



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION II  
245 PEACHTREE CENTER AVENUE N.E., SUITE 1200  
ATLANTA, GEORGIA 30303-1200

August 27, 2024

IA-24-001

Travis Hodges

**[NOTE: HOME ADDRESS DELETED  
UNDER 10 CFR 2.390]**

SUBJECT: NOTICE OF VIOLATION, NUCLEAR REGULATORY COMMISSION OFFICE  
OF INVESTIGATIONS REPORT 2-2023-003

Dear Travis Hodges:

This letter refers to the investigation completed on November 8, 2023, by the U.S. Nuclear Regulatory Commission's (NRC, the Commission) Office of Investigations (OI) at Southern Nuclear Operating Company's (SNC's) Edwin I. Hatch Nuclear Plant (Hatch). The purpose of the OI investigation was to determine whether you, acting in your official capacity of senior radiation protection technician for SNC at Hatch, falsified radiation and contamination surveys. The incident under OI review occurred between August 2021 and November 2021, when you were assigned to perform surveys within radiologically controlled areas at Hatch.

On May 15, 2024, the NRC issued a letter to you with the preliminary results of the NRC's review, including a Factual Summary of the OI Investigation and an apparent violation regarding your engagement in deliberate misconduct, contrary to the requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) 50.5, "Deliberate Misconduct." This requirement prohibits an employee of a licensee or contractor from engaging in deliberate misconduct that causes or would have caused a licensee to be in violation of any regulation, or Order; or any term, condition, or limitation of any license issued by the Commission.

The NRC's May 15, 2024, letter also provided you the opportunity to address the apparent violation by either attending a predecisional enforcement conference (PEC) or providing a written response before the NRC made a final enforcement decision. Since we did not receive a request for a PEC or a written response to our letter, the NRC is proceeding with its enforcement action based on the results of the OI investigation.

Based on the information developed during the investigation, the NRC has determined that a deliberate violation of NRC requirements occurred. The violation is cited in the enclosed Notice of Violation (Notice). The information from the OI investigation demonstrates that, on eight occasions between August 2021 and November 2021, you deliberately submitted survey results data to the licensee, representing that you had obtained the data from your own physical surveys of the assigned areas, when in fact you had actually copied the data from previously completed surveys without actually "walking down" the assigned areas and performing the required radiation and contamination surveys.

Your deliberate actions placed SNC's Hatch in violation of 10 CFR 20.1501, "Surveys and Monitoring" and 10 CFR 50.9 "Completeness and Accuracy of Information," and you in violation of 10 CFR 50.5, "Deliberate Misconduct." A copy of the enforcement action issued to SNC is available electronically for public inspection in the NRC Public Document Room or the Agencywide Documents Access and Management System (ADAMS), Accession Number ML24214A328 accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

The violation did not cause any actual consequences to you, other employees, or to the plant because there were no occupational exposures exceeding regulatory limits and the affected plant areas were properly surveyed afterwards as part of the normal frequency of routine surveys. However, the potential consequences of a deliberate misconduct violation are significant and concerning to the NRC. As discussed in the NRC Enforcement Policy, willful (e.g., deliberate misconduct) violations are of particular concern because the NRC's regulatory program is based on licensees and their contractors, employees, and agents acting with integrity and communicating with candor. As a senior radiation protection technician at the time, you held a particular responsibility to ensure that your actions rigorously complied with regulatory requirements. Considering the repetitive nature of your deliberate actions, this violation has been categorized at a Severity Level III in accordance with the NRC Enforcement Policy.

You should be aware that if you are involved in NRC-licensed activities in the future, additional deliberate violations could result in more significant enforcement action or criminal penalties.

The NRC has concluded that information regarding the violation is already adequately addressed on the docket in our May 15, 2024, letter to the licensee (ADAMS ML24080A415) and its response, dated June 17, 2024 (ADAMS ML24169A622). Therefore, you are not required to respond to this letter unless the description therein does not accurately reflect the corrective actions or your position. In that case, or if you choose to provide additional information, you should follow the instructions specified in the enclosed Notice.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice and Procedure," a copy of this letter, its enclosures, and your response, if you choose to provide one, will be made available electronically for public inspection in the NRC Public Document Room or from ADAMS, accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the public without redaction. The NRC also includes significant enforcement actions on its Web site at <http://www.nrc.gov/reading-rm/doc-collections/enforcement/actions/>.

