



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

CC: Denton
DeYoung ✓
G Cunningham

October 20, 1983

1-83-008

MEMORANDUM FOR: Thomas E. Murley, Regional Administrator
Region I

FROM: *BH* Ben B. Hayes, Director
Office of Investigations

SUBJECT: SEABROOK STATION UNIT 1, FALSIFICATION OF
NON-DESTRUCTIVE EXAMINATION (NDE) RECORDS

Enclosed is a Report of Investigation pertaining to an investigation conducted at the Seabrook Station, Unit 1 concerning the captioned subject. The investigation confirmed that one radiographer employed by Pullman-Higgins (P-H), the site radiographic firm, had not performed certain NDE tests and in fact falsified NDE Inspection Reports. However, no information was developed indicating that anyone in P-H management was aware of, or attempted to cover-up the incident. No additional investigative activity is contemplated by this office regarding these allegations.

A copy of this report has also been provided to the Department of Justice for their prosecutive review.

Neither this memorandum or report may be released outside the NRC without the permission of the Director, OI. Internal NRC access and dissemination may be on a need and right to know basis.

Enclosure:
as stated

cc: W.J. Dircks, EDO (3 copies)
R. K. Christopher, OI:RI

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PDR FOIA
GARDE86-188 PDR

Released

SUMMARY

On May 9, 1983, the Acting Regional Administrator requested an investigation after the licensee (Public Service Company of New Hampshire) reported on April 29, 1983, that a welding inspector employed by the Pullman-Higgins Company (Contractor) was possibly involved in procedure violations during Nondestructive Examination (NDE) for both safety related and non-safety related welds at the Seabrook Unit 1 and 2, Nuclear Generating Stations. On April 18, 1983, approximately two weeks prior to the licensee's notification, the NRC Seabrook Senior Resident Inspector (SRI) received an anonymous allegation that identified a Pullman-Higgins (P-H) NDE Technician as responsible for record falsification and further alleged that the technician's supervisors were attempting to cover up the falsification. Accordingly, this investigation was initiated to determine if there was actual falsification of P-H NDE records and if true, to determine what action the P-H management took towards identifying and reporting the wrongdoing.

The NDE technician (Subject) identified by the anonymous alleger was interviewed by the reporting investigator on May 22, 1983. He said that in April 1983, he became aware that the P-H management was investigating alleged improprieties concerning his NDE workmanship (liquid penetrant and magnetic particle examinations). He said that on April 21, 1983, his P-H NDE certifications were pulled by P-H management and he was informed that he would not be allowed to perform any more NDE inspections until the P-H investigation was complete. He said that during this time, P-H management indicated to him that they suspected that he had completed inspection reports without ever doing the actual inspections. When questioned about the allegations by P-H management, Subject said he continually denied the allegations but did admit to occasional procedural violations regarding some of his liquid penetrant inspection. He said that on April 27, 1983, his employment was terminated for "poor workmanship". Subject stated that he did not know of anything which could account for the P-H findings and further stated that he never falsified any NDE reports and "on

every occasion" did his assigned work "accurately" and "honestly" and to the best of his ability.

Subsequent interviews with P-H onsite management personnel and P-H NDE technicians, determined that Subject's questionable NDE inspections were first brought to management's attention in January 1983 when a reinspection of a weld, previously accepted by Subject, was found to have rejectable indications. Management and technician interviews indicate that this incident did not, at the time, raise suspicions of record falsification or suspicions that Subject was not conducting his assigned inspections. However, in accordance with applicable procedures, on January 28, 1983, P-H reported the incident in a supplement to the appropriate nonconformance report to United Engineers and Constructors (UE&C), the architect at the Seabrook Unit 1, for corrective action. UE&C reviewed the supplement and sent back their disposition dated April 11, 1983. The disposition required P-H to "spot check other acceptable liquid penetrant inspections performed by the individual responsible for the initial liquid penetrant inspection performed on this weld ... to verify that the discrepancy between the initial and subsequent liquid penetrant inspections is an isolated incident." Prior to receiving the aforementioned disposition, during the late March and April 1983 time period, the P-H Quality Assurance (QA) Manager initiated reinspections of samplings of Subject's NDE work. The reinspection involved both liquid penetrant (LP) and magnetic particle (MP) inspections and the results of the reinspections indicated that Subject did not properly conduct his assigned NDE inspections and may have falsified P-H NDE inspection reports; however, when interviewed on several occasions by P-H management personnel, Subject continued to deny that he had either falsified NDE reports or that he had not done his assigned work. The aforementioned information was verified through interviews of P-H management personnel and nonmanagement employees and through a review of related documentation. It was further determined that the licensee was notified by P-H in early to mid April 1983, that they (P-H) were conducting an investigation into a potential problem concerning NDE inspection violations by one of their (P-H) NDE technicians. The P-H QA manager said that based on Subject's admitted failure to follow written procedures, and reinspection results,

he terminated Subject's employment on April 27, 1983, and notified the licensee of the reasons behind the termination on the same date.

