTED] SSES, SO 36

[REDACTED] SSES, Assistant SSS 20

KEIMIG, Richard, NRC, Chief, Emergency Preparedness, Section,
Region-I 2A

[REDACTED] SSES, SO 31

[REDACTED] SSES, SSOC 37

MCBRIDE, Brian, SSES Training Instructor 28

[REDACTED] SSES, SO 19

[REDACTED] SSES, SO 29

([REDACTED]) SSES, SO 14
([REDACTED]) SSES, SSOC 38
STOTLER, Richard, SSES, Manager-Nuclear Security 26
([REDACTED]) SSES, SO 18
([REDACTED]) SSES, SSOC 34
([REDACTED]) SSES, SO 39
([REDACTED]) SSES, SO 24
([REDACTED]) SSES, SSS 25

DETAILS OF THE INVESTIGATION

Purpose of Investigation

This investigation was initiated on October 1, 1992, to determine the veracity of allegations made by a Susquehanna Steam and Electric Station (SSES) Senior Security Officer/Controller (SSOC) against his Security Shift Supervisor (SSS) (Exhibit 1, pp. 1-3). Specifically, this investigation concerned whether the SSS deliberately and improperly provided assistance to some members of his shift in answering questions during a written recertification examination and provided a copy of a graded emergency preparedness (EP) drill scenario to several shift members prior to the actual drill (Exhibit 2, pp. 6-13). The OI investigation also sought to determine whether any other security and/or site managers knew of, directed, or condoned such actions and whether such activities extended to any other shifts. This case was upgraded to a full field investigation on November 18, 1992.

In addition, during the course of the investigation additional allegations surfaced, made by another SO against the same supervisor, of alleged cheating on other recertification examinations.

Initially, it was thought that the allegation concerning the security staff having prior knowledge of the timeline for an EP practice drill was a violation of the regulations; however, it was later determined during discussions with NRC regional staff that it was not (Exhibit 2A, pp. 1 and 2).

Background

On September 20, 1992, [REDACTED] a Senior Security Officer/Controller (SSES) at SSES, submitted a letter to NRC outlining eight allegations against his then current supervisor [REDACTED] (Exhibit 2, pp. 6-13). The first seven allegations focused on policy, procedures and personnel matters at SSES and [REDACTED] management style on the "B" shift. The last allegation (marked number eight) states that [REDACTED] deliberately and improperly provided assistance to some members of his shift during a written recertification examination (Exhibit 2, pp. 12 and 13). [REDACTED] was interviewed by OI on October 5, 1992.

Per [REDACTED] the Security Department at the SSES has approximately ninety employees. Prior to his "B" shift assignment, [REDACTED] was the supervisor on the "C" shift. The shift managers, including the SSS, are rotated approximately every two years. Each shift has one SSS, one assistant SSS, three SSOC's, and about ten Security Officers (SO) (Exhibit 2, p. 2).

Normally, a shift will receive training about every five weeks for a period of four days. The lectures and examinations are usually proctored by personnel in the security training department. A lesson plan for the lecture and examination questionnaire are prepared in advance by the security training staff. The proctor needs only to read from the lesson plan to complete the lecture. Certain answers on the examination are selected as mandatory answers in order to pass the test. A test score of less than 80% or one missed mandatory answer will result in the student failing the course. The proctor of the examination should not know which answers are mandatory, because test papers are usually corrected by the staff secretary. If a student fails the

test, the student is provided with private remedial training and allowed to take the test over again. The SSS can proctor lectures and examinations when the training staff is busy with other SSES assignments. On the day in question, the training department instructors were busy with other SSES business, and [redacted] proctored a series of lectures and examinations (Exhibit 27, pp. 1 and 2). 7C

During the week of September 1 through September 4, 1992, the "B" shift received training (Exhibit 3, p. 1). On September 3, 1992, the shift received lectures from [redacted] on "Special Situations," from lesson plan [redacted] (Exhibit 4, pp. 1-9). On the same date, the examination for Task 4.4.2 for Armed Response Personnel, "Reports to Scene of Adversary Action," was administered to the class by [redacted] (Exhibit 5, pp. 1-3 and Exhibit 6, pp. 1-12). The answer key listing the correct answers and the mandatory questions is also appended (Exhibit 7, p. 1). 7C

[redacted] and other shift personnel said [redacted] is driven by the "Semi-Annual Shift Award" that is given to the outstanding security shift on a semi-annual basis (Exhibit 8, pp. 1-4). [redacted] has won the award several times in past years (Exhibit 9, pp. 10-12 and 19-27). 7C

The semi-annual shift award has approximately six written performance criteria, with each criteria being assigned points. The points are given for the shift with the least number of sick days used, the highest scores on weapons tests, the highest written test scores during training, and the best scores on the physical stress tests. In addition, a shift is also assigned points if a shift member becomes the employee of the month and the shift with the least number of vehicle accidents also receives points. The shift with the best score wins the award. The winning shift's photograph is displayed and each member receives a small award. The last award was a gift certificate for \$25.00 to a local store (Exhibit 8, pp. 1-4).

