



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION III  
2056 WESTINGS AVENUE, SUITE 400  
NAPERVILLE, IL 60563-2657

July 30, 2025

EAI-RIII-2025-0083

Jerome Case  
[HOME ADDRESS DELETED]  
UNDER 10 CFR 2.390(a)]

SUBJECT: NOTICE OF VIOLATION, NRC INSPECTION REPORT NO. 05000254/2024403,  
NRC INVESTIGATION REPORT 3-2023-013 AND EXERCISE OF ENFORCEMENT  
DISCRETION

Dear Jerome Case:

This letter refers to an inspection that was performed by the U.S. Nuclear Regulatory Commission (NRC) Region III office at the Quad Cities Nuclear Power Station, which concluded on April 16, 2025. The purpose of the inspection was to review activities surrounding a Unit 1 reactor pressure vessel (RPV) drain down event due to the mispositioning of approximately 177 safety-related hydraulic control units (HCU) accumulator drain valves that occurred on March 28, 2023. This letter also refers to an investigation that was conducted by the NRC's Office of Investigations (OI). The purpose of the investigation was to determine whether personnel at the Quad Cities Nuclear Station (Quad Cities) who had knowledge of a human performance error that occurred on March 28, 2023, deliberately took action to cover up the event. The investigation was completed on September 11, 2024. A factual summary of Investigation 3-2023-013, which substantiated willful behaviors by you, is provided as Enclosure 1. NRC Inspection Report No. 05000254/2024403 can be found in the NRC's Agencywide Documents Access and Management System (ADAMS) at ML25114A211.

On June 10, 2025, a predecisional enforcement conference was conducted in the Region III Office with you to discuss the apparent violations, their significance, their root causes, and your corrective actions.

Based on the information developed during the investigation and inspection and the information that you provided during the conference, the NRC has determined that a deliberate violation of NRC requirements occurred. The violation is cited in the enclosed Notice of Violation (NOV) (Enclosure 2). On March 28, 2023, as a Senior Reactor Operator (SRO) overseeing the Unit 1 outage work activities, you became aware of an RPV drain down event due to the mispositioning of the safety-related HCU accumulator drain valves. Despite this knowledge, for 10 days, you inaccurately attributed the event to broken hoses and submitted an inaccurate Corrective Action Program document based on this false claim on April 6, 2023. You did not rectify this inaccurate information until April 7, 2023. This information was material to the NRC, as it left inspectors unaware of the drain down event and the performance issues causing it within a timeframe necessary to assess appropriate event response and follow-up inspection activities. Your deliberate actions placed Quad Cities in violation of 10 CFR 50.9 and placed you in violation of 10 CFR 50.5, Deliberate Misconduct.

This violation is normally categorized in accordance with the NRC Enforcement Policy at Severity Level II (see example 6.9.b.1); however, after consultation with the Director, Office of Enforcement, I have been authorized to exercise discretion to reduce the significance of this violation to Severity Level III, consistent with Section 3.5, "Violations Involving Special Circumstances," of the Enforcement Policy. Discretion is being exercised due to relevant circumstances which include: (1) you withdrawing the inaccurate work group evaluation (WGE) from the corrective action program within 24 hours of the initial submittal; (2) you then revised the WGE and informed your supervisor of the actual cause of the event; (3) your NRC license was terminated effective June 7, 2023; and, (4) you admitted wrongdoing and accepted responsibility while attending the conference.

The NRC has concluded that information regarding: (1) the cause of the violation, and (2) the corrective actions to address the violation were adequately addressed by actions taken by you and Quad Cities. Therefore, you are not required to respond to this letter. However, should you choose to respond, your response should be sent to the U.S. Nuclear Regulatory Commission, ATTN: Director, Division of Operating Reactor Safety, 2056 Westings Avenue, Suite 400, Naperville IL, 60563-2657, include EAI number, "EAI-RIII-2025-0083," and marked "Open by Addressee Only," within 30 days of the date of this letter. You may contact Diana Betancourt-Roldan, Enforcement/Investigations Officer, if you have any questions at 630-810-4373.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure(s), 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. 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>. Finally, a copy of this letter will be placed in your 10 CFR Part 55 docket file.

Please feel free to contact Nestor J. Feliz Adorno of my staff at 630-829-9739 if you have any questions.

Sincerely,



Signed by Giessner, Jack  
on 07/30/25

John B. Giessner  
Regional Administrator

Enclosures: 1. Factual Summary  
2. Notice of Violation

Letter to J. Case from J. Giessner dated July 30, 2025.