All of the P-H NDE site management personnel, supervisory personnel and NDE technicians were interviewed and other than the instant investigation, all denied being aware of any other actual or suspected falsification of records.

Information obtained during several of the aforementioned interviews indicated that Subject may have provided false information on his P-H job application and resume regarding his formal education and previous employment. Contact with an educational institution and a past employer listed on the above mentioned documents, determined that Subject did not have a college degree or previous NDE certifications as listed on these documents. It was further learned that Subject's employment with a previous NDE employer resulted in termination for a "falsified radiographic film report".

On June 21, 1983, Subject was reinterviewed by the reporting investigator and initially denied that he had falsified P-H inspection reports or that he had not done all of his assigned inspections. After approximately 35 minutes of being interviewed, Subject admitted that he had falsified "a good number" of P-H MP and LP NDE inspection reports. He said that he did actually perform, and accurately document, all of his assigned safety related NDE assignments; however, he said he did not perform all of his assigned non-safety related NDE assignments but did submit the reports which falsely documented the work as being completed and acceptable. He further admitted that he had lied on his P-H job application and resume regarding his formal education and previous NDE certification. He said that no one, to include P-H management, was aware that he had falsified P-H NDE inspection reports.

This investigation determined that Subject, a P-H NDE technician, did falsify P-H NDE Inspection Reports, however, there was no indication that P-H management was either aware of, or attempted to cover up, the wrongdoing by Subject. P-H reported the first noted inspection discrepancy to UE&C on January 28, 1983;

commenced investigating the discrepancy in late March 1983, prior to receiving UE&C's corrective action; when their (P-H) investigation raised suspicions of wrongdoing, they promptly notified the licensee of the ongoing investigation; and when their investigation was complete on April 27, 1983, they immediately notified the licensee of the results. Interviews with all of the technicians in the P-H NDE Department indicate that the falsification was an individual, isolated incident. This investigation is CLOSED.

GOVERNMENT ACCOUNTABILITY PROJECT

1555 Connecticut Avenue, N.W., Suite 202
Washington, D.C. 20036

(202) 232-8550

March 18, 1986

FREEDOM OF INFORMATION ACT REQUEST

Director
Office of Administration
Nuclear Regulatory Commission
Washington, D.C. 20555

FREEDOM OF INFORMATION
ACT REQUEST

FOIA-86-188
Rec'd 3-29-86

To Whom It May Concern:

Pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. 552, the Government Accountability Project (GAP) requests copies of any and all agency records and information, including but not limited to notes, letters, memoranda, drafts, minutes, diaries, logs, calendars, tapes, transcripts, summaries, interview reports, procedures, instructions, engineering analyses, drawings, files, graphs, charts, maps, photographs, agreements, handwritten notes, studies, data sheets, notebooks, books, telephone messages, computations, voice recordings, computer runoffs, any other data compilations, interim and/or final reports, status reports, and any and all other records relevant to and/or generated in connection with I.E. Notice 85-97, entitled "Jail Term for Contractor Employee who Intentionally Falsified Welding Inspection Records," dated December 26, 1985.

This request includes all agency records as defined in 10 C.F.R. 9.3a(b) and the NRC Manual, Appendix 0211, Parts 1.A.2 and A.3 (approved October 8, 1980) whether they currently exist in the NRC official, "working", investigative or other files, or at any other location, including private residences.

If any records as defined in 10 C.F.R. 9.3a(b) and the NRC Manual, supra, and covered by this request have been destroyed and/or removed after this request, please provide all surrounding records, including but not limited to a list of all records which have been or are destroyed and/or removed, a description of the action(s) taken relevant to, generated in connection with, and/or issued in order to implement the action(s).

GAP requests that fees be waived, because "finding the information can be considered as primarily benefitting the general public," 5 U.S.C. 552(a)(4)(a). GAP is a non-profit, non-partisan public interest organization concerned with honest and open government. Through public outreach, the Project promotes whistleblowers as agents of government accountability. Through its Environmental Whistleblower Clinic, GAP offers assistance to local public interest and citizens groups seeking to ensure the health and safety of their communities. The Environmental Whistleblower Clinic is currently assisting several citizens groups, local governments and intervenors in Texas concerning the construction of the Comanche Peak nuclear power plant.

We are requesting the above information as part of an ongoing monitoring project on the adequacy of Region IV and the NRC's efforts to protect public safety and health at nuclear power plants.

For any documents or portions that you deny due to a specific FOIA exemption, please provide an index itemizing and describing the documents or portions of documents withheld. The index should provide a detailed justification of your grounds for claiming each exemption, explaining why each exemption is relevant to the document or portion of the document withheld. This index is required under Vaughn v. Rosen (I), 484 F.2d 820 (D.C. Cir. 1973), cert. denied, 415 U.S. 977 (1974).

We look forward to your response to this request within ten working days.

Sincerely,

Billie Pirner Garde
Billie Pirner Garde
Director, Environmental
Whistleblower Clinic