The PP&L Security Department started to conduct an investigation when [redacted] allegations surfaced; however, they discontinued their investigation when it was determined NRC:OI was reviewing the allegations. A copy of the PP&L investigation was obtained and is appended (Exhibit 8A, pp. 1-10). 7C

Coordination with the NRC Staff

During the course of this investigation, a coordinated effort was made with the NRC staff relative to the multiple allegations. NRC inspection staff was advised of the contents of the investigation. Initially, it was thought that the allegation concerning the security staff having prior knowledge of the timeline was a violation of the regulations; however, it was later determined that it was not (Exhibit 2A, pp. 1-2). Briefings were held by OI during the investigation, keeping the staff current on OI efforts and preliminary findings.

The NRC staff related that in the Training and Qualification Plan, under the Requalification section, security force members are specifically identified to be requalified at least every twelve months to perform their assigned crucial security duties and tasks. Section 4.4.2, Armed Response Personnel, "Reports to Scene of Adversary Action," is a critical task, listed in the plan and must be completed.

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

SSES, SO	November 20, 1992
SSES, SO	November 20, 1992
SSES, SO	November 20, 1992
SSES, SO	November 20, 1992
SSES, SSOC	November 20, 1992
SSES, SO	November 20, 1992
SSES, SO	November 20, 1992
SSES, SSOC	November 20, 1992
SSES, SSOC	November 20, 1992
SSES, SO	November 20, 1992
SSES, SSS	January 14, 1993
SSES, SSS	January 14, 1993
SSES, SSS	January 15, 1993

Evidence

1. On May 17, 1990, the SSES, "Academic Honesty Policy and Procedure for Administration of Examinations" became effective. The policy states that academic misconduct is an attempt or act of commission or omission by an employee or contractor in training, which will compromise the results of an examination (Exhibit 10, p. 2).
2. Per the policy, major test misconduct are flagrant acts of copying test information, stealing exams, coercing others to supply test information, selling examinations, and other acts of equivalent nature (Exhibit 10, p. 2.)
3. On January 14, 1992, the SSES instruction, "Student Advising," became effective. The policy states students failing course examinations should be given a reexamination after remedial training. Remedial training may consist of self-study, one-on-one instruction, or attendance at the course again (Exhibit 11, p. 3).

INVESTIGATOR'S NOTE: During the course of the interviews it was determined that students that failed a written test would be instructed after all the examinations were marked. A student that failed a test would be given private remedial instruction and allowed to take the test again. Both tests would be maintained with the second test being marked "Re-test."

4. [REDACTED] said that about every five weeks "B" shift attends training class for a week. During this training the shift will be instructed on a

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certain subject, then the class will take a written test (Exhibit 2, p. 4).

5. [REDACTED] said there are approximately ten instruction periods and ten written tests per week of training. Certain questions are mandatory in order to pass the test and the test is changed every two or three years (Exhibit 2, p. 4). 7C
6. [REDACTED] said if a student fails the test that student is given remedial instruction and allowed to take the test again (Exhibit 2, p. 4).
7. [REDACTED] said the specific test in question on September 3, 1992, dealt with bomb threats, hostages and adversary actions (Exhibit 2, p. 4).
8. [REDACTED] said that [REDACTED] instructed the class because George GALLAGHER and Brian MCBRIDE, the SSES instructors, were busy with other duties (Exhibit 2, p. 4). 7C
9. [REDACTED] said that it was not unusual for [REDACTED] to instruct the class, but his methods of instructing were solely for the class to answer the test questions correctly (Exhibit 2, p. 4).
10. [REDACTED] said that present in the classroom were SSES security employees [REDACTED] and [REDACTED] (Exhibit 2, p. 4). 7C
11. [REDACTED] said that after handing in the answer sheet, and purposely marking one answer incorrectly, he was approached by [REDACTED] to change an answer on his test sheet. [REDACTED] stated something like, ". . . Jeas (phonetic) Jeas . . . we can't have this (motioning to the answer sheet) . . . That one answer has to be changed it has to be ### . . ." (Exhibit 2, p. 12; Exhibit 12, p. 1; and Exhibit 6, p. 1). 7C
12. [REDACTED] said that [REDACTED] then gave him the correct answer. [REDACTED] reviewed all his answer sheets from the tests he took that week and stated that he changed answer #2F on test 4.4.2. as directed by [REDACTED] (Exhibit 12, p. 1 and Exhibit 6, p. 1).