SUBJECT: NOTICE OF VIOLATION, NRC INSPECTION REPORT NO. 05000254/2024403,  
NRC INVESTIGATION REPORT 3-2023-013 AND EXERCISE OF ENFORCEMENT  
DISCRETION

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OFFICE	RIII-EICS		RIII-DORS		RIII-DORS		OE	
NAME	GEwards:bw		NFeliz Adorno		JKozal		DBraqdley for JPeralta	
DATE	7/15/2025		7/15/2025		7/15/2025		7/22/2025	
OFFICE	OGC for NLO		RIII-EICS		RIII-ORA			
NAME	SRogers for SKirkwood		GEwards for DBetancourt-Roldan		JGiessner			
DATE	7/24/2025		7/28/2025		7/30/2025			

**OFFICIAL RECORD COPY**

### **Factual Summary of NRC Office of Investigations Cases No. 3-2023-013**

On August 18, 2023, the U.S. Nuclear Regulatory Commission (NRC), Office of Investigations (OI), Region III, initiated investigation No. 3-2023-0013 to determine whether personnel at the Quad Cities Nuclear Station (Quad Cities or licensee) who had knowledge of a human performance error that occurred on March 28, 2023, deliberately took action to cover up the event. The investigation was completed on September 11, 2024.

Title 10 CFR § 50.9(a), "Completeness and Accuracy of Information," requires, in part, that information required by statute or by the Commission's regulations, orders, or license conditions to be maintained by the applicant or the licensee shall be complete and accurate in all material respects. The investigation showed that on March 28, 2023, Jerome Case, at the time a Senior Reactor Operator (SRO) overseeing the Unit 1 outage work activities, became aware of a reactor pressure vessel (RPV) drain down event due to the mispositioning of 177 safety-related hydraulic control units (HCU) accumulator drain valves. Despite this knowledge, for 10 days, he inaccurately attributed the event to broken hoses and submitted an inaccurate Corrective Action Program document (Work Group Evaluation (WGE)) that contained inaccurate information. He did not rectify this inaccurate information until April 7, 2023. Through his sworn testimony and admission, he was aware of the facts of what happened on March 28, 2023, and admitted to investigators that he submitted an incomplete and inaccurate WGE to the licensee. He also stated in his testimony that he knew the WGE he submitted was false and that he was aware it was false at the time he sent it. He stated that fear of a particular senior manager's anger kept him from providing complete and accurate information.

## NOTICE OF VIOLATION

Jerome Case  
[HOME ADDRESS DELETED  
UNDER 10 CFR 2.390]

EAI-RIII-2025-0083

During the performance of the Inspection Procedure 71152, Problem Identification and Resolution, at the Quad Cities Nuclear Generating Station (Quad Cities), on April 16, 2025, and NRC Investigation Report 3-2023-013 which was completed on September 11, 2024, the NRC identified a violation of U.S. Nuclear Regulatory Commission (NRC) requirements concerning a licensed operator. In accordance with the NRC Enforcement Policy, the violation is listed below:

Senior Reactor Operator License Number SOP-500475-1 issued to Jerome Case on May 17, 2022, states, in part, "While performing licensed duties you shall observe the operating procedures and other conditions specified in the facility licensee authorizing operation of the facility."

Title 10 CFR 50.5(a)(2) requires, in part, that any employee of a licensee may not deliberately submit to a licensee information that the person submitting the information knows to be incomplete or inaccurate in some respect material to the NRC.

Title 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," states "Activities affecting quality to be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings."

The licensee established procedure OP-AA-106-101-1001, "Event Response Guidelines," Revision 32, provides instructions for responding to significant plant issues and events. Step 4.4.1, states, "Ensure an IR is written for the event." Step 4.4.2, states, "Review the event to determine if the event is significant and if a prompt investigation is necessary. Significant equipment failures and human performance events require equal consideration for prompt investigations." Step 4.4.2 clarifies that examples of a significant event include a level 1, 2, or 3 configuration control event.

Contrary to the above, from March 28, 2023, through April 7, 2023, Jerome Case, at the time a licensed Senior Reactor Operator (SRO) at Quad Cities, deliberately submitted to the licensee information that he knew at the time to be incomplete and/or inaccurate and material to the NRC. Specifically, on March 28, 2023, as an SRO overseeing Unit 1's outage work activities, you became aware of an RPV drain down event due to the mispositioning of the safety-related HCU accumulator drain valves. Despite this knowledge, you deliberately failed to accurately evaluate or report the event for a period of 10 days. Instead, you knowingly misattributed the water spill to broken hoses and willfully submitted an inaccurate WGE on April 6, 2023, based on that false explanation. You did not correct the record until April 7, 2023.

This information was material to the NRC, as it left inspectors unaware of the drain down event and the performance issues causing it within a timeframe necessary to assess appropriate event response and follow-up inspection activities.

This is a Severity Level III violation (Enforcement Policy Section 6.9).

Enclosure 2

The NRC has concluded that information regarding: (1) the cause of the violation, and (2) the corrective actions to address the violation were adequately addressed by actions taken by you and Quad Cities. 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; EAI-R111-2025-0083" and send it to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001, with a copy to the Regional Administrator, Region III, 2056 Westings Avenue, Suite 400, Naperville, IL, 60563-2657, and a copy to the NRC Resident Inspector at the Quad Cities Nuclear Power Plant 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.

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 30<sup>th</sup> day of July 2025.