

**From:** [Timani Samau](#)  
**To:** [Alldredge, Casey](#); [Gepford, Heather](#)  
**Cc:** [Douglas Eatts](#); [Pouifi Tufuga](#); [Pouesi Fitisemanu](#)  
**Subject:** [External\_Sender] RE: RE: FW: Reply to a Notice of Violation; EA-21-013  
**Date:** Tuesday, April 27, 2021 1:09:01 AM  
**Attachments:** [image001.png](#)  
[image003.png](#)  
[017-A003-1229 Lab Management Plan Rev 20.docx](#)  
[20210324 - NRC Process Logistics.pptx](#)

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Hi Casey

Please find the latest findings.

Based on the investigations 5 whys

1. New Staff inexperienced Lab, newly appointed Lab Manager past 11 months into current role, however no proper handover was completed with interim long term Manager Tony McDowell. Tony was with us for +10 years. Since his departure no training was formally given to NDM process when handling logistics.
2. Internal system - Audit failed internally pick up this process had broken down. Our previous HSE Officer left 2018, failed to audit our staff were aligned of roles and responsibilities.
3. Logistics team – MCD conducted at audit with the team that handle freight. Of the 6 questions 83% did not know the procedure when sending or receiving the NDM. Fail in process internally to up keep training with Radiation safety handling.

Forms 4/14 1:21 PM Updated

Timani Samau created a poll  
Not anonymous; Results shared

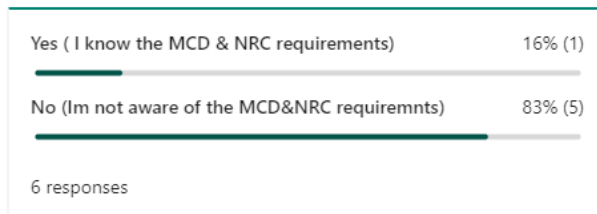
Who knows the formal approval process when importing/ exporting NDM Machine ?

Yes ( I know the MCD & NRC requirements)

No (Im not aware of the MCD&NRC requiremnts)

[Submit Vote](#)

Updated



4. Training register failed to pickup training had lapsed, over due on new staff that have been with us less than 18 months.
5. Audit process – lack of visibility during standard audit sheets to ask if the team understand the NRC process.

Actions

- Training planned for Logistics and Lab Technicians reinforce the learnings. Toolbox

training session. Booked for 1<sup>st</sup> May.

- Regular auditing schedule to pick up the Radiation Safety Program is being carried out. Booked June and November 2021.
- Updated Lab Management Plan with findings – reviewed and signed by Lab Staff. Completed in March 2021.
- Update Job Safety Environment Assessment for Lab – planned 1<sup>st</sup> May. Signed by staff.
- Update the Weekly inspection sheets – to have a section NRC safety/ dates and due dates of expiry. Trigger items coming up for renewal.

We propose to send the signed sheets of the training of those who completed the training with a letter to show closed actions.

Ngā mihi | Kind regards

**Timani Samau**

Branch Manager

McConnell Dowell Constructors Ltd

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**From:** Alldredge, Casey <Casey.Alldredge@nrc.gov>

**Sent:** Tuesday, 27 April 2021 8:52 AM

**To:** Timani Samau <Timani.Samau@mcdgroup.com>; Gepford, Heather <Heather.Gepford@nrc.gov>

**Cc:** Douglas Eatts <Douglas.Eatts@mcdgroup.com>; Pouifi Tufuga <Pouifi.Tufuga@mcdgroup.com>; Pouesi Fitisemanu <Pouesi.Fitisemanu@mcdgroup.com>

**Subject:** RE: RE: FW: Reply to a Notice of Violation; EA-21-013

Hi Mr. Samau,

Have you completed your investigation? If so can you please send me your findings and corrective

actions?  
Thanks,

Casey Alldredge  
Health Physicist  
Materials Licensing and Decommissioning Branch  
Region IV, USNRC