INVESTIGATOR'S NOTE: There are five correct answers for question #2. The original answer sheet document reflects that answer #2f was erased (Exhibit 6, p. 1).

13. [REDACTED] said the entire class witnessed [REDACTED] giving him the correct answer. By being vocal with the answer, [REDACTED] was instructing the entire class on the correct test answer (Exhibit 2, pp. 4 and 5).
14. [REDACTED] said that [REDACTED] another SSES security guard, was told by [REDACTED] to change an answer on her test. She later learned the original answer was correct (Exhibit 2, p. 5). 7C
15. [REDACTED] said the motivation for the cheating incident is [REDACTED] desire to win the semi-annual shift award (Exhibit 2, p. 5).

16. [redacted] said that he never witnessed any other cheating incident at SSES nor was he knowledgeable if [redacted] ever gave answers to test questions when [redacted] supervised other shifts at SSES (Exhibit 2, p. 5). 7C

17. [redacted] said that on or about September 3, 1992, he was in training with "B" shift and he was taking a test on a subject he could not recall (Exhibit 13, p. 1). 7C

18. [redacted] said [redacted] was the instructor for the class and [redacted] administered the test since the normal instructors were busy with other business (Exhibit 13, p. 1).

19. [redacted] said he completed the test and turned the answer sheet into [redacted] (Exhibit 13, p. 1).

20. [redacted] said that after a short period of time [redacted] walked from the podium to his position at the table and handed him his answer sheet. [redacted] said something like, "... Look over ### question ..." as [redacted] gestured to a question on the examination (Exhibit 13, p. 2). 7C

21. [redacted] said he could not recall the specific question or answer. However, from [redacted] comments he inferred that the answer he gave was wrong and that he should change the answer, which he did (Exhibit 13, p. 2).

22. [redacted] stated that it was not his intention to cheat on the test, but he felt he was intimidated into changing the answer. He said that he also observed [redacted] walk to [redacted] table; however, he was not knowledgeable of [redacted] or [redacted] conversation (Exhibit 13, p. 2). 7C

23. [redacted] stated that he never received any answers, to any other questions, from any other supervisor, during any recertification examination (Exhibit 13, p. 2).

INVESTIGATOR'S NOTE: A review of [redacted] answer sheet for test "Task 4.4.2" reflects that answer #2a was erased (Exhibit 6, p. 2). 7C

24. [redacted] said that on or about September 3, 1992, [redacted] gave a training session which normally would have been given by a company security training officer (Exhibit 14, p. 1).

25. [redacted] could not recall the subject matter of the training class. He said the training class is mandatory for the company to maintain their nuclear generating license (Exhibit 14, p. 1).

26. [redacted] said that he recalls [redacted] walking over to [redacted] desk and they both had a conversation; however, he could not recall the subject matter of the conversation, nor could he recall any further details of the incident (Exhibit 14, p. 1). 7C

27. [redacted] stated that on or about the same date he took a test for recertification and handed the paper into [redacted]. He said that

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() reviewed the document and then walked to his desk and handed his paper back, pointing to a question and stating, "You may want to take a look at this again" (Exhibit 14, p. 1). 7C

28. () said that he did not intend to cheat on the test, but was intimidated into changing his answer by () (Exhibit 14, p. 2).

29. () stated that he previously had questioned the subject matter and/or the specific question on the examination (Exhibit 14, p. 1).

30. () stated that he was never given an answer sheet back once he handed in the document. He stated that maybe () felt that he didn't teach the class properly; therefore, he was giving him help in answering the question (Exhibit 14, pp. 1 and 2). 7C

31. () stated that he thinks it was the same test in which () and () had a conversation, but he could not be sure. He claimed that this incident was isolated, having never been done before by () or any other supervisor (Exhibit 14, p. 2).

INVESTIGATOR'S NOTE: On () answer sheet for "Task 4.4.2," answer #2h appears to be erased on the original document (Exhibit 6, p. 3).

32. () said that about every five weeks his shift has training and it is not unusual for () or another supervisor to instruct the class and administer the recertification test regarding the subject matter (Exhibit 15, p. 1). 7C

33. () said the instruction and testing room consists of six tables in two rows of three, with the instructor's desk at the front of the room. He said that most employees sit in certain places because of friendships with other officers (Exhibit 15, p. 1).

34. () said that he sits next to () at the second table facing the right side of the room. He said that on or about September 3, 1992, after a class was completed a test was administered, () and () handed their papers in prior to the other class members (Exhibit 15, p. 1). 7C

35. () said that () was checking the answers on the papers when he walked from the instructor's desk to () position and returned () paper (Exhibit 15, p. 1).

36. () said that () also returned () test paper (Exhibit 15, p. 1).

37. () said that () stated to both () and () something like-- "This answer is wrong! You may want to change it?" (Exhibit 15, p. 1). 7C

38. () stated that he does not know if either () or () changed their answers, because he was not concerned with their tests, but only concerned with his own (Exhibit 15, pp. 1 and 2).

39. [redacted] said the whole class witnessed the incident of cheating by [redacted]. He claimed that neither [redacted] or [redacted] intended to cheat on the test but were intimidated into changing their answers by [redacted] (Exhibit 15, p. 2).
40. [redacted] said he suspects the motive for the cheating incident is [redacted] desire to win the Semi-annual Shift Award for the "B" shift. High test scores on the recertification examinations is one of the criteria for receiving the award (Exhibit 15, p. 2). 7C
41. [redacted] said that on or about September 3, 1992, he was in training and he was taking a test on a subject he could not recall. He completed the test and turned the answer sheet over per his usual manner (Exhibit 16, p. 1). 7C
42. [redacted] said that he observed [redacted] who was the instructor for the class, walk to [redacted] table and hand the answer sheet back to [redacted] and state, "Change the answer" (Exhibit 16, pp. 1 and 2).
43. [redacted] did not know which question or answer [redacted] was instructing [redacted] to change. He said that he observed [redacted] erase his answer sheet, and it appeared that he marked the paper again (Exhibit 16, p. 2).
44. [redacted] said that he did not observe [redacted] giving any other answers to any other students (Exhibit 16, p. 2). 7C
45. [redacted] stated that, normally, if a student fails a test, the student is given remedial instruction and allowed to take the test again. Both test papers are maintained in the files, with one test paper marked with the word "retest" (Exhibit 16, p. 2).
46. [redacted] said it is not unusual for security officers to fail the tests because some test questions are mandatory, and the correct answer is required in order to pass the test (Exhibit 16, p. 2).
47. [redacted] said the motivation to provide answers to the tests is the security department's semi-annual shift award, which [redacted] always wants to win. The award is given to the best performing shift in the security department (Exhibit 16, p. 2). 7C
48. [redacted] said that [redacted] cheated on the test so that [redacted] would get a higher test score, thus placing the shift in a position to win the award. He opined that it was not [redacted] intention to cheat on the test, but [redacted] was intimidated by [redacted] because [redacted] controls his merit pay percentage increase (Exhibit 16, p. 2). 7C
49. [redacted] said on or about September 3, 1992 [redacted] gave a training session which normally would have been given by company security training officers Brian MCBRIDE and George GALLAGHER (Exhibit 17, p. 1).
50. [redacted] said it is not unusual for [redacted] or another supervisor to instruct the class and administer the test regarding the subject matter (Exhibit 17, p. 1). 7C

51. [REDACTED] said that he sits in the back of the classroom. After the class was completed a test was administered, [REDACTED] and [REDACTED] handed their papers in prior to the other class members (Exhibit 17, p. 1). 7C
52. [REDACTED] said [REDACTED] gave [REDACTED] and [REDACTED] their papers back stating, "Number.....is wrong there is a better answer and its not this one" (Exhibit 17, p. 1). 7C
53. [REDACTED] said [REDACTED] basically instructed [REDACTED] and [REDACTED] to change their answers and both employees complied with [REDACTED] instructions. He said the whole class witnessed the incident of cheating by [REDACTED] (Exhibit 17, p. 1). 7C
54. [REDACTED] said some employees had not completed their test and they could have used [REDACTED] instructions to answer some questions (Exhibit 17, p. 1). 7C
55. [REDACTED] said that he suspects the motive for the cheating incident was [REDACTED] efforts to win the Semi-annual Shift award for the "B" shift (Exhibit 17, pp. 1 and 2).
56. [REDACTED] said that "B" shift won the award only once under [REDACTED] but [REDACTED] has won the award several times. He also claimed the motive for [REDACTED] and [REDACTED] to change their answers was intimidation by [REDACTED] (Exhibit 17, p. 2). 7C
57. [REDACTED] said that on or about September 3, 1992, he was in training and he was taking a test on a subject he could not recall (Exhibit 18, p. 1).
58. [REDACTED] said he recalls [REDACTED] instructing the class, but he does not recall the specific test in which it was alleged that [REDACTED] gave answers to the class (Exhibit 18, p. 1). 7C
59. [REDACTED] said that only through rumor did he learn that allegations had surfaced of an alleged cheating incident. He denied that he received any answers to questions from any supervisor during any recertification examination (Exhibit 18, p. 1).
60. [REDACTED] said that on or about September 3, 1992, she was in training and she was taking a test on a subject she could not recall (Exhibit 19, p. 2). 7C
61. [REDACTED] said that after she completed her test and turned her paper over, [REDACTED], who was the instructor for the class, started going over the test in the front of the classroom, prior to several members of the class completing their tests (Exhibit 19, p. 2).
62. [REDACTED] said that [REDACTED] went over the entire test and it was possible that some of her classmates could have changed an answer after [REDACTED] released the correct answer. Upon reflection, she was shocked that [REDACTED] would openly cheat on the test (Exhibit 19, p. 2). 7C
63. [REDACTED] said with the class getting 100% of the test questions correct, the test score would reflect favorably upon [REDACTED] After the