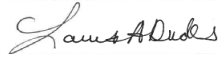
In addition, this letter will be maintained by the Office of Enforcement in an NRC Privacy Act system of records, NRC-3, Enforcement Actions Against Individuals. This system, which is not publicly accessible, includes all records pertaining to individuals who are being or have been considered for enforcement action, whether such action was taken or not. Detailed information about this system of records, including the NRC-3 system notice, can be accessed from the NRC Web site at <http://www.nrc.gov/reading-rm/foia/privacy-systems.html>.

T. Hodges

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If you have any questions concerning this matter, please feel free to contact Mr. Binoy Desai at 404-997-4519.

Sincerely,

A handwritten signature in cursive script that reads "Laura A. Dudes".

Signed by Dudes, Laura  
on 08/27/24

Laura A. Dudes,  
Regional Administrator

Enclosure:  
Notice of Violation

SUBJECT: NOTICE OF VIOLATION, NUCLEAR REGULATORY COMMISSION OFFICE OF INVESTIGATIONS REPORT 2-2023-003 – DATED AUGUST 27, 2024

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**ADAMS ACCESSION NUMBER: ML24215A270**

<b>Entire Report:</b>		X Non-Sensitive			Publicly Available	
X SUNSI Review		□ Sensitive			X Non-Publicly Available	
OFFICE	RII:DRS	RII:DRP		RII/DRP	RII/ECIS	RII/ORA/RC
NAME	J. Bell	A. Alen	B. Desai	A. Blamey	M. Kowal	S. Price
DATE	8/5/2024	8/2/2024	8/2/2024	8/2/2024	8/5/2024	8/6/2024
OFFICE	RII:DRS	HQ:OE	HQ:OGC (NLO)	RII:ORA		
NAME	G. Suber	J. Peralta	M. Simon	L. Dudes		
DATE	8/8/24	8/16/2024	8/23/2024	8/27/2024		

OFFICIAL RECORD COPY

## NOTICE OF VIOLATION

Mr. Travis Hodges  
[HOME ADDRESS DELETED  
UNDER 10 CFR 2.390]

IA-24-001

During a U.S. Nuclear Regulatory Commission (NRC) investigation completed on November 8, 2023, a violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

Title 10 of the *Code of Federal Regulations* (10 CFR), paragraph 50.5(a)(2) states, in part, that an employee of a licensee may not deliberately submit to a licensee, information that the employee knows to be incomplete or inaccurate in some respect material to the NRC.

Contrary to the above, on eight occasions between August 2021 and November 2021, Mr. Hodges, at the time a senior radiation protection technician employed by Southern Nuclear Operating Company (SNC), an NRC licensee, deliberately submitted information to SNC that he knew at the time was inaccurate in some respect material to the NRC. Specifically, Mr. Hodges submitted survey data to the licensee, representing that he had obtained the data from actual physical surveys of plant areas on the assigned dates, when in fact he did not enter the areas to conduct physical surveys but instead copied the data from previously completed surveys. This information was material to the NRC because the licensee relied on Mr. Hodges's survey results to provide radiological information to licensee staff and contractors entering radiologically controlled areas, and because radiological survey records provide evidence of compliance with NRC regulatory requirements in 10 CFR Part 20, "Standards for Protection Against Radiation."

This is a Severity Level III violation (NRC Enforcement Policy, Section 2.2.1.d).

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 on the docket in our May 15, 2024, letter to the licensee (ADAMS ML24080A415) and its response provided to the NRC, dated June 17, 2024 (ADAMS ML24169A622). However, if the description therein does not accurately reflect your position or corrective actions, you are required to submit a written statement or explanation pursuant to 10 CFR 2.201 within 30 days of the date of the letter transmitting this Notice of Violation. In that case, or if you choose to respond, clearly mark your response as a "Reply to a Notice of Violation, IA-24-001," and send it to the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, One White Flint North, 11555 Rockville, Maryland 20852-2738, with a copy to the Document Control Desk, Washington, DC 20555-0001.

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.

Your response will be made available electronically for public inspection in the NRC Public Document Room and in the NRC's Agencywide Document Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the public without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response,

Enclosure

then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.390(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

This letter will be maintained by the Office of Enforcement in an NRC Privacy Act system of records, NRC-3, Enforcement Actions Against Individuals. This system, which is not publicly accessible, includes all records pertaining to individuals who are being or have been considered for enforcement action, whether such action was taken or not. The NRC-3 system notice, which provides detailed information about this system of records, can be accessed from the NRC Web site at <http://www.nrc.gov/reading-rm/foia/privacy-systems.html>.

Dated this 27<sup>th</sup> day of August 2024