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**From:** Timani Samau <[Timani.Samau@mcdgroup.com](mailto:Timani.Samau@mcdgroup.com)>  
**Sent:** Thursday, April 15, 2021 4:11 PM  
**To:** Alldredge, Casey <[Casey.Alldredge@nrc.gov](mailto:Casey.Alldredge@nrc.gov)>; Gepford, Heather <[Heather.Gepford@nrc.gov](mailto:Heather.Gepford@nrc.gov)>  
**Cc:** Douglas Eatts <[Douglas.Eatts@mcdgroup.com](mailto:Douglas.Eatts@mcdgroup.com)>; Pouifi Tufuga <[Pouifi.Tufuga@mcdgroup.com](mailto:Pouifi.Tufuga@mcdgroup.com)>;  
Pouesi Fitiseanu <[Pouesi.Fitiseanu@mcdgroup.com](mailto:Pouesi.Fitiseanu@mcdgroup.com)>  
**Subject:** [External\_Sender] RE: FW: Reply to a Notice of Violation; EA-21-013

Hi Casey

Thank you for the reminder, we are near the conclusion of the investigation.  
We plan to have the findings and corrective actions submitted next week. Tuesday AS LT.

Thank you

Ngā mihi | Kind regards

**Timani Samau**  
Branch Manager  
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**From:** Alldredge, Casey <[Casey.Alldredge@nrc.gov](mailto:Casey.Alldredge@nrc.gov)>

**Sent:** Friday, 16 April 2021 9:08 AM

**To:** Timani Samau <[Timani.Samau@mcdgroup.com](mailto:Timani.Samau@mcdgroup.com)>; Gepford, Heather <[Heather.Gepford@nrc.gov](mailto:Heather.Gepford@nrc.gov)>

**Subject:** RE: FW: Reply to a Notice of Violation; EA-21-013

Good afternoon Mr. Samau,

The letter attached to your previous email stated that you would send an update regarding your findings from your investigation of the violation within a few weeks. It has been a few weeks since that letter and it has been 30 days since the violation was issued.

As a reminder, the Notice of Violation stated that within 30 days you needed to provide a response including:

- (1) the reason for the violation, or, if contested, the basis for disputing the violation or severity level;
- (2) the corrective steps that have been taken and the results achieved;
- (3) the corrective steps that will be taken; and
- (4) the date when full compliance will be achieved

If you have any questions please let me know.

Thanks,

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**From:** Timani Samau <[Timani.Samau@mcdgroup.com](mailto:Timani.Samau@mcdgroup.com)>

**Sent:** Sunday, March 21, 2021 3:21 PM

**To:** Alldredge, Casey <[Casey.Alldredge@nrc.gov](mailto:Casey.Alldredge@nrc.gov)>; Gepford, Heather <[Heather.Gepford@nrc.gov](mailto:Heather.Gepford@nrc.gov)>

**Subject:** [External\_Sender] FW: Reply to a Notice of Violation; EA-21-013

FYI

Ngā mihi | Kind regards

**Timani Samau**

Branch Manager

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**From:** Timani Samau

**Sent:** Sunday, 21 March 2021 10:16 PM

**To:** 'R4Enforcement@nrc.gov' <[R4Enforcement@nrc.gov](mailto:R4Enforcement@nrc.gov)>

**Cc:** Douglas Eatts <[Douglas.Eatts@mcdgroup.com](mailto:Douglas.Eatts@mcdgroup.com)>; Pouifi Tufuga <[Pouifi.Tufuga@mcdgroup.com](mailto:Pouifi.Tufuga@mcdgroup.com)>; Sachin Ramchand <[Sachin.Ramchand@mcdgroup.com](mailto:Sachin.Ramchand@mcdgroup.com)>; Loloane Auala <[Loloane.Auala@mcdgroup.com](mailto:Loloane.Auala@mcdgroup.com)>; Marlo Logwood <[Marlo.Logwood@mcdgroup.com](mailto:Marlo.Logwood@mcdgroup.com)>

**Subject:** Reply to a Notice of Violation; EA-21-013

Attention- Document Control Desk, Washington, DC 20555-0001

MCD response pursuant to the provisions of 10 CFR 2.201, McConnell Dowell (American Samoa) Ltd, are required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission. Attached.

Ngā mihi | Kind regards

**Timani Samau**

Branch Manager

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