- incident, she talked to no one about it except (b) and (b) (Exhibit 19, p. 2). 7C
64. (b) said the motivation for cheating by (b) is his effort to win the semi-annual shift award which is awarded to the best shift (Exhibit 19, p. 2).
65. (b) said part of the criteria for winning the semi-annual shift award is the shift with the best training record (Exhibit 19, p. 2). 7C
66. (b) said that (b) told her directly that the semi-annual shift award is important to him (Exhibit 19, p. 3).
67. (b) said (b) told her directly that, "There is the PP&L (Pennsylvania Power & Light Company) way, my way and security's way and you do it my (b) way." In explaining her predicament, she said that she could never seek counsel from upper management because upper management supports their supervisors 100%, no matter what is in dispute (Exhibit 19, p. 3). 7C
68. (b) said that it was not her intention to cheat on any examination, but she feels intimidated by (b) (Exhibit 19, p. 3).
69. (b) said that on the date in question he recalls (b) teaching the class, but he could not recall (b) handing back the papers (Exhibit 20, p. 3). 7C
70. (b) said he probably was reading the newspaper at that time, and not paying attention (Exhibit 20, p. 3).
71. (b) said, it was rumored that (b) provided answers on the test because he likes winning the semi-annual shift award, and the award would make (b) look good for promotions. He claimed the award has no bearing on promotions (Exhibit 20, p. 3). 7C
72. (b) said, like the other shift members, he received a \$25.00 gift certificate to a local store for the award and the shift picture is displayed at the entrance gate. He does not consider the award a significant factor in his career (Exhibit 20, p. 3).
73. (b) said he recalls an incident in which (b) and (b) had a discussion at (b) desk regarding a test that was administered by (b). He said he could not recall the specifics of the discussion between (b) and (b) (Exhibit 21, p. 2). 7C
74. (b) said he recalls (b) going down to (b) table, but claimed he, basically, was not paying attention, since at the time he did not consider the incident to be significant (Exhibit 21, p. 1).
75. (b) said it was not until two weeks later that he learned that the incident involved possible cheating on an examination by (b) and (b). He claimed he never discussed the incident with anyone at SSES, other than to say that he witnessed a discussion between (b) and (b) (Exhibit 21, p. 1). 7C

76. [REDACTED] said that, normally, during the training class he would listen to the block of instruction, take the test, and turn the test paper over when he was done. After completing the test, he would read the newspaper, do crossword puzzles, or daydream (Exhibit 21, p. 2).
77. [REDACTED] said that this is the only incident that he recalls, in his career at SSES, which could be considered cheating. He has never cheated on any test, nor has he ever been given any answers to a test by a supervisor (Exhibit 21, p. 2). 7C
78. [REDACTED] said [REDACTED] has been his supervisor since January 1992 and that he [REDACTED] did not attend training class on the day in question (Exhibit 22, p. 1).
79. [REDACTED] said he never received any answers, to any questions, from any supervisor, during any recertification examination (Exhibit 22, p. 1).
80. [REDACTED] said [REDACTED] has been his supervisor since January 1992 (Exhibit 23, p. 1).
81. [REDACTED] said he was not present during the alleged incident in which answers were given to students during a training session for a recertification test (Exhibit 23, p. 1).
82. [REDACTED] said he has never cheated on any tests, and that he never received any help in answering any recertification questions (Exhibit 23, p. 1).
83. [REDACTED] said [REDACTED] has been his supervisor since January 1992. He said he was on vacation from August 27, 1992, until September 18, 1992 (Exhibit 24, p. 1). 7C
84. [REDACTED] said he never received any answers, to any questions, from any supervisor, during any recertification examination (Exhibit 24, p. 1).
85. [REDACTED] said, normally, George GALLAGHER and Brian McBRIDE would teach the lesson plan and administer the examination. The aforementioned instructors were busy with other duties and not available to teach the course (Exhibit 25, p. 5).
86. [REDACTED] said that when the instructors are not available he is authorized to teach the course. On the date in question [on or about September 3, 1992], he taught two courses and administered the examinations (Exhibit 25, p. 5).
87. [REDACTED] said after the first course he administered the examination. He then taught the second course and administered the second examination (Exhibit 25, p. 5). 7C
88. [REDACTED] said while he was proctoring the second test he reviewed the answer sheets for the first test and noticed that four or five personnel answered the same question incorrectly. He believes [REDACTED] and [REDACTED] got the same answer wrong (Exhibit 25, p. 5).

89. [REDACTED] said he taught that portion of the lesson plan over again, handed the answer sheets back, and then told the aforementioned personnel to "take a look at the question again" (Exhibit 25, p. 5).
90. [REDACTED] said it was not his intention to falsify the test results. As way of explaining, he said that [REDACTED] did answer another question incorrectly on the same test, but he did not offer [REDACTED] the opportunity to change that answer (Exhibit 25, p. 5). 7C
91. [REDACTED] further denied that he ever gave any employee, any answer, to any test question (Exhibit 25, p. 5).
92. [REDACTED] said that it was rumored that he cheated on the test because he likes winning the semi-annual shift award. There are five elements involved in winning the semi-annual shift award and all of the elements are out of his control (Exhibit 25, p. 5). 7C
93. [REDACTED] said, like the other shift members, he receives a \$25.00 gift certificate to a local store and the shift picture is displayed at the gate house entrance for winning the award (Exhibit 25, p. 5).
94. [REDACTED] said that he has won the award in the past. He claims that he has no control over the shift winning the award and further denies the award was a factor in some of the decisions he made as a supervisor (Exhibit 25, p. 5). 7C
95. [REDACTED] said that on or about the same day [September 3, 1992], she was summoned to the training office by [REDACTED]. Other than [REDACTED] and herself, no other persons were present (Exhibit 19, p. 2). 7C
96. [REDACTED] said that [REDACTED] told her that she failed a test by getting one of the mandatory test questions wrong. She went on to say that [REDACTED] told her the correct answer, and she completed another answer sheet per [REDACTED] instructions (Exhibit 19, p. 2).
97. [REDACTED] said that [REDACTED] did not instruct her on the lesson plan, nor was remedial instruction provided which would have been the usual procedure (Exhibit 19, p. 2). 7C
98. [REDACTED] said that she later learned her original answer was correct, and the answer she received from [REDACTED] was incorrect (Exhibit 19, p. 2).
99. [REDACTED] claimed that [REDACTED] has given her answers to test questions that she had gotten incorrect on at least six different occasions. The way she was given the answers were basically under the same circumstances. She could not recall any of the test subjects, nor could she recall the specific questions that she was instructed to change (Exhibit 19, p. 2). 7C
100. [REDACTED] said that on one occasion, when [REDACTED] first became her supervisor, he [REDACTED] looked over her shoulder while she was taking a test and pointed to a question and said, "make it [REDACTED]" (indicating the correct letter answer). She claimed that [REDACTED] whispered the answer to her so that other employees could not hear the response (Exhibit 19, p. 2). 7C

101. [REDACTED] said about five weeks ago she counted her score on the pistol range and counted a score of 95 out of 100, but when [REDACTED] counted the score he recorded the score at 98. She said that [REDACTED] raised the score enough to get extra points, but not enough to raise suspicion that he was cheating (Exhibit 19, p. 3). 7C
102. [REDACTED] said that she is intimidated by [REDACTED] because he controls her pay raises. She claimed that too much emphasis is placed by management on personality rather than performance (Exhibit 19, p. 3). 7C
103. [REDACTED] said that [REDACTED] has made comments that if she wanted a good evaluation, and thus a larger incentive raise, that she should "... do it my way" (Exhibit 19, p. 3). 7C

INVESTIGATOR'S NOTE: A review of the test answer sheets for [REDACTED] reflects that [REDACTED] was administered a retest for "Task 4.4.2." [REDACTED] failed the examination on question #31 which was a mandatory question (Exhibit 6, pp. 4 and 5). Mandatory answers must be correct in order to pass the test (Exhibit 7, p. 1). It appears that [REDACTED] was in error when she stated her original answer was correct. The answer she gave in the original answer sheet was incorrect (Exhibit 6, pp. 4 and 5). 7C

104. STOTLER said that [REDACTED] advised him that he [REDACTED] gave the test and, after collecting the answer sheets, realized that several security officers failed to answer the same question correctly (Exhibit 26, p. 4). 7C
105. STOTLER said that [REDACTED] told him that he taught that portion of the class over and told the class to go over their answer sheets (Exhibit 26, p. 4).
106. STOTLER said that he is not convinced that it was [REDACTED] intention to cheat on the test by providing answers to the test (Exhibit 26, p. 4).
107. STOTLER said, normally, [REDACTED] is not an instructor and his excuse is understandable; however, he would not accept any excuse if [REDACTED] gave answers directly to the class (Exhibit 26, p. 4). 7C
108. STOTLER said that if [REDACTED] was providing answers directly to the class he would take direct, appropriate action (Exhibit 26, p. 4).
109. STOTLER stated that, since [REDACTED] actions became an issue in the allegation, he has instructed the training staff to teach and - administrator the tests whenever possible (Exhibit 26, p. 4).
110. GALLAGHER stated that he is an instructor at SSES and that the normal procedure has been for a training instructor to instruct the class. The subject matter to be covered is based on a lesson plan (Exhibit 27, p. 1).
111. GALLAGHER said the instructor would then administer the test. After the test, the instructor would take the tests to the administrative support personnel, and they would correct the tests (Exhibit 27, p. 1).

112. GALLAGHER said that all students that fail the test receive personal remedial instruction, and are allowed to take the test over again. A student could fail the test if the student received a score lower than eighty percent or fail to correctly answer a mandatory question (Exhibit 27, p. 1).
113. GALLAGHER said the shift supervisors are allowed to instruct the class when the instructors are busy with other PP&L assignments. He said that he signed the evaluator's signature on the tests in question, verifying the accuracy of the answers on the tests answer sheets (Exhibit 27, p. 2).
114. GALLAGHER said, normally, the instructor would not score the test; however, he can recall scoring the tests of a class that he instructed. Mandatory answers to questions are selected prior to the test being administered. The instructor would not know which questions were mandatory (Exhibit 27, p. 1).
115. GALLAGHER said, normally, a shift supervisor would not instruct the class; however, procedure does allow the shift supervisor to instruct the class, and administer the test (Exhibit 27, p. 2).
116. GALLAGHER said the only incentive to cheat on a test would be the semi-annual shift award which is awarded twice a year to the best shift (Exhibit 27, p. 2).
117. GALLAGHER said the shift with the least number of incorrect mandatory questions on recertification examinations would win that section toward winning the award (Exhibit 27, p. 2).
118. GALLAGHER said that (redacted) would not have prior knowledge as to which answers are the mandatory answers, since that information is contained on the "key" (Exhibit 27, p. 2). 7C
119. GALLAGHER said that correcting all the answers on the test would insure that none of the incorrect answers were the mandatory answers (Exhibit 27, p. 2).
120. GALLAGHER said winning the semi-annual shift award is not reflected on the supervisor's performance appraisal (Exhibit 27, p. 2).
121. GALLAGHER said he has no personal knowledge of the incident regarding alleged cheating by shift supervisor (redacted) however, he was knowledgeable that (redacted) instructed a class (Exhibit 27, p. 2).
122. GALLAGHER said that (redacted) had ten minutes notice that a training instructor was not available, and that he (redacted) would teach the class (Exhibit 27, p. 2). 7C
123. GALLAGHER also said he was knowledgeable that (redacted) volunteered to teach the class and was given the opportunity to review the lesson plan and prepare to teach the class (Exhibit 27, p. 2).

124. McBRIDE said he had heard only rumor regarding the alleged incident in which a supervisor told employees to change answers on a recertification examination (Exhibit 28, p. 1).
125. McBRIDE said he was aware that [REDACTED] taught the class on the day in question, but he has no first hand knowledge of the incident of alleged cheating (Exhibit 28, p. 1). 7C
126. McBRIDE said, normally, the instructor for the class would teach the class from a lesson plan, but the teacher would not mark the test papers. The test papers would be forwarded to the office secretaries who would correct the tests (Exhibit 28, p. 1).
127. [REDACTED] and [REDACTED] were all interviewed and said from January 1990 to January 1992 [REDACTED] was their supervisor. They all said they never received any answers, to any questions, from any supervisor, during any recertification examination (Exhibits 29-39, p. 1). 7C
128. [REDACTED] and [REDACTED] said they never received any answers, to any questions, from any supervisor, and as supervisors, they never gave out any answers during any recertification examinations (Exhibits 40-42, p. 1).
129. [REDACTED] and [REDACTED] said they heard only rumor regarding the incident in which a supervisor allegedly told employees to change answers on a recertification examination (Exhibits 40-42, p. 1). 7C
130. [REDACTED] said she recalls teaching a class maybe three or four times in the last six years. During all her teaching assignments, she never corrected the tests. She normally would give the tests to the training section secretary, whose job it was to correct the tests (Exhibit 42, p. 1).
131. [REDACTED] and [REDACTED] said that he did not consider the award significant enough to have any bearing on further promotions (Exhibits 40-42, pp. 1 and 2).

Conclusion

Based on the evidence developed by OI, it is concluded that [REDACTED] deliberately and improperly provided assistance to some members of his shift in answering questions during a written recertification examination. The OI investigation did not verify that any other security and/or site managers knew of, directed, or condoned such actions. The investigation did not disclose evidence that such activities extended to other shifts. There was insufficient evidence to substantiate [REDACTED] allegation of other recertification testing wrongdoing by [REDACTED]. 7C

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SUPPLEMENTAL INFORMATION

[REDACTED] was recently promoted to a higher position within the SSES Security Department. [REDACTED] said that as a result of writing the letter to NRC his performance evaluation was substandard for 1992, he received a below average pay raise, and he was harassed because he identified the allegations of wrongdoing. [REDACTED] said that he attempted to get the performance evaluation changed; however, PP&L declined to take any action. [REDACTED] filed a harassment and intimidation complaint with the U.S. Department of Labor and with the NRC.

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LIST OF EXHIBITS

<u>Exhibit No.</u>	<u>Description</u>
1	Notification of Investigation (Case 1-92-052R), dated November 18, 1992.
2	Report of Interview with [REDACTED] dated October 5, 1992, and appended letter outlining his eight allegations.
2A	E-mail from Kenna to KEIMIG and from KEIMIG to Kenna.
3	Security Training Agenda for "B" shift for September 1-4, 1992, form dated July 31, 1992.
4	Lesson Plan #720, Revision 3, "Special Situations."
5	Examination for Task 4.4.2, Armed Response Personnel, "Reports to Scene of Adversary Action," dated September 11, 1993, Marked Void.
6	Answer Sheets for "B" Shift, Task 4.2.2., dated September 3, 1992.
7	Answer Sheet, Task 4.4.2., Revision 4, dated March 20, 1991.
8	PP&L Instructions for "Semi-Annual Outstanding Shift Award," Instruction No. SI-SSM-006, dated October 23, 1992.
8A	PP&L Investigation.
9	Memorandums on Semi-Annual Outstanding Shift Award Winners, dated from July 12, 1988, to January 15, 1993.
10	"Academic Honesty Policy and Procedure for Administration of Examinations," dated May 17, 1990.
11	SSES Instruction "Student Advising," Procedure STCP-221, Revision 3, dated January 14, 1992.
12	Report of Interview with [REDACTED] dated November 19, 1992.
13	Report of Interview with [REDACTED] dated November 19, 1992.
14	Report of Interview with [REDACTED] dated November 13, 1992.
15	Reports of Interview with [REDACTED] dated October 5, 1992, and November 19, 1992.
16	Report of Interview with [REDACTED] dated November 12, 1992.
17	Reports of Interview with [REDACTED] dated October 5, 1992, and November 19, 1992.

- 18 Report of Interview with [REDACTED], dated November 13, 1992.
- 19 Report of Interview with [REDACTED], dated November 12, 1992.
- 20 Report of Interview with [REDACTED], dated June 28, 1993.
- 21 Report of Interview with [REDACTED], dated November 12, 1992.
- 22 Report of Interview with [REDACTED], dated November 19, 1992.
- 23 Report of Interview with [REDACTED], dated November 13, 1992.
- 24 Report of Interview with [REDACTED], dated November 19, 1992.
- 25 Report of Interview with [REDACTED], dated June 27, 1993.
- 26 Report of Interview with STOTLER, dated September 15, 1993.
- 27 Report of Interview with GALLAGHER, dated January 14, 1993.
- 28 Report of Interview with McBRIDE, dated January 15, 1993.
- 29 Report of Interview with [REDACTED], dated November 20, 1992.
- 30 Report of Interview with [REDACTED], dated November 20, 1992.
- 31 Report of Interview with [REDACTED], dated November 20, 1992.
- 32 Report of Interview with [REDACTED], dated November 20, 1992.
- 33 Report of Interview with [REDACTED], dated November 20, 1992.
- 34 Report of Interview with [REDACTED], dated November 20, 1992.
- 35 Report of Interview with [REDACTED], dated November 20, 1992.
- 36 Report of Interview with [REDACTED], dated November 20, 1992.
- 37 Report of Interview with [REDACTED], dated November 20, 1992.
- 38 Report of Interview with [REDACTED], dated November 20, 1992.
- 39 Report of Interview with [REDACTED], dated November 20, 1992.
- 40 Report of Interview with [REDACTED], dated January 14, 1993.
- 41 Report of Interview with [REDACTED], dated January 14, 1993.
- 42 Report of Interview with [REDACTED], dated January 15, 